



Chemical Waste Management, Inc.
Technical Services Division
1701 Henrico Road
Conley, Georgia 30027
404/241-1718

RECEIVED

SEP 20 1989

HAZARDOUS WASTE
PERMITTING

September 13, 1989

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Florida Department of Environmental Regulation
2600 Blair Stone Road
Suite 471
Tallahassee, FL 32399-2400
Attn: Satish Kastury

Dear Mr. Kastury:

The Technical Services Division of Chemical Waste Management, Inc. has assumed the operating responsibilities for Hazco International. Hazco has operated vacuum tank trucks throughout a 40 state area and services a customer base of over 1000 customers in the state of Florida. Our customer base is concentrated on auto body shops and auto painting operations which generate waste thinner.

Our driver's typically pick-up 15 - 20 locations weekly producing a load of fuel grade thinner of approximately 2500 gallons.

Each customer signs his/her hazardous waste manifest and appropriate land disposal restriction form prior to shipment. Therefore, when our tankers arrive at a disposal outlet, 15 - 20 manifests accompany the load.

Tricil Recovery Service in Bartow, FL is our primary disposal facility within the state of Florida. Hazco originally identified the waste thinner on a generic profile sheet showing Hazco as the generator/broker to establish an approved wastestream for shipment.

When our tankers arrive at Tricil, a cover manifest is generated totalling the gallonage on the individual manifests and showing Chemical Waste Management as generator. Our drivers are required to sign the manifest as generator and transporter prior to unloading. Tricil has learned from D.E.R. that this is an acceptable practice since it shows one tanker as received rather than 15 or 20, based on the number of manifests received.

All manifests received with a tanker are signed by a facility agent and returned to each generator as required. However, all waste received is reported on Tricil's biennial reports as being

generated by Hazco (Chemical Waste Management).

Since our company has notified the EPA of our transporter activity only and is not seeking generator status, I request clarification in this matter. I propose to forego the required cover manifest and utilize a substitute method (i.e. an alternate record keeping form) of identifying each tanker arriving at the facility. I do not feel comfortable having my drivers sign a legal document such as a hazardous waste manifest since our company, in this sense, does not meet the definition of a generator in 40 CFR, 260.

I request your clarification of State of Florida requirements in the matter within fifteen days.

Should you need additional information, please contact my office at your earliest convenience.

Sincerely,

Mitch Osborne

Mitch Osborne
Area General Manager

MO/tsm

cc: Stephen Jank, Tricil Recovery Service
Greg Reese, Chemical Waste Management-Marietta
Clabe Polk, Florida D.E.R.
Gary Early, Florida D.E.R.-Tampa