

Jamie J. Spataro

Senior Counsel
Legal Department
(412) 747-8470
jamie.spataro@fedex.com



VIA E-MAIL AND OVERNIGHT DELIVERY

September 12, 2018

Mr. John White
Environmental Consultant
Florida Department of Environmental Protection
3319 Maguire Boulevard Suite 232
Orlando, Florida 32803
(470) 897-4305
John.White@dep.state.fl.us

RE: FedEx Ground Package System, Inc. (FedEx Ground) Response to Request for Information

Dear Mr. White:

Thank you for the opportunity to meet with you and other representatives of the Florida Department of Environmental Protection (FLDEP) on August 14, 2018 to discuss the Order to Comply with Request for Information (Order to Comply) dated June 11, 2018. We appreciated sitting down with you and we hope that you found our conversation to be helpful and productive.

Please accept this letter and the enclosed CD as FedEx Ground's response to the Order to Comply. Contained on the CD are the following documents:

1. Copies of Uniform Hazardous Waste Manifests generated at FedEx Ground's Orlando hub and Ocala hub for the last three years. (See attachments "ORLA (328) HW HazardousWasteManifests 10-15 through 7-18" and "FL DEP Manifests Veolia").
2. Copies of Uniform Hazardous Waste Manifests documenting the final destination facility for shipments of hazardous waste generated by FedEx Ground in the State of Florida for the last three years. (See attachments "ORLA (328) HW HazardousWasteManifests 10-15 through 7-18" and "FL DEP Manifests Veolia").
3. Procedures outlining FedEx Ground's emergency response protocols and damaged hazardous materials management protocols for FedEx Ground personnel who handle damaged hazardous materials packages. (See attachments "HAZ-006," "HAZ-017" and "OP-890").

4. Physical addresses for all FedEx Ground facilities where any hazardous waste was generated and/or stored in the State of Florida for greater than 24 hours for the last three years. As we mentioned during our August 14 meeting, our hubs in Ocala and Orlando are designated to receive for evaluation packages containing hazardous materials that were damaged in transportation. The other addresses listed are stations where some waste was generated in the last three years. (See attachment "FedEx Ground - Facility Addresses for HazWaste Disposal").
5. Copies of hazardous waste management training records for all FedEx Ground employees responsible for managing hazardous waste at FedEx Ground's Orlando hub and Ocala hub for the last three years. (See attachments "Hub Training Documentation All," "Hub Training ENV103 Only" and "Hub Training ENV104 Only").
6. A Memorandum of Understanding (MOU) entered into between the U.S. Pipeline and Hazardous Materials Safety Administration and the U.S. Environmental Protection Agency which discusses the regulatory overlap between the two agencies related to the transportation of hazardous waste. Please note that we were not able to locate the 2006 version of the MOU, but we have included the 1981 MOU on this topic for your reference. (See attachment "MOU DOT EPA").

The documents enclosed in response to Paragraphs 1 through 5 above are business confidential and exempt from public disclosure, and as such, we request that they not be distributed outside of FLDEP.

Please do not hesitate to reach out to me should you have any questions or require additional information. We look forward to continuing to work with you in this regard.

Sincerely,



Jamie J. Spataro
Senior Counsel
FedEx Ground Package System, Inc.