

DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

To: Pam
To: _____
To: _____
To: _____

NORTHEAST DISTRICT - JACKSONVILLE

*TO: Don Trussell
Hazardous Waste Section, Tallahassee

THROUGH: Ashwin B. Patel, Hazardous Waste Supervisor *ABP*
Hazardous Waste Section

Vicky G. Valade, Environmental Supervisor *VG*
Hazardous Waste Section

FROM: Pamela Fellabaum, Environmental Specialist *PF*
Hazardous Waste Section

DATE: February 26, 1992

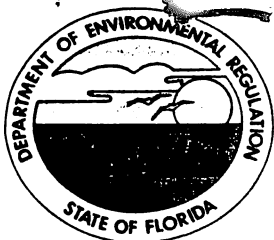
SUBJECT: Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of January 16, 1992
Alachua County - FLD 980 711 071

Attached is subject inspection report.

*Land Ban

PF/ps

Attachments



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 28, 1992

CERTIFIED MAIL - RETURN RECEIPT

Mr. Ben Warren
Quadrex Environmental Company, Inc.
Post Office Box 4100
Gainesville, Florida 32606

Dear Mr. Warren:

Quadrex Environmental Company, Inc.
Warning Letter No. WL92-0296HW01NED
Class II Hazardous Waste Violations
DER/EPA ID FLD Non-Notifier
Alachua County - Hazardous Waste

A hazardous waste compliance inspection was conducted at your facility on January 16, 1992. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 17-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described in the "Summary of Violations" section of the attached inspection report.

You are requested to contact Pamela Fellabaum of this office at (904) 448-4320 within 10 calendar days of receipt of this Warning Letter to arrange a meeting with Department personnel to discuss the issues raised in this Warning Letter. You may wish to consult an attorney and to have the attorney attend the meeting with the Department.

PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If after

Administration 448-4300
Air 448-4310
Waste Management 448-4320

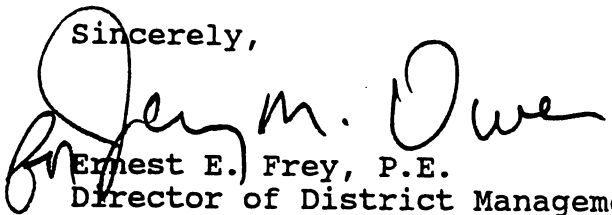


Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366

further investigation, the Department determines that the violations occurred you may resolve the violations by correcting the violations or, in some cases, by providing an acceptable time schedule within which the violations will be corrected.

Failure to respond in writing in 10 days may result in the initiation of a formal administrative enforcement proceedings through the issuance of a Notice of Violation and the assessment of penalties. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

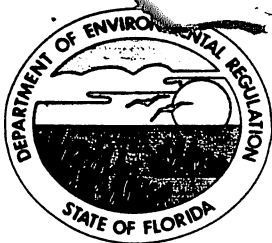
Sincerely,

A handwritten signature in dark ink, appearing to read "Ernest E. Frey". The signature is fluid and cursive, with a large initial "E" and "F".

Ernest E. Frey, P.E.
Director of District Management

EF:pfs

Enclosure



Florida Department of Environmental Regulation

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT XX ROUTINE FOLLOW-UP PERMITTING

FACILITY NAME Quadrex Environmental Company

DER/EPA ID FLD 980 711 071

STREET ADDRESS 1940 NW 67th Place, Gainesville, Florida 32606

MAILING ADDRESS Post Office Box 4100, Gainesville, Florida 32606

COUNTY Alachua PHONE (904) 373-6066 DATE 1/16/92 TIME 10:30 AM

TYPE OF FACILITY:

Generator Status

 Conditionally Exempt
Small Quantity

 Generator
(100-1000 kg/month)

XX Generator (>1000kg/mo)

XX Hazardous Waste

Fuel Marketer

Storage

XX Container

XX Tank

 Waste Pile

 Surface Impoundment

Treatment

 Tank

 Land Treatment

 Thermal

 Chem/Phys/Bio.

 Incinerator

 Surface Impoundment

Transporter

 Transporter

 Transfer Facility

Disposal

 Landfill

 Surface Impoundment

 Waste Pile

Non-Handler

 Non-Handler

2. Applicable Regulations:

 40 CFR 261.5 XX 40 CFR 262 40 CFR 263 40 CFR 264 XX 40 CFR 265
XX 40 CFR 266.34

3. Responsible Official: Mr. Ben Warren, Vice President

4. Survey Participants & Principal Inspector: Mr. Warren, Quadrex
Mr. Fleetwood, Quadrex
Tom Seif, HRS
Dan Oakey, HRS
Mr. Whittle, Quadrex
Pam Fellabaum, FDER

5. Facility Latitude: 29°42'08"
Longitude: 82°20'51"

Section: 18
Township: 9S
Range: 20E

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: H001-169480 Date Issued: 9/28/90 Exp. Date: 9/27/95

8. Pre-arranged Inspection: XX Yes No

Administration 448-4300
Air 448-4310
Waste Management 448-4320



Water Facilities 448-4330
Water Management 448-4340
FAX 448-4366

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
January 16, 1992

PROCESS DESCRIPTION:

Quadrex Environmental Company, Inc. is a waste processing and liquid bulking operation for liquid scintillation fluids (LSF). These fluids are used by researchers to detect small amounts of radioactivity from samples of research materials that have been immersed in the fluid. The LSF contain small amounts of xylene and toluene, and are therefore, regulated under RCRA as F003/F005 hazardous waste and are subject to the land ban regulations. Quadrex is also subject to NRC regulations due to the potential radioactivity of the LSF.

Brokers throughout the United States ship the LSF to Quadrex in drums containing either small glass or plastic vials or bulk liquids. Approximately ninety percent (90%) of the LSF arrive in vials and the remaining ten percent (10%) arrive in bulk liquids in lined drums. Both types of drums contain cushioning packing material, usually vermiculite.

After the paperwork corresponding to each drum has been checked, the drums are assigned a number and taken to the temporary holding area before processing. The drums that contain the LSF vials and packing material are processed inside the main facility building. The drum lids are removed, the drums are lifted by an air hoist and the contents are emptied onto a shaker screen. The packing materials that fall into a catch basin are radiologically tested and then put into a roll-off. This packing material is shipped to Chemical Conservation Company for use in the production of light weight aggregate.

The glass and plastic vials that remain on top of the shaker table are conveyed to a crusher. The fluid in the vials is drained into a basin, radiologically tested and then pumped to a 3,000 gallon above-ground tank outside. The broken glass and plastic are caught in a catch basket and rinsed in a solution of alcohol and water which is in turn radiologically tested then pumped to the 3,000 gallon tank.

The crushed, rinsed plastic/glass is visually inspected to remove any uncrushed plastic/glass containers and placed in a drum where any residual liquids drain to the bottom of the drum. The accumulated liquid is then drained off, tested, and pumped to the 3,000 gallon tank. The remaining glass/plastic is put into trucks and transported by A.R. Paquette to Harold Clifton in Garden City, Georgia for disposal in an industrial waste landfill.

The bulk liquids that are brought to Quadrex arrive in both trucks and containers. The liquids that test negatively radiologically are then pumped through a filter to the 3,000 gallon tank. The packing material and empty drums are tested and picked up by Chemical Conservation. The inner liners are rinsed and either returned to the broker or are picked up by Chemical Conservation. All filtered solid material (gloves and towels) are manifested and shipped to Southeastern Chemical in South Carolina.

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
January 16, 1992
Page Two

Liquids that test negative radiologically and have waste codes D001, F003, F005 are pumped to the 3,000 gallon tank. The hazardous waste fuel in this tank is manifested to Giant Cement Company. The tank has 100% secondary containment and a sump to contain any spillage. All underground piping has been brought above ground to comply with the 40 CFR 264 tank regulations. Liquids with waste codes that Giant Cement is not permitted to accept remain in the drums for transportation to other facilities including: Fisher Industrial Services, Detrex Corp., and Oldover Corporation.

All liquids that test positive radiologically are put into drums and placed in the main hazardous waste storage area for additional radiological decay. These drums were closed and were properly labeled.

All empty drums are radiologically tested and then loaded onto a trailer and sent to Drum Service of Florida in Zellwood.

Quadrex was issued Operating Permit #HO 01-169480 on September 28, 1990. The expiration date of the permit is September 27, 1995. The hazardous waste storage area has been built to permit specifications and consists of a covered, bermed concrete storage structure with secondary containment and sumps. The facility appears to be operating within its permitted storage capacity. There were approximately 600 55-gallon drums of hazardous waste inside the storage area. All of the drums were labeled with hazardous waste labels and with the dates of accumulation. Hazardous waste generated by Quadrex is also stored in the permitted storage area and all of these drums were closed and properly labeled. Two (2) 55-gallon drums of F003/F005 hazardous waste and two (2) 55-gallon drums of D001/F003/F005 hazardous waste accumulating in the permitted storage area were not marked with the dates of accumulation. Not marking these drums with dates of accumulation is a violation of 40 CFR 268.50(a)(2); however, facility personnel dated these drums during the inspection with January accumulation dates. In one area next to the 3,000 gallon storage tank, there were eight (8) 55-gallon drums of waste that had been generated by Quadrex. Adequate aisle space had not been provided for these drums.

A review of the facility's operating records found them to be in order. Manifests and accompanying land ban documents were also in order. The 40 CFR 268.50(a)(2) violation mentioned above will be referred to EPA for enforcement, since the State is not authorized for the Land Ban regulations.

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
January 16, 1992
Page Three

Summary of Violations

The following is a violation of the Florida Administrative Code (FAC) Section 17-730.180 which adopts and incorporates by reference Title 40 Code of Federal Regulation Part 265.

40 CFR 265.35 - Required Aisle Space

The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, unless aisle space is not needed for any of these purposes.

VIOLATION: Facility did not provide adequate aisle space for eight 55-gallon drums of hazardous waste accumulating adjacent to the 3,000 gallon hazardous waste storage tank.

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
January 16, 1992
Page Four

RECOMMENED CORRECTIVE ACTION

40 CFR 265.35

Facility provided adequate aisle space at the time of the inspection.

PLEASE PRINT or TYPE

(Form designed for use on elite [12-pitch] typewriter)

Form Approved. OMB No. 2050-0039 Expires 9-30-81

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's U.S. EPA ID No.

FLD 980711071

Manifest
Document No.

12007

2. Page 1
of 1Information in the shaded areas is not
required by Federal law, but is by State law.

3. Generator's Name and Mailing Address Quadrex Environmental Company
1940 NW 67th Place
Gainesville, FL 32606

4. Generator's Phone (904) 373-6066

5. Transporter 1 Company Name
A R PAQUETTE & COMPANY

6. U.S. EPA ID Number

FLD 982105884

7. Transporter 2 Company Name

8. U.S. EPA ID Number

1111111111111111

9. Designated Facility Name and Site Address

10. U.S. EPA ID Number

GIANT CEMENT COMPANY
HIGHWAY SC 453 NORTH @ I-26
HARLEYVILLE, SOUTH CAROLINA 29448

SIC 10033511699

11. State Facility's ID

SCD 003351699

12. Facility's Phone

(803) 496-7676 or 496-5033

11. U.S. DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total Quantity

14. Unit
Wt/Vol

15. Waste Number

a. RQ WASTE FLAMMABLE LIQUID N.O.S. (CONTAINS XYLENE &
TOLUENE) FLAMMABLE LIQUID UN1993

001 T,T

15,000

GAL

F003

F005

b.

--	--	--	--	--	--	--	--	--	--

c.

--	--	--	--	--	--	--	--	--	--

d.

--	--	--	--	--	--	--	--	--	--

1. Additional Descriptions for Materials Listed Above

a. H V - F 0 3 3 1 - M 0 9 5
b.

--	--	--	--	--	--	--	--	--	--

c.

--	--	--	--	--	--	--	--	--	--

d.

--	--	--	--	--	--	--	--	--	--

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information D004 D005 D006 D007 D008 D011

ADDITIONAL CODES ARE -

D001 U080 U122 U220 U239 U044

24 HOUR EMERGENCY RESPONSE: CONTACT 1-800-255-3924

Public reporting burden for this collection of information is estimated to
average 37 minutes for generators, 15 minutes for transporters, and 10
minutes for treatment storage and disposal facilities. This includes time
for reviewing instructions, gathering data, and completing and reviewing
the form. Send comments regarding the burden estimate, including
suggestions for reducing this burden, to Chief, Information Policy
Branch, PM-223, U.S. Environmental Protection Agency, 401 M St., S.W.,
Washington, D.C. 20460, and to the Office of Information and Regulatory
Affairs, Office of Management and Budget, Washington, D.C. 20503

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified,
packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and
the laws of the State of South Carolina.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically
practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human
health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method
that is available to me and that I can afford.

Printed/Typed Name

RAYMOND WHITTLE

Signature

Month Day Year

12 03 91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Larry J. Penley

Signature

Month Day Year

12 03 91

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

--	--	--	--	--	--	--	--	--	--

19. Discrepancy Indication Space

a. 425 lbs c.

--	--	--	--	--	--	--	--	--	--

 lbs.b.

--	--	--	--	--	--	--	--	--	--

 lbs d.

--	--	--	--	--	--	--	--	--	--

 lbs.

20. Facility Owner or Operator, Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

A. Robbie Brown

Signature

Month Day Year

12 04 91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. F.L.D.9.8.0.8.4.1.7.4.6		Manifest Document No. 09.1.2.9	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
		3. Generator's Name and Mailing Address MARTIN MARIETTA CORP (ELECTRONIC SYSTEMS) P.O. BOX 628007, ORLANDO, FL 32862-8007		A. State Manifest Document Number			
4. Generator's Phone (407) 356-4673		ATTN: LARRY RUSSELL MP-1002		B. State Generator's ID FLD980841746			
5. Transporter 1 Company Name A.R. PAQUETTE & COMPANY		6. US EPA ID Number F.L.D.9.8.2.1.0.5.8.8.4		C. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 904-736-1978		E. State Transporter's ID	
9. Designated Facility Name and Site Address QUADREX ENVIRONMENTAL COMPANY 1940 NORTHWEST 67TH PLACE GAINESVILLE, FL 32606-1649		10. US EPA ID Number F.L.D.9.8.0.7.1.1.0.7.1		F. Transporter's Phone		G. State Facility's ID	
				H. Facility's Phone 904-373-6066			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)				12. Containers		13. Total	
				No.	Type	Quantity	Unit
a. X RQ WASTE FLAMMABLE LIQUID, N.O.S. (CONTAINS ACETONE, XYLENE) FLAMMABLE LIQUID UN1993 (F002F003F005)				0.01	DM	0.00.50	G
b. X RQ WASTE FLAMMABLE LIQUID, N.O.S. (CONTAINS METHANOL, TOLUENE) FLAMMABLE LIQUID UN1993 (D001) D007				00.1	DM	0.0.1.0.0	P
c. X RQ WASTE PAINT RELATED MATERIAL (D008D007D011) FLAMMABLE LIQUID UN1263 (F003F005D001D035)				00.1	DM	0.0.0.50	G
d.							
J. Additional Descriptions for Materials Listed Above				K. Handling Codes for Wastes Listed Above			
11.a ACETONE, XYLENE, IPA, METHANOL, FREONTF, 1,1,1-TRI ERG #27				11.a Q-000644			
11.b FLAMMABLE LAB PACKS ERG #27				11.b Q-001342-1			
11.c TOLUENE, MEK, IPA, XYLENE, PAINT, HYDROCARBONS ERG #26				11.c Q-002827-G			
15. Special Handling Instructions and Additional Information							
24 HOUR EMERGENCY CONTACT: 800-424-9300							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name Lawrence W. Russell				Signature Lawrence W. Russell		Month Day Year 11/12/09/1	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Edward M. Carter				Signature Edward M. Carter		Month Day Year 11/12/09/1	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.							
Printed/Typed Name Ron Burton				Signature Ron Burton		Month Day Year 11/12/09/1	

GENERATOR

TRANSPORTER

FACILITY