

State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION

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From	Osia

Interoffice Memorandum

NORTHEAST DISTRICT - JACKSONVILLE

*TO:

Don Trussell, Hazardous Waste Section, Tallahassee

THROUGH:

Mike Fitzsimmons

Ashwin B. Patel 600

Vicky Valade

FROM:

Pamela Fellabaum

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

Bob Martinez, Governor

Dale Twachtmann, 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,

Michael J. Fitzsimmons Waste Program Administrator

Enclosure



Florida Department of Environmental Regulation

Northeast District •

3426 Bills Road •

Jacksonville, Florida 32207

904,708,420

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary Ernest Frey, Deputy Assistant Secretary

HAZARDOUS WASTE INSPECTION REPORT

1.	INSPECTION REPORT	COMPLAINT <u>xx</u> ROUTINEFO	LLOW-UPPERMITTING
	FACILITY NAME Environ	mental Recovery Group	DER/EPA ID FL <u>D 092 718 576</u>
	STREET ADDRESS 251 Le	vy Road, Atlantic Beac	h, Florida 32233
	MAILING ADDRESS Post	Office Box 548, Atlant	ic Beach, Florida 32233
	COUNTY Duval PHO	NE (<u>904</u>) <u>241-2200</u> DATE	6/14/90 TIME 2:00
		TYPE OF FACILITY:	•
Con xxS G (G	erator Status ditionally Exempt mall Quantity enerator 100-1000 kg/month) enerator (>1000kg/mo) on-Handler	StorageContainerTankWaste PileSurface Impoundment	TreatmentTankLand TreatmentThermalChem/Phys/BioIncineratorSurface Impoundment
<u>xx</u> T	<u>nsporter</u> ransporter ransfer Facility	<pre>DisposalLandfillSurface ImpoundmentWaste Pile</pre>	<u>Non-Handler</u> Non-Handler
	Applicable Regulations xx40 CFR 261.540 C		40 CFR 26440 CFR 265
3.	Responsible Official:	John Connolly, Jr.,	President
4.			Mr. Freeman, ERG Mr. Teague, ERG Mike Reutter, FDER
5.	Facility Latitude: 30 Longitude: 8		Section: 18 Township: 2S Range: 29E
6.	Type of Ownership: F.	EDERAL STATE COUNTY	MUNICIPAL PRIVATE
7.	Permit number:	Date Issued:	Expiration Date:
8.	Pre-arranged Inspecti	on: xxYes No	

Environmental Recovery Group Hazardous Waste Inspection of June 14, 1990

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 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 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 (MWDD/YY)

06/08/90

PAODUCÉR . Rollins Burdick Hunter of Florida, Inc. P. O. Box 37360

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

ksonville, FL 32236

(904) 389-3003

CODE

SUB-CODE

INSURED

Environmental Recovery Group, Ltd.

P. O. Box 548

Atlantic Beach, FL 32233

COMPANIES AFFORDING COVERAGE

COMPANY A Lloyds Underwriters and/or

LETTER ILU Companies

COMPANY B National Union Fire Insurance Company

of Pittsburg, PA

COMPANY C LETTER

LETTER

Liberty Mutual Insurance Company

COMPANY D LETTER

COMPANY E LETTER

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	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	*	ALL LIMITS <u>IN THOUS</u>	ANDS
A	COMMERCIAL GENERAL LIABILITY CLAIMS MADE X OCCUR. OWNER'S & CONTRACTOR'S PROT.	ANN 8200 Includes Ship Republicability Coverage	_	07/09/90	PERSONAL & EACH OCCUR FIRE DAMAGE	OMP/OPS AGGREGATE ADVERTISING INJURY	1,000, 1,000, 1,000, 50,
	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS SCHEDULED AUTOS HIRED AUTOS NON-OWNED AUTOS GARAGE LIABILITY	CA 802-04-040	07/09/89	07/09/90	COMBINED SINGLE LIMIT BODILY INJURY (Per person) BODILY INJURY (Per accident) PROPERTY DAMAGE	\$ 1,000, \$	
A	EXCESS LIABILITY X OTHER THAN UMBRELLA FORM	ANN 8700	07/09/89	07/09/90		EACH OCCURRENCE \$ 5,000, \$	AGGREGATE 5,000,
c	WORKER'S COMPENSATION AND EMPLOYERS' LIABILITY OTHER	WC1351-472274-019 Includes Coverage and Harbor Worker			\$ 500, \$ 500, \$ 500,	(EACH AC	CIDENT) —POLICY LIMIT) —EACH EMPLOYEI

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

JUN 12 REC'D

Construction Industry Licensing Board ™O N. Monroe Street #60 _lahassee, 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,

CACORD CORPORATION 1988

ACORD 25-S (3/88)

72-62-7820-01

Ashland Chemical Company DIVISION OF ASHLAND OIL INC.

P O BOX 2219, COLUMBUS, OHIO 43216 . (614) 889-3333



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) ~~~~~

CAS NUMBER:

MINERAL SPIRITS NONEXEMPT 8052-41-3

OIL RECOVERY 251 LEVY RD ATLANTIC BEACH

FL 32233

05 50 087 6640870-

Data Sheet No: 0000589-003 Prepared:

Supersedes:

09/18/84

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

ATTN: PLANT MGR./SAFETY DIR.

A STATE OF THE PROPERTY OF THE

General or Generic ID: ALIPHATIC HYDROCARBON

DOT Hazard Classification: COMBUSTIBLE (173.115)

SECULION FILES COMPONENTIS.

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

INGREDIENT

2 (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.

Boiling Point	for PRODUCT) 6	300.00 Deg f 148.88 Deg C 760.00 mm Hg
Vapor Pressure	for PRODUCT		9(2.00 mm Hg 68.00 Deg F 20.00 Deg C
Specific Vapor Density	AIR = 1			4.9
Specific Gravity			9 (.780 60.00 Deg F 15.55 Deg C
Percent Volatiles				100.00%
Evaporation Rate	(ETHER	= 1)		70.00

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 POSITVE 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 HELDING 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

CHESEL DUONSWEHEAUTH SHAZAR DEDATTA CHESCARIO が発生されている。 1000年に対象という。 1000年に対象という 1000年に対象という 1000年に対象という 1000年に

PERMISSIBLE EXPOSURE LEVEL

500

THRESHOLD LIMIT VALUE

100

PPM

PPH

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 MASAL AND RESPIRATORY IRRITATION, CENTRAL MERVOUS SYSTEM
EFFECTS INCLUDING DIZZINESS, HEAKNESS, FATIGUE, MAUSEA, HEADACHE AND POSSIBLE UNCONSCIOUSNESS, AND EVEN

CONTINUED ON PAGE: 2

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- 10-1: (* (1)

P O 80% 2519, COLUMBUS, CHO 43216 . 1614) 689-3333 DIVISION OF ASHLAND OIL INC. hnsgaod lepinoid busidað

24-HOUR EMERGENCY TELEPHONE (606) 324-1133

DATA SHEET YTERAL SAFETY 12-62-7620-01

TAMEKAL SPIRITS NONEXEMPT

FIRST AID: DMINS - CAN CAUSE CHEMICAL PRETATION, NAUSER, VOMITING, AND DIARRHEA. ASPIRATION OF MATERIAL INTO

IF SHALLOHED: DO NOT INDUCE VOMITING CAN CAUSE CHEMICAL PNEUMONITIS MHICH CAN BE FATAL.

INTO THE LUNGS DUE TO VOMITING CAN CAUSE CHEMICAL PNEUMONITIS MHICH 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 WESH EXPOSED AREA MITH SOAP AND WATER. REHOVE CONTAMINATED CLOTHING. LAUNDER

IF BREATHED: IF AFFECTED, REMOVE INDIVIDUAL TO FRESH AIR, IF BREATHING IS DIFFICULT, ADMINISTER OXYGEN. IF BREATHING HAS STOPPED GIVE ARTIFICIAL RESPIRATION.

INHALATION, SKIN CONTACT PRIMARY ROUTE(S) OF ENTRY:

Restaun Missen Villenses 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

SERVICE OCCUR HAZARDOUS POLYMERIZATION:

STABILITY: STABLE

SMYLLONING

489T00

INCOMPATIBILITY: AVOID CONTACT MITH:, STRONG OXIDIZING AGENTS.

- SEERION MURE Shure ON REAR BARRESS

SMALL SPILL: ABSORB LIGUID ON PAPER, VERMICULITE, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND TRANSFER TO STEPS TO BE TEKEN IN CASE MATERIAL IS RELEASED OR SPILLED:

LARGE SPILL: ELIMINATE ALL IGNITION SOURCES (FLARES, FLAMES INCLUDINS PILOT LIGHTS, ELECTRICAL SPARKS). PERSONS

NOT WERRING PROTECTIVE EQUIPMENT SHOULD BE EXCLUDED FROM SPREADING, PUMP LIGUID TO SALVAGE TANK, REMAINING

LIGUID MAY BE TAKEN UP ON SAND, CLAY, EARTH, FLOOR ABSORBENT, OR OTHER ABSORBENT MATERIAL AND SHOVELED INTO

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

MASTE DISPOSAL METHOD:

LARGE SPILL: DESTROY BY LIQUID INCINERATION. SMALL SPILL: ALLOW VOLATILE PORTION TO EVAPORATE IN HOOD. ALLOW SUFFICIENT TIME FOR VAPORS TO COMPLETELY CLEAR

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

RESPIRATORY PROTECTION: IF WORKPLACE EXPOSURE LIMIT(S) OF PRODUCT OR ANY COMPONENT IS EXCEEDED (SEE SECTION II).
A MIDSH/MSHA APPROVED AIR SUPPLIED RESPIRATORS (NEGATIVE PRESSURE TYPE) UNDER SPECIFIED CONDITIONS REQUILATIONS ALSO PERMIT COTHER NIOSH/MSHA RESPIRATORS (NEGATIVE PRESSURE TYPE) UNDER SPECIFIED CONDITIONS (SEE YOUR SAFETY EQUIPMENT SUPPLIER). ENGINEERING OR ADMINISTRATIVE CONTROLS SHOULD BE IMPLEMENTED TO REDUCE EXPOSURE.

LLV(S) VENTILATION: PROVIDE SUFFICIENT MECHANICAL (GENERAL AND/OR LOCAL EXHAUST) VENTILATION TO MAINTAIN EXPOSURE BELOM

PROTECTIVE GLOVES: WEAR RESISTANT GLOVES SUCH AS:, NITRILE RUBBER

EYE PROTECTIONS ALSO PERMIT OTHER TYPE SAFETY GLASSES. (CONSULT YOUR SAFETY EQUIPMENT SUPPLIER)

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

STATES OF THE PROPERTY OF THE

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

THE INFORMATION ACCUMULATED HEREIN IS BELIEVED TO BE ACCURATE BUT IS NOT WARRANTED TO BE WHETHER ORIGINATION IS CURRENT, APPLICABLE, AND SUITABLE TO THEIR CIRCUMSTANCES.

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Ashland Cnemical Company DIVISION OF ASHLAND DIL INC.

P D BOX 2219 COLUMBUS, ONIO 43216 • 1614) 889-3333



24-HOUR EMERGENCY TELEPHONE (606) 324-1133

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.

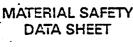
SECTION IX SPECIAL PRECAUTIONS OR OTHER COMMENTS

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.







4		1. Generator's US EPA ID No FILI DO161361119	Docur	nent No.	2. Page 1 of \		the shaded areas d by Federal law.
	3. Generator's Name and Mailing Address	BRUNING P	AINT C			nifest Documen	t Number
	1100 500 12 AVE, R	mpano de	ACH, F	٠ ـــا إ	B. State Ge	nerator's ID	
. 1	33069 4. Generator's Phone (305) 781						
	5. Transporter 1 Company Name ENVIR	CONMED 6. U	S EPA ID Numbe			insporter's ID	-18 -11
	TAL RECOVERY GROUD 7. Transporter 2 Company Name		192718 S EPA ID Numbe			ter's Phone(Q nsporter's ID	241-2202
	7. Transporter 2 Company/Vame	ו ו ו			F. Transpor		
.	9. Designated Facility Name and Site Addres	s 10. U	S EPA ID Numbe	7	G. State Fa	cility's ID	
	9. Designated Facility Name and Site Addres TRICIL RECOVERY SERI WORLDAL ALEPORT	BARTOW, F	FL.	.100	H. Facility's	Phone	•
	33830-9504		180729	16/10	(813)	<u>533-</u>	6111
6	11. US DOT Description (Including Proper Shi)	oping Name, Hazard Class ar	nd ID Number)	12. Conta No.	T T	13. 14. otal Unit antity Wt/Vol	Waste No.
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$\ $	16. GENERATOR'S CERTIFICATION: I hereby declare proper shipping name and are classified, packed, r	that the contents of this consignm	ent are fully and accu	rately descri	bed above by	/ay	
	according to applicable international and national g If I am a large quantity generator, I certify that	povernment regulations.					have determined to be
$\ $	economically practicable and that I have select future threat to human health and the environm	ed the practicable method of trea	stment, storage, or o	disposal cum	ently available	to me which minir	mizes the present and
$\ $	the best waste management method that is available	ble to me and that I can afford.					
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إن	20. Facility Owner or Operator: Certification			fis manife	est except as	noted in Item 19	
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20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

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HAZARDOUS WASTE SITE INSPECTION EXIT INTERVIEW SUMMARY

FACILITY: Env. ron mental Recovery Group
I.D. NUMBER: FLD 1927185% DATE: 8/14/90 TIME: 3.15
INTERVIEW PARTICIPANTS: Pam Fellabaum, Mike Reutter, Roger Freeman, Joly Teagul
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, therfore, 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 assesment
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.
TIADITICY.
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: CESQU at this time, will check on Iw discharge
DER INSPECTOR SIGNATURE: James Fellebogum
FACILITY PARTICIPANT SIGNATURE: X 10 m W Councilly 14
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.