


Memorandum

Florida Department of Environmental Protection

TO: File

FROM: Jim Byer

DATE:  November 8, 2005

SUBJECT: Onyx Environmental CDI

On October 20, 2005, I met with Mr. Phil Ditter to discuss and further investigate alleged violations cited in the facility's self-reporting letter of September 20, 2005. Mr. Ditter described the events relating to the discovery of the facility's un-permitted storage of hazardous waste in further detail. He explained that the storage area was not off-road parking area immediately adjacent to the facility as depicted in picture A, but an area completely across the industrial park in its southeast corner as depicted in picture B.



Picture A



Picture B

The storage location was an un-surfaced parking area for tractor-trailers, picture C. Onyx typically has 20 plus trailers (vans) and 5 tractors available for transport over-the-road. The trailers not being used for active transport are either parked at this location or at the facility for unloading, picture D. Mr. Ditter indicated that the loaded trailers maybe temporarily parked at this location awaiting its turn for unloading at the facility's dock. This delay in unloading could be greater than 24 hours and usually less than 10 days. At the time of the discovery of the un-permitted storage, four additional vans (not road worth) had been parked in this area and the excess of 400 containers of mercury containing materials were found there. The vans utilized for this activity had already been removed from the location and their contents properly transported to three other ONYX facilities for proper processing. Manifests and shipping documents attached.



Picture C



Picture D

An overhead picture of the industrial park is attached and an e-mail from the Drinking Water Program indentifying the nearest public drinking water well to be approximately 6,900 feet to the north.

JCB:jcb