



July 1, 2008

Certified Mail #70021000000493055178

Ms. Nicole McDonald
Florida Department of Environmental Protection
Northwest District
160 Governmental Center
Pensacola, FL 32502-5794

**RE: Safety-Kleen Tallahassee Branch, 4426 Entrepot Blvd., Tallahassee, FL 32310
Warning Letter, Dated May 14, 2008 and Associated Corrective Actions.**

Dear Ms. McDonald:

This letter is intended to address the corrective actions for the violations that resulted from the Department's inspection of the above referenced Safety-Kleen facility on 4/23/08. These violations were agreed upon at an enforcement meeting held between representatives of Safety-Kleen and the Florida Department of Environmental Protection Northwest District at the Departments office on June 12, 2008. The violations are listed in order below followed by Safety-Kleen's proposed corrective action for each.

- **40 CFR 171.2(e) & 263.20 Incorrect/Missing Shipping Papers.** SK shipped one 30 gallon drum of hazardous waste solvent without shipping papers on April 30, 2008.
Safety-Kleen Corrective Action. Safety-Kleen has in place a Daily Truck Inventory and Waste Reconciliation standard operating procedure (SOP) Task Number: 10-10-107-03. The Safety-Kleen Tallahassee branch management will ensure this SOP is complied with to avert future non-compliance. A copy of the SOP is enclosed for the Department.
- **40 CFR 263 Part B Incorrect information on Shipping Papers/containers.** SK shipped transported 1-16 gal and 2-30 gal drums of waste without the proper identification of waste and generator id on shipping papers and containers.
Safety-Kleen Corrective Action. The Safety-Kleen representative responsible for this violation has been retrained on proper procedures regarding the proper identification of waste and generator id on shipping papers and containers. The Safety-Kleen representative has also been informed that waste containers will not be transported without being properly identified on appropriate shipping papers and labeled with the proper identification and generator information.
- **40 CFR 264.14 & Permit Specific Condition 12 in Part 1 Signage.** Two signs were found on the ground and signage is not in accordance with the permit.

RECEIVED

JUL 14 2008

NORTHWEST FLORIDA
DEP

Safety-Kleen Systems, Inc.

5610 Alpha Drive

Boynton Beach, FL 33426

Phone 561.736.1339

Fax 561.731.1696



Safety-Kleen Corrective Action. Facility signage was previously placed on the fence with plastic zip ties. The new signage has been received and is in accordance with the permit. The new signs will be placed on the fence with metal ties to ensure they stay in place. Furthermore, management will conduct weekly visual checks of facility signs. A photo of the new facility signage with the emergency number is enclosed.

Thank you for the Departments time in this matter. If you should require more information or have any questions regarding this submittal please contact me at (561) 523-4719.

Best regards,

Jeff Curtis
EHS Manager
Safety-Kleen Systems, Inc.
5610 Alpha Drive
Boynton Beach, FL 33426

enc. Safety-Kleen Branch SOP Task Number: 10-10-107-03, Facility signage photograph.



Task Number: 10-10-107-03

Task Rev Date: 05-19-08

Service Management

Daily Reconciliation



ESSENTIAL

D. Daily Truck Inventory and Waste Reconciliation

Purpose: To ensure proper inventory controls and accurate daily inventory and waste records.

Responsibility:

- BGM
- SSR
- VSSR
- OSSR
- Material Handler or BGM Designee

When: Daily; in the morning prior to the truck leaving the branch and in the evening when the truck returns to the branch.

Required Actions:

Evening Before Next Service Day

1. A designated individual in the branch requests inventory needed on the truck for the next service day using the *SK Vehicle Inventory Reconciliation Form*. Items requested are added to the 'Loaded from Warehouse' column.
 - a. The *SK Vehicle Inventory Reconciliation Form* is on SKNet in excel form and can be modified to add or remove specific items.
- Note:** Add the standard branch truck inventory levels for the branch onto the form to tailor the form to the branch's needs.
2. This form is given to the Material Handler.
3. The Material Handler loads the inventory onto the truck.
4. The Material Handler counts all inventory on the truck, documents it in the 'Daily Beginning Inventory' section.
5. The Material Handler leaves the form on the truck.

Prior to the Start of Day

1. The Service Representative verifies that the requested inventory for the day has been loaded onto his truck by auditing the inventory on his truck with the *SK Vehicle Inventory Reconciliation Form* that the Material Handler completed the previous evening.
2. If all inventory items are not accounted for, the Service Representative resolves the discrepancies with the Material Handler or member of Branch Management.
3. Once all inventory counts have been verified and any discrepancies have been resolved, both the Service Representative and the BGM or designee sign and date the form in the 'Check-Out at Beginning of Day' section. The form is kept on the truck and is used during the day to document all inventory transfers.

During the Day

1. After each service stop, the Service Representative will document on the *SK Vehicle Inventory Reconciliation Form* the inventory item and quantity that was removed from the truck inventory and placed at the customer facility, or returned to the truck inventory. This can be tracked using hash marks with each new transaction on the form.
2. Equipment and product returns and pulls must be recorded on the form in the 'Daily Route Pulls/Returns' section.
3. Equipment and product sales and placements must be recorded on the form in the 'Daily Route Placements/Sales' section.

End of Service Day

1. Upon returning to the branch, the Service Representative must have his remaining truck inventory reconciled against his inventory usage and service documents.
2. The BGM or designee will use the *SK Vehicle Inventory Reconciliation Form* and verify the physical inventory remaining on the truck against the remaining inventory shown on the form.
3. The BGM or designee will then verify the amount of inventory shown used and returned on the *SK Vehicle Inventory Reconciliation Form* against the service documents.
4. Enter the total number of waste solvent drums on the truck.
5. Enter the total number of other waste drums on the truck.
6. Prior to the truck being offloaded, the BGM or designee must reconcile the solvent and waste by;
 - a. Verifying that the physical number of waste solvent, clean solvent and other waste drums on the truck match the number of drums recorded on the *SK Vehicle Inventory Reconciliation Form*.
 - b. Verifying that the number of waste solvent, clean solvent and other waste drums recorded on the *SK Vehicle Inventory Reconciliation Form* match the number of drums shown on the SAM End of Day Receipt and M / P documents.
 - c. As needed, use the Waste Summary Report printed during the End of Day Process on the SAM to review the number of waste drums on the services.
 - d. Each container on the truck must be checked to ensure the waste label shows the accumulation start date (U.S. only) and the manifest / document number.
7. Once the inventory and waste reconciliation has been completed, the form is signed by the Service Representative and the BGM or designee. The completed form is turned in with the Service Representative's End of Day Checklist and Daily Control Sheet package.
8. The *SK Vehicle Inventory Reconciliation Form* is separated from the other documents and is filed in a Vehicle Inventory Reconciliation file or binder for 2 periods.

Evening Before Next Service Day

1. The designated individual in the branch will use a new *SK Vehicle Inventory Reconciliation Form* to request inventory for the next service day.
2. The designated individual will then request any additional inventory needed for the next day in the 'Loaded from Warehouse' column of the form.
3. This form is given to the Material Handler.
4. The Material Handler loads the inventory onto the truck.
5. The Material Handler counts all inventory on the truck and documents it in the 'Daily Beginning Inventory' section.
6. The Material Handler leaves the new form on the truck.

Standards of Performance:



1. Truck inventory is requested and controlled with the *SK Vehicle Inventory Reconciliation Form*.
2. The BGM or designee and Service Representative both sign the form prior to the truck leaving the facility.
3. Inventory is not removed or placed at a customer site without proper documentation on the service document.
4. Inventory on each truck is reconciled with the *SK Vehicle Inventory Reconciliation Form* and the service documents prior to being unloaded at the end of each service day.
5. The *SK Vehicle Inventory Reconciliation Form* is always reconciled against the clean and waste drums on the truck and the service documents prior to the truck being unloaded.
6. The *SK Vehicle Inventory Reconciliation Form* is turned in with the sales and service rep's End of Day Checklist.
7. The *SK Vehicle Inventory Reconciliation Form* is filed in a Vehicle Inventory Reconciliation file or binder for 2 periods.

References:

For more information on this procedure, refer to;

- [BOG O330-001](#) - Branch Solvent Control Procedure (US)
- [BOG OC330-001](#) - Branch Solvent Control Procedure (Canada)
- [BOG O330-002](#) – Daily Solvent Reconciliation Procedure (US)
- [BOG OC330-002](#) – Daily Solvent Reconciliation Procedure (Canada)
- [10-10-107-05- End of Day Check In Process](#)
- [SK Vehicle Inventory Reconciliation Form](#) – SKNet >> Branches >> Tools >> Branch Forms

Contacts:

For assistance with this procedure, contact;

- Regional Operations Director



SK Vehicle Inventory Reconciliation Form

SAFETY-KLEEN CORP. VEHICLE INVENTORY RECONCILIATION FORM: ALL VEHICLES									
Rep:		SAP Plant:		Unit #:		Date:			
Comments:									
PARTS CLEANER MACHINES			Start of Day		Daily Route	Daily Route	End of Day		
Part Num.	Description	Standard Truck Inventory	Loaded from Warehouse	Daily Beginning Inventory	Pulled/Returned From Customer	Placed/Sold to Customer	Ending Inventory	Unloaded at Warehouse	
1112	Model 36 ABC Cleaner								
1140	Model 30 Parts Washer								
1150	Model 18 Parts Washer								
1160	Model 14 Parts Washer								
2287	Aqueous Prep 90/9/84								
2288	Stand, SSPW								
ALLIED PRODUCTS			Start of Day		Daily Route	Daily Route	End of Day		
Part Num.	Description	Standard Truck Inventory	Loaded from Warehouse	Daily Beginning Inventory	Pulled/Returned From Customer	Placed/Sold to Customer	Ending Inventory	Unloaded at Warehouse	
312	PK Hand Cleaner 4/20oz								
312	Gloves, Black (pair)								
314	Brush, Pic-Tite								
315	Brush, Disc								
316	Hoop, Black								
320	Hand Cleaner 1/2oz								
334	Hand Cleaner 1/2oz								
7215	Solvent 1/20 NP								
7320	Solvent Banded 5 Pack								
Drums			Start of Day		Daily Route	Daily Route	End of Day		
Part Num.	Description	Standard Truck Inventory	Loaded from Warehouse	Daily Beginning Inventory	Pulled/Returned From Customer	Placed/Sold to Customer	Ending Inventory	Unloaded at Warehouse	
3360	Drum, 30 Gallon Open								
3369	Drum, 55 gal, Black								
13388	Drum, 18 Empty 4IN, red								
13348	Drum, 30 Empty 4IN, red								
8003300	Overhead, Used								
8003389	Drum, 55gal Used								
SOLVENT/AQUEOUS			Start of Day		Daily Route	Daily Route	End of Day		
Skim# / Aqueous Type	Container	Standard Truck Inventory	Loaded from Warehouse	Daily Beginning Inventory	Pulled/Returned From Customer	Placed/Sold to Customer	Ending Inventory	Unloaded at Warehouse	
	18 Gallon Drum - Solvent								
	30 Gallon Drum - Solvent								
	18 Gallon Drum - Aqueous								
	30 Gallon Drum - Aqueous								

LOADED FROM WAREHOUSE VERIFICATION: (initials)

WASTE ON VEHICLE SECTION

Total Waste Solvent on Vehicle: _____

Total Other Waste on Vehicle: _____

By signing below, you are verifying the above information is correct and accurate.

SIGN BELOW DURING CHECK-OUT @ BEGINNING OF DAY	SIGN BELOW DURING CHECK-IN @ END OF DAY
Rep's Signature: _____	Rep's Signature: _____
Date: _____	Date: _____
Manager's Signature: _____	Manager's Signature: _____
Date: _____	Date: _____

