



June 14, 2022

Via E-mail

Ms. Monica Hardin
Florida Department of Environmental Protection
Northwest District
160 W. Government St., Suite 308
Pensacola, FL 32502

Re: Compliance Assistance Offer
Safety-Kleen Systems, Inc. – Tallahassee & Denton
EPA ID: FLD982133159 & TXR000081205
Tallahassee Facility Customer Generator Status Audit

Dear Ms. Hardin:

The purpose of this letter is to provide the Department with Safety-Kleen Systems, Inc.'s ("Safety-Kleen") follow up response to the above-referenced Compliance Assistance Offer (CAO) letter, dated April 4, 2022. The CAO alleged potential non-compliance with the requirements of Chapter 403, Florida Statutes, Chapter 62-730, F.A.C. and Title 40 CFR Part 263 as part of a file review conducted by the Department on March 24, 2022. During a Microsoft Teams Meeting on 3/28/22, Safety-Kleen agreed to perform an internal audit of the Tallahassee facility customer database to ensure the correct generator status is identified in our account management system. The results of that internal audit are outlined below. It is our intention and expectation that nothing in this letter shall be construed as an admission or used against the Company in any administrative or judicial proceeding. The Company expressly reserves any and all defenses it might have to the matters set forth in this letter and does not intend to waive any of those defenses by making this submission.

The following generators shipped unmanifested hazardous waste that was transported by Safety-Kleen Systems, Inc. (TXR000081205) and received by Safety-Kleen Systems, Inc., 4426 Entrepot Blvd., Tallahassee, FL 32310 (FLD982133159).

- Tallahassee Community College FLD984187062 – Between 5/2/18 and 4/27/22 Safety-Kleen collected spent hazardous waste parts washer solvent (D039) on twenty (20) separate occasions without a uniform hazardous waste manifest. Seven (7) gallons (46.9 lbs.) were collected at each service. The FDEP handler database indicates this generator last notified as a SQG on 7/19/11.
- Skinner's Paint & Body Shop FLD984168260 – Between 5/6/20 and 2/15/21 Safety-Kleen collected UN1263 Waste Paint Related Material (D001, D018, D035, D039, D040, F003, F005) on four (4) occasions with a uniform hazardous waste manifest. Five (5) gallons (~36 lbs.) were

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collected at each service. The FDEP handler database indicates this generator last notified as a SQG on 8/26/10.

- Ring Power Corp. FLR000136598 – On 12/31/19 Safety-Kleen collected fourteen (14) gallons (93.8 lbs.) of spent hazardous waste parts washer solvent (D039) without a uniform hazardous waste manifest. The FDEP handler database indicates this generator last notified as a SQG on 8/19/20.
- Super Value (United Natural Foods Inc.) FLD984178962 – Between 11/1/17 and 2/25/22 Safety-Kleen collected twenty-eight (28) gallons (187.6 lbs.) of spent hazardous waste parts washer solvent (D039) on twenty (20) occasions without a uniform hazardous waste manifest. The FDEP handler database indicates this generator last notified as a SQG on 8/11/20.
- Utility Trailers ALD077911915 – Between 8/9/17 and 5/2/22 Safety-Kleen collected fourteen (14) gallons (93.8 lbs.) of spent hazardous waste parts washer solvent (D039) without a uniform hazardous waste manifest. The federal database (RCRA Info Search) indicates this generator is notified as a LQG.
- Farley Nuclear Plant ALD000615583 – Between 11/27/18 and 3/17/22 Safety-Kleen collected fourteen (14) gallons (93.8 lbs.) of spent hazardous waste parts washer solvent (D039) on six (6) occasions without a uniform hazardous waste manifest. The federal database indicates this generator is notified as a SQG.
- Southwire Co. GAR000004408 – Safety-Kleen collected spent hazardous waste parts washer solvent (D039) on four (4) occasions without a uniform hazardous waste manifest:
6/22/17 – twenty-four (24) gallons (160.8 lbs.); 8/16/17 – fifteen (15) gallons (100.5 lbs.);
10/11/17 – twenty-four (24) gallons (160.8 lbs.); 12/7/17 – twenty-seven (27) gallons (180.9 lbs.)
The federal database indicates this generator is notified as a SQG.
- Valdosta State University Printing GAD000610121 – Safety-Kleen collected spent hazardous waste parts washer solvent (D039) on five (5) occasions without a uniform hazardous waste manifest:
2/19/21 – eighteen (18) gallons (120.6 lbs.); 5/6/21 – six (6) gallons (40.2 lbs.); 9/2/21 – six (6) gallons (40.2 lbs.); 2/15/22 – twelve (12) gallons (80.4 lbs.); 6/6/22 – six (6) gallons (40.2 lbs.)
The federal database indicates this generator is notified as a SQG.

The above customer generator statuses were changed in our system to reflect their most recent regulatory notifications, so going forward any hazardous waste collected from these sites by Safety-Kleen will be done on a hazardous waste manifest. It is possible some of the identified generators are actually Very Small Quantity Generators (VSQGs) based on their current waste generation volumes. We will contact the referenced customers to suggest they complete a current waste generation review by their personnel and inform Safety-Kleen and their respective regulatory agency of any changes necessary.

As stated in our previous letter, dated 4/15/22, Safety-Kleen does not and cannot know all waste generation activities nor changes to waste generation that take's place at generator's site. Therefore, we require our customers to confirm and certify their generator status at the time of each service. With respect to the above generators, their representatives certified their status as a VSQG on every occasion that the above-referenced hazardous wastes were collected. In addition, each hazardous waste collection performed by Safety-Kleen service representatives noted above and the original unmanifested

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waste report for Corteva Agriscience LLC were below 220 lbs. There was not any indication based on the service type, volume of waste removed, or communications with the generator that these customers were SQGs or LQGs. While performing this recent internal audit, Safety-Kleen did not identify any record of the customers noted in this correspondence notifying us that they were an SQG or LQG.

Safety-Kleen thanks the Department for its' time in this matter. If you have any questions or require additional information, please contact me at (561) 523-4719.

Sincerely,



Jeff Curtis

Sr. Environmental Compliance Manager

Safety-Kleen Systems, Inc.

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