



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: <u>Pam</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
Vicky Valade *VG*

FROM: Pamela Fellabaum *PF*

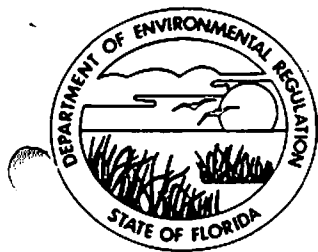
DATE: May 29, 1990

SUBJECT: Quadrex HPS Incorporated
Hazardous Waste Inspection of May 17, 1990
Alachua County - FLD 980 711 071

Attached is subject inspection report.

* Land Ban

PF:jf



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

May 31, 1990

Mr. Ben Warren, Vice President
Quadrex HPS Incorporated
Post Office Box 4100
Gainesville, Florida 32606

Dear Mr. Warren:

Quadrex HPS Incorporated
Hazardous Waste Inspection of May 17, 1990
Alachua County - FLD 980 711 071

Enclosed is a copy of the report documenting the May 17, 1990, Hazardous Waste Inspection conducted by this office.

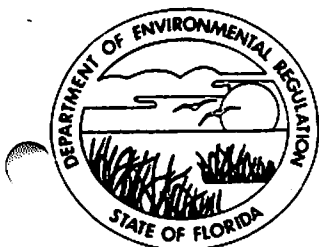
If you have any questions regarding this report or hazardous waste regulations, please do not hesitate to contact this office for assistance.

Thank you for your time and continued cooperation.

Sincerely,

Pamela Fellabaum
Pamela Fellabaum
Environmental Specialist

PF:jf
Enclosure



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HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT __COMPLAINTxxROUTINE__FOLLOW-UP__PERMITTING

FACILITY NAME Quadrex HPS Incorporated DER/EPA ID FLD 980 711 071

STREET ADDRESS 1940 N.W. 67 Place, Gainesville, Florida 32606

MAILING ADDRESS Post Office Box 4100, Gainesville, Florida 32606

COUNTY Alachua PHONE (904) 373-6066 DATE 5/17/90 TIME 10:00

TYPE OF FACILITY:

Generator Status

Conditionally Exempt

__Small Quantity

__Generator

(100-1000 kg/month)

xxGenerator (>1000kg/mo)

xxHazardous Waste Fuel Marketer

Storage

xxContainer

xxTank

__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 xx40 CFR 262 __40 CFR 263 __40 CFR 264 xx40 CFR 265
xx40 CFR 266.34

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

4. Survey Participants & Principal Inspector

Pamela Fellabaum, FDER

Mark Cadenhead, FDER

Mr. Whittle, Quadrex

Mr. Warren, Quadrex

Mr. Flaacke, Quadrex

Mr. Owens, Quadrex

Mr. Pelto, Quadrex

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 number: HT01-136540 Date Issued: 7/15/88 Expiration Date: 10/15/90

8. Pre-arranged Inspection: xxYes __No

PROCESS DESCRIPTION

Quadrex HPS Incorporated 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 sent to Chemical Conservation 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 Rineco Chemical Industries in Benton, Arkansas.

All liquids that test negative radiologically are pumped to the 3,000 gallon tank. Oldover Corporation pumps out this tank and the liquids are burned as hazardous waste fuel by Florida Solite Corporation. This 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.

All liquids tht test positive radiologically are put into drums and placed in a temporary storage area for additional radiological decay. There were approximately 30 55-gallon drums decaying outside the main hazardous waste storage area. These drums were covered 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 Temporary Operating Permit (TOP) #HT 01-136540 on July 15, 1988. The expiration date of the permit has been extended until October 15, 1990. 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 650 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 and dated.

A review of the facility's operating records found them to be in order. No violations were noted at the time of the inspection.

HAZARDOUS WASTE SITE INSPECTION
EXIT INTERVIEW SUMMARY

FACILITY: Quadrax
I.D. NUMBER: FLD 980-711-071 DATE: 5/17/90 TIME: 12:00
INTERVIEW PARTICIPANTS: Pamela Fellabaum, Mark Kadenhead, Jack Flaacke

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: No violations noted at this time

DER INSPECTOR SIGNATURE: Pamela Fellabaum

FACILITY PARTICIPANT SIGNATURE: X Jack Flaacke

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.