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February 21, 1992

Sent Via Federal Express Mail
February 21, 1992
OR-JACKSONVILLE

Mr. Ashwin Patel
Hazardous Waste Section
Florida Department of Environmental
Regulation - Northeast District
7825 Baymeadows Way, Suite 200B
Jacksonville, FL 32256-7577

Subject: 15 Gal Soap Spill Last Feb 7, 1992
Safety-Kleen, Orange Park
FLD 980 847 214

Dear Mr. Patel:

The purpose of this letter is to submit an incident report pursuant to 40 CFR 264.56(j). This report pertains to a release of 15 gallons of a soap material at the above mentioned site.

INCIDENT REPORT

Facility Operator: Safety Kleen Corp.
777 Big Timber Road
Elgin, IL 60123

Facility Location: 161 Industrial Loop South
Orange Park, Clay County

EPA ID Number: FLD 980 847 214

1. Report Date: February 21, 1992
2. Person Making Report: Victor L. San Agustin
3. Date and Time of Incident: Feb. 7, 1992, 11:00 AM
4. Description of Incident:

Approximately 15 gallons of a virgin soap material spilled outside the containment wall of the tank farm. The soap spilled from a FLEET truck after it just delivered clean mineral spirits to our tank. One of the compartment's pumps and hoses in the truck tanker had some leftover soap from another delivery. The material spilled after the truck

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driver removed the cover to the pump. Some of the soap spilled on an unpaved area located outside the tank farm containment wall.

5. Extent of Personal Injuries: None

6. Extent of Property Damage:

Some soil contaminated with the soap had to be excavated and removed from the property.

7. Description and Estimated Quantity of Any Materials Released:

Approximately 15 gallons of a soap material spilled from a FLEET truck just outside the tank farm containment wall. Enclosed is a copy of a MSDS for the soap. The spill formed into a small puddle on the pavement next to the tank farm.

8. Human Health and Environmental Impact Assessment:

No human health impacted. Some soil located next to the tank farm containment wall was impacted.

9. Remedial Action Taken:

The incident was discovered approximately 3 hours after the FLEET tanker left the branch. Upon discovery, corn cob absorbent was used to absorb the soap spilled on the paved areas. Dirt was excavated until no evidence of the soap could be observed either visually or by smell. All clean-up material was placed in 16 gallon drums.

10. Estimated Quantity of Clean-Up Residue for Treatment and Disposal.

A total of 2 - 16 gallon drums was generated during the clean-up. One drum had contaminated dirt and absorbent. The other drum contained corn cob absorbent contaminated with the soap. Both drums were shipped to Safety-Kleen's Recycle Center in Lexington, South Carolina. The supplier of the material does not consider the soap as a hazardous waste if spilled. A review of the enclosed MSDS shows no constituents that would make the spilled material a listed waste and that no properties of the soap would make the material characteristically hazardous.

If you have any questions please call me.

Sincerely,

A handwritten signature in cursive script that reads "Victor L. San Agustin".

Victor L. San Agustin, P.E.
Regional Environmental Engineer
Tampa Region

cc: Satish Kastury, BWPR
James Kutzman, USEPA IV

bc: Catherine McCord, EHS/Eastern Division
Debbie Green, EHS/Remediation
Al Seyfer, RM
Russ Giambrone, BM