

VIA CERTIFIED MAIL

August 9, 1991

RECEIVED

AUG 12 1991

Florida Department of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Attention: Neal Schobert, Waste Management

HAZARDOUS WASTE
PERMITTING

Re: Laidlaw Environmental Services of Bartow, Inc.
FLD 980729610

Dear Mr. Schobert;

We have received and reviewed the report from your May 31, 1991, RCRA compliance inspection and wish to comment on the violations of 40 CFR 268 alleged in the report. The Land Disposal Restrictions (40 CFR 268) are extremely complex, and the violations alleged in the May, 1991, inspection report are not similar to previous alleged violations, as implied in the last paragraph of the Process Description. The report does not make clear that past violations cited have been resolved to the Department's satisfaction, and were, in fact, never violations, but only a misunderstanding in semantics; specifically, the use of the word "as" in the first paragraph of the form (attached), which was changed (attached).

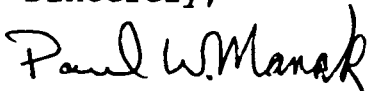
Of the three manifests cited which appear to be in error, the report states that #02046 "should state the waste is a non-wastewater to identify the correct treatment standards". The LDR notice which accompanied this manifest (attached) clearly states on page 2 that "This is an Non-Wastewater unless this box is checked indicating Wastewater". The box is not checked, and this should not have been cited as a violation.

LDR notices for Manifests #02176 and #02147 were incorrectly completed as noted by the Department. This occurred when the receiving facilities required us to use their new forms, instead of the ones we had been using. Since shipments of this type are not common from this facility, an administrative error occurred due to a lack of experience with the customer's LDR forms. However, none of this material was land-disposed, and all of it was sent to hazardous waste facilities for incineration, which meets the LDR requirements for treatment. The manifesting personnel have been re-instructed in the correct way to complete various LDR notices, especially those from the facilities in question. Also, a two-day training class on manifesting will be conducted at Bartow on August 6 and 7 (notice attached). Attached is a recent manifest and LDR showing that the errors cited were indeed the product of administrative error and not the normal practice of the facility personnel.

We believe that appropriate corrective action has been taken to assure that this matter will not be a cause for concern on future inspections. Additionally, we request that the May 31, 1991, inspection report be adjusted to remove the statement that "(LDR) notices remain a source of violations ...". As stated earlier in this response, those allegations were based on a misunderstanding in semantics and the Department had previously agreed that these were not violations.

If you have any questions or comments, please feel free to call me or Steve Taylor at (813) 533-6111.

Sincerely,



Paul W. Manak
Facility Manager

PWM/drs

cc: Wanda Parker, BWP&R
James Scarbrough, USEPA, Region IV
Ashley Chadwick, LES, Anitoch
Barbara Hamilton, LES, Columbia
Jim Green, LES, Columbia

1482A

Laidlaw Environmental Services
NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL

GENERATOR: TRICIL RECOVERY SERVICES, INC.

ADDRESS: 170 Bartow Municipal Airport
Bartow, Florida 33830-9504

Manifest No.: _____

USEPA ID #: FLD980729610

Date: _____

This shipment as referenced by the Manifest Number above contains wastes which correspond to the following USEPA Hazardous Waste Numbers: D001, F001, F002, F003, F005, K086, and other wastes as listed below.

RESTRICTED WASTE REQUIRING TREATMENT

I notify that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated by the appropriate regulatory treatment standard or in such a manner which renders it non-liquid by chemical fixation or solidification prior to land disposal. Corresponding treatment standards are listed below.

TREATMENT STANDARDS EXPRESSED AS CONCENTRATION

TABLE CCWE - CONSTITUENT CONCENTRATIONS IN WASTE EXTRACT

F001 - F005 Spent Solvents

Constituent Name	Concentration (mg/l)	
	Wastewaters Containing Spent Solvents	All Other Spent Solvent Wastes
Acetone	0.05	0.59
n-Butyl Alcohol	5.0	5.0
Carbon Disulfide	1.05	4.81
Carbon Tetrachloride	0.05	0.96
Chlorobenzene	0.15	0.05
Cresols (and Cresylic Acid)	2.82	0.75
Cyclohexanone	0.125	0.75
1,2-Dichlorobenzene	0.65	0.125
Ethyl Acetate	0.05	0.75
Ethylbenzene	0.05	0.053
Ethyl Ether	0.05	0.75
Isobutanol	5.0	5.0
Methanol	0.25	0.75
Methylene Chloride	0.20	0.96
Methyl Ethyl Ketone	0.05	0.75
Methyl Isobutyl Ketone	0.05	0.33
Nitrobenzene	0.66	0.125
Pyridine	1.12	0.33
Tetrachloroethylene	0.079	0.05
Toluene	1.12	0.33
1,1,1-Trichloroethane	1.05	0.41
1,1,2-Trichloro-1,2,2-Trifluoroethane	1.05	0.96
Trichloroethylene	0.062	0.091
Trichlorofluoromethane	0.05	0.96
Xylene	0.05	0.15

TREATMENT STANDARDS EXPRESSED AS SPECIFIED TECHNOLOGIES

Waste Code	Waste description and/or treatment subcategory	Wastewater	Nonwastewater
D001	Ignitable liquids based on 261.21(a)(1) High TOC Ignitable Liquids Subcategory Greater than or equal to 10% total organic carbon	NA	FSUBS, RORGS, OR INCIN
U154	Methanol	(WETOX OR CHOXD)fb CARBN OR INCIN	FSUBS OR INCIN
U238	Ethyl Carbamate	(WETOX OR CHOXD)fb CARBN OR INCIN	INCIN

TREATMENT STANDARDS EXPRESSED AS SPECIFIED TECHNOLOGIES

Waste Code	Regulated Hazardous Constituent	Wastewaters Concentration (mg/l)	Non-Wastewaters Concentration (mg/kg)
0004	Arsenic	5.0	NA
0005	Barium	100	NA
0006	Cadmium	5.0	NA
0007	Chromium (Total)	5.0	NA
0008	Lead	5.0	NA
0009	Mercury	0.20	NA
0010	Selenium	1.0	NA
K093	Benzene	0.14	5.6
	Aniline	0.31	14
	Diphenylamine	0.52	NA
	Diphenylnitrosamine	0.40	NA
	Sum of Diphenylamine and Diphenylnitrosamine	NA	14
	Nitrobenzene	0.068	14
	Phenol	0.039	5.6
	Cyclohexanone	0.36	30
K086	Nickel	0.47	NA
	Acetone	0.28	160
	Acetophenone	0.010	9.7
	Bis(2-ethylhexyl)phthalate	0.28	28
	n-Butyl alcohol	5.6	2.6
	Butylbenzylphthalate	0.017	7.9
	Cyclohexanone	0.36	NA
	1,2-Dichlorobenzene	0.088	6.2
	Diethyl phthalate	0.20	28
	Dimethyl phthalate	0.047	28
	Di-n-butyl phthalate	0.057	28
	Di-n-octyl phthalate	0.017	28
	Ethyl acetate	0.34	33
	Ethylbenzene	0.057	6.0
	Methanol	5.6	NA
	Methyl isobutyl ketone	0.14	33
	Methyl ethyl ketone	0.28	36
	Methylene chloride	0.089	33
	Naphthalene	0.059	3.1
	Nitrobenzene	0.068	14
	Toluene	0.080	28
	1,1,1-Trichloroethane	0.054	5.6
	Trichloroethylene	0.054	5.6
	Xylenes (Total)	0.32	28
	Cyanides (Total)	1.9	1.5
	Chromium (Total)	0.32	NA
	Lead	0.037	NA
U002	Acetone	0.28	160
U019	Benzene	0.14	36
U044	Chloroform	0.046	5.6
U057	Cyclohexanone	0.36	NA
U077	1,2-Dichloroethane	0.21	7.2
U112	Ethyl acetate	0.34	33
U121	Trichloromonofluoromethane	0.020	33
U159	Methyl ethyl ketone	0.28	36
U161	Methyl isobutyl ketone	0.14	33
U210	Tetrachloroethylene	0.056	5.6
U211	Carbon tetrachloride	0.057	5.6
U220	Toluene	0.080	28
U226	1,1,1-Trichloroethane	0.054	5.6
U228	Trichloroethylene	0.054	5.6

Signature: _____

Date: _____

Laidlaw Environmental Services
NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL

GENERATOR: LIDLAW ENVIRONMENTAL SERVICES OF BARTOW, INC.
 ADDRESS: 170 Bartow Municipal Airport Manifest No.: _____
Bartow, Florida 33830-9504
 USEPA ID #: FLD980729610 Date: _____

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D004	Arsenic	5.0	NA
D005	Barium	100	NA
D006	Cadmium	5.0	NA
D007	Chromium (Total)	5.0	NA
D008	Lead	5.0	NA
D009	Mercury	0.20	NA
D010	Selenium	1.0	NA
K083	Benzene	0.14	6.6
	Aniline	0.81	14
	Diphenylamine	0.52	NA
	Diphenylnitrosamine	0.40	NA
	Sum of Diphenylamine and Diphenylnitrosamine	NA	14
	Nitrobenzene	0.068	14
	Phenol	0.039	5.6
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