Conversation With:

Mike Isom

Safety and Environmental Manager

Kelly Tractor Co.

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Laura Comer

FDEP South District

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We went over the analytical results together for four parts washers at the Clewiston facility. Mr. Isom noted that the vinyl chloride detection limit is 0.45 mg/L and although not detected at that limit, the regulatory standard is 0.2 mg/L. Mr. Isom will discuss with the laboratory conducting the results but will also use product knowledge to demonstrate that the products used do not contain any chlorinated solvents and chlorinated solvents are not used on or off-site to potentially contaminate the waste stream.

Laura pointed out the high corrosivity (pH 12) for parts washer 1 liquid waste and Mr. Isom believes this may be a dilution issue which he will review with employees responsible for adding concentrate detergent to parts washers.

Mr. Isom wanted to know if the non-hazardous parts washer solids could be added to the soils from the oil/water separator. These soils are also tested before disposal by Heritage Crystal Clean. Laura advised that the waste is still a solid waste and must go to an appropriate solid waste management facility. Mr. Isom said he would confirm where the waste soils go but with testing and if landfilled will consider this option.

LMC