



SAFETY KLEEN CORPORATION
ENVIRONMENTAL HEALTH AND SAFETY DEPT.
Facsimile Transmittal

DATE: 6-8-94TIME: 1445NO. OF PAGES INCLUDING COVER: 3

FROM: William C. Crawford
Environmental Engineer
Florida

tel (813)621-3610 fax (813)626-7528

TO: Vickie Valade904-448-4366SUBJECT: Orange Park facilityWL 94- 0445HW10 NEDCOMMENTS: Vickie,

The attached letter is intended to address
all recommended corrective action items that
have not been previously addressed.

A hard copy will be mailed today.

Should you have any questions please call

ThanksBillDOCKET # 94-110

Va
PF
BBP
SCT
J
KC



June 8, 1994

Earnest E. Frey, P.E.
Director of District Management
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7577

Subject: Safety-Kleen Corp., Orange Park Facility
Warning Letter No. WL94-0445HW10NED
DER/EPA ID FLD 980 847 214

Dear Mr. Frey:

On May 10, 1994, representatives of Safety-Kleen (SK) met with your staff to discuss the subject letter. On May 23, 1994 SK submitted a letter in response to the subject letter. On June 2, 1994 a telephone conversation was held to review the position your staff has in regard to SK's response. This letter is a good faith effort to resolve the Department's concerns. It is our intention and expectation that nothing in this letter shall be construed as an admission or used against Safety-Kleen Corp. in any administrative or judicial proceeding. Safety-Kleen Corp. expressly reserves any and all defenses it might have to the matters set forth in the warning letter and does not waive any of those defenses by making this response.

The information submitted with this letter is to supplement information submitted with the SK letter dated May 23, 1994 and to address corrective actions required by the subject warning letter. The specific items addressed are: training of personnel in Safety-Kleen spill response procedures, the correct use of personal protective equipment, and proper container management procedures.

Safety-Kleen has established practices in response to spills/releases at the branch. The practice includes responding to the incident immediately upon discovery, and donning the appropriate protective equipment. Small spills are addressed by recovering the released material through the use of absorbent pads, and placed into a container marked with the waste codes for the material recovered. Should any material remain on the floor, a small amount of soap and water is used to complete the spill cleanup. This material is also placed in a container labeled with the waste codes for that material. The periodic cleaning of the warehouse floor (including the hazardous waste storage area) for house keeping purposes is accomplished only after any released material has been removed. These procedures will be reviewed with the warehousemen and sales representatives within the next 30 days, to ensure that they are understood by all concerned.

Earnest E. Frey, P.E.


June 8, 1994

Page 2

The management of containers at the branch is designed to minimize the potential of a failure through dropping or physical contact. The handling and movement of containers is minimized to reduce potential problems. The practices involve the use of hand dollies to move containers into the storage area and the use of pallets and fork lifts to move containers from the storage area to transport trucks. The handling and use of the containers at the customer location is addressed through customer education. The condition of the containers (shape and material on the outside of the container) must be inspected at the time of service. Containers must be closed and sealed, with no residue on the outside. Unacceptable practices by the customer must be identified and corrected by training. The warehousemen and sales representatives will be retrained on these requirements within 30 days.

Safety-Kleen's policy on the use of personal protective equipment is included in the introductory and annual training of all warehouse and sales personnel. These policies include the use of gloves, safety shoes, aprons and respirators at appropriate times. The level of protection is determined by the amount of potential exposure the individual might experience. The criteria for the use of personal protective equipment will be reviewed with the warehouse personnel and sales representatives for clarification within 30 days.

We believe these actions, in conjunction with corrective actions already accomplished, adequately address the issues raised during the January 1994 inspection. Should you have any questions or need additional information, please call me at 404-434-1572.


Della A. Ridley
Safety-Kleen
Regional Environmental Manager