



March 2, 2020

Via E-Mail

Ms. Carrie L. Kruchell, P.G.
Professional Geologist II
Hazardous Waste Program & Permitting
Florida Department of Environmental Protection
2600 Blair Stone Road, M.S. 4560
Tallahassee, FL 32399

RE: Notification and Reporting Requirements of Permit No. 0077130-010-HO, Safety-Kleen Systems, Inc., 161 Industrial Loop South, Orange Park, FL 32073. FLD980847214.

Dear Ms. Kruchell,

Per the notification and reporting requirements in the above referenced permit, Part I General and Standard Conditions #12, Safety-Kleen is notifying the Department of a non-compliance event with Part II Subpart B.2 – Specific Operating Conditions for Container Storage Units #8.

Specifically, the Safety-Kleen Systems, Inc. Orange Park facility received three (3) containers of 10-day transfer hazardous waste from the Naval Air Station, Jacksonville (FL6170024412) on February 6, 2020. These hazardous waste containers were held at the facility for twenty-five (25) days. They were ultimately shipped out of the SK Orange Park facility on March 2, 2020.

The main causes of non-compliance were:

1. Due to specific profiling requirements this generator's waste did not automatically upload into Safety-Kleen's waste tracking system through the handheld device used by the sales and service representative completing the service. For reference, the normal procedure when Safety-Kleen accepts waste from a generator is that the waste is entered into the service representative's electronic hand-held device at the time of service. The waste is then automatically uploaded into our waste tracking system. Upon receipt of the waste at the branch, an administrator attempted to manually enter the waste into the tracking system and was unsuccessful. Because the waste was not entered into the electronic tracking system, the programmed tools to manage waste time on site could not be utilized. The administrator also failed to escalate the issue to the proper personnel for resolution.
2. The Lead Material Handler, who manages warehouse waste operations, failed to identify and document the 10-day time limit had approached and subsequently expired for these specific waste containers when he completed the facility transfer waste inspections.
3. Facility personnel tasked with managing waste manifests and managing/shipping waste off-site failed to communicate this issue to facility management or the environmental


compliance department.

The steps being taken to reduce, eliminate, and prevent recurrence of this non-compliance event are as follows:

1. On Friday, February 28, 2020 the administrative assistant received additional training on how to enter waste shipments into the waste tracking system manually. Training on entering waste shipments manually into the internal tracking system will be given to at least one other employee at the facility within the next two weeks. Written procedures will be kept on hand at the facility on how to manually enter waste into the system in the event that personnel leave the employment of Safety-Kleen. Going forward, facility personnel tasked with waste tracking will be required to notify the Safety-Kleen Environmental Compliance Department by phone, and e-mail, in the event of any waste shipment received at the branch that is not entered into the waste tracking system within 24 hours of receipt.
2. The facility Lead Material Handler will be re-trained on performing facility inspections. This training will be conducted, and documented, by myself on March 9/10 in person at the facility.
3. A management team investigation will be conducted with the key members at the facility involved in this event along with the environmental compliance department and district management. The goal of this investigation will be to document the event and immediate causes identified here, identify any hidden causes that may not have been noted, ensure that corrective actions are documented with a completion date, and management personnel are specified for the completion of each action item.

It is important to note these containers remained under the control of Safety-Kleen while at the Orange Park facility and were inspected daily and stored in a secured and contained area until they were shipped off-site. Safety-Kleen is committed to compliance with all applicable regulations and permit conditions and will take all necessary steps to prevent reoccurrence. 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.

cc: Cheryl Mitchell, FDEP Northeast District
Pamela Cosgrove, FDEP Northeast District