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February 8, 1995

Mr. Stanley Tam
Florida Department of
Environmental Protection
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32257-7577

Re: Used Oil Filter Storage

Dear Mr. Tam:

I am writing to confirm our conversation regarding the storage of used oil filters so Environmental Remediation Services, Inc. (ERS) will operate in compliance with established FDEP Used Oil Management regulations, Chapter 62-710 F.A.C.

My understanding is that no current regulation exists for the storage of this waste until promulgated legislation is passed. After legislation is passed any transporter handling this wastestream must be a licensed hazardous waste hauler and the facility which stores the used oil filters must register as a Used Oil Filter Transfer Facility with the State of Florida.

ERS is a licensed hazardous waste transporter, #FLD 984261412, and currently manages this wastestream for several clients. ERS transports the drummed waste documented by a non hazardous manifest generated from the clients site to Perma-Fix in Gainesville, for recycling since ERS is not presently registered as a Transfer Facility. ERS does not store drummed waste, but does possess the warehouse space and impermeable concrete floor surface to effectively manage this phase. The following questions require attention:

- 1) Can ERS store the drummed oil filters at our warehouse before promulgated legislation is passed and for what length of time?
- 2) After legislation is passed, ERS will register as a Used Oil Filter Transfer Facility. Will storage requirements, volume, or length of time change?

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3) Can ERS store other types of Non Hazardous waste such as drummed sludge, drummed or bulk petroleum contaminated soil, drill cuttings, and drummed monitoring well water for bulk disposal?

Thank you for your help and if you have questions about ERS' capabilities please call me at my office (904) 721-7225.

Sincerely,



Scott J. Cook
Manager - Technical Services