



Jul

April 1, 1992

Sent Via Certified Mail
P 705 508 894
Return Receipt Requested

Mr. Robert Snyder, P.E.
Hazardous Waste Section
Florida Department of Environmental
Regulation - Central District
3319 Maguire Blvd., Suite 232
Orlando, FL 32803-3767

Subject: Unmanifested Waste Report
Altamonte Springs Facility
FLD 097 837 983



Dear Mr. Snyder:

Pursuant to 40 CFR 264.76, the following information is being submitted for an unmanifested waste shipment. Enclosed is information provided in lieu of a completed Form 8700-13B.

We tried to obtain this form from your office and EPA Region IV but a copy was not available. The form we requested from FDER in Tallahassee arrived today but it is form 8700-13A/B which pertains to filing a 1991 Hazardous Waste Report. There are no forms in the booklet pertaining to filing an unmanifested waste report.

Hazardous wastes were transported from 5 customers without manifests. Enclosed are Appendices A, B, C, D, and E. Each appendix provides information required under 40 CFR 264.76 for each customer.

Your cooperation and understanding in this regard is requested. If you have any questions, please call me at (813)682-8094.

Sincerely,

Victor L. San Agustin

Victor L. San Agustin, P.E.
Regional Environmental Engineer
Tampa Region

**Appendix A -
Unmanifested Waste from EG & G Florida**

**Appendix A -
Unmanifested Waste from EG & G Florida**

A. EPA ID Number, Name, and Address of Facility:

Safety-Kleen Corporation
505 Plumosa Avenue
Altamonte Springs, FL 32701
EPA ID # FLD 097 837 983

B. Date Facility Received Waste:

March 10, 1992

C. EPA ID Number, Name, and Address of Generator and Transporter:

Generator: EG & G Florida/
Kennedy Space Center
Bldg. K7-468
Kennedy Space Center, FL 32899
EPA ID # FL6 800 014 585

Transporter: Safety Kleen Corporation
777 Big Timber Road
Elgin, IL 60123
EPA ID # ILD 051 060 408

D. Description and Quantity of Each Unmanifested Hazardous Waste and Facility Received:

Waste
Description: Dirty Mineral Spirits
Combustible Liquid, UN1255, ERG #27
Hazardous Waste Nos. D001, D018, D039

Quantity: Two 30 gallon drums (each about 1/2 full),
total weight - 172 pounds

Facility
Received: Safety-Kleen Corporation
505 Plumosa Avenue
Altamonte Springs, FL 32701

E. Method of Treatment, Storage, and Disposal:

Waste was stored at Altamonte Springs facility in a RCRA permitted storage tank. Waste was then shipped to Safety-Kleen's Recycle Center in Lexington, South Carolina. Waste is recycled back into clean mineral spirits by

distillation.

F. Explanation of Why Waste Was Unmanifested:

The waste was transported from EG & G last March 10, 1992. EG & G is located at Bldg. K7-468 inside the Kennedy Space Center complex. Wastes had been manifested properly since May 1990 until the March 10 pick-up. Branch personnel discovered last March 26 that a manifest was not used. EG & G called that day to find out why a copy of the manifest signed by the designated facility had not yet been sent back to EG & G. Safety-Kleen personnel inspected the customer file that same day and confirmed that a manifest was not used.

The service rep who serviced EG & G parts washers that day was new and was not aware of the on going enforcement case between Safety-Kleen and the Department. One of the alleged violations is connected with our picking up of wastes from EG & G.

Our transportation document (also known as a preprint) still showed the customer as a conditionally exempt small quantity generator. Enclosed is a copy of the preprint and land disposal restriction notice. Although this was the information on the manifest, the rep was instructed by branch management to prepare a hazardous waste manifest. The rep forgot about the verbal instructions and transported the waste based the information provided in the preprint. Furthermore, the customer initialed on our preprint as a conditionally exempt small quantity generator so he felt the information on the preprint was correct.

Future preprints for EG & G will show this customer as a Large Quantity Generator and all hazardous waste pick-ups from this customer will be manifested. There is no excuse for this incident to reoccur specially after almost two years of correctly manifesting EG & G waste. Disciplinary actions have been taken internally to ensure this incident does not happen again.

G. Certification Signed by Authorized Representative:

This is to certify that the above information is true and correct to the best of my knowledge:

Victor L San Agustin

Victor L. San Agustin, P.E.
Authorized Representative