

1330

2/12/08

Safety Kileen

DISCUSSION OF PIPING SYSTEM FOR CUP SYSTEM

MOST OF PIPING SHOULD HAVE SUBSTANT BB TAGS

DISCUSSION OF CUP

* 71 GALLONS OF CLEAN SOLVENT PUT INTO SYSTEM FROM DISPENSER - NOT CUP SOLVENT (PAGE 4 OF 7 OF REPORT LINE 7)
EMPLOYEE KEEPS LOG OF SOLVENT - INVENTORY AND DAILY SHOWS 71 GALLONS OF PRODUCT USED.

VALVE SHUTS SUMP OFF SO CUP SOLVENT CAN BE USED. THE CUP SOLVENT IS USED ONCE THEN GOES TO WASTE TANK.

TWO DRUM WASHERS, ONLY ONE CONNECTED TO CUP SOLVENT TANK. EACH DRUM WASHER CAN HOLD 504 GALLONS, NOT SEPARATE ~~TANK~~ TANK BUT PART OF A UNIT.

EAST IS PRIMARY DRUM WASHER 90%
WEST IS CUP SOLVENT WASHER OR BACKUP FOR EAST UNIT.

~~DRUM WASHING~~

SAMPLE ISSUE

CUSTOMER EDUCATION DONE EVERY PICKUP
EXPECT THAT IF CUSTOMER IS WASHING PAINTING
EQUIPMENT THEY WILL PICK UP CONTAMINANTS.

ONLY CHECK FOR COLOR, ODOOR OR VOLUME CHANGE

DISPUTE REDUCING VALUE OF SOLVENT FOR
CLEANING PURPOSES.

WORK ON ASSUMPTION THAT CUSTOMER CAN
CERTIFY BY SIGNING A DOCUMENT AND
ASSERT GEN KNOWLEDGE.

JANINE DISCUSSED FPE EHS MGR NOT
KNOWING ANYTHING ABOUT CUP PROGRAM OR
TRAINING. S-K REP, SPECIFICALLY MR LONGSHORE,
STATED THAT THEY DEAL W/ PEOPLE DOING
WORK, NOT NECESSARILY EHS MGR. S-K POINTS
OUT THAT EHS MGR AT FPE, (LOG) SHOULD
KNOW WHAT IS GOING ON.

SIGNING PAPER EVERY TIME, NOT NECESSARILY
TRAINING EVERY TIME.

Janine discussed "introducing listed constituents into system"

S-K SAYS IT IS EXPECTED AND NOT A PROBLEM. "A COUPLE OUNCES WILL GET YOU THESE CONCENTRATIONS" - JAMES CHILDRESS.

* NOTE: Toluene is over 1% in TANNING LAB SAMPLE ALSO, EPA GUIDANCE FOR USED OIL REFERS TO MIXING LISTED WASTE AS ANYTHING OVER 100 PPM

Janine indicated she would go by FPE to find out who "Linda" is that signed documents.

* Item #1 - RENDER MIXTURE HW BY CROSS CONTAM S-K SAYS NOT HW ISSUE, SOLVENT CAN STILL BE REUSED. THAT PROGRAM ANTICIPATES THIS ISSUE.

TANNING LABS IS AQUEOUS PDBS WASHED NOW. S-K THOUGHT THEY WOULD BE CESQC

* NOT RESOLVED