



December 7, 2000

Mr. Bob Snyder
FL DEP – Central District
3319 Maguire Boulevard
Suite 232
Orlando, FL 32803-3767

**Re: Inadvertent Termination of Non-Regulated Waste
Safety-Kleen Systems - Sanford, FL Service Center
Facility EPA ID # FLD984171165
Generator – Damron Auto Orlando, FL**

Dear Mr. Snyder:

Per our telephone discussion of November 3, 2000, this letter is being submitted for your records.

Background

In the last two years, Safety-Kleen has introduced a program to its customers that generate large volumes of wastewater. This program is similar to the Safety-Kleen parts washer service in that Safety-Kleen installs the water treatment equipment at the customer's location and then services it on a periodic basis to ensure consistent and proper operation. During each service call, all accumulated wastewater is removed from the equipment and placed into drums provided by Safety-Kleen.

At the time of the first service call after the initial equipment installation, a sample of the wastewater is collected and sent to the Safety-Kleen Technical Center in Elk Grove Village, IL. (The drums of wastewater remain at the generator's location until sample analysis has been completed.) The Safety-Kleen Technical Center performs analysis to determine the following: regulatory status of the wastewater, appropriate designated facility for the wastewater within the Safety-Kleen system, and the proper shipping description. Once this information is available, a Safety-Kleen Sales Representative returns to the customer location with the proper paperwork and drum labels to transport the wastewater to the local Safety-Kleen Service Center. Provided that the customer's wastewater treatment application has not changed, all subsequent wastewater pick-ups will use the prequalification data (proper shipping name, designated facility, etc.) obtained from the initial sample.

Summary of Events

On November 1, 2000, a representative of the Safety-Kleen Sanford facility serviced the wastewater treatment unit at Damron Auto in Orlando, FL. During this service, 68 gallons of non-regulated wastewater were removed from the unit and placed into four 30-gallon blue Safety-Kleen drums. A non-regulated waste label was affixed to each of the four drums and a hazardous waste manifest listing Safety-Kleen Bartow as the designated facility was completed. All four drums were transported back to the Safety-Kleen Sanford branch as 10-day transfer wastes.

SAFETY-KLEEN CORP.

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Upon arrival at the Sanford facility on November 1, the wastewater drums were off-loaded from the route truck by the Warehousemen at the facility. Believing the drums were waste aqueous cleaner (which is typically transported in 30-gallon blue drums), the Warehousemen emptied the contents of the drums into the return and fill dumpster. While performing the daily warehouse reconciliation on the morning of November 2, the Warehouse Manager learned of the inadvertent waste termination and notified facility management. The non-regulated wastewater was ultimately shipped via tanker trailer to the Safety-Kleen Lexington Recycle Center (along with the waste parts washer solvents) for processing.

Corrective Action

The Safety-Kleen Sanford facility has had a long-standing policy/procedure that requires Sales Representatives to off-load all waste drums from route trucks except for those containing waste parts washer solvents (petroleum and aqueous based). This policy was reviewed with the appropriate facility personnel shortly after the November 1st incident. The facility Warehousemen have been instructed to be more diligent in checking the waste labels of all drums at the Return and Fill Dock prior to emptying them into the dumpster.

The hazardous waste manifest used for transportation of the non-regulated wastewater from Damron Auto was amended to show Safety-Kleen Sanford as the designated facility. A representative of the Sanford facility terminated the manifest and sent the original copy to the generator.

Conclusion

Safety-Kleen values its cooperative relationship with the FL DEP's Central District Office and believes that notification of this operating error is an appropriate course of action. However, because the inadvertent termination of the 10-day transfer waste involved a non-regulated material, Safety-Kleen does not believe a violation of the federal/state regulations or the conditions associated with the Safety-Kleen Sanford RCRA operating permit has occurred.

I apologize for the delay in submitting this correspondence. If you have any questions or need additional information, please contact me at 561-736-2267.

Sincerely,



Scott A. Schneider
Environmental, Health & Safety Manager

cc: Damron Auto
999 File 1010 (Permit Correspondence)
Mr. Jim Childress, Safety-Kleen