STATE OF FLORIDA IENT OF ENVIRONMENTAL PROTE DEPA SOUTHWEST DISTRICT 3804 Coconut Palm Drive Tampa, FL 33619-1352 (813) 744-6100

Copy Request Cover Sheet

Requesting Company: Lowis, Longm	an + Walko	R, A. Telep	hone: 8	50-222-5702
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Copying Representative:		- Exten	sion:	253
D.E.P. Authorization:	<i>V</i> .			
File Name	County	Out	Out	DEP Contact
Freehold Cortage	Pola.			A
3 Enforcement files				Bloom
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#### Conditions:

- The above mentioned copying company must be bonded and insured.
- The file integrity must be maintained. The contents must not be removed,

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I have read the above statement and agree to comply with these conditions.

Representative



# Department of Environmental Protection

Jeb Bush Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

David B. Struhs
Secretary

May 11, 2000

Mr. Mike Pasquerella Freehold Cartage, Inc. 175 Bartow Municipal Airport Bartow, Florida 33830

> Re: Freehold Cartage, Inc. FLD 984 187 831 Warning Letter #235378 Polk County

Dear Mr. Pasquerella:

A review of the file for the referenced case indicates that the violations cited in the Warning Letter have been resolved. This enforcement action is now closed.

Sincerely,

William Kutash

Administrator

Division of Waste Management

WK/gtd

cc: Morgan Leibrandt, HWR Section

Compliance File



**F TRANSPORTATION** FLORIDA DEPARTMEN' Motor Carrier Compliance Afice 1815 Thomasville Road Tallahassee, FL 32303 (850)488-7920

VEHICLE INSPECTION REPORT DRI

Report #: FL63500516

Date: 05/01/00

Time Started: 21:45 Time Ended: 21:50

Insp. Level: 3 (Driver Only Inspection)

FREEHOLD CARTAGE INC

**825 HIGHWAY 33** 

FREEHOLD, NJ 07728-8431

ICC #: 154002

DOT #: 190713

Phone #:

Fax #:

Driver: SULLIVAN, LAWRENCE M

Cargo: GENERAL FREIGHT

License #: 462885536

DOB: 11/05/55

State #:

CVSA#

Date:

State: GA

MAY \$ 5 2000

Southwest Districk Tampa

Location: I-95 & SR-104 Highway: I-95 Shipper: SAC

Unit Type

ŤΤ

ST

1

2

MilePost:

County: DUVAL

Origin: TAMPA, FL

Destination: MILLINGTON, TN

Shipping Paper #:

VEHICLE IDENTIFICATION

Make <u>Yr</u> 99 PTRB **FRUE** 

98

Company 663 290053

License AE762A U65523

State NJ TN

HAZARDOUS MATERIALS

HM Code/Class

Qty Wst

**BRAKE ADJUSTMENTS** 

Axle # Right Left Chamber

**VIOLATIONS** 

Violation Code 392.2S

**Unit** D

OOS

Citation #

Violations Discovered Verify N Local law/speeding

Old Seal #: Incident Report: N Violation of O-O-S: N FDOT Seal #:

\* CARRIER CERTIFICATION: The undersigned certifies that all violations on this report have been corrected and action taken to assure compliance with the Motor Carrier Safety and Hazardous Materials Regulations and Florida Statute 316.302, insofar as they are applicable to motor carriers and drivers. Please sign the below certification and return this report to the address which appears at the top of this report WITHIN FIFTEEN (15) DAYS.

Signature of Carrier Official: X Report Prepared By:

V.PERRY

Badge #:

635

Copy Received By: LAWRENCE M. SULLIVAN

Page #: 1 Last Page

March 24, 2000

Mr. Gil Dembeck Dept. of Environmental Protection 3804 Coconut Palm Drive Tampa, FL 33619 FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

APR = 5 2000

SOUTHWEST DISTRICT

TAMPA

Dear Mr. Dembeck:

Please find enclosed replacement pages 1,3,7 and 20 for our contingency plan. Revisions were made due to a change in secondary emergency contact. If any further information is required please contact me anytime.

Michael L. Pasquerella
General Manager

Maximum 2

Maxi

enclosures

175 BARTOW MUN.ARPT • BARTOW FL • 33830 PHONE: 863-533-4599 • FAX: 863-533-1613

## FREEHOLD CARTAGE, INC.

#### PLAN A

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

APR - 5 2000

SOUTHWEST DISTRICT

## EMERGENCY SPILL MANAGEMENT PLAN

### 1. FACILITY IDENTIFICATION

TYPE OF FACILITY:

TRUCK TERMINAL WITH 10 DAY

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STORAGE AND TRANSFER

FACILITY PORTION OF A WASTE

CONTROL FIRM.

LOCATION OF FACILITY:

175 BARTOW MUNICIPLE AIRPORT

BARTOW, FL 33830 PHONE: 863-533-4599 LATITUDE: 27,57', 15" LONGITUDE:81,46',40"

**EPA DESIGNATION:** 

NJD054126164, FLD984187831

OWNER/OPERATOR:

THOMAS J. BLANCHET II, PRESIDENT

ADDRESS OF OWNER/

OPERATOR:

PO BOX 5010, FREEHOLD, NJ 07728

DESIGNATED PERSON ACCOUNTABLE FOR

SPILLS / EMERGENCIES:

MICHAEL L. PASQUERELLA

6333 CHRISTINA GROVES CIR. W.

LAKELAND, FL 33813 863-619-5037 HOME

941-944-7661 CELL PHONE 1-800-213-0393 PAGER

2<sup>ND</sup> DESIGNATED PERSON ACCOUNTABLE FOR SPILLS

AND EMERGENCIES:

JOSEPH M. TRAWICK 601 DIXIE HIGHWAY AUBURNDALE, FL 33823

863-967-2201 HOME 1-800-448-9375 PAGER

1-863-287-8357 CELL PHONE

## RECORD OF AMENDMENTS (CONTINUED)

6) Add responsible party	Review of Plan	1/30/97
7) Revised site plan	Addition of new containment pad	8/7/97
8) Revised site plan	Addition of new loading dock & c	anopy
9)Change responsible party	Reorganization	4/1/99
100 0		
10) Revision to Primary and secondary	As Requested	4/1/99
emergency contacts		;
11) Revision to Primary emergency responder	As Requested	4/1/99
10)		
12) Revised site plan	Addition of new office building	11/1/99
13) Revised secondary emergency contact	Reorganization	3/1/00

## XIII. CONTINGENCY PLAN - OFF SITE

#### PLAN B

FREEHOLD CARTAGE, INC. 175 BARTOW MUNICIPLE AIRPORT BARTOW, FL 33830

## CONTACT PERSONS: EMERGENCY COORDINATOR

MIKE PASQUERELLA
6333 CHRISTINA GROVES CIRCLE W.
LAKELAND, FL 33813
863-533-4599 OFFICE
863-619-5037 HOME
941-944-7661 CELL PHONE
1-800-213-393 PAGER

## SECONDARY COORDINATOR

JOSEPH M. TRAWICK 601 DIXIE HIGHWAY AUBURNDALE, FL 33823 863-533-4599 OFFICE 863-967-2201 HOME 800-448-9375 PAGER

## EMERGENCY TELEPHONE NUMBERS:

R. Q. SPILLS; NATIONAL RESPONSE CENTER	1-800-424-8802
DISASTER RESPONSE CENTER, FLORIDA	1-904-488-1320
DECONTAMINATION INFORMATION, CHEMTREX	1-800-424-9300
DIVISION OFFICE, BARTOW OFFICE	1-863-533-4599
CORPORATE OFFICE, FREEHOLD, NEW JERSEY	1-732-462-1001
CB RADIO, CHANNEL 9 AND 19	
O & H MATERIALS, INC.	1-904-394-2196
AMERICAN COMPLIANCE TECHNOLOGIES	1-800-226-0911



May 1, 2000

Florida Department of Environmental Protection Southwest District Attn: Ms. Deborah A. Getzoff 3804 Coconut Palm Drive Tampa, FL 33619 D.E.P.
MAY 0 5 2000
Southwest District Tampa

RE: Freehold Cartage, Inc. FLD 984 187 831 Warning Letter No. 235378

Dear Ms. Getzoff,

With reference to the above noted Warning Letter, Freehold Cartage, Inc. wishes to offer the following information:

1. Alleged Violation, 40 CFR 263.20(c). Failure to ensure the original manifest accompanies all hazardous waste shipments.

All personnel have been re-trained, with regards to 40 CFR 263.20(c).

2. Alleged Violation, 40 CFR 279.43(a). Failure to deliver all used oil to another transporter, used oil processing/re-refining facility, or used oil burner facility.

During 1999, Freehold Cartage, Inc. delivered several 55 gallon drum of Used Oil to Jamson Environmental, Oldsmar, Florida. We had done so in good faith, believing that Jamson (who we were working for at the time), was a permitted Used Oil Transporter. It has been recently brought to our attention that they may in fact, not be properly registered at this time (see attached correspondence from William C. Horn, Vice President, Jamson Environmental).

Freehold Cartage, Inc. will not delivery any Used Oil to Jamson Environmental until such time as we have proof of proper registration and permit.

3. Alleged Violation, 40 CFR 279.44(a). Failure to determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.

## FREEHOLD CARTAGE INC.

I have discussed this issue with the Department several times in the past, most recently at a meeting attended by myself, Michael Pasquerella (FCI), Ronald Noble, Esq. (law firm of Fowler, White), William Kutash (FLDEP), Elizabeth Knauss (FLDEP), and Gilbert Dembeck (FLDEP). At that meeting, it was discussed that the intent of 40 CFR 279.44(a) was to ensure that transporters who collect and bulk used oil primarily from local automotive repair shops for transportation to a used oil re-refiner, do not contaminate a bulk shipment with a high halogen material. Our discussion also included the fact that a used oil facility that hires a transporter to pick up non-bulk containers of used oil from the facility's customers, and transport the containers to the facility will perform the required analytical work prior to processing the used oil. Further, it was discussed that it is not practical, and inherently unsafe for a common carrier's drivers to open non-bulk containers for sampling under these conditions.

However, in the future, Freehold Cartage, Inc. will obtain a statement from each generator of used oil, certifying that the halogen content of the material is less then 1,000 PPM, or the material otherwise qualifies as non RCRA, based on a rebuttal to the presumption that it is a hazardous waste.

4. Alleged Violation, 40 CFR 279.44(d). Failure to maintain records of analysis conducted to ensure that used oil is not a hazardous waste.

As noted above, Freehold Cartage, Inc. will obtain a statement from each generator of used oil, certifying that the material qualifies as non-RCRA regulated hazardous waste. This statement will become part of the shipping paper, and will be maintained as such.

I trust this information will satisfy the requirements of the Warning Letter issued to Freehold Cartage, Inc. on April 5, 2000. If you should have any questions, or require any additional information, please feel free to contact me at (732) 462-1001, ext. 7201.

Very Truly Yours,

Freehold Cartage, Inc.

W. Barry Olsen

Safety & Compliance Director

via certified mail

cc: Mr. Ronald Noble, Esq.



HAZARDOUS WASTE MANAGEMENT - REMEDIATION . MATERIALS PROCESSING FACILITY

105 South Bayview Boulevard • Oldsmar, Florida USA 34677-3130 24-Hour (813) 891-0440 • Fax (813) 814-9081

iamson@interaccess.net

April 25,2000

Via mail and FAX: (941)533-1613

Mr. Mike Pasquerella Freehold Cartage, Inc. 175 Bartow Municipal Airport Bartow, Florida 33830

RE:

Materials Processing Facility Solid Waste Permit S029-249712

Dear Mr. Pasquerella,

This letter is written to clarify the above-referenced facility permit in light of the warning letter Freehold Cartage, Inc. received as a result of delivering used oil to this facility.

In 1996, Jamson Environmental purchased the above referenced solid waste processing facility with an existing 5-year permit in place with a permit expiration date of May 30, 1999. Two pages from that permit are attached for your reference outlining the materials we were permitted to process at this facility. Under special condition "e." tank bottoms, waste oil, and waste oil sludges are specifically identified with a limit of accepting only non-bulk shipments. At the time of purchase, Jamson contacted Mr. Bill Crawford with the FDEP Southwest District and Mr. Raoul Clark with the FDEP Tallahassee office and asked specifically if any additional notification or permitting was required for handling used oil. It was our understanding from these conversations that at the time there was no specific permitting required for used oil, the solid waste permit covering the processing of waste oil was sufficient, and nothing further was required.

Our renewal application was filed in a timely manner on March 30, 1999. A new permit (Permit #70757-002-SO) was issued to the facility by the FDEP Solid Waste department on December 9, 1999. Specific condition "e." of the new permit indicates that the new permit does not specifically authorize the processing of material covered under the used oil regulations and management of these materials may require a separate Department permit. We have contacted the District FDEP and are in the process of applying for a waiver to this requirement for which we were referred to FDEP Tallahassee. We have also registered as a used oil transfer facility and a copy of that registration is enclosed for your records.

We have certainly tried to stay in compliance with all of the regulatory changes as they have come about, and thought that by contacting the Department for guidance we were insuring that we were in compliance. Whatever the semantic shortcoming identified by the inspector, this

Mr. Mike Pasquerella Freehold Cartage, Inc. April 25, 2000 Page 2 of 2

facility strives to maintain an unblemished record of regulatory compliance. From discussions with Mr. Rick Neves with FDEP Tallahassee Used Oil Section and Mr. Gill Dembeck with the FDEP Southwest Hazardous Waste Section, I believe we are in full compliance with all used oil regulations impacting this facility.

It is my understanding that Mr. Dembeck also indicated in his warning letter that you were not in compliance with the transporter regulation requiring you to maintain documentation to ensure that the used oil is not a hazardous waste under the rebuttable presumption (40 CFR 279.44). The regulation requires that the transporter make this determination either by testing it (i.e. laboratory test or screen with a "halogen sniffer") or by applying knowledge of the material or processes used. The regulations do not take into consideration the fact that transportation of drums of used oil might be subcontracted to an independent hauler with no connection to the generator. It seems to me that we could satisfy this regulation by adding a statement to the manifest that could, if necessary, be initialed by the generator at the time of pickup. The statement would be a generator certification that the halogen content of the material is less than 1,000 ppm or the material otherwise qualities as non-RCRA based on a rebuttal to the presumption that it is a hazardous waste. The manifest copy you file would then act as your documentation under the rebuttable presumption.

I hope this will help meet your needs in responding to the FDEP. It should at least show that you have corrected the two perceived deficiencies they have identified relative to transportation of used oil and delivery to our facility. Should you have any questions or need additional information, please do not hesitate to call.

Sincerely,

JAMSON ENVIRONMENTAL, INC.

William C. Horn, CHMM

Vice President

I D=\_\_\_\_\_\_ P04/07

PERMITTEE: Jamson Environmental, Inc. Ms. Patricia Eastman, Vice-President

PERMIT NO: S029-249712 Materials Processing Facility

## SPECIFIC CONDITIONS:

- Facility Designation. This site shall be classified as a materials processing facility for the processing of non-hazardous materials only. The materials which are permitted to be accepted, processed, and stored at the facility are limited exclusively to: Amended 4-12-96.
  - Petroleum contaminated soil, as defined in 17-775.200, F.A.C. Petroleum contaminated soil is soil which has become contaminated with one or more of the following liquid products made from petroleum: all forms of fuel know as gasoline, diesel fuel, jet fuel, kerosene, grades 2 through 6 fuel oils, crude oil, bunker C oil, residual oils; and non-hazardous-petroleum based lubricating, hydraulic and mineral oils. Copies of the results from pre-burn sampling and analyses shall be retained by the permittee in accordance with the recordkeeping requirements of this permit.
  - Petroleum contaminated soil, as defined in 17-775.200, F.A.C., which has originated from accidental spills may be accepted at the facility only if the permittee performs or requires the generator to perform the pre-burn sampling and analyses required by Chapter 17-775, F.A.C. If the generator performs the pre-burn sampling and analyses, copies of the results shall be retained by the permittee in accordance with the recordkeeping requirements of this permit.
  - For the purposes of this permit, water which has been contaminated as defined in 17-770.200, F.A.C., exclusively by petroleum products as defined in Section 376.301(16), Florida Statutes, in quantities which may result in a violation of Chapter 17-3, F.A.C., water quality standards. Petroleum products are defined as any liquid fuel commodities made from petroleum, including, but not limited to, all forms of fuel known or sold as diesel fuel, kerosene, all forms of fuel known or sold as gasoline, and fuels containing a mixture of gasoline and other products, excluding liquefied petroleum gas and ASTM grades no. 5 and no. 6 residual oils, bunker C residual oils, intermediate fuel oils used for marine bunkering with a viscosity of 30 and higher, asphalt oils, and petrochemical feedstocks. Amended 4-12-96.
    - Investigation derived soil and water waste may be accepted only if the permittee performs or requires the generator to perform the pre-burn sampling and analyses required by Chapter 17-775, F.A.C. If the generator performs the pre-burn sampling and analyses, copies of the results shall be retained by the permittee in accordance with the recordkeeping requirements of this permit.

ID=

P.05/07

PERMITTEE: Jamson Environmental, Inc. Ms. Patricia Eastman, Vice-President

PERMIT NO: 3029-249712 Materials Processing Facility

#### SPECIFIC CONDITIONS:

(Specific Condition #1 cont'd) Tank bottoms, waste oil, waste oil sludges and shipments of contaminated soil in containers other than 55 gallon drums (i.e. bulk shipments) shall not be accepted, processed or stored at the facility.

- All solid waste not specifically listed above, including petroleum contaminated absorbent pads, booms, fibrous and cellular materials, shall be managed, stored and disposed of separately from the petroleum contaminated soils.
- Process water from sources or with contaminants other than those listed above may cause soil/liquid waste mixtures generated by this facility to be subject to RCRA regulations.
- This permit does not authorize the acceptance, processing, storage or other management of materials contaminated by substances other than petroleum products (e.g. solvent contaminated wastes). New NOV 1 0 1998.

This facility shall be constructed and operated in accordance with all applicable requirements of Chapters 17-3, 17-4, 17-25, 17-28, 17-520, 17-522, 17-550, 17-701, 17-730, and 17-775, Plorida Administrative Code (F.A.C.) and all applicable requirements of Department Rules.

Permit Application Documentation. This permit is valid for construction and operation of the volume reduction facility and related facilities in accordance with the reports, plans and other information, submitted by Florida Recycling & Distribution, Inc., as follows:

Application for Solid Waste Management Volume Reduction

Facility, dated April 22, 1994; Revision #1 (pages replacing original), dated June 24, 1994; Revision #2 (pages replacing original), dated August 16, 1994; Site Plan and Floor Plan, signed and sealed on August 15, 1994;

Information submitted by Jamson Environmental, Inc. dated May 20, 1998 (received May 26, 1998) and August 27, 1998 (received August 31, 1998), concerning revised operations [In the event that this information conflicts with the Specific Conditions of this permit, the Specific Conditions of this permit shall supersede the information submitted.];

Amended MOV 10 1998 and in accordance with all applicable requirements of Department rules.

Page 7 of 15.



# Department of Environmental Protection

Emy

Jeb Bush Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

David B. Struhs Secretary

April 5, 2000

Mr. Mike Pasquerella Freehold Cartage, Inc. 175 Bartow Municipal Airport Bartow, Florida 33830

> Re: Freehold Cartage, Inc. FLD 984 187 831 Warning Letter #235378 Polk County

Dear Mr. Pasquerella:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on February 18, 2000, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Section 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

You are requested to contact Gilbert Dembeck at (813)744-6100, extension 399, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter. Alternatively, you may respond in writing within thirty (30) days with documentation that all alleged violations have been corrected. Please see Section 11 of the inspection report for a list of recommended corrective actions.

Freehold Cartage, Inc. FLD 984 187 831 Warning Letter #235378 Page 2

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(4), F.S. If your fail to respond and document a return to compliance within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), you may be designated as significantly out of compliance. This could result in issuance of a formal administrative complaint or "Notice of Violation" (NOV) and assessment of civil penalties if the case is not resolved within 150 days of the attached inspection report. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,

Deborah A. Getzoff

Director of District Management

Southwest District

DAG/gtd

Attachment

cc: Morgan Leibrandt, HWR Section Compliance File



# Department of **Environmental Protection**

Jeb Bush Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

David B. Struhs Secretary -

#### **HAZARDOUS WASTE INSPECTION REPORT**

1.	INSPECTION TYPE: Routine Complaint Follow-Up Permitting Pre-Arranged
	FACILITY NAME Freehold Cartage Inc. EPA ID # FLD 984 187 831
	STREET ADDRESS 175 Bartow Municipal Airport, Bartow, Florida 33830
	MAILING ADDRESS Same
	COUNTY Polk PHONE 863/533-4599 DATE 2/18/00 TIME 10:40 A.M.
NO	OTIFIED AS: CURRENT STATUS:
	□ Non Handler       □ CESQG (<100 kg/mo.)
2.	APPLICABLE REGULATIONS:          □ 40 CFR 261.5         □ 40 CFR 262         □ 40 CFR 263         □ 40 CFR 264         □ 40 CFR 266         □ 40 CFR 268         □ 40 CFR 273         □ 40 CFR 27
3.	RESPONSIBLE OFFICIAL(s):
4.	Mike Pasquerella, General Manager  INSPECTION PARTICIPANTS:
••	
	Mike Pasquerella Mike Trawick Barry Olson – Gilbert T. Dembeck, FDEP
5.	LATITUDE/LONGITUDE 27°57'14" 81°46'41"
6.	SIC Code: 4213, 4214
7.	TYPE OF OWNERSHIP: Private Federal State County Municipal
R	PERMIT # N/A ISSUE DATE: EXP DATE:

#### 9. PROCESS DESCRIPTION:

Freehold Cartage Inc. (FCI) is a hazardous waste transporter operating under EPA ID# NJD054126164, and a hazardous waste transfer facility operating under EPA ID# FLD984187831. FCI is also a used oil and used oil filter transporter and transfer facility, and a transporter of mercury containing lamps and devices. As part of their transfer facility operation, Bartow has become a central accumulation point for dry cleaner waste tetrachloroethylene and used oil filters for MCF Systems Atlanta, Inc.

All hazardous waste which remains at the facility more than 24 hours is stored on one of the facility's two concrete containment pads. Examination of the pad and containment system did not detect any appearance of spillage or residues. A covered dock between the two containment pads facilitates trailer to trailer transfers. Container of wastes are segregated in the various trailers at the dock to avoid incompatibility problems and to stage the drums for shipment. The contents of the trailers were examined and found to be properly packaged and identified.

All trailers and roll off containers parked off the containment pad were either empty or contained non-regulated material.

The transfer facility log of waste entering and leaving the facility was examined and was found complete. A spot check of material listed as present in the transfer facility was verified against manifests and the transfer facility log.

The facility Contingency Plan has been revised to reflect the new construction.

A copy of the facility's 1999 used oil annual report was reviewed along with copies of the manifests for each shipment. While FCI acknowledges that it may occasionally transports used oil manifested as non-regulated material, i.e., not specifically "Used Oil" along with hazardous waste, it not possible to track the quantity of used oil handled this way for reporting purposes. The facility uses DEP Form 62-701.900(13) for tracking of all identified used oil shipments. FCI has not complied with the halogen determination to ensure the used oil is not a hazardous waste under the rebuttable presumption of 40 CFR 279.10(b)(1)(ii) as required by 40 CFR 279.44(a), and the record keeping requirements of 40 CFR 279.44(d). FCI has already contacted the brokers who arrange FCI's transportation of used oil to provide this information prior to them agreeing to transport it in the future so that the proper recordkeeping can be established for reporting purposes. Some of the used oil transported in 1999 was delivered to Jamson Environmental, Inc. This is a violation of 40 CFR 279.43(a) because Jamson is not a used oil transporter, processor/re-refiner, or burner.

On 10/30/99, FCI driver, Joseph Southard, signed manifest #10309 accepting a shipment of 155 gallons hazardous waste by tank truck from Sterling Cleaners. This waste was generated from cleanup activities following a fire at Sterling Cleaners. This manifest lacked the Designated Facility site address, US EPA ID number, and phone number. Even though it is the generators' responsibility for the proper preparation of the manifest, FCI is in violation of Federal Department of Transportation (FDOT) regulations, 49 CFR 172.205(a), because the transporter is responsible that a properly prepared manifest accompany each shipment of hazardous waste. Following the repackaging of the waste from the tank truck into drums at FCI's transfer facility, the waste was remanifested as item 11d. on manifest #00001 to the same designated facility on 11/1/99. No notations of any kind were made on the original manifest #10309 to indicate the ultimate disposition of this hazardous waste. While the repackaging of the hazardous waste is permissible, failure to use the original manifest to deliver this waste to the designated facility is a violation of 40 CFR 263.20(c).

On 11/26/99, a 20 cu/yd container of hazardous waste debris, from the Sterling Cleaners fire, shipped on manifest #00002 was rejected by the designated facility and was brought back to FCI's transfer facility on 12/6/99, were it was repackaged into drums. On 12/13/99, FCI remanifested the drums to another designated facility who could accept the waste. Although the new manifest #84141 referenced the original #00002 manifest, FCI improperly designated their facility as generator and not Sterling Cleaners. This action again appears to be a violation of FDOT regulations. The long delayed revisions to the Uniform Hazardous Waste Manifest Rule are supposed to address situations such as these. Until a final rule is published, it is recommended the FCI contact the Department for guidance in the event hazardous waste must be repackaged by the company (in other then overpacks).

#### 10. SUMMARY OF ALLEGED VIOLATIONS:

40 CFR 263.20(c)	Failure to ensure that the original manifest accompanies all hazardous waste shipments.
40 CFR 279.43(a)	Failure to deliver all used oil to another used oil transporter, used oil processing/re-refining facility, or used oil burner facility.
40 CFR 279.44(a)	Failure to determine whether the total halogen content of used oil being transported or stored at a transfer facility is above or below 1,000 ppm.
40 CFR 279.44(d)	Failure to maintain records of analysis conducted to ensure that used oil is not a hazardous waste.

#### 11. RECOMMENDATIONS:

40 CFR 263.20(c)	Ensure that the manifest accompanies all hazardous waste shipments to the designated facility.
40 CFR 279.43(a)	Only deliver used oil to another used oil transporter, used oil processing/re-refining facility, or used oil burner facility.
40 CFR 279.44(a)	For all used oil transported or stored at a transfer facility determine whether the total halogen content of used oil is above or below 1,000 ppm.
40 CFR 279.44(d)	For all used oil transported maintain records of analysis conducted to ensure that used oil is not a hazardous waste.

Report prepared by:

Gilbert T. Dembeck

Environmental Specialist III

Approved by:

Elizabeth Knauss

Environmental Manager

Date \_3/20/

Facili LD 984 187 831

Date: February 18, 2000

### **TRANSPORTERS CHECKLIST**

1.	Site Name: Freehold Cartage, Inc.	
		<del>-</del>
	Transporter Requirements (40 CFR 263)	,
1.	Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500)	YN
2.	Does transporter have an EPA identification number? (263.11(a))	YN
3.	Does the transporter use manifest system as required by 263.20?	YN
	Do the manifests contain at least:  See the factories have a. Name, address, phone number, and EPA ID No. of generator?	YN
	b. Name, phone number, and EPA ID of transporter?	YN
	c. Name address EPA ID No of designated permitted facility?	YN
	d. Corresponding manifest document number?	YN
	e. Description and quantity of each hazardous waste?	YN
	f. Signature of subsequent transporters?	YN
	g. Signatures signifying proper delivery or reasons why delivery could not be certified?	YN
	h. EPA waste codes?	YN
4.	International shipments: (263.20(g))	NA
	a. Record of date waste left U.S.?	YN
	b. Presence of one signed copy in records?	YN
	c. Signed copy of manifest returned to the generator?	YN
	d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?	YN \
5.	For SQG waste:	N
	a. Is waste transported according to reclamation agreement?	YN
	b. Is following information recorded on a shipping paper:	:
	Name, address, and EPA ID of waste generator	YN

	Date	-Didaiy 10, 2000
	Quantity of waste accepted	YN
	DOT - required shipping info	YN
	Date waste is accepted	YN
	c. Does transporter carry this shipping paper during transport?	YN
	d. Are records maintained for three years after termination or expiration of reclamation agreement?	YN \
6.	Are copies of the manifest retained for 3 years? (263.22)	YN
7.	Is there evidence of discharge of hazardous waste? (263.30)	YN
8.	Has transporter demonstrated the financial responsibility required under 62-730.170(2)	YN
9.	Does the transporter verify financial responsibility with the Department annually (62-730.170(3))?	YN
	Transfer Facility Requirements (62-730.	171)
1.	Does transporter comply with 10 day storage limit for transfer facilities? (263.12)	YN
	a Is the hazardous waste packaged according to 262.30? (263.12)	YN
2.	General Facility Standards (265 Subpart B)	
	a. Security (265.14)	·
	(1) Is the facility security system adequate to minimize unauthorized entry?	YN
	(2) Are signs posted and legible for 25 feet?	YN
	b. Inspection Requirement (265.15)	,
	(1) Does the facility have a copy of the Inspection Plan?	YN
	(2) Does the facility have completed inspection logs?	YN
	(3) Were the deficiencies corrected in a timely manner?	YN
	(4) Are the inspection logs maintained at the facility for 3 years?	YN
	c. Personnel Training (265.16)	/
	(1) Do management personnel complete hazardous waste training?	YN
	Is training on the job?	YN

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		Date: Fed	ruary 18, 2000
		(2) Do laborers who handle hazardous waste complete training?	YN
		Is training on the job? Is training in the classroom?	YN YN
		(3) Does training include:	•
		Emergency response procedures? Inspection procedures? Operation of hazardous waste handling equipment?	YN YN
		(4) How often is training reviewed? An northy	
		(5) Does the facility have personnel training records including:	
	-	Job title and description of position? Description of employee's training	YN YN
		(6) Is training successfully completed within 6 months of hiring/transfer to HW position?	YN
		(7) Are records maintained for three years at the facility?	YN
	d.	Ignitable, Reactive, or Incompatible Waste (265.17)	
		(1) Is the waste separated and confined from sources of ignition or reaction, sparks, spontaneous ignition, and radiant heat?	Y N
		(2) Are "No Smoking" signs posted in the area?	YN
3.	Pr	eparedness and Prevention (265 Subpart C)	•
	a. en	Is there evidence of fire, explosion or contamination of the vironment? (265.31 Maintenance and Operation of Facility)	YN
	lf y	yes, use narrative explanation.	
	b.	Is the facility equipped with (265.32 - required equipment):	,
		(1) Internal communications or alarm system? Is it easily accessible in case of emergency?	YN YN
		(2) Telephone or two-way radio to call emergency response personnel?	YN
		(3) Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?	YN
		Is this equipment tested to assure its proper operation?	YN
		How frequently? Annually	
		(4) Water of adequate volume for hoses, sprinklers or water spray system?	Y/_N
		(a) Describe source of water.	

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(b) Indicate flow rate and/or pressure and storage capacity, if applicable.		
c. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between drums to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space)	YN	
d. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with Local Authorities)	YNNA	
If NA, explain	, , , , , , , , , , , , , , , , , , ,	
e. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities)	YNNA	
If yes, indicate primary authority.  Souton Air for Fire Day  Is the fire department a city or volunteer fire department.  Cry		
f. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities)	YN	
Are they readily available to the emergency coordinator?	YN	
g. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorites)	YN	
If no, has the owner/operator attempted to do this?	YN/V/	7
h. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities)	YN <i>M</i> }	
Contingency Plan and Emergency Procedures (265 Subpart D)		
a. Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)	YN	
b. Is it maintained at the facility? (265.53 - Copies of Contingency Plan)	YN	
c. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan)	YN/	•
(1) Does the plan include:	/	
(a) Action personnel will take?	YN	

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Date:

4.

Date: _	February 18, 2000
(b) Evacuation routes?	75.5 5 6 1 Y <u>- 1 N</u>
(c) Emergency Equipment?	YN
(d) Is the emergency equipment properly inspected and maintained?	Y
d. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator)	YN
e. Who is the emergency coordinator? Mike fasquarella	<u> </u>
f. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Pl	/
g. Has the facility supplied DEP with a copy of the Contingency Plan (62-730.171(2)(a))	YN
Container Storage Checklist (Subpart I - Use and Management of Co	ontainers 265.170)
<ul> <li>a. Are the containers in good condition (265.171)?</li> <li>(check for leaks, corrosion, bulges, etc.)</li> </ul>	YNM. (4,740)
b. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	Y_N_Outside
<ul><li>c. Is the waste compatible with the containers and/or its liner? (265.172)</li></ul>	YN \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
d. Are containers holding hazardous waste opened, handled or stor in such a manner as to cause the container to rupture or leak? (265.1)	red 173) YN
If yes, explain using narrative.	
e. Are each of the containers inspected at least weekly (265.174)?	YN
If no, explain using narrative concerning the frequency of inspection.	
f. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176)	st YN
If yes, explain using narrative.	
g. Are incompatible wastes stored in the same containers?	YN
If yes, explain using narrative.	
h. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?	al YN

6. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of

If no, explain using narrative.

5.

Date: _	February 18, 2000
40 CFR 265.111, 265.112(c), 265.114, 265.115? (62-730.171(2)(b))	
Has the facility supplied DEP with a copy of the plan?	YN
7. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (62-730.171(2)(d))	YN
8. Is a written log maintained for all waste entering or leaving the transfe facility? (62-730.171(2)(e))	er YN
Does the log contain:	
Generators' names? Manifest numbers? Dates when waste enters and leaves facility?	YN YN
9. Has the facility notified the Department on DEP Form 62-730.900(6) (Transfer Facility Notification Form)? (62-730.171(3))	Y
10. Does the transfer facility have an EPA/DEP identification number?	YN
Unregulated Wastes (Household/Conditionally Exempt/Small Quantity NA	/ Generator Wastes)
Does the transporter have documentation that this waste was generated by an unregulated source?	YN
2. If no, is the transporter assuming responsibility as the generator of this waste?	YN
<ul> <li>a. If yes, complete the applicable Generator or Small Quantity Generator checklist.</li> </ul>	
b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspecte to ensure that the applicable requirements are being satisfied. A foll inspection should be scheduled as follows:	ed ow-up
(1) 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg.	
(2) 180 days after initial inspection if the quantity of "unregulated wastes on site are less than 1000 kg.	<b>"</b>
3. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?	YN

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If yes, complete the Generator checklist.

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Date:	February 18, 2000	

### Land Disposal Restrictions

1.	Does the transporter manage restricted (land ban) wastes?	YN
	If yes, check appropriate boxx(es).	
	"California List" F List Solvents First Third Second Third Third	
	Soil and Debris	

## **USED OIL TRANSPORTER CHECKLIST**

Fa	cility Name: Freehold Cartage, Inc.	Date: Febru	uary 18, 20	000	
Fa	cility Representative: Mike Pasquerella, Barry Olson	Facility ID #	‡ <u>FLD 984</u>	<u>187 831</u>	
SIC	C Codes: <u>4213, 4214</u>	_Inspector:	Gilber	t Dembed	ck
		·t Ct - m	alauala		
	40 CFR 279 Subpart E Trans	porter Stan	aaras		. /
1.	Is the facility exempt under any of the following? [279.40(a)]			Y	N/_
	On site transport?		•		
	Generator transporting < 55 g /time to a collection center?				
	Transporter of < 55 g /time from generator to aggregation po by same generator?	int owned			
2.	If the transporter also transports hazardous waste in the same are used to transport used oil, are the vehicles emptied per 2 HW shipments? (If not, the used oil must be managed as h	261.7 after		Y	N LA
3.	Does the transporter process used oil incidental to transport	? [279.41]		Y	N
	Are any residues managed as used oil, reclaimed, or used a asphalt manufacture feedstock?	s	N/A	Y	N
	If not, has the transporter conducted a hazardous waste determination? [279.10(e)]	-	N/A	Y	N
4.	Has the facility notified of used oil activities? Check EPA form 8700-12.			Y	N
5.	Does the transporter only deliver used oil to other transporte oil processors, off specification used oil burners with EPA ID Numbers, or to on-specification oil burners? [279.43(a)]	rs,		Y	N
6.	Does the transporter comply with DOT requirements? [279.4	13(b)]		Y	N
7.	If any oil is discharged during transport, does the transporter	r: [279.43(c)]			
	Notify National Response Center and State Warning Point a Guard per 33 CFR 153.203, as applicable?	nd Coast		Y	N
	Report to DOT in writing per 49 CFR 171.16?			Y	N
	Clean up any discharges until the discharge poses no threat	1?		Y	N
8.	Does the facility also transport used oil filters?			Y	N
	If so, are the filters stored in above ground containers which	are: [62-710	.850(6)]	/	
	In good condition?			Y	N
	Closed or otherwise protected from weather?			Y	N
	Labeled "Used Oil Filters"?			Y	N
	Stored on an oil impervious surface?			Y	N

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		. ຸ, 2000		

### Transporter Recordkeeping -- 279.46

1.	Do used oil acceptance records include: [279.46(a)]		<del></del>
	Name & Address of facility providing the oil for transport?	Y	N
	EPA ID # of oil provider (if applicable)?	Y	N
	Quantity of oil accepted?	Y	N
	Date of shipment?	Y	N
	Signature of oil provider, dated upon receipt?	Y	N
2.	Do used oil delivery records include: [279.46(b)]	. ,	
	Name & Address of receiving facility or transporter?	Y	N
	EPA ID # of receiving facility or transporter?	Y	N
	Quantity of oil delivered?	Y	N
	Date of delivery?	Y	N
	Signature of oil receiver, dated upon receipt?	Y	N
3.	Do the above records also include state required information on the type of oil and destination or end use? [62-710.510(1)(c & e)]	Y	N
4.	Does the facility keep records on DEP Form 62-701.900(13) or equivalent? [62-710.510(1)]	Y	N
5.	Does the facility submit an annual report on DEP Form 62-701.900(14) by March 1 summarizing the on site records for the previous calendar year? [62-710.510(5)]	Y	N
	If not, is the facility a generator who transport only their own used oil generated at		
	their own non-contiguous operations to their own central collection facility for storage prior to having their used oil picked up by a certified used oil transporter.?	ge	
	[62-710.510(3)]	Y	N
7.	Does the transporter keep copies of the record and reports for three years at the street address of the facility? [62-710.510(4)]	Y	N
8.	Does the transporter sell to burners or claim that any oil meets the specification? If so, complete the USED OIL MARKETER checklist.	Y	N
	Transporter Certification 62-710 F.A.C.		
1.	Is the transporter certified? (local governments, and < 55g/time transporters are exempt) [62-710.600]	Y	N
2.	Does the facility maintain training records? [62-710.600(2)(c)]	Y	N
3.	Does the facility maintain insurance or financial assurance of \$100,000 combined single limit? [62-710.600(2)(d)]	Y	N
4.	Is the facility registration form and ID number displayed? [62-710.500(4)]	Y	N

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Date: _	February	, 2000 د	·	

## Transfer Facility Standards -- 279.45

•	Does the transporter store used oil at any transportation related facility (including parking lots) for more than 24 hours and not longer than 35 days during the normal course of transport? Transfer facilities storing used oil more than 35 days must comply with 279 Subpart F	<b>\/A</b>	Y	N	
	Is the transfer facility registered per 62-710.500(1)(a) F. A. C.?		Y	N	
2.	Does the transporter determine whether used oil stored at a transfer facility has a total halogen content above or below 1,000 ppm?		Y	N	,
	Is this done by testing?		Y	N	
	Is this done by process knowledge? Describe basis in narrative.		Y	N	
	Are test records or copies of records providing basis for determination kept for 3 years? [279.44(d)]		Y	N	<i>.</i> *
3.	Have any analyses showed exceedances of the 1,000 ppm level?		Y	N	MA
	If so, was the oil managed as hazardous waste?		Y	N	
	If not, was the oil exempt? Describe in narrative.	N/A	Y	N	$\Delta$
<b>4.</b>	Is used oil stored only in tanks or containers? (Circle applicable units)		Y	N	
5.	If the facility has tanks, do they comply with 62-761 F. A. C. rules? (Describe in narrative, including number and size of tanks, noting registration numbers if applicable, and compliance status.)		<b>Y</b>	N	NIT
	Is secondary containment provided and adequate?		Y	N	V
6.	Are containers, and tank trailers in good condition and not leaking?		Y	N	
7.	Are containers provided with secondary containment consisting of walls and floor at a minimum?		Y	N	MA
	Is the containment system impervious to oil so as to prevent migration?		Y	N	1
8.	Are ASTs, UST tank fill lines and containers labeled "used oil?		Y	N	V
9.	Are used oil filters stored more than 10 days?				
	If so, is the facility a registered used oil filter transfer facility? [62-710.850]	N/A	Y/	N	_
10	Does the facility stop operations and clean up releases of used oil, repairing or replacing any leaking units as applicable?	ng	Y/	N	,

NON-HAZARDOUS  1. Generator's US E	PA ID No.  Manifest Document No.	2. Page 1	1		· Philipp
WASTE MANIFEST F 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1. 1. 9. 7. 3. 5. 543949	1-1-			
DOVATRON 1771 Hercules Ave. Clearwater, FL 34625 Generator's Phone ( 813 ) 447-2511	•	•			
Generator's Phone (813) 447-2511  Transporter 1 Company Name  6.	US EPA ID Number	A. Transporter's	Phone		
·	N J D O 5. 4. 1. 2. 6. 1. 6. 4			941) 533-45	99
7. Transporter 2 Company Name 8.	US EPA ID Number	B. Transporter's F	hone		٠.
9. Designated Facility Name and Site Address 10	). US EPÄ ID Number	C. Facility's Phon	e		
Jamson Environmental, Inc. 11817 Elesa Road Thonotos sa, FL 33592	S 0 2 9 2 4 9 7 1 2	ass	(81	3) 891-044(	)
11. Waste Shipping Name and Description		12. Con	tainers Type	13. Total Quantity	14. Unit Wt/Vo
• Non Regulated Waste (Oil)				: .	
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b				<u> </u>	730
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<b>d.</b> [ ]					1.5
	, e				
D. Additional Descriptions for Materials Listed Above	and hole	E. Handling Coo	les for W	astes Listed Above	100
11a. Waste Oil from Compressors # O()	2771002			٠	
		•	÷	· ·	:
15. Special Handling Instructions and Additional Information (813) 891–0440 Will Horn		<u> </u>			
WO#992355					;
WO#992335		<b>j</b> . 4			٠.
*	*	v.		A SU	
16. GENERATOR'S CERTIFICATION: I certify the materials described abo	ove on this manifest are not subject to federal i	egulations for reportin	g proper o	disposal of Hazardos	n Waste.
Printed/Typed Name					
Trinian Typau Truma	Signature			Month Day	
Ken A Holgos I.	Signature Signature			Month Day	
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed Typed Name (1)	Signature Signature	J 1-	CAF	Month Day  Month Day  Month Day	919.9
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed Typed Name (1)	495	f As	AF	10.412.	919.5
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Types Name	495	A As	AF	10.412.	9 9°9
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Type Name	Signature Signature	A As	AF EC	10.4 2. Month Do	9 9°9  9 9°9
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name  19. Discrepancy indication Space	Signature Signature	P. As.	AF	10.4 2. Month Do	9 9°9
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name  19. Discrepancy Indication Space	Signature Signature	:	AF	10.4 2. Month Do	9199 9199
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name  19. Discrepancy Indication Space  20. Facility Owner or Operator: Certification of receipt of waste materials	Signature Signature  prials covered by this manifest except as no	:	AF	10.4 2. Month Do	919.9
17. Transporter 1 Acknowledgement of Receipt of Materials  Printed/Typed Name  18. Transporter 2 Acknowledgement of Receipt of Materials  Printed/Typed Name  19. Discrepancy Indication Space	Signature Signature	:	AF	10.4 2. Month Do	919.9 919.9

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Windshift Co.

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C. C.	NON-HAZARDOUS WASTE MANIFEST	CONS. EX	emot.		2. Page of	9 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1	-		
4	Generator's Name and Mailing Address  KAKN Baydstei  Generator's Phone (741) 87-441)	Things Mi 1600 LI	ALLIAND.	<i>f</i> 33802	7	nsporter's F	lhoma.		
7	Transporter 2 Company Name  Transporter 2 Company Name	Twe M	7054 US EPÁ ID	176164 Number	B. Trai		53	3-459 <u>9</u>	7
	Designated Facility Name and Site Address  I HINK ED ITTOMPOON TO TAKE  PANEL FAMOUS THE	IOLUMA 10.	US EPA ID	Number.		OHI		s-488	/
						12 Con	tainers 3	Total Quantity 42	1143
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R									
	Dir Fickes - 4694-1 Liquid 4694-203	002 11,A.			*	dling Code	s for Wa	stes Listed Above	
	Confinct! Steen Closed Applies Env. 5 (127) 862-78	· ·	**.		· ·		-		
	<u> </u>					· ·		·	
	16. GENERATOR'S CERTIFICATION: I certify the reprinted Typed Name  17. Transporter 1 Acknowledgement of Receipt of Name	dston	this manifest are not	subject to federal regularity	Bo	reporting pro	toper dispo	Month Da	
RANSP	Printed Fred Name Sescriff / R.	wick	Signature	Mh	lean	t L	/	Month Da	29
RTER	18. Transporter 2 Acknowledgement of Receipt of Northern Printed/Typed Name	watenais	Signature		>			Month Da	y Ye
FAC	19. Discrepancy Indication Space	The state of the s					· ·		
LITV	20. Facility Owner or Operator: Certification of rece	pipt of waste materials cover	ered by this manifes	t except as noted in	Item 19	7			1
	Printed/Typed Name		Signature		//			Month D	7 (°

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1-800-235-500 6				:
	2. Page 1 of <b>/</b>	to have the state of		
3. Generator's Name and Mailing Address BAYFRONT MEDICAL CENTER				
701 GTH STREET SOUTH			*	
		4:		
	A. Transport	er's Phone		
FREEHOLD CARTAGE, INC. N.J.D. 054126164		533-45	99	
	B. Transport		A	
			*	
5. Designated Facility Name and One Name	C. Facility's I	Phone	***	
WASTE RESEARCH AND RECOVERY, INC.				
100 WASTE RESCHACH DRIVE	(770)	825-	0400	÷ (*)
MACON, GA 4 84		Containers	13.	14.
11. Waste Shipping Name and Description		lo. Type	Total Quantity	Unit Wt/Vol
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b.				
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INDUSTRIAL WASTE, NON TEGGULATED MATERIAL	-  ^	<u> </u>	12 2 2 2	
INDUSTRIAL WASTE, NOW REGULATED MATERIAL	X	XIDP	X X X X	5 4
d				1
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D. Additional Secondaria is Materials Elected in the	E. Handling	٠	asies Lisieu Abov	
8.) LATEX PAINT (8533) C.) NON RE4-LP (8532) 6.) ZINC AIR BATTEMES (8078)  15. Special Handling Instructions and Additional Information		٠	astes Listeu Abov	6
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R.) LATEX PAINT (8533) C.) NON REG-LP (8532) 6.) ZINC AIR BATTENES (8078) 15. Special Handling Instructions and Additional Information CONTACT: APPLIED ENV. SOLUTIONS (727) 862-7867 STEVE KLOSZEWSKI  16. GENERATOR'S CERTIFICATION: I certify the materials described above on this manifest are not subject to federal regulated printed/Typed Name  Signature	SØI,	M141	osal of Hazardous	Waste.
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## FREEHOLD CARTAGE

PHONE 941-533-4599 FAX 941-533-1613

TO: G11.

FROM: MIKE PASQUERELLA

SUBJECT: MANGELS

PAGES: (INCLUDING THIS PAGE) 3

MESSAGE:

It I can Help Please eall

That How MM

# Tank Tek, Inc. ENVIRONMENTAL SERVICES

Fex- (813) 744-6125

To- 611 Demback

Flom Rober Ryan

RE: Munifest ReQuested For Sterling Cleuneus

Any More Questions Please Call

Thenks

Ruk

## TANKTEK, INC

ENVIRONMENTAL, INDUSTRIAL & CONSTRUCTION SERVICES Here's what I got out of my file.

I pulled the Duplicates.

Call with questions.

Jony

P.O. Box 37 LUTZ, FL 33548-0037

E-mail: Tanktak@Concentric.net

(813) 909-0040 FAX: (813) 909-0042

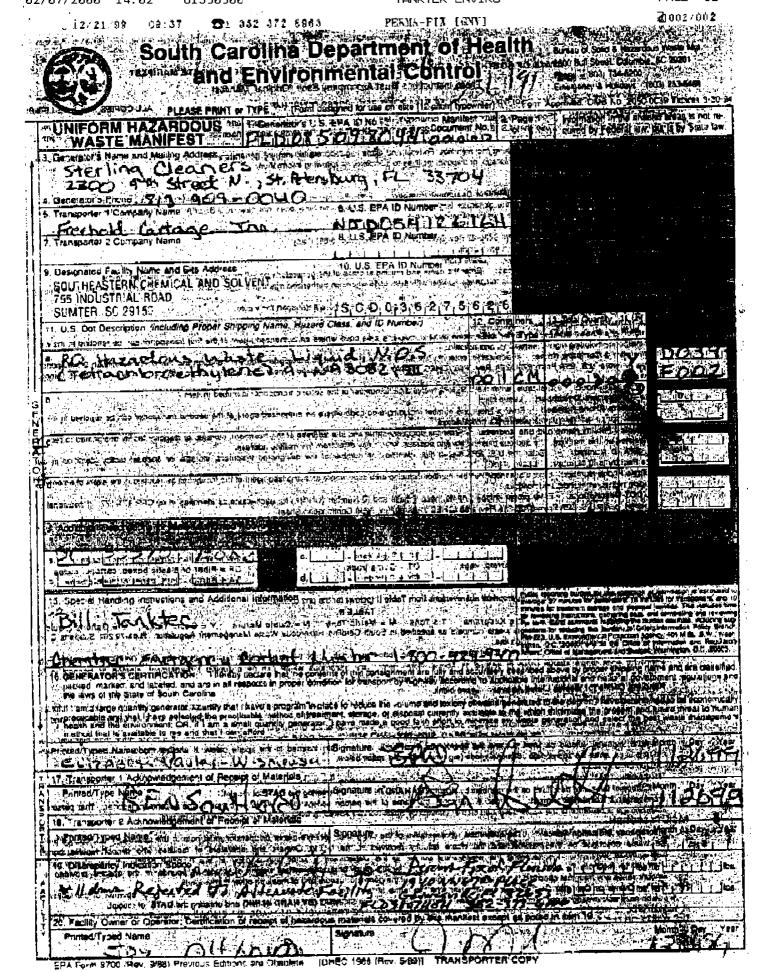
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	11. US DOT Description (Including Proper Shipping	g Name, Hazard Class, and	ID Number)		12. Conta	_	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
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	J. Additional Descriptions for Materials Listed Above	••				K. Her	ndling Codes for We	astes ∐s	red Above
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	Freq Content = 1-8	RB-433-459	Michael	I De	e) ( et e k	م او	300 Copy	火るかん	1125 No.24 Fla. 33704
	16. GENERATOR'S CERTIFICATION: ( hereby dec packed, marked, and labeled, and are in all respec	clare that the contents of this	nooriaameer em	fully and so	curately descaped interpolation	ribed al	cove by proper ship at and national gover	ping nam	e and are classified regulations.
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	19. Discrepancy Indication Space								
FACI	·								
L	20. Facility Owner or Operator: Certification of re-	celpt of hazardous materials	covered by this	manifest ex	cept as note	d in Iter	n 19.		
I Y	Printed/Typed Name		Signature	01		21			Month Day Yes
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TANKTEK ENVIRO

PAGE 02

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# South Carolina Department of Health and Environmental Control

Bureau of Solid & Hazardous Waste Mgt. 2600 Bull Street, Columbia, SC 29201 Phone: (803) 734-5200

Phone: (803) 734-5200
Emergency & Holidays: (803) 253-6488

LEASE PRINT or TYPE (Form designed for use on elite [12-pitch] typewriter) Form Approved. OMB No. 2050-0039 Expires 9

UNIFORM HAZARDOUS  1. Generator's U.S. EPA ID No.  WASTE MANIFEST  1. Generator's U.S. EPA ID No.  PL. D. O.8 5 0 9 8 0 9 4 4 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	
3. Generator's Name and Mailing Address Sterling Cleaners	A land Configuration of the Co
2300 9th Street N., St. Petersburg, FL 3370	94
5. Transporter 1 Company Name 6. U.S. EPA ID Number	C. Ship and the study
7. Transporter 2 Company Name 8. U.S. EPA ID Number	
9. Designated Facility Name and Site Address 10. U.S. EPA ID Number	
SOUTHEASTERN CHEMICAL AND SOLVENT 755 INDUSTRIAL ROAD SUMTER. SC 29150 . S. C. D. B. 3, 6, 2, 7, 5	1612.6 FEIG From 1993 (1993)
SUMTER: SC 29150  S <sub>1</sub> C <sub>1</sub> D <sub>1</sub> 0 <sub>1</sub> 3 <sub>1</sub> 6 <sub>1</sub> 2 <sub>1</sub> 7 <sub>1</sub> 5  11. U.S. Det Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers 13. Total Quantity 14. Unt 1997a de Curro de C
* RQ Hazardons Waste Liquid, N.O.S.	No. Type Wi Vo!
RQ Hazardons waste, Liquid, N.O.S. (Tetrachloroethylene) 9, NA3082, III	COILCHODODO & FOOZ
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J. Additional Descriptions for Materials Dated Above.	// 8 K Harding Codes to Waster Englishings
15. Special Handling Instructions and Additional Information	Public reporting burtlern for this collection of information is éssimated in
Bill: Tanktec	average: 37 minutes for generators. 15 minutes for transporters, and 16 minutes for treatment storage and disposal facilities. This includes time for reviewing instructions, gathering data, and completing and reviewing that form. Send commants regarding the burden asimists, including seg
A	gespons for reducing this burgen, in Chief. Information Policy Stanct PM-223, U.S. Environmental Protection Agency, 401 M St. S.W. Wash increa. D.C. 20460; and to the Office of Information and Regulator.
Chemittee Emergency Contact Use ber 1-800-42	ccurately described above by proper shipping name and are classified
packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to laws of the State of South Carolina.  If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of	of waste generated to the degree I have determined to be economically
practicable and that I have selected the practicable method of treatment, storage, or disposal currently av health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to method that is available to me and that I can affect.	ailable to me which minimizes the present and luture threat to humal inimize my waste generation and select the best waste managemen
Printed Typed Names Paula - Wisniews Signature & PM	Monte Day Year
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20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manile	st except as noted in item 19.
Printed/Typed Name Signature	Month Day Steal



## WASTE MANAGEM VISION MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

#### DO NOT WRITE IN THIS SPACE

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ATT. DIS. TI REJ. T PR. C.

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Э.	Generator's Name and Mailing Address	5 Teulins Clemens		A. State Manifest I	Document Number
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		ST- PRIE FL 3370	<del>1</del>	B. Stare Generator	's ID
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5.	Generator's Phone I 813 1 969 Transporter 1 Company Name	6. US EPA ID	Number	C. State Transporte	
	FreeHold Califore	125. NJ0054	126164	D. Transporter's Pl	1009 733 - 462-
7	Transporter 2 Company Name	8. US EPA ID	Number	E. State Transporte	er's ID
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ļ. 2	Po Facility Owner or Operator: Certification Item 19.	Or receipt of parallipps mare has prove	TOUR DEPTHENCE	ist except as timed it	. Lage



175 BARTOW MUN, AIRPORT BARTOW, FL 33830 PHONE:(941) 533-4599 FAX:(941) 533-1813

P.O. BOX 2010 \* PREEMOUN, DI) Up/MP3010 (732) 462-1001 - FAX (732) 308-1924

108 MONAHAN AVENUE DUNMORE, PA 18512 PHONE: (570) 342-7232 FAX: (570) 342-7867

350 PIGEON POINT ROAD NEW CASTLE, DV 19720 PHONE: (302) 858 2005 FAX: (302) 658-6229

156 DRIFTWOOD DRIVE EUTAWVILLE, SC 29048 PHONE/FAX: (803) 492-9595 MANIFEST FCI EPA ID NO .:

NJD054126164 J84102

			- /	1	17			7/			
GEN	ERATOR NAME/ADDRESS STERLING	Class	PHONE	BIB	-909	-004	40	SENERATOR EPA	21505	718/0K	14
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	1 man fed	0000				001	CM	20	X	_	
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SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (LE, IDENTIFICATION SHIPMENT OF A NON-HAZARDOUS NATURE WHICH DOES NOT HAVE TO BE MANIFESTED).											
The	GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation U.S. EPA and the State. The wastes described above were consigned to the Transported named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.										
Payr	nent to the contractor for waste remove a contractor,	al does not constitu	te payment to the	carrier and if the c	onirector does	not pay the	e carrier,	the generator is ob	ligated to pay th	a agreed rate	offered
	ASE PRINT NAME/TITLE	CT	DOZ GEN	IERATOR'S SIGN	NATURE	~~~		***	DATELOAD	ED	4
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White - FCI Original Yellow - FCI Billing

Blue - FCI Office/Customer Green - Retained by TSDF Gold - Retained by Generator

J84102

NY JA-113



175 BARYOW MUN. AIRPORT BARTOW, FL 33630 PHONE:(941) 533-4589 FAX: (941) 533-1613

(732) 462-1001 • FAX (732) 808-0924

108 MONAHAN AVENUE DUNMORE, PA 18512 PHONE:(570) 342-7232 FAX:(570) 342-7367 350 PIGEON POINT ROAD NEW CASTLE, DE 19720 PHONE:(302) 538-2005 FAX:(302) 658-6229

156 DRIFTWOOD DRIVE EUTAWVILLE, SC 29048 PHONE/FAX:(803) 492-9595

MANIFEST FCI EPA ID NO .: NJD054126164 J84101

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IL SWH-1540

MN 61572

J84101

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175 BARTOW MUN. AIRPORT BARTOW, FL 33830 PHONE: (941) 523-4599 FAX:(941) 533-1613

## (732) 462-1001 - FAX (732) 308-0924 IONAHAN AVENUE 350 PIGEON FOUNT ROAD

108 MONAHAN AVENUE DUNMORE, PA 18512 PHONE: (570) 342-7232 FAX: (670) 342-7967 NEW CASTLE, DE 19720 PHONE:(302) 658-2005 FAX:(392) 658-6229

156 DRIFTWOOD DRIVE EUTAWVILLE, SC 29048 PHONE/FAX:(803) 492-9595 ......

NJD054126164 J79415

GENERATOR NAME ADDRESS NO CAN	LI FOR	THE THE	132-1	607	1	FZ DOS	90.	1Khik	14
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GENERATOR'S CERTIFICATION: This is to certify that	the above named m	aterials are prope	rly classified, o	lescribed,	package	d, marked and labeled	and are in	proper condi	tion for
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IL SWH-1540 MN 61572	NY JA-113		A FATALT-WAY	or .					

White - FCI Original Yellow - FCI Billing Blue - FCI Office/Customer

Green - Retained by TSDF Gold - Retained by Generator J79415

CONTACT Robert KI CAT (813) 240-1579 Information in the shaded areas is not required by Federal law. Manifest 2. Page 1 1. Generator's US EPA ID No. UNIFORM HAZARDOUS al I FLD 085 0980440000 WASTE MANIFEST A Stote Manifest Document Number Cleaners And the second section of the second 3. Generator's Name and Malling Address STEVILUS 3300 9Th STLEOT NOUTH 8. State Generator's ID AND RESIDENT TO THE PROPERTY OF 57. Petersburg, FL 33704 ATT: MIKE GLUBBS 4. Generator's Phone (737) 833-1607 C., State Transporter's ID US FOA ID Number 5. Transporter 1 Company Name D., Transporter's Phone (941) 533-4571 WJ.D 0.5.4.1.2.6.1.6. EVERHOLD CONTERSE E. State Transporter's ID US EPA ID Number 7. Transporter 2 Company Name F. Transporter's Phone G. State Facility's ID TO THE US EPA ID Number 9. Designated Facility Name and Site Address Perma-Fix of Florida H. Facility's Phone 373-6066 de distribute Gainsville, Florida 32653 FLD980711071 TOTAL LOT BY 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 12. Containers Total Waste No No. · W1/Yal Type Quantity Dool RQ, waste Flammable Liovids, N.O.S. FOO 3, ( Perchilogethriens, petholeum Hydrocubons) 08.6.00 HOLD UN 1993, P.G. II Flammable Liavid, N.O.S. RQ, WESTE 3, ( ParchiotoeThylene, Perholeum Hydheus. 003 DF UN 1993, P.C. I Flanmable Liquid, 20051 waste RO. 3, ( Petchlolo ETLylene, Petholeum Hodbou 00.9.40 UN 1993, P. 6.Z Dod & waste Flammable Liand, wiois. RQ, 3, ( perchlorouthylene , persolam Hydrout Hedge Control of Material Lines Asset 17 (August 1997) Dec Berg man Codes for Wastes Listed Above LENLTEL, The state of the state of most/most avsency Response 15. Special Handling Instructions and Additional Informatio IIId - MATCHAI STEEL 30 GLIION OPEN TOP DINAS and Remod Poly OPEN TOP 30 Gallen Drum lirb. Dhun 4-55 6-113 STEEL DOWN + 1- 30 GUILL STEEL LL. C. 16. GENERATOR'S CERTIFICATION; I hereby declare that the contents of this consignment are fully and accurately described above by proer shipping no marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and touldty of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, grange, or disposal currently available to me which minimizes the present and future threat to human health and the environment of the practicable method of treatment, grange, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OE, it cam a small quantity generator, I have made a good faith effort to minimize my wastygeneration and select the best waste management method that it available to me and that I can offord. 17. Transporter I Acknowledgement of Receipt of Materials Signature Printed/Typed Name 18. Transporter 2 Acknowledgement of Receipt of Materials Day Year Month Signature Printed/Typed Name

19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hexardous materials covered by this manifest except as noted in Item 19. d/Typed Nome Signature

> RETURN TO GENERATOR ORIGINAL-



175 BARTOW MUN. AIRPORT BARTOW, FL 33630 PHONE: (941) 533-4599 FAX:(941) 533-1613

#### (732) 462-1001 • FAX (732) 308-0984

108 MONAHAN AVENUE OUNMORE, PA 18512 PHONE: (576) 342-7232 ~ FAX: (570)(342-7387

NEW CASTLE, DE 19720 PHONE: (302) 658-2005 FAX: (302) 658-6229

350 PIGEON POINT ROAD 156 DRIFTWOOD DRIVE EUTAWAILLE, SC 29048 PHONE/FAX: (803) 492-9585

### **MANIFEST**

FCI EPA ID NO .: NJD054126164 J79043

GENERATOR NAME/ADDRESS	al IP	HOME	022-	1607	GENERATOR EPA ID N	10.	هما ما
GENERATOR NAME/ADDRESS STEPLE 146	CICAMERS	OSA CADE	Or hard	1001	11/4/01/01/81	SOFK	51414
		RACTOR	TRAILER	100	APPOINTMENT DIME		
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GENERATOR'S CERTIFICATION: This is transportation according to the applicable re. The Treatment, Storage or Disposal Facility	to certify that the above name egulations of the Department of can and will accept the ships	ned materials are propo of Transportation, U.S. F ment of hazardous wast	erty classified, d PA and the States, and has a val-	lescribeld, packa el The westes de id permit to do so	ged marketi and labeled seribed above were conside to certify that the foregoing	and are in proper of medito the Transports is true and correct!	condition for ned named. to the best of
my knowledge.					0.		
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IL SWH-1540 MN 6157	NY JA			151			

White - FCI Original Yellow - FCI Billing Blue - FCI Office/Customer Green - Resained by TSDF Gold - Retained by Generator

J79043

Form Appraved. OMB No. 2050-0039. Expires 9-30-9

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<u> 4. (</u>	Generators Phone	<u>( (さ)さ) (と</u>	20-5995		- 1				
<b>  3.  </b> 	Transporter 1 Com モクトム		EAL THE JAB	US EPA ID Numbe	1.64	and he was a second	integorier	:10) D 7(16)-7/	₹77; <del>₹</del>
7. <u>T</u>	Iransporter 2 Com	pany Name	8.	US EPA ID Numbe	er,				
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16.	GENERATOR'S CER	TIFICATION: I hereby de	eclars that the contents of this co	onsingment are fully and acc	araiely describ	ed shove by		now of sec	
1 3	proper shipping name	and are classified, pack	ed, marked, and labeled, and an nal government regulations.	e in all respects in proper co	ndition for tran	sport by high	way		
	If I am a large quan	nity generator, I certify t	that I have a program in place elected the practicable method	to reduce the volume and	toxicity of wa	isle general Mv svallahk	ed to the deg	ree I have deter	mined to
3.4	intrie turest to liftill	an health and the enviro	onment; OR, If I am a small q vailable to me and that I can allo	uantity generator. I have m	ade a good to	aith effort to	minimize my	waste peneration	n and Be
	Printed/Typed Na	me 🗡		Signature	2 7 (	\ <u></u>		Month	Day
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N S P 18	Transporter 2 Ack	me in service of the	eceipt of Materials					Month	Day
N S P 18	Transporter 2 Ack Printed/Typed Na	me in service of the	eceipt of Materials		/WS			Month	Day
AAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA	Transporter 2 Ack Printed/Typed Na Discrepancy India	me pation Space		Signature	st except as	noted in	Item 19	Month	Day
18. 19.	Transporter 2 Ack Printed/Typed Na Discrepancy India	eation Space Operator: Certification	on of hazardous materials	Signature	st except as	noted in	item 19.	Month	Pay

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						Form Approved.	OMB No. 2050-0	0038. Empires 9-30-
	UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA FL DOBSO	- N-	nifest cument No.		ls not	required by	shaded areas Federal law.
	3. Generator's Name and Mailing Address	NEDC	-		A Sta	e Manifest Do	cument Nun	nber
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$ \cdot $	5. Transporter 1 Company Name	TUC. DUT SE	US EPA ID Nun	nder 		e e cereprober		
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	16. GENERATOR'S CERTIFICATION: I hereby declar	re that the contents of this cor	nsignment are fully and	accurately descr	vode bedin	ө бу		
	proper shipping name and are classified, packed,	marked, and labeled, and are	In all respects in proper	condition for th	влероп бу	highway		
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$\mathbb{H}$	sconomically practicable and that I have select	ed the practicable method of	of treatment, storage, d	or diapossi cum	ently avai	lable to me which	ch minimizes (	he present and
11	future threat to human health and the environm the best waste management method that is availa			i matas a dono	iento enci	TE MINIMIZE IN	/ waste genen	91100 Bmd \$619CT
	Printed/Typed Name		Signature	$\overline{}$	7		Mor	in Day Yes
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Ť	17. Transporter 1 Acknowledgement of Rece			10	1	- 11		
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10	18. Transporter 2 Acknowledgement of Rece	lpt of Materials			- 25			
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	19. Discrepancy Indication Space							
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Ţ	20. Facility Owner or Operator: Certification of Printed/Typed Name	JI HAZBIUOUS MATERIAIS C	Signature	nesi except a	13 110(80	ni nem 19.	Mar	nth Day Yea
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175 BARTOW MUN. AIRPORT BARTOW, FL 33830 PHONE (841) 533-4599

P.O. BOX 3010 \* PERRIOLD, NJ 0//46-3010 (732) 462-1001 - FAX (732) 308-0924 108 MONAHAN AVENUE

THE STO PIGEON POINT ROAD NEW CASTLE, DE 19720 PHONE (302) 658-2005

156 DRIFTWOOD DRIVE PHONE/FAX: (803) 492-0593

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MANIFEST

FCI EPA ID NO .: NJD054126164

PHONE: (841) 533-4599 PHONE: (	NEW CASTLE, DE 19720 570) 342-7292 PHONE: (302) 658-2005 FAX: (302) 658-6229	PHONE/FAX: (803) 492 9593	J78918
STERLING CLEANING	AREA CODE) TRACTOR / TRAILER	995 GENERATOR EPA	8 90 9 8 0 9 9
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SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXIBE MANIFESTED).	EMPERON (I.E., IDENTIFICATION SHIPMEI	NT OF A NON-HAZARDOUS NAT	TURE WHICH DOES NOT HAVE TO
GENERATOR'S CERTIFICATION: This is to certify that the above nat transportation according to the applicable regulations of the Department The Treatment, Storage or Disposal Facility can and will accept the ship my knowledge.	of Transportation, U.S. EPA and the State, T	The wastes described above were o	consigned to the Transported named.
Payment to the contractor for waste removal does not constitute payment to the contractor.	F It to the carrier and if the contractor does not	pay the sarrier, the generator a ob	ligated to pay the agreed rate offered
PLEASE PRINT NAME/TITLE	GENERATOR'S SIGNATURE	<del>/</del>	DATE LOAGED
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White - FCI Original Yellow - FCI Billing

SWH-1540

AP H-0257 PC 944

CT CT-HW-307

DE-SW-203

Blue - FCI Office/Customer Green - Retained by TSDF Gold - Retained by Generator ME ME-HWT-47 ME-WOT-47

MD HWH-187 98-OP-1765

MA MA-294

MN 61572

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QUEBEC, CANADA QC-6ML-047

RI-535

TX 40705

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MO H-1490

ND WH-429

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