



State of Florida  
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Paw</u>	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

# Interoffice Memorandum

NORTHEAST DISTRICT - JACKSONVILLE

\*TO: Don Trussell, Hazardous Waste Section, Tallahassee

THROUGH: Mike Fitzsimmons *MF*  
Ashwin B. Patel *ABP*  
Vicky Valade *VV*

FROM: Pamela Fellabaum *PF*

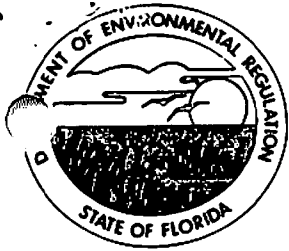
DATE: July 26, 1990

SUBJECT: Environmental Recovery Group  
Hazardous Waste Inspection of June 14, 1990  
Duval County - FLD 092 718 576

Attached is subject inspection report.

\*Land Ban

PF:jhf



## Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary  
Ernest Frey, Deputy Assistant Secretary

July 27, 1990

### CERTIFIED - RETURN RECEIPT

Mr. John Connolly Jr., President  
Environmental Recovery Group  
251 Levy Road  
Atlantic Beach, Florida 32233

Dear Mr. Connolly:

Environmental Recovery Group  
Hazardous Waste Inspection of June 14, 1990  
Duval County - FLD 092 718 576

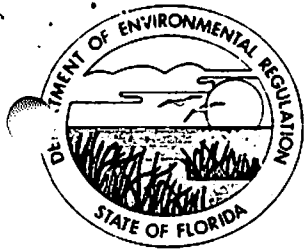
The Department conducted a Hazardous Waste Compliance inspection at your facility on June 14, 1990. The inspection and subsequent correspondence between the Department, ERG staff and NAS Mayport revealed a discrepancy concerning the final disposition of certain sludges. Please submit documentation to the Department within 30 days of receipt of this letter, clarifying the issue raised in paragraph three of the attached report. Failure to submit this information may result in the Department initiating formal enforcement actions.

If you have any questions regarding this letter or the report, please contact Pamela Fellabaum at the letterhead address or telephone number.

Sincerely,

for Michael J. Fitzsimmons  
Waste Program Administrator

1/1  
PF:jf  
Enclosure



# Florida Department of Environmental Regulation

Northeast District • 3426 Bills Road • Jacksonville, Florida 32207 • 904-798-4200

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary  
Ernest Frey, Deputy Assistant Secretary

## HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT \_\_COMPLAINTxxROUTINE\_\_ FOLLOW-UP \_\_ PERMITTING

FACILITY NAME Environmental Recovery Group DER/EPA ID FLD 092 718 576

STREET ADDRESS 251 Levy Road, Atlantic Beach, Florida 32233

MAILING ADDRESS Post Office Box 548, Atlantic Beach, Florida 32233

COUNTY Duval PHONE (904) 241-2200 DATE 6/14/90 TIME 2:00

### TYPE OF FACILITY:

#### Generator Status

Conditionally Exempt

xxSmall Quantity

\_\_Generator

(100-1000 kg/month)

\_\_Generator (>1000kg/mo)

\_\_Non-Handler

#### Storage

\_\_Container

\_\_Tank

\_\_Waste Pile

\_\_Surface Impoundment

#### Treatment

\_\_Tank

\_\_Land Treatment

\_\_Thermal

\_\_Chem/Phys/Bio.

\_\_Incinerator

\_\_Surface Impoundment

#### Transporter

xxTransporter

\_\_Transfer Facility

#### Disposal

\_\_Landfill

\_\_Surface Impoundment

\_\_Waste Pile

#### Non-Handler

\_\_Non-Handler

### 2. Applicable Regulations:

xx40 CFR 261.5 \_\_40 CFR 262 xx40 CFR 263 \_\_40 CFR 264 \_\_40 CFR 265

3. Responsible Official: John Connolly, Jr., President

4. Survey Participants & Principal Inspector

Pamela Fellabaum, FDER

Mr. Freeman, ERG

Mr. Teague, ERG

Mike Reutter, FDER

5. Facility Latitude: 30°20'09"

Longitude: 81°25'03"

Section: 18

Township: 2S

Range: 29E

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit number: \_\_\_\_\_ Date Issued: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

8. Pre-arranged Inspection: xxYes \_\_No

PROCESS DESCRIPTION

Environmental Recovery Group (ERG), formerly Oil Recovery Company, is an Emergency Response contractor and a hazardous waste transporter. The facility is also an all-purpose contractor that cleans out ship voids for military bases and shipyards, cleans pipes removed from navy vessels and provides sandblasting, painting and fiberglassing for various companies. ERG sells sorbents, booms and skimmers and purges and removes underground storage tanks.

The facility, as a hazardous waste transporter, only recently began to transport hazardous waste. The hazardous waste manifests examined during the inspection were in order.

A large portion of the work being performed by the facility is through contracts with military bases and shipyards. ERG pumps out ship voids through the use of a vacuum truck. If the original generator of the waste cannot certify that the waste is non-hazardous, then ERG pumps out the voids and leaves all of the waste at the generator's facility. If the original generator of the waste is certain that the material is non-hazardous, then the entire vacuum truck is driven back to ERG's facility where the liquid portion is transferred to a large holding tank and any remaining sludge is placed into 55-gallon drums. The liquid in the holding tank is eventually sent to Industrial Water Services, while the drums of sludge are sent back to the original generator of the waste. Roger Freeman, Hazardous Material specialist for ERG, stated that the above procedure is a routine part of the facility's operations, and that the procedure has not changed in years. This position was also stated in a letter to the Department from ERG. The information that the drums of sludge were returned to the base prompted a follow-up check with U.S. NAS-Mayport to determine whether or not a hazardous waste determination had been made on the suspected non-hazardous waste sludge. A phone call to NAS Mayport resulted in the Department receiving a letter stating that the navy was not aware of any material being returned to the base. A letter will be sent to ERG with this report requesting clarification of this issue.

ERG also receives and cleans pipes removed from navy vessels. The pipes are steam cleaned, dipped in an acid bath, and rinsed. All rinsate is directed back into the acid vat and the vat is cleaned once a year. The liquid acid from the tank is neutralized, and the sludge is tested for EP TOX metals. To date, the sludge has been found non-hazardous each time the vat is cleaned.

Environmental Recovery Group  
Hazardous Waste Inspection of  
June 14, 1990 - page two

The facility, as an all-purpose contractor, performs various functions at both military and private facilities. All waste that is generated is left on-site for the generator to arrange for disposal.

ERG maintains its vehicle fleet on-site, performing minor vehicle repair and preventative maintenance. The facility uses one mineral spirit parts washing machine that generates 20 gallons of D001 waste. The solvent in the parts washer is changed every few months, resulting in ERG currently being classified as a Conditionally Exempt Small Quantity Generator of hazardous waste (CESQG). When the solvent is changed, the D001 waste mineral spirits is mixed with the facility's waste oil and sent for recycling. Since ERG is a CESQG, the practice of mixing the D001 waste mineral spirits with its waste oil and sending the mixture for recycling is acceptable.

No violations of the hazardous waste regulations for transporters or Conditionally Exempt Small Quantity Generators were noted at the time of the inspection. The Department may initiate formal enforcement concerning the issue addressed in paragraph 3, pending resolution of the waste sludge issue.

# ACORD. CERTIFICATE OF INSURANCE

ISSUE DATE (MM/DD/YY)

06/08/90

PRODUCER

Rollins Burdick Hunter of Florida, Inc.  
P. O. Box 37360  
Jacksonville, FL 32236

(904) 389-3003

CODE

SUB-CODE

INSURED

Environmental Recovery Group, Ltd.  
P. O. Box 548  
Atlantic Beach, FL 32233

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW

## COMPANIES AFFORDING COVERAGE

COMPANY LETTER A Lloyds Underwriters and/or ILU Companies  
COMPANY LETTER B National Union Fire Insurance Company of Pittsburgh, PA  
COMPANY LETTER C Liberty Mutual Insurance Company  
COMPANY LETTER D  
COMPANY LETTER E

## COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

CO LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	ALL LIMITS IN THOUSANDS
	GENERAL LIABILITY				GENERAL AGGREGATE \$ 1,000, PRODUCTS-COMP/OPS AGGREGATE \$ 1,000, PERSONAL & ADVERTISING INJURY \$ 1,000, EACH OCCURRENCE \$ 1,000, FIRE DAMAGE (Any one fire) \$ 50, MEDICAL EXPENSE (Any one person) \$ 5,
A X	COMMERCIAL GENERAL LIABILITY CLAIMS MADE X OCCUR. OWNER'S & CONTRACTOR'S PROT.	ANN 8200	07/09/89	07/09/90	
		Includes Ship Repairers Legal Liability Coverage			
	AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT \$ 1,000, BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$
X	ANY AUTO	CA 802-04-040	07/09/89	07/09/90	
	ALL OWNED AUTOS				
	SCHEDULED AUTOS				
X	HIRED AUTOS				
X	NON-OWNED AUTOS				
	GARAGE LIABILITY				PROPERTY DAMAGE \$
	EXCESS LIABILITY				EACH OCCURRENCE \$ 5,000, AGGREGATE \$ 5,000,
A X	OTHER THAN UMBRELLA FORM	ANN 8700	07/09/89	07/09/90	
C	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY	WC1351-472274-019	07/09/89	07/09/90	STATUTORY \$ 500, (EACH ACCIDENT) \$ 500, (DISEASE-POLICY LIMIT) \$ 500, (DISEASE-EACH EMPLOYEE)
		Includes Coverage for Longshoremen's and Harbor Worker's Compensation Act			
	OTHER				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/RESTRICTIONS/SPECIAL ITEMS

JUN 12 REC'D

CERTIFICATE HOLDER

Construction Industry Licensing Board  
40 N. Monroe Street #60  
Tallahassee, Florida 32399-0750  
Attn: Revenue Unit

CANCELLATION

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL 30 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO MAIL SUCH NOTICE SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE COMPANY, ITS AGENTS OR REPRESENTATIVES.

AUTHORIZED REPRESENTATIVE

James C. Coleman, III

*James C. Coleman*


**MATERIAL SAFETY  
DATA SHEET**

24-HOUR EMERGENCY TELEPHONE (606) 324-1133

001687

**MINERAL SPIRITS NONEXEMPT**

Page: 1

THIS MSDS COMPLIES WITH 29 CFR 1910.1200 (THE HAZARD COMMUNICATION STANDARD)

Product Name: MINERAL SPIRITS NONEXEMPT  
CAS NUMBER: 8052-41-3

OIL RECOVERY  
251 LEVY RD  
ATLANTIC BEACH

FL 32233

05 50 087 6640870-

PRODUCT: 2516000  
INVOICE: 480025  
INVOICE DATE: 05/10/88  
TO: SAME

Data Sheet No: 0000589-003  
Prepared: 03/04/86  
Supersedes: 09/18/84

ATTN: PLANT MGR./SAFETY DIR.

**SECTION II - PRODUCT IDENTification**

General or Generic ID: ALIPHATIC HYDROCARBON

DOT Hazard Classification: COMBUSTIBLE (173.115)

**SECTION III - COMPONENTS**

IF PRESENT, IARC, NTP AND OSHA CARCINOGENS ARE IDENTIFIED IN THIS SECTION  
SEE DEFINITION PAGE FOR CLARIFICATION

INGREDIENT	% (by WT)	PEL	TLV	Note
ALIPHATIC PETROLEUM DISTILLATES CAS #: 8052-41-3	100	500 PPM	100 PPM	( 1 )

**Notes:**

( 1 ) NIOSH RECOMMENDS A LIMIT OF 350 MG/CUM - 8 HOUR TIME WEIGHTED AVERAGE, 1800 MG/CUM AS DETERMINED BY A 15 MINUTE SAMPLE.

THIS COMPONENT MAY CONTAIN 3.5% PSEUDOCUMENE(1,2,4 OR 1,2,5-TRIMETHYLBENZENE) CAS# 95-63-6 AND 0.4% MESITYLENE(1,3,5-TRIMETHYLBENZENE) CAS# 108-67-8.

**SECTION IV - PHYSICAL DATA**

Boiling Point	for PRODUCT	300.00 Deg F ( 148.88 Deg C ) @ 760.00 mm Hg
Vapor Pressure	for PRODUCT	2.00 mm Hg ( 68.00 Deg F 20.00 Deg C )
Specific Vapor Density	AIR = 1	4.9
Specific Gravity		.780 ( 60.00 Deg F 15.55 Deg C )
Percent Volatiles		100.00%
Evaporation Rate	(ETHER = 1)	70.00

**SECTION V - FIRE AND EXPLOSION INFORMATION**

FLASH POINT 100.0 Deg F ( 37.8 Deg C )

EXPLOSIVE LIMIT (PRODUCT) LOWER - 1.0%

EXTINGUISHING MEDIA: REGULAR FOAM OR CARBON DIOXIDE OR DRY CHEMICAL

HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS:, CARBON DIOXIDE AND CARBON MONOXIDE, VARIOUS HYDROCARBONS, ETC.

FIREFIGHTING PROCEDURES: WEAR SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN THE POSITIVE PRESSURE DEMAND MODE WHEN FIGHTING FIRES.

SPECIAL FIRE & EXPLOSION HAZARDS: VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND OR BE MOVED BY VENTILATION AND IGNITED BY HEAT, PILOT LIGHTS, OTHER FLAMES AND IGNITION SOURCES AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT.

NEVER USE WELDING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE PRODUCT (EVEN JUST RESIDUE) CAN IGNITE EXPLOSIVELY.

NFPA CODES: HEALTH- 1 FLAMMABILITY- 2 REACTIVITY- 0

**SECTION VI - HEALTH HAZARD DATA**

PERMISSIBLE EXPOSURE LEVEL 500 PPM  
THRESHOLD LIMIT VALUE 100 PPM

**EFFECTS OF ACUTE OVEREXPOSURE: FOR PRODUCT**

EYES - CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, BLURRED VISION.  
SKIN - PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING, DERMATITIS.  
BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL AND RESPIRATORY IRRITATION, CENTRAL NERVOUS SYSTEM EFFECTS INCLUDING DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE AND POSSIBLE UNCONSCIOUSNESS, AND EVEN DEATH.

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE BUT IS NOT WARRANTED TO BE WHETHER ORIGINATING WITH THE COMPANY OR NOT. RECIPIENTS ARE ADVISED TO CONFIRM IN ADVANCE OF NEED THAT THE INFORMATION IS CURRENT, APPLICABLE, AND SUITABLE TO THEIR CIRCUMSTANCES.

CONTAINERS OF THIS MATERIAL MAY BE HAZARDOUS WHEN EMPLOYED SINCE EMPLOYED CONTAINERS RETAIN PRODUCT RESIDUES (VAPOR, LIQUID, AND/OR SOLID), ALL HAZARD PRECAUTIONS GIVEN IN THE DATA SHEET MUST BE OBSERVED.

# SECTION 1: IDENTIFICATION OF HAZARDOUS MATERIALS AND OTHER COMMENTS

OTHER PROTECTIVE EQUIPMENT: TO PREVENT REPEATED OR PROLONGED SKIN CONTACT, WEAR IMPERVIOUS CLOTHING AND BOOTS.

EYE PROTECTION: CHEMICAL SPLASH GOGGLES IN COMPLIANCE WITH OSHA REGULATIONS ARE ADVISED, HOWEVER, OSHA REGULATIONS ALSO PERMIT OTHER TYPE SAFETY GLASSES. (CONSULT YOUR SAFETY EQUIPMENT SUPPLIER)

PROTECTIVE GLOVES: WEAR RESISTANT GLOVES SUCH AS: NITRILE RUBBER

VENTILATION: PROVIDE SUFFICIENT MECHANICAL (GENERAL AND/OR LOCAL EXHAUST) VENTILATION TO MAINTAIN EXPOSURE BELOW (TLV'S).

RESPIRATORY PROTECTION: IF WORKPLACE EXPOSURE LIMITS (OF PRODUCT OR ANY COMPONENT IS EXCEEDED (SEE SECTION II)), A NIOSH/MSHA APPROVED AIR SUPPLIED RESPIRATOR IS ADVISED IN ABSENCE OF PROPER ENVIRONMENTAL CONTROL. OSHA REGULATIONS ALSO PERMIT OTHER NIOSH/MSHA RESPIRATORS (NEGATIVE PRESSURE TYPE) UNDER SPECIFIED CONDITIONS (SEE YOUR SAFETY EQUIPMENT SUPPLIER). ENGINEERING OR ADMINISTRATIVE CONTROLS SHOULD BE IMPLEMENTED TO REDUCE EXPOSURE.

# SECTION 2: PHYSICAL AND CHEMICAL PROPERTIES

CONTAMINATED ABSORBENT MAY BE DEPOSITED IN A LANDFILL IN ACCORDANCE WITH LOCAL, STATE AND FEDERAL REGULATIONS.

LARGE SPILL: DESTROY BY LIQUID INCINERATION.

SMALL SPILL: ALLOW VOLATILE PORTION TO EVAPORATE IN HOOD. ALLOW SUFFICIENT TIME FOR VAPORS TO COMPLETELY CLEAR HOOD DUCT WORK. DISPOSE OF REMAINING MATERIAL IN ACCORDANCE WITH APPLICABLE REGULATIONS.

# HAZARD DISPOSAL METHOD:

PREVENT RUN-OFF TO SEWERS, STREAMS OR OTHER BODIES OF WATER. IF RUN-OFF OCCURS, NOTIFY PROPER AUTHORITIES AS REQUIRED, THAT A SPILL HAS OCCURRED.

LARGE SPILL: ELIMINATE ALL IGNITION SOURCES (FLARES, FLAMES INCLUDING PILOT LIGHTS, ELECTRICAL SPARKS). PERSONS NOT WEARING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM AREA OF SPILL UNTIL CLEAN-UP HAS BEEN COMPLETED. STOP SPILL AT SOURCE, DIKE AREA OF SPILL TO PREVENT SPREADING, PUMP LIQUID TO SALVAGE TANK. REMAINING LIQUID MAY BE TAKEN UP ON SAND, CLAY, EARTH, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND SHOVELLED INTO CONTAINERS.

SMALL SPILL: ABSORB LIQUID ON PAPER, VERMICULITE, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND TRANSFER TO HOOD.

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

# SECTION 3: REACTIVITY AND STABILITY

INCOMPATIBILITY: AVOID CONTACT WITH: STRONG OXIDIZING AGENTS.

STABILITY: STABLE

HAZARDOUS POLYMERIZATION: CANNOT OCCUR

# SECTION 4: TOXICITY

OVEREXPOSURE TO THIS MATERIAL (OR ITS COMPONENTS) HAS BEEN SUGGESTED AS A CAUSE OF THE FOLLOWING EFFECTS IN HUMANS: CENTRAL NERVOUS SYSTEM EFFECTS

EFFECTS OF CHRONIC OVEREXPOSURE: FOR PRODUCT

INHALATION, SKIN CONTACT

PRIMARY ROUTE(S) OF ENTRY:

IF BREATHED: IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR. IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED GIVE ARTIFICIAL RESPIRATION. KEEP PERSON WARM, QUIET AND GET MEDICAL ATTENTION.

IF SWALLOWED: DO NOT INDUCE VOMITING, KEEP PERSON WARM, QUIET, AND GET MEDICAL ATTENTION. ASPIRATION OF MATERIAL INTO THE LUNGS DUE TO VOMITING CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

IF IN EYES: FLUSH WITH LARGE AMOUNTS OF WATER, LIFTING UPPER AND LOWER LIDS OCCASIONALLY, GET MEDICAL ATTENTION.

IF ON SKIN: THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING BEFORE RE-USE. CONTAMINATED CLOTHING. LAUNDRY

# FIRST AID:

SMALLING - CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND DIARRHEA. ASPIRATION OF MATERIAL INTO THE LUNGS CAN CAUSE CHEMICAL PNEUMONITIS WHICH CAN BE FATAL.

# SECTION 5: PHYSICAL AND CHEMICAL PROPERTIES

MINERAL SPIRITS NONEXEMPT

001687

Page: 2

MATERIAL SAFETY  
DATA SHEET

72-62-7620-01

24-HOUR EMERGENCY TELEPHONE (606) 324-1133

P O BOX 2219, COLUMBUS, OHIO 43216 • (614) 889-2333

DIVISION OF ASHLAND OIL INC.

Ashland Chemical Company







# **MATERIAL SAFETY DATA SHEET**

## **DEFINITIONS**

This definition page is intended for use with Material Safety Data Sheets supplied by the Ashland Chemical Company. Recipients of these data sheets should consult the OSHA Safety and Health Standards (29 CFR 1910), particularly subpart G - Occupational Health and Environmental Control, and subpart I - Personal Protective Equipment, for general guidance on control of potential Occupational Health and Safety Hazards.

### **SECTION I PRODUCT IDENTIFICATION**

**GENERAL OR GENERIC ID:** Chemical family or product description.

**DOT HAZARD CLASSIFICATION:** Product meets DOT criteria for hazards listed.

### **SECTION II COMPONENTS**

Components are listed in this section if they present a physical or health hazard and are present at or above 1% in the mixture. If a component is identified as a CARCINOGEN by NTP, IARC or OSHA as of the date on the MSDS, it will be listed and footnoted in this section when present at or above 0.1% in the product. Negative conclusions concerning carcinogenicity are not reported. Additional information may be found in Section V. Other components may be listed if deemed appropriate.

Identities of components listed generically are declared trade secret.

Exposure recommendations are for components. OSHA Permissible Exposure Limits (PELs) and American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values (TLVs) appear on the line with the component identification. Other recommendations appear as footnotes.

### **SECTION III PHYSICAL DATA**

**BOILING POINT:** Of product if known. The lowest value of the components is listed for mixtures.

**VAPOR PRESSURE:** Of product if known. The highest value of the components is listed for mixtures.

**SPECIFIC VAPOR DENSITY:** Compared to AIR = 1. If Specific Vapor Density of product is not known, the value is expressed as lighter or heavier than air.

**SPECIFIC GRAVITY:** Compared to WATER = 1. If Specific Gravity of product is not known, the value is expressed as less than or greater than water.

**pH:** If applicable.

**PERCENT VOLATILES:** Percentage of material with initial boiling point below 425 degrees Fahrenheit.

**EVAPORATION RATE:** Indicated as faster or slower than ETHYL ETHER, unless otherwise stated.

### **SECTION IV FIRE AND EXPLOSION DATA**

**FLASH POINT:** Method identified.

**EXPLOSION LIMITS:** For product if known. The lowest value of the components is listed for mixtures.

**HAZARDOUS DECOMPOSITION PRODUCTS:** Known or expected hazardous products resulting from heating, burning or other reactions.

### **SECTION IV (cont.)**

**EXTINGUISHING MEDIA:** Following National Fire Protection Association criteria.

**FIREFIGHTING PROCEDURES:** Minimum equipment to protect firefighters from toxic products of vaporization, combustion or decomposition in fire situations. Other firefighting hazards may also be indicated.

**SPECIAL FIRE AND EXPLOSION HAZARDS:** States hazards not covered by other sections.

**NFPA CODES:** Hazard ratings assigned by the National Fire Protection Association.

### **SECTION V HEALTH HAZARD DATA**

**PERMISSIBLE EXPOSURE LIMIT:** For product.

**THRESHOLD LIMIT VALUE:** For product.

**EFFECTS OF ACUTE OVEREXPOSURE:** Potential local and systemic effects due to single or short term overexposure to the eyes and skin or through inhalation or ingestion.

**EFFECTS OF CHRONIC OVEREXPOSURE:** Potential local and systemic effects due to repeated or long term overexposure to the eyes and skin or through inhalation or ingestion.

**FIRST AID:** Procedures to be followed when dealing with accidental overexposure.

**PRIMARY ROUTE OF ENTRY:** Based on properties and expected use.

### **SECTION VI REACTIVITY DATA**

**HAZARDOUS POLYMERIZATION:** Conditions to avoid to prevent hazardous polymerization resulting in a large release of energy.

**STABILITY:** Conditions to avoid to prevent hazardous or violent decomposition.

**INCOMPATIBILITY:** Materials and conditions to avoid to prevent hazardous reactions.

### **SECTION VII SPILL OR LEAK PROCEDURES**

Reasonable precautions to be taken and methods of containment, clean-up and disposal. Consult federal, state and local regulations for accepted procedures and any reporting or notification requirements.

### **SECTION VIII PROTECTIVE EQUIPMENT TO BE USED**

Protective equipment which may be needed when handling the product.

### **SECTION IX SPECIAL PRECAUTIONS OR OTHER COMMENTS**

Covers any relevant points not previously mentioned.

## **ADDITIONAL COMMENTS**

Containers should be either reconditioned by CERTIFIED firms or properly disposed of by APPROVED firms. Disposal of containers should be in accordance with applicable laws and regulations. "EMPTY" drums should not be given to individuals. Serious accidents have resulted from the misuse of "EMPTIED" containers (drums, pails, etc.). Refer to Sections IV and IX.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address BRUNING PAINT CO. 100 SW 12 AVE., POMPANO BEACH, FL. 33069		A. State Manifest Document Number		B. State Generator's ID		C. State Transporter's ID		D. Transporter's Phone (904) 241-2202	
4. Generator's Phone (305) 781-1441		5. Transporter 1 Company Name ENVIRONMED		6. US EPA ID Number FL106136119191020010014		E. State Transporter's ID		F. Transporter's Phone	
7. Transporter 2 Company Name		8. US EPA ID Number		9. Designated Facility Name and Site Address TRICIL RECOVERY SERVICES INC., 170 BARTOW MUNICIPAL AIRPORT, BARTOW, FL. 33830-9504		10. US EPA ID Number FL106136119191020010014		G. State Facility's ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit W/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> PAINT RELATED MATERIAL FLAMMABLE LIQUID / NA 1263		No. Type		001 TT 04000 G		D001			
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information									
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. 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 GLENN E. JAREN		Signature Glenn E. Jaren		Month Day Year 10/04/90					
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name DOMINIC RAFFANIELLO		Signature Dominic Raffaniello		Month Day Year 10/04/90			
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 MARTHA HAMILTON		Signature Martha Hamilton		Month Day Year 10/04/90					

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address		BRUNING PAINT CO.		A. State Manifest Document Number					
100 SW 12 AVE, POMPANO BEACH, FL.		33069		B. State Generator's ID					
4. Generator's Phone		(305) 781-1441		C. State Transporter's ID					
5. Transporter 1 Company Name		ENVIRON -		6. US EPA ID Number		D. Transporter's Phone		(904) 241-2202	
MENTAL RECOVERY GROUP		FLD00927118576		E. State Transporter's ID					
7. Transporter 2 Company Name				8. US EPA ID Number		F. Transporter's Phone			
9. Designated Facility Name and Site Address		TRICIL RECOVERY SERVICES, INC.		10. US EPA ID Number		G. State Facility's ID			
MUNICIPAL AIRPORT, BARTOW, FL.		33830-9504		FLD9180729610		H. Facility's Phone		(813) 533-6111	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. <input checked="" type="checkbox"/> PAINT RELATED MATERIAL		No. Type							
X FLAMMABLE LIQUID NA1263		001 TT04000 G						D001	
b.									
c.									
d.									
J. Additional Descriptions for Materials Listed Above		K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information									
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.									
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		Signature		Month Day Year					
GLENN E. SAREN		Glenn E. Saren		06/05/90					
17. Transporter 1 Acknowledgement of Receipt of Materials		Printed/Typed Name		Signature		Month Day Year			
		DOMINIC RAFFANELLO		Dominic Raffanello		06/05/90			
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		Signature		Month Day Year			
		MARTHA HAMILTON		Martha Hamilton		06/05/90			

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. FLD0636119190200006		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address BRUNING PAINT CO. 100 SW 12 AVE., POMPANO BEACH, FL. 33069						A. State Manifest Document Number							
4. Generator's Phone (305) 781-1441						B. State Generator's ID							
5. Transporter 1 Company Name ENVIRON-6						C. State Transporter's ID							
MENTAL RECOVERY GROUP FLD09271185176						D. Transporter's Phone (904) 241-2202							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address TRICIL RECOVERY SERVICES, INC., 170 BARTOW MUNICIPAL AIRPORT, BARTOW, FL.						G. State Facility's ID							
33830-9504						H. Facility's Phone (813) 533-6111							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. PAINT RELATED MATERIAL						No. Type							
FLAMMABLE LIQUID NA1263						01011104000G						D001	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
15. Special Handling Instructions and Additional Information													
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. 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 GLENN E. SAREN						Signature [Signature]				Month Day Year 06/06/90			
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name DOMINIC RAFFANELLO						Signature [Signature]				Month Day Year 06/06/90			
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 MARTHA HAMILTON						Signature [Signature]				Month Day Year 06/06/90			

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator's USEPA ID No. <b>FLD06131619190200007</b>		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.		
3. Generator's Name and Mailing Address <b>BRUNING PAINT CO. 100 SW 12 AVE., POMPANO BEACH, FL. 33069</b>						A. State Manifest Document Number				
4. Generator's Phone <b>(305) 781-1441</b>						B. State Generator's ID				
5. Transporter 1 Company Name <b>ENVIRON - MENTAL RECOVERY GROUP</b>						C. State Transporter's ID				
6. US EPA ID Number <b>FLD06131619190200007</b>						D. Transporter's Phone <b>(904) 241-2202</b>				
7. Transporter 2 Company Name						E. State Transporter's ID				
8. US EPA ID Number						F. Transporter's Phone				
9. Designated Facility Name and Site Address <b>TRICIL RECOVERY SERVICES INC. 170 BARTOW MUNICIPAL AIRPORT, BARTOW, FL. 33830-9504</b>						G. State Facility's ID				
10. US EPA ID Number <b>FLD191810721916110</b>						H. Facility's Phone <b>(813) 533-6111</b>				
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. <input checked="" type="checkbox"/> PAINT RELATED MATERIAL FLAMMABLE LIQUID NA 1263						No. Type				
b.										
c.										
d.										
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above				
15. Special Handling Instructions and Additional Information										
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. 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 <b>GLENN E. SAREN</b>						Signature <i>Glenn E. Saren</i>		Month Day Year <b>10/6/79</b>		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name <b>DOMINIC RAFFANELLO</b>						Signature <i>Dominic Raffanello</i>		Month Day Year <b>10/6/79</b>		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name						Signature		Month Day Year <b>10/6/79</b>		
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 <b>CHARLES JOHNSTON</b>						Signature <i>Charles Johnston</i>		Month Day Year <b>10/4/79</b>		

HAZARDOUS WASTE SITE INSPECTION  
EXIT INTERVIEW SUMMARY

FACILITY: Environmental Recovery Group

I.D. NUMBER: FLD 0927185X DATE: 8/14/90 TIME: 3:15

INTERVIEW PARTICIPANTS: Pam Fellabaum, Mike Bester, Roger Freeman, Joey Teague  
Bob Wilson

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-30, which adopts Federal Regulation 40 CFR Parts 260-266 by reference. It is possible that the list of violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the investigator will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- ☐ 1. Hazardous Waste Determination (262.11).
- ☐ 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11)
- ☐ 3. Manifest Deficiencies or Recordkeeping and Reporting  
(262 Subpart B and D or 263 Subpart B or 264/263 Subpart E).
- ☐ 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16].
- ☐ 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or  
254 Subpart D].
- ☐ 6. Preparedness and Prevention (265 Subpart C or 264 Subpart C).
- ☐ 7. Container Requirements (262.34 or 264/265 Subpart I).
- ☐ 8. Tank Requirements (262.34 or 264/265 Subpart J).
- ☐ 9. Operating a treatment, storage or disposal facility without a  
permit (403.722 F.S., F.A.C. 17-30, Section IV).
- ☐ 10. Security Requirements (264/265.14).
- ☐ 11. Groundwater Monitoring (264/265 Subpart F).
- ☐ 12. Closure/Post-closure (264/265 Subpart G).
- ☐ 13. Failure to comply with the provisions of a Department Issued  
Permit or with the provisions of the Consent Order.
- ☐ 14. Other \_\_\_\_\_

COMMENTS: CESQO at this time will check on Iw discharge

DER INSPECTOR SIGNATURE: Pamella Fellabaum

FACILITY PARTICIPANT SIGNATURE: X John A. Connolly Jr

NOTE: BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.