

# FAX

Date 11/19/99

Number of pages including cover sheet

TO:

Jennifer Hobbs  
Lu Buason

Phone

Fax Phone 893 - 3124

FROM:

SAFETY KLEEN CORP.

600 Central Park Dr.  
Sanford, FL 32771

Phone

407-321-6080

Fax Phone

407-321-0065

CC:

REMARKS:

Urgent

For your review

Reply ASAP

Please Comment

- Raymond Zimmerman
- Carmela Settanni
- Eric Greene
- Daryl Tedrick
- Randy Butschillinger
- Robert Ferrell
- Mike Kiernan
- George Niceley
- Mark Gutierrez
- Lois Benjamin
- Mary Rode
- Kami Hellyer
- Frank Balaz

Any policy changes from  
this 1995 memo!

Is it OK to mix  
used oil / Fuel Filters

F.A.D.A.

Policy still correct  
verified w/ Mike Reed  
11/22/99  
SW

# FADA Services, Inc.



505 N. Mills Ave. (32803)  
P. O. Box 531124  
Orlando, FL 32853-1124  
Tel. 407/896-7371  
Fax 407/896-7721

November 4, 1999

MR. RAY ZIMMERMAN  
Branch Manager  
SAFETY-KLEEN CORP.  
600 Central Park Drive  
Sanford FL 32771

Question

RE: Disposal of Fuel Filters with Oil Filters

Dear Ray:

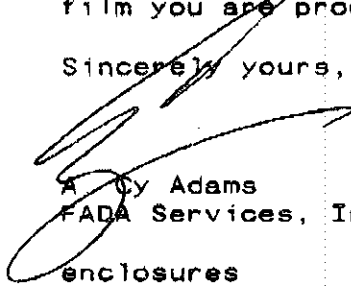
Some time ago I questioned the practice of mixing these two filters and we have finally received a reply that I think will interest you as it seems someone else in Safety-Kleen asked the same question in July 1995.

The reply furnished by the state had a copy of a letter written to your Richard Morris - copy enclosed.

As we read this, as long as the fuel filters are drained and are destined to be recycled with the dealer's oil filters, it is okay.

Next time you want an outside opinion on any of the photographic film you are processing . . . PLEASE call me.

Sincerely yours,

  
Amy Adams  
FADA Services, Inc.  
enclosures

Jennifer Hobbs  
I believed we talked about this a few weeks ago!  
I was amazed about the amount of work that went into finding this obscure memo from 1995

Any further comments on this?







# Department of Environmental Protection

Lawton Chiles  
Governor

Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Virginia B. Wetherell  
Secretary

July 26, 1995

Mr. Richard R. Morris  
Environmental Engineer  
Safety-Kleen Corporation  
Post Office Box 20008  
Tallahassee, FL 32316

Dear Mr. Morris:

Thank you for your July 6 letter regarding the proper management of used gasoline filters.

If the gasoline entrapped within a used fuel filter is to be disposed of, it is then solid waste and could (probably would) test out as hazardous for, at least, ignitability and benzene. If the gasoline entrapped within a used fuel filter is destined for recycling as a commercial chemical fuel (e.g. mixed with used oil) by burning for energy recovery, it is not discarded and is not, therefore, a hazardous waste, according to Federal Register, Vol. 50, No. 230, November 29, 1985, p. 49179 (enclosed).

The metal and paper portions of the fuel filter casing could qualify for the scrap metal recycling exemption found in Chapter 40, Part 261.6(a)(3)(iii), (enclosed).

Used fuel filters destined for recycling would be exempted from the manifesting and permitting requirements of the hazardous waste management regulations.

Generators of used fuel filters should drain them of all free flowing liquid prior to shipping. Due to the low flash point of gasoline, the generator should store them safely, allowing for the venting of any pressure build-up, and protecting the storage area from the possibility of sparks.

I hope this information is of assistance to you. If you have any additional questions, please feel free to phone me at (904) 488-0300.

Sincerely

Rick Neves  
Environmental Specialist  
Hazardous Waste Management Section

RCN/rn

Enclosure

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

## Management of Gasoline Fuel Filters

July 26, 1995

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