



Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

December 4, 2001

OCD-HW/C-01-0336

Safety-Kleen
7140 Centennial Place
Nashville, Tennessee 37209

Attention: James C. Childress
Regional Environmental Compliance Manager

Seminole County – HW
Safety-Kleen
Unmanifested Waste Reports

Dear Mr. Childress:

I am in receipt of your response dated November 19, 2001. As you have correctly noted, the Auto Skill Center operates on U.S. Patrick Air Force Base and Dynacs operates on U.S. NASA Kennedy Space Center. While both operations generate minimal amounts of hazardous waste, that waste is subject to regulation under the standards for generators found in 40 CFR Part 262 and adopted by the Department in 62-730.160(1).

U.S. Patrick Air Force Base and U.S. NASA Kennedy Space Center each use multiple contractors to carry out their respective operations. As "facilities" all hazardous waste generated as a result of base operations counts towards their monthly generation rates. As a result, each base generates greater than 1,000 kilograms of hazardous waste each calendar month. Therefore, a hazardous waste manifest is required for off-site transportation of hazardous waste from each of these facilities.

Safety-Kleen was already aware of this requirement and has been cited for this same violation in the past. An inspection of Safety-Kleen on October 30, 1991 identified several instances of Safety-Kleen transporting hazardous waste without a manifest, including shipments of hazardous waste from U.S. NASA Kennedy Space Center. Attached is a letter dated February 25, 1992 identifying steps taken by Safety-Kleen to prevent this violation from recurring.

I welcome any suggestions you may have to assist the Department in preventing this violation in the future.

Sincerely,

John White
Environmental Specialist

jw

cc: Jason Sherman, OGC

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