

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, ^{ASB} Hazardous Waste Supervisor
Vicky G. Valade, ^V Environmental Supervisor
Hazardous Waste Section

FROM: Pamela Fellabaum, Environmental Specialist ^{PF}
Hazardous Waste Section

DATE: April 5, 1993

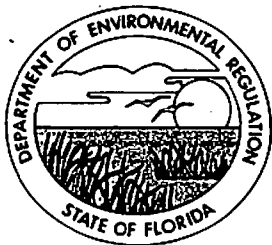
SUBJECT: Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of March 23, 1993
Alachua County - FLD 980 711 071

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

Virginia B. Wetherell, Secretary

May 4, 1993

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. WL93-0369HW01NED
Class I Hazardous Waste Violations
DER/EPA ID FLD 980 711 071
Alachua County - Hazardous Waste

A hazardous waste compliance inspection was conducted at your facility on March 23, 1993. 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 advised that any activity at your facility that may be contributing to violations of the above described statutes and rules should be ceased immediately. Operation of a facility in violation of state statutes or rules may result in liability for damages and restoration, and the judicial imposition of civil penalties up to \$50,000 per violation per day pursuant to Section 403.727, Florida Statutes.

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.




Mr. Ben Warren
Quadrex Environmental Company, Inc.
Warning Letter No. WL93-0369HW01NED
Page Two

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 you take acceptable corrective actions within 90 days of the date of the inspection report, the Department will not seek penalties from you. However, if you do not take appropriate corrective action within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued against you within 150 days of the date of the attached inspection report. 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.

If after further investigation, the Department determines that the violations occurred and you have not taken timely corrective actions, this matter may be amicably resolved only through the entry of a Consent Order, which will include a compliance schedule and an appropriate penalty.

Sincerely,


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

JW
EEF:pfs

Enclosure



Florida Department of Environmental Regulation

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

Lawton Chiles, Governor

Virginia B. Wertherell, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT ☐ COMPLAINT ☒ ROUTINE ☐ FOLLOW-UP ☐ PERMITTING
FACILITY NAME Quadrex Environmental Co. DER/EPA ID FLD 980 711 071
STREET ADDRESS 1940 N.W. Place, Gainesville, Florida 32606
MAILING ADDRESS Post Office Box 4100, Gainesville, Florida 32606
COUNTY Alachua PHONE (904) 373-6066 DATE 3/23/93 TIME 10:45 AM

TYPE OF FACILITY:

Generator Status

☐ Conditionally
Exempt (<100 kg/mo)
☐ SQG (100-1000 kg/mo)
☒ Generator (>1000 kg/mo)
☐ Non-Handler
☒ Hazardous Waste
Fuel Marketer

Storage

☒ Container
☒ 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

2. Applicable Regulations:

☐ 40 CFR 261.5 ☒ 40 CFR 262 ☐ 40 CFR 263 ☒ 40 CFR 264
☒ 40 CFR 265 ☒ 40 CFR 266 ☒ 40 CFR 268

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

4. Survey Participants & Principal Inspector: Mr. Fleetwood, Quadrex Mr. Whittle, Quadrex Pamela Fellabaum, FDER

5. Facility UTM: 17/369641/3286370

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: HO 01-169480 Date Issued: 9/28/90 Exp. Date: 9/27/95

8. Pre-arranged Inspection: ☐ Yes ☒ No

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
March 23, 1993

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 by A.R. Paquette to Florida Solite 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.

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
March 23, 1993
Page Two

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

Liquids that test negative radiologically and have waste codes D001, F003, F005 are either pumped to the 3,000 gallon tank or bulked into a tote before pumped into a tanker truck. The hazardous waste fuel is then 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 Corporation, 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 18, 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 516 55-gallon drums of hazardous waste inside the storage area, and all of the drums were labeled with hazardous waste labels. Fourteen (14) drums accumulating in the permitted storage area did not have dates of accumulation on either the labels or the drums. Not marking these drums with dates of accumulation is a violation of 40 CFR 268.50(a)(2). Hazardous waste generated by Quadrex is also stored in the permitted storage area, and all of these drums were closed and properly labeled.

A review of the facility's operating records found them to be in order. Manifests and accompanying land ban documents were also in order.

SUMMARY OF VIOLATIONS

The following is a violation of the Florida Administrative Code Section 17-730.183 which adopts and incorporates by reference Title 40 Code of Federal Regulations (CFR) Part 268.

Subpart E -- Prohibitions on Storage

40 CFR 268.50(a)(2)(i) - Prohibitions on Storage of Restricted Wastes

- (a) Except as provided in this section, the storage of hazardous wastes restricted from land disposal under Subpart C of this part of RCRA section 3004 is prohibited, unless the following conditions are met:
 - (2) An owner/operator of a hazardous waste treatment, storage, or disposal facility stores such wastes in tanks or containers solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment, or disposal and:
 - (i) Each container is clearly marked to identify its contents and the date each period of accumulation begins;

VIOLATION: Facility failed to date the fourteen (14) drums mentioned in the process description section of the report.

Quadrex Environmental Company, Inc.
Hazardous Waste Inspection of
March 23, 1993
Page Four

RECOMMENDED CORRECTIVE ACTIONS

- 40 CFR 268.50(a)(2)(i) - Within one (1) day, facility shall mark the fourteen (14) drums with the date the waste was accepted by the facility. The date that is placed on the drum shall be preceded by a code that indicates that the waste was received by Quadrex on that day.