

Proffitt, Leah

From: Knauss, Beth
Sent: Thursday, April 24, 2003 8:04 AM
To: Proffitt, Leah
Subject: RE: Jan's Oil Service, Inc.

My point was that Atlantic does have a formal training program, which the driver took. He was very comfortable conducting the Dexil tests. However, his answers to my questions seemed to indicate that:

1. Atlantic did not provide the driver with calibration check samples or standards
2. Atlantic did not require the driver to determine that the meter was functioning correctly before use
3. Atlantic does not check the drivers' meters on any regular basis to confirm that they are operating correctly

I have never seen Atlantic's written analysis plan, so I don't know what the facility does to check incoming loads. It could be that the facility just does calibration checks if the facility's sniffer detects a problem with an incoming load that was not detected by the driver's sniffer. That might be OK provided that the facility's sniffer is being checked regularly, and the calibration checks are being recorded.

-----Original Message-----

From: Proffitt, Leah
Sent: Thursday, April 24, 2003 7:43 AM
To: Burson, Lu
Cc: White, John; Knauss, Beth
Subject: RE: Jan's Oil Service, Inc.

I already planned on calling Jack McCully today to talk about the artwork for the sticker they have agreed to print... I will ask him about the training status of the "new" employees they acquired when they purchased Jan's and Hobo's. As far as the development of a formal training program goes, it was not part of the "official" settlement, but I do know that AIS has been training their Lowell facility employees. Certainly the new management has tried to be diligent, with the exception of that one slip-up.

Anyway, I will ask Jack about a timeline for training the new employees, and perhaps an outline of what will be covered.

-----Original Message-----

From: Burson, Lu
Sent: Tuesday, April 22, 2003 8:48 AM
To: Proffitt, Leah
Cc: White, John; Knauss, Beth
Subject: FW: Jan's Oil Service, Inc.

FYI

Didn't Atlantic develop an SOP, calibration standards and the like after our first enforcement case? It seems our current case is mostly an act of not covering for the guy who was on vacation. Jan's (and Hobo's) drivers are "new" Atlantic employees. Any thoughts on how we want to include this issue in the current enforcement case or do we want SW to open a separate case with Atlantic over training issues? At the very least we need to ask Atlantic some questions about the training they have, or plan to have, for their new employees. Still doesn't answer the question of whether Jan's driver(s) have manifests that have the screening results pre-recorded on them.

-----Original Message-----

From: Knauss, Beth
Sent: Tuesday, April 22, 2003 8:21 AM
To: Proffitt, Leah; Dempsey, Angela; London, Lisa; Holmes, Georgiana; Pedigo, Leslie
Cc: Burson, Lu; White, John; Bradner, James
Subject: RE: Jan's Oil Service, Inc.

We visited the Jan's sites and her new office yesterday. The new office is being used as a dispatch center. She says she only dispatches one truck out of that location, and also dispatches the Hobo's trucks.

We got lucky, and her driver was there when we arrived. He had already picked up 2 loads. I had him show me his sniffer, and then had him sniff a 2000 ppm methylene chloride in virgin oil standard I had made up. His sniffer did not react, and he could not make it react. I sniffed his oil with our sniffer and got a hit, but it tested at 500 ppm when he did a Dexil test.

As the driver is an Atlantic employee, and the sniffer and training was provided by Atlantic, do you want to take the lead on this issue? Is your case with Atlantic is still open? The basic issue is that the driver did not have any check samples to confirm his sniffer was operating. He never did any calibration checks, and did not have any spare tips that I saw.

Atlantic needs to provide these, and write up an SOP for their drivers. They also need to keep a calibration log on the instruments. These are standard requirements under the QA rule, 62-160 FAC and the new SOPs.