



**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

NORTHEAST DISTRICT
8800 BAYMEADOWS WAY WEST, SUITE 100
JACKSONVILLE, FLORIDA 32256

RICK SCOTT
GOVERNOR

HERSCHEL T. VINYARD JR.
SECRETARY

September 20, 2013

Mr. Harvey Hall, Branch Operations Manager
Univar USA Inc
155 Ellis Rd S
Jacksonville, Florida 32254
harvey.hall@univar.com

**Re: Univar USA Inc
EPA/DEP ID: FL0 000 596 866
Duval County – Hazardous Waste**

Dear Mr. Hall:

Department personnel conducted a compliance inspection of the above-referenced facility on May 14, 2013. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's hazardous waste rules and regulations. A copy of the inspection report is attached for your records. Non-compliance identified in the inspection report has been corrected.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Jabe Breland at (904) 256-1671 or via e-mail at Jabe.Breland@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Vincent Clark".

Vincent Clark
Environmental Manager
Northeast District

Enclosure(s) – Inspection Report



Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Univar USA Inc

On-Site Inspection Start Date: 05/14/2013 **On-Site Inspection End Date:** 05/14/2013

ME ID#: 50189 **EPA ID#:** FL0000596866

Facility Street Address: 155 Ellis Rd S, Jacksonville, Florida 32254-3546

Contact Mailing Address: 155 Ellis Rd S, Jacksonville, Florida 32254-3546

County Name: Duval **Contact Phone:** (904) 693-4815

NOTIFIED AS:

LQG (>1000 kg/month)

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for LQG (>1000 kg/month) facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transfer Facility

Routine Inspection for Used Oil Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Jabe Breland III, Inspector

Other Participants: Stephany Fenn, Inspector; Harvey Hall, Branch Operations Manager; Robert Potochnik, Operations Manager; Craig Frost, Tank Farm Supervisor

LATITUDE / LONGITUDE: Lat 30° 19' 24.8286" / Long 81° 44' 32.9217"

SIC CODE: 5169 - Wholesale trade - chemicals and allied products, nec

TYPE OF OWNERSHIP: Private

Introduction:

Univar USA Inc (Univar) was inspected on May 14, 2013, as an unannounced hazardous waste compliance evaluation inspection. Univar was last inspected by the Department on August 6, 2008. On March 22, 2013, the facility notified the DEP as a Transporter and Large Quantity Generator (LQG) of hazardous waste, a Used Oil Transporter and Transfer facility, and a Universal Waste Transporter and Transfer facility. The facility is currently operating as a Transporter and LQG of hazardous waste. The facility's Used Oil Transporter and Transfer activities and Universal Waste Transporter and Transfer activities are limited.

Univar is a distributor of chemicals and industrial solvents. The facility has been in operation at this location since 2001, has 16 operations employees, and is on city water and sewer. The facility consists of a Warehouse, an outside aboveground Tank Farm, an outside Storage Yard, and several offices.

Process Description:

The Warehouse, Tank Farm, and Storage Yard are used to store industrial chemicals for distribution, including solvents, corrosives, and pharmaceuticals. The facility receives product from the manufacturer through rail car and tanker truck, and redistributes them to their customers in totes or drums. Hazardous waste is generated at the facility if a product container leaks or breaks, a product exceeds its shelf life, is off-specification, or when any tank lines/sumps are flushed.

Inspection Date: 05/14/2013

Warehouse:

Products such as caustics, buffers, acids, and pharmaceuticals are stored in the Warehouse. Inside the Warehouse, the facility has a 90-day Accumulation Area and Lab, where hazardous wastes are generated and accumulated prior to disposal.

Warehouse - 90-Day Accumulation Area:

This area is located in the northwest corner of the Warehouse. At the time of the inspection, there was one 300-gallon tote accumulating that contained D002 hazardous waste caustics from a line flushing (Photo 1). The tote was closed, properly labeled, and dated. The facility also stores damaged or expired products and pharmaceuticals for reverse distribution in this area. The damaged and expired products are manifested off-site as hazardous waste with U-code designations. The majority of the facility's hazardous waste generated is from expired product. At the time of the inspection, there was no hazardous waste expired product being stored in the Warehouse.

Waste generated from the facility's transporter activities is stored outside of the Warehouse in trucks. At the time of the inspection, no transporter waste was being stored. According to Mr. Hall, Univar's Branch Operations Manager, transporter waste is not stored on-site for longer than 24 hours. In most cases the waste is sent out within 12 hours.

Warehouse - Lab:

Univar operates a quality assurance laboratory. This lab is located in the Warehouse. The facility performs specific gravity tests on isopropyl alcohol (IPA) to determine if it is in the same range as the control to assure quality. The samples are eventually recombined with the product. If the facility is not able to recombine the solvent, the waste solvent is transferred to a 55-gallon flammable hazardous waste accumulation drum located in the tank farm and described below.

Tank Farm:

The Tank Farm is located outside and to the north of the Warehouse. The Tank Farm consists of 39 tanks, separated into two bays depending on the characteristic of the chemical being stored. Flammable products are stored in Bay 1, and corrosive products are stored in Bay 2. Each tank is located within secondary containment. Three open pails were observed in the tank farm during the inspection, and the facility was unaware of what was in the pails (Photos 2-4) [40 CFR 262.11]. Following the inspection, the facility determined that one pail contained a non-hazardous detergent blend and one pail contained rain water. The third pail contained D002 hazardous waste sodium hydroxide. The D002 hazardous waste sodium hydroxide was added to the facility's 90-day tote, located in the warehouse.

The facility has one 55-gallon drum in the Tank Farm that is used to accumulate all flammable waste generated at the facility, including waste IPA from the Lab, line flushes, and waste samples. This drum was closed, properly labeled, and dated (Photo 5).

Four bulk caustic product tanks ranging from 5,500 to 10,000 gallons are stored outside of the Tank Farm. The four tanks were labeled and were located within secondary containment.

Storage Yard:

The Storage Yard is outside and to the north of the Warehouse. There were several drums and containers that were full of product to be shipped to customers. There were also several empty drums stored outside that will be filled with product sent for reconditioning or cleaning.

Also located in the storage yard is the facility's de-ionized (DI) water tank. DI water is added to

Inspection Date: 05/14/2013

dilute IPA. Blending occurs in the Tank Farm. Reject water from the facility's DI water tank is discharged to the facility's stormdrain. Both the Stormwater and Industrial Wastewater sections of DEP have been notified and are currently working with the facility regarding this Area of Concern.

Record Review:

Univar is currently operating as both a Transporter and LQG of hazardous waste, as well a Used Oil Transporter and Transfer facility and Universal Waste Transporter and Transfer facility. Generally, Univar transports its hazardous waste to Tampa, where it is then transported by Dupre Transport Inc (LAR000045963) to the designated facility, Tradebe Treatment and Recovery (TND000772186).

The facility submitted proof of liability insurance to the Department in order to operate as a hazardous waste transporter and carries a copy in each of its vehicles.

A review of the facility's records revealed them to be in order, except for the following:

1. The facility did not have the number of containers on its weekly inspection log at the time of the inspection [62-730.160(6), FAC].
2. The facility did not have its used oil registration form and ID number displayed at the time of the inspection [62-710.500, FAC].
3. The facility did not have used oil transportation acceptance and delivery records available for review at the time of the inspection [40 CFR 279.46(a)].

New Potential Violations and Areas of Concern:**Violations**

Type:	Violation
Rule:	262.11
Explanation:	Three open pails were observed during the inspection, and the facility was unaware of what was in the pails.
Corrective Action:	No further action is required. The facility returned to compliance per a May 20, 2013 email. One of the pails contained D002 hazardous waste.

Type:	Violation
Rule:	279.46(a)
Explanation:	The facility did not have used oil transportation acceptance and delivery records available for review at the time of the inspection.
Corrective Action:	No further action is required. The facility returned to compliance per a May 20, 2013 email.

Type:	Violation
Rule:	62-730.160(6)
Explanation:	The facility did not have the number of hazardous waste containers on its weekly inspection log at the time of the inspection.
Corrective Action:	No further action is required. The facility returned to compliance per a May 20, 2013 email.

Inspection Date: 05/14/2013

Type: Violation

Rule: 62-710.500

Explanation: The facility did not have its used oil registration form and ID number displayed at the time of the inspection.

Corrective Action: No further action is required. The facility returned to compliance per a May 20, 2013 email.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Inspection Date: 05/14/2013

Photo 5



Inspection Date: 05/14/2013

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62-740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Jabe Breland III

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE



PRINCIPAL INSPECTOR SIGNATURE

DEP

ORGANIZATION

9/16/2013

DATE

Supervisor: Jabe Breland III

Inspection Approval Date: 09/18/2013

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.