



November 5, 2010

Fedex -- Next Day Service

Ms. Karen Knight  
USEPA Region IV  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960

RE: Unmanifested Waste Report, Safety-Kleen Systems Inc., 359 Cypress Rd.  
Ocala, FL 34472. FLR000060301. PCB Contaminated Oil Receipt on 10/1/10.

Dear Ms. Knight:

Safety-Kleen is submitting this unmanifested waste report as specified by 40 CFR 761.211. The Safety-Kleen Ocala facility is not a PCB commercial storage or disposal facility, but these reporting procedures are being followed as a self disclosure of this event.

The receiving facility/transporter for the unmanifested waste was Safety-Kleen Systems, Inc., 359 Cypress Rd., Ocala, FL 34472. A load of used oil contaminated with PCB's was received at the above facility on October 1, 2010 and off-loaded into a 30,000 gallon used oil storage tank (#10). Safety-Kleen was unaware that the used oil contained PCB's until 10/6/10 when the facility received analyses from a sample taken before processing the material being held in tank #10.

The preliminary results of this analysis indicated approximately 4 ppm or either Aroclor 1232 and/or 1242. Safety-Kleen then reviewed the off-load records into this tank and immediately locked down the tank itself and all collection trucks that had off-loaded into tank #10. In addition Safety-Kleen reviewed all collection records and analyzed the customer retain samples to identify the source of the contaminated oil. After analyzing numerous customer retain samples it was determined that the source was Corkey's Muscle Car Performance, 7461 S. US Highway 441, Unit C, Ocala, FL 34480. Two loads were picked up at this location, 40 gallons of used oil and 90 gallons of used antifreeze. Subsequent analyses of the two retain samples from this pick up indicated 383.9 ppm PCB for the used oil retain sample and 238 ppm for the oil phase in the used antifreeze retain sample. This customer is listed as a Conditionally Exempt Small Quantity Generator and does not have an EPA ID number.

Safety-Kleen accepted this material from Corkey's Muscle Car Performance under Safety-Kleen's Oil Services Program. The material was initially represented to Safety-Kleen as being vehicular used crank case oil generated at this business. The customer



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certified to Safety-Kleen that the material was not RCRA or TSCA regulated and therefore the shipment was not manifested.

Safety-Kleen performed a pre-qualification field test at the customer's location prior to collection to determine halogen content and the material passed this test.

The contaminated material, which consisted of 130 gallons in total, from Corkey's Muscle Car Performance was comingled on the collection truck with two other customer pick ups and then off-loaded into tank # 10 at our Ocala facility. On subsequent days the collection truck in question also off-loaded into tanks # 11 & 12. In total Safety-Kleen has 57,801 gallons of used oil contaminated with PCB's being held in tanks 10, 11, & 12. These tanks as well as the collection truck have been locked down since we first received the results of the PCB analyses. All contaminated used oil will be managed by Safety-Kleen as TSCA regulated material and transported by licensed transporters to a permitted PCB disposal facility. Following removal of this material the tanks and collection truck at our Ocala facility will be decontaminated before returning to service. In addition all tankers used to transport this material will be decontaminated once they off-load at the permitted facility. Full records of all activities will be maintained on site.

If you require additional information, please do not hesitate to contact me at [jeff.curtis@safety-kleen.com](mailto:jeff.curtis@safety-kleen.com) or by phone at 561-523-4719.

Best regards,

A handwritten signature in black ink, appearing to read 'Jeff Curtis', with a long horizontal line extending to the right.

Jeff Curtis  
EHS Manager, Florida  
Safety-Kleen Systems, Inc.

cc: Bheem Kothur, FDEP  
Darwin Robinson, SK Ocala