THE ENVIRONMENTAL QUALITY COMPANY

EQ FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FL 33619 • *tel* 800-624-5302 • *fax* 813-628-0842

October 31, 2013

Merlin D. Russell Jr.
Professional Geologist II
Hazardous Waste Program & Permitting, Room 330G
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2600

Re: Closure Certification for EQFL Filter Press

Dear Mr. Russell:

Attached is a signed certification of closure, a trip report and photographs of closure of the filter press contained in our current hazardous waste permit. This unit was never placed into operation and has sat idle for a number of years. We would like to have it certified closed and notify you that it will not be included in our upcoming submittal for renewal of the hazardous waste permit for this facility.

As noted in the attachments, EQ Florida, Inc. has no plans to sell or scrap the unit at this time. Rather, it will be shipped to our Oklahoma facility for their use.

Please call me at 813-319-3410, or email me at gene.cieply@eqonline.com if I can answer any questions after you've had a chance to review this material.

Sincerely,

Gene Cieply

Gene Cieply
General Manager
EQ Florida, Inc.

KCI TECHNOLOGIES

ISO 9001:2008 CERTIFIED

ENGINEERS • PLANNERS • SCIENTISTS • CONSTRUCTION MANAGERS

10401 Highland Manor Drive, Suite 120 • Tampa, FL 33610 • Phone 813-740-2300 • Fax 813-740-0158

Engineering Certification

I hearby certify that I have reviewed the documentation and discussed the observations with the staff conducting the investigations and that these documents were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. In my professional judgement, the closure that was accomplished for the EQFL filter press was conducted in substantial compliance with the closure plan for this unit as described in the existing permit and is consistent with commonly accepted engineering practices.

Thomas Sprehe, P.E.
Florida Registration No.73679
Florida Certificate of Authorization No. 4898

10/31/13
Date

KCI TECHNOLOGIES

MEMORANDUM

TO: File/EQFL-Orient Road, Tampa, FL

FROM: Jerry E. Kubal, P.G.

DATE: 31 October 2013

SUBJECT: Inspection of Decon and Closure of Filter Press
KCI Project No.: 12123014

JERRY EDWARD KUBAL LICENSE No.PG875 STATE OF FLORIDA PROFESSIONAL GEOLOGIST

On Friday, October 18, 2013, I visited the EQFL site on Orient Road to observe and photo document closure activities related to the filter press (FP) which is currently included as a hazardous waste treatment unit under EQ's permit. EQ reportedly only used the FP one time, approximately 15 years ago, and it has been sitting idle since then (Figure 1). There were no plans to restart the unit at the Tampa facility and EQ decided to remove the unit in accordance with the closure plan in the hazardous waste permit.
In the permit, closure of the FP is described as "... cleaned and decontaminated by pumping a dilute muriatic acid solution followed by water through the press. The press will also be cleaned and decontaminated using a pressure wash. All collected rinsates will be managed as hazardous waste with the other facility decontamination rinsates. The press will be sold for any residual value or as scrap metal."

Because the FP was not operational, pumping a dilute muriatic solution through the press was not an option. Rather, the unit was brushed down in place to remove 15 years of accumulated dust and dirt. The pressure was released, and 13 of 14 individual plates were removed for cleaning. The one exception was the front-most plate which was lodged in place and could not be removed (Figure 2). This necessitated decontaminating this one plate while still attached to the unit and collecting the accumulated rinsate.

Upon my arrival, Curtis Merkerson and Ed Barnes had moved the 13 individual plates over to the decontamination area set up outside the waste storage building. Both were wearing appropriate PPE consisting of tyvek suits, hard hats, full face shields and chemically resistant gloves (Figure 3). Four of the plates had been decontaminated and were sitting atop a wooden pallet covered with plastic sheeting and being allowed to air dry. Four individual plates were sitting inside a round, polyethylene containment vessel sitting on plastic sheeting.

Decontamination consisted of rinsing each plate with a pressure spray bottle containing a dilute, 15 percent muriatic acid solution. One individual kept the spray bottle pressurized while the other rinsed off the individual plates. Once rinsed, each plate was rinsed with clean water through a spray nozzle attached to a hose. The plates were then turned around and the same process was conducted on the opposite side. Once the plates had been decontaminated in this fashion, they were stacked on the wooded pallet with other previously cleaned plates (Figure 4). Work continued in similar fashion on the remaining five plates.

To the extent possible, rinsate accumulating in the bottom of the containment vessel was then pumped out into a plastic drum labeled as containing caustic "Hazardous Waste" (Figures 5 and 6). The remaining liquid (approximately 2-3 gallons) was poured into a 5-gallon pail along with clean rinse water sprayed over the bottom of the containment vessel and then poured into the plastic drum. All material and any liquid captured on the underlying plastic sheeting was removed using absorbent pads. The pads, tyvek suits, gloves and sheeting were wrapped up and placed in a see through plastic bag for disposal and the decontaminated containment vessel was loaded into the bed of the pick up truck (Figures 7, 8 and 9).

After observing the decontamination of the individual plates, I visited the FP area to observe the work that had been conducted there (Figures 1 and 2). Ed Barnes described the brush down, cleaning of the plate that could not be removed and indicated the FP was to be taken over to the non-haz waste side for a pressure wash to remove the accumulated dust and dirt, with the rinse waters collected and disposed of properly.

Although the FP was not closed in exact accordance with the plan described in the permit, it was felt that the process utilized was the most practical approach available to EQ and achieved an equivalent level of decontamination of the unit before removal. It should be noted that the ultimate disposition of the unit is not to be sold or scrapped. Rather, EQ plans to ship the unit to its facility in Oklahoma for use in the process at that location.

Analytical Test Results

A sample of the rinsate was collected by EQ personnel on October 24, 2013. Based on generator knowledge, the sample was analyzed for pH and the "RCRA 8 metals" (arsenic, barium, cadmium, chromium, lead, mercury, selenium and silver) by TCLP (toxicity characteristic leaching procedure). The analytical results and chain of custody form are attached to this trip report.

The rinsate was determined to be corrosive (D002), and characteristically hazardous for the metals cadmium (D006) and chromium (D007). A waste manifest was prepared for proper disposal/disposition of the rinsate and is also attached. Because the drum was only partially full following decontamination, other waste was consolidated with the rinsate which is the reason for the additional waste codes and classifications on the manifest.

Attachments: Photographs (9)
Analytical Test Results (SunLabs)
Waste Manifest

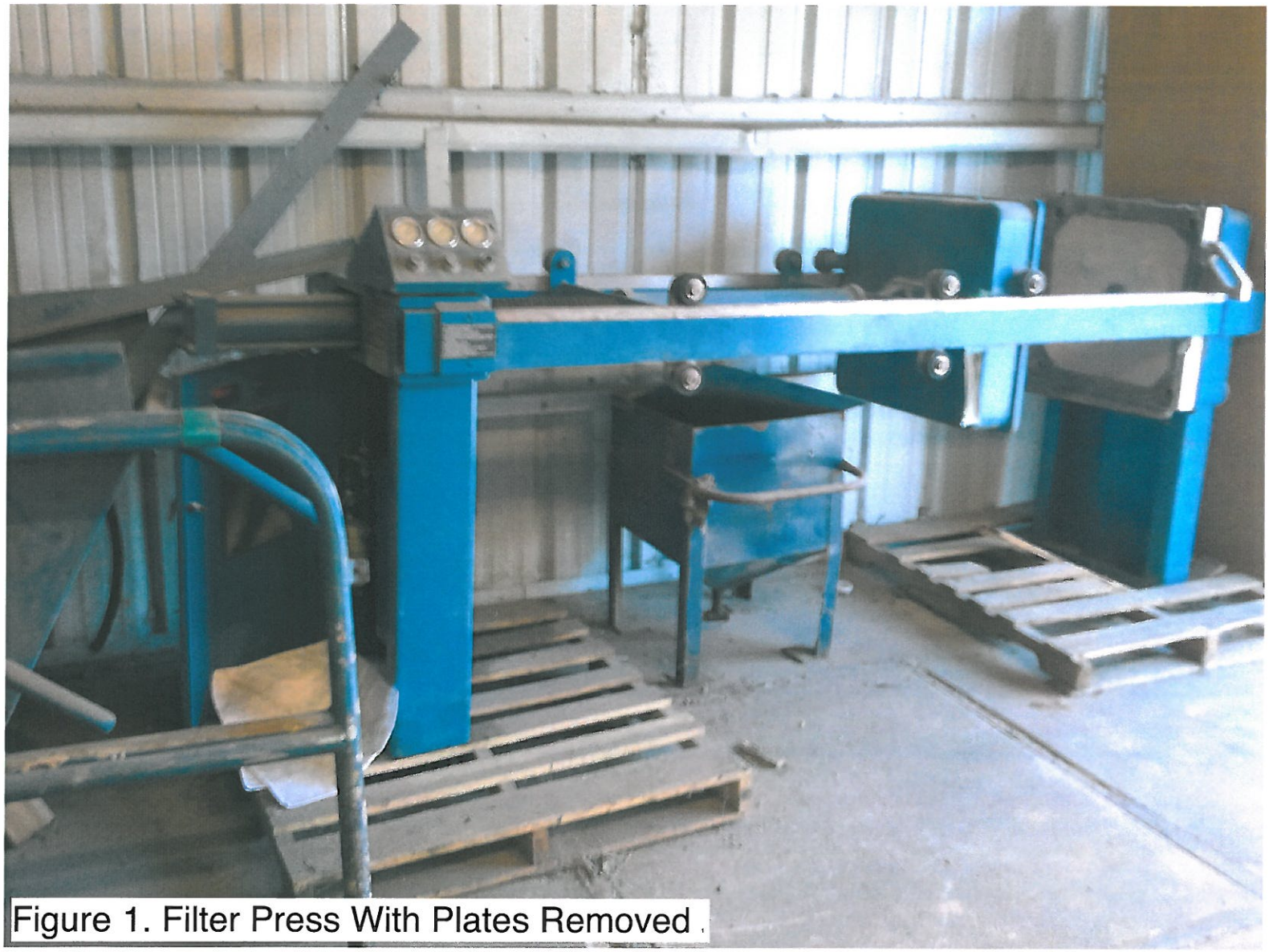

Figure 1. Filter Press With Plates Removed .

Figure 2. Filter Press With Plate Decontaminated in Place.

Figure 3. Decontamination Process for Filter Press Plates

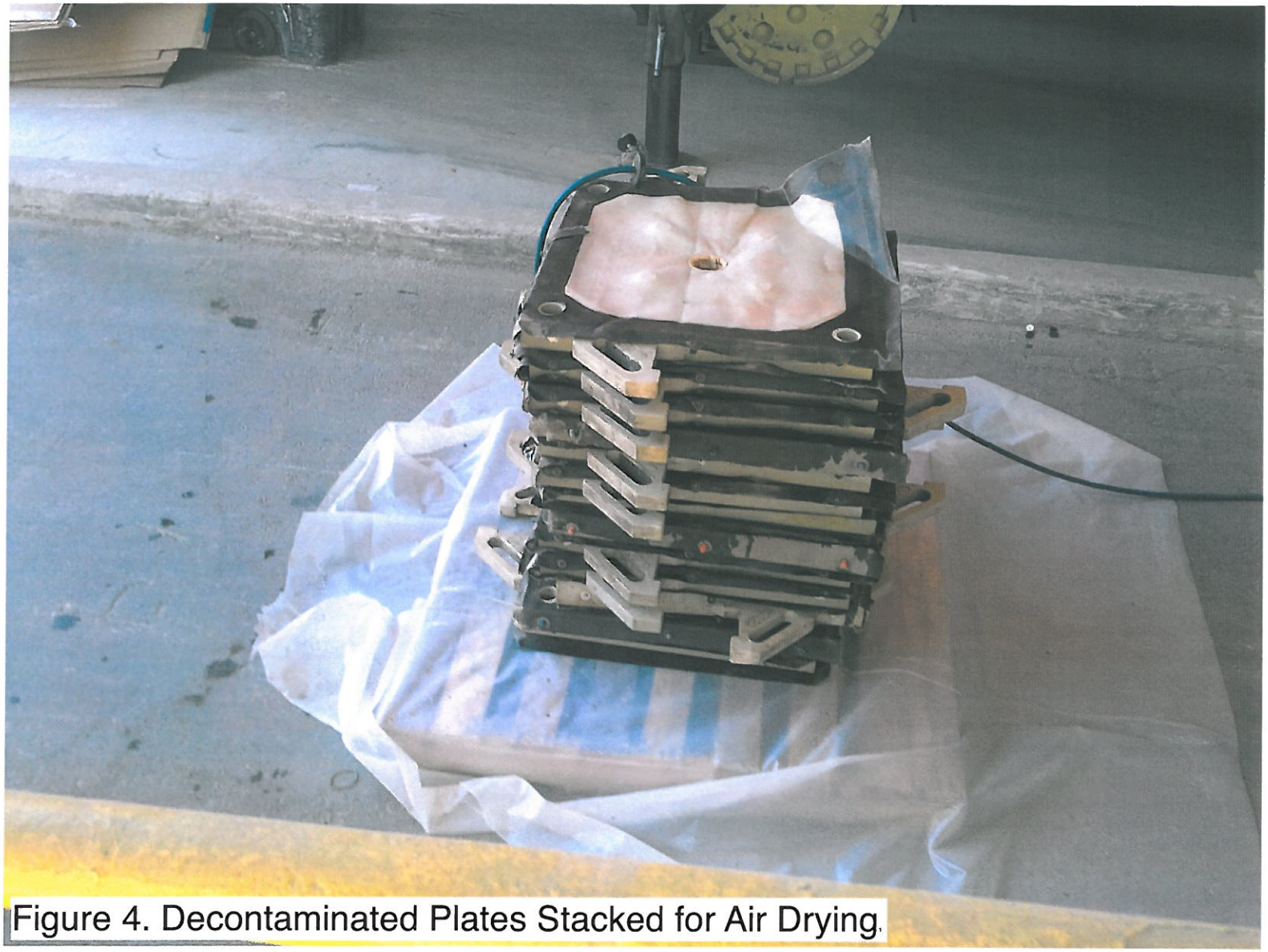

Figure 4. Decontaminated Plates Stacked for Air Drying.

Figure 5. Start of Removing Rinsate from Containment Vessel

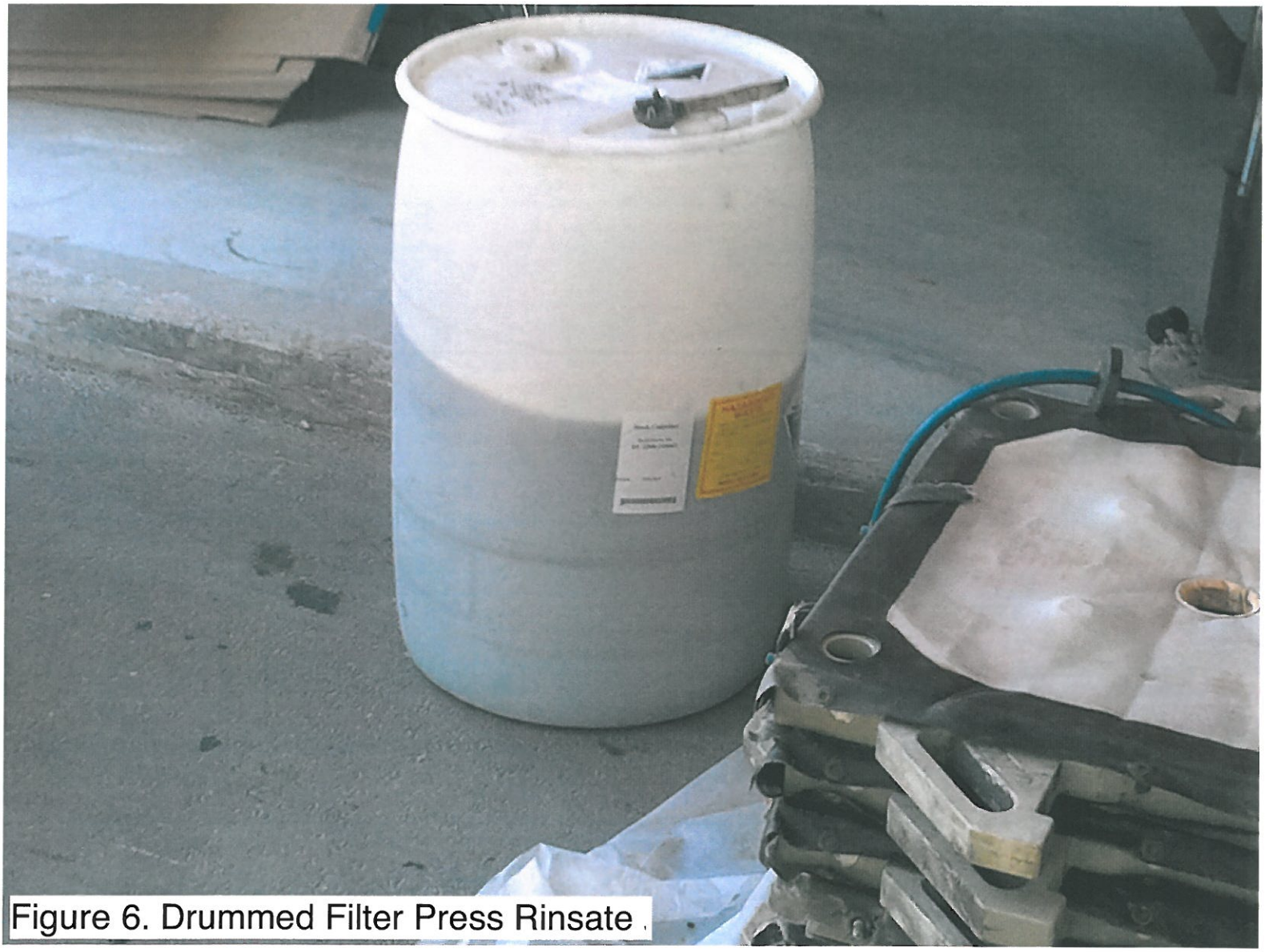

Figure 6. Drummed Filter Press Rinsate

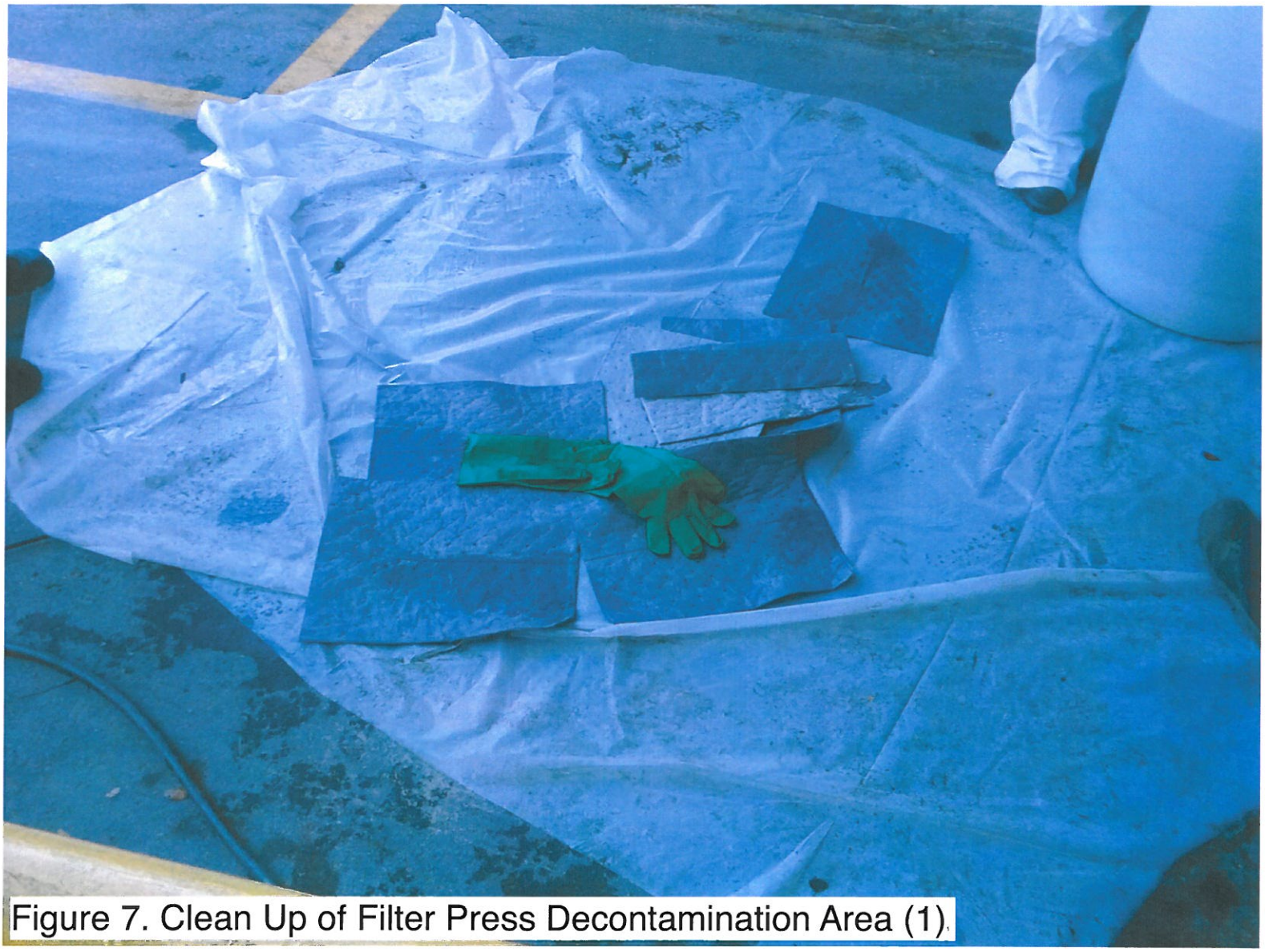

Figure 7. Clean Up of Filter Press Decontamination Area (1).

Figure 8. Clean Up of Filter Press Decontamination Area (2)

Figure 9. Clean Up of Filter Press Decontamination Area (3).

Tyler Colcord
EQ Florida, Inc.
2002 N. Orient Road
Tampa, FL 33619

October 29, 2013

SunLabs Project Number: **3102509**
Client Project Description: **Filter Press Decon Rinsate**

Dear Mr. Colcord,

Enclosed is the report of laboratory analysis for the following samples:

Sample Number	Sample Description	Date Collected	Date Received
3102509-01	Filter Press Decon Rinsate	10/24/13 15:30	10/25/13 14:22

Narrative

Unless otherwise noted below or in the report and where applicable:

- Samples were received at the proper temperature and analyzed as received.
- Sample condition upon receipt is reported on the chain-of-custody attached to this report.
- Results for all solid matrices are reported on a dry weight basis.
- Appropriate calibration and QC criteria were satisfactorily met.
- All applicable holding times for analytes have been met.
- Copies of the chains-of-custody, if received, are attached to this report.

The TCLP Leachate for sample 3102509-01 was created 10/28/13 at 1248.

If you have any questions or comments concerning this report, please do not hesitate to contact us.

Michael W. Palmer
Vice President, Laboratory Operations

Unless Otherwise Noted and Where Applicable:
The result herein relate only to the items tested or to the samples as received by the laboratory. This report shall not be reproduced except in full, without the written approval of SunLabs. All samples will be disposed of within 60 days of the date of receipt of the samples. All results meet the requirements of the NELAC standards. Uncertainty values are available upon request.

Report of Laboratory Analysis

SunLabs Project Number	EQ Florida, Inc.
3102509	Project Description: Filter Press Decon Rinsate

October 29, 2013

SunLabs Sample Number: **3102509-01**
Sample Designation: **Filter Press Decon Rinsate**

Matrix: **Liquid**
Date Collected: **10/24/13 15:30**
Date Received: **10/25/13 14:22**

Parameters	Method	Units	Results	Dil Factor	MDL	PQL	CAS Number	Date/Time Analyzed	Date/Time Prep
pH by EPA 9040C							Method Qualifier:		
pH	EPA 9040C	pH Units	< 1	1			NA	10/28/13 14:52	10/28/13 14:49
TCLP Mercury by EPA 7470							Method Qualifier:		
Mercury	EPA 7470	mg/L	0.13	5	0.00080	0.0032	7439-97-6	10/29/13 12:33	10/28/13 13:40
TCLP Metals by EPA 6010							Method Qualifier:		
Arsenic	EPA 6010	mg/L	0.0048 U	1	0.0048	0.10	7440-38-2	10/29/13 01:21	10/28/13 13:15
Barium	EPA 6010	mg/L	0.37	1	0.0010	0.10	7440-39-3	10/29/13 01:21	10/28/13 13:15
Cadmium	EPA 6010	mg/L	41	10	0.0060	1.0	7440-43-9	10/29/13 11:19	10/28/13 13:15
Chromium	EPA 6010	mg/L	38	10	0.035	1.0	7440-47-3	10/29/13 11:19	10/28/13 13:15
Lead	EPA 6010	mg/L	0.44	1	0.0044	0.10	7439-92-1	10/29/13 01:21	10/28/13 13:15
Selenium	EPA 6010	mg/L	0.0047 U	1	0.0047	0.10	7782-49-2	10/29/13 01:21	10/28/13 13:15
Silver	EPA 6010	mg/L	0.0033 U	1	0.0033	0.10	7440-22-4	10/29/13 01:21	10/28/13 13:15

Footnotes

X	*< 1*
U	*The compound was analyzed for but not detected.*
I	*The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.*
****	*SunLabs is not currently NELAC certified for this analyte. Unless directed otherwise by client, a NELAC certified sub-contract laboratory has performed this analysis (see cover letter for details).*
LCS / LCSD	*Laboratory Control Sample / Laboratory Control Sample Duplicate*
MB	*Method Blank*
MS / MSD	*Matrix Spike / Matrix Spike Duplicate*
RPD	*Relative Percent Difference*

Quality Control Data

SunLabs Project Number	EQ Florida, Inc.
3102509	Project Description: Filter Press Decon Rinsate

Batch No: B001747

Test: **TCLP RCRA7**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B001747-BLK1)				Prepared: 10/28/13 Analyzed: 10/29/13					
Arsenic	0.0048 U	mg/L							
Barium	0.0010 U	mg/L							
Cadmium	0.00060 U	mg/L							
Chromium	0.0035 U	mg/L							
Lead	0.0044 U	mg/L							
Selenium	0.0047 U	mg/L							
Silver	0.0033 U	mg/L							
LCS (B001747-BS1)				Prepared: 10/28/13 Analyzed: 10/29/13					
Arsenic	5.2	mg/L	5.0		104	80-120			
Barium	4.9	mg/L	5.0		98.4	80-120			
Cadmium	5.0	mg/L	5.0		100	80-120			
Chromium	4.8	mg/L	5.0		96.7	80-120			
Lead	5.1	mg/L	5.0		101	80-120			
Selenium	5.3	mg/L	5.0		105	80-120			
Silver	4.4	mg/L	5.0		87.5	80-120			
Matrix Spike (B001747-MS1)	**Parent Sample: 3100708-01**			Prepared: 10/28/13 Analyzed: 10/29/13					
Arsenic	5.2	mg/L	5.0	0.014	103	80-120			
Barium	5.0	mg/L	5.0	0.25	95.3	80-120			
Cadmium	5.0	mg/L	5.0	0.0077	99.7	80-120			
Chromium	4.8	mg/L	5.0	0.031	96.3	80-120			
Lead	5.0	mg/L	5.0	0.14	97.5	80-120			
Selenium	5.1	mg/L	5.0	0.012	102	80-120			
Silver	4.3	mg/L	5.0	ND	86.3	80-120			

Batch No: B001758

Test: **TCLP Mercury**

Analyte	Result	Units	Spike Level	Parent Result	%REC	%REC Limits	RPD	RPD Limit	Flags
Blank (B001758-BLK1)				Prepared: 10/28/13 Analyzed: 10/29/13					
Mercury	0.00016 U	mg/L							
LCS (B001758-BS1)				Prepared: 10/28/13 Analyzed: 10/29/13					
Mercury	0.020	mg/L	0.020		102	0-200			
Matrix Spike (B001758-MS1)	**Parent Sample: 3101707-01**			Prepared: 10/28/13 Analyzed: 10/29/13					
Mercury	0.020	mg/L	0.020	ND	100	0-200			

Samples Associated with QC Batches

QC Batch ID	Method	Sample List
B001727	EPA 1311	3102509-01
B001731	EPA 9040C	3102509-01
B001747	EPA 6010	3102509-01
B001758	EPA 7470	3102509-01
B001759	EPA 7470	3102509-01RE1

SunLabs, Inc. Chain of Custody

№ 39711

Client Name: EQ Florida, Inc.
Contact: Ken Dean / Tyler Colcord
Address: 2002 N. Orient Rd
Tampa, FL 33619
Phone / Fax: 813-319-3422
E-Mail: Ken.Dean@eqonline.com
Tyler.Colcord@eqonline.com

SunLabs Project # 3102509

Project Name: Filter Press Decon Rinseate
Project #:
PO #:
Alt Bill To:

SunLabs Sample #	Sample Description	Sampled Date	Sampled Time	# of Bottles	Bottle Type	Preservative	Matrix	Analysis / Method Requested: RCRA 8 TCLP	pH
-01	Filter Press Decon Rinseate	10/24/13	15:30	1				X	X

Due Date Requested*:

☐ FDEP PreApproval site
☐ ADaPT EDD (PGM:_____)
Facility/Site ID:

Remarks / Comments:
Liquid Sample
Rush 1 qt

Length of Record Retention if other than 5 years:*

Sampler Signature / Date: 10/24/13

Printed Name / Affiliation: Kenneth S. Dean / EQ Florida Operations Mgr.

SUNLABS, INC. RESERVES THE RIGHT TO BILL FOR DISPOSAL OF UNUSED/ UNRETURNED SAMPLES AND TO RETURN UNUSED SAMPLES.

Relinquished By:	Relinquished To:	Date:	Time:
		10/25/13	14:22
Relinquished By:	Relinquished To:	Date:	Time:
Relinquished By:	Relinquished To:	Date:	Time:
Relinquished By:	Relinquished To:	Date:	Time:

Bottle Type Codes:
GV = Glass Vial; GVS = Low Level Volatile Kit
GA = Glass Amber; T = Tedlar Bag
P = Plastic; O = Other (Specify)
S = Soil Jar

Preservative Codes:
H = Hydrochloric Acid + Ice; S = Sulfuric Acid + Ice
I = Ice only; VS = NaHSO4, MeOH, + Ice
N = Nitric Acid; T = Sodium thiosulfate + ice
B = Sodium bisulfate + Ice; O = Other (Specify)_____

Matrix Codes:
A = Air; SO = Soil; SOL = Solid
SW = Surface Water
DW = Drinking Water; WS = Waste; WW = Waste Water
GW = Ground Water; W = Water (Blanks)
SE = Sediment; O = Other (Specify:_____)

Internal Use Only
Temp upon receipt: 28.7 °C
Received on Ice? Y / (N) / NA

Internal Use Only
Sample Condition Upon Receipt:

Custody Seals present?	Y / (N) / NA
Custody Seals intact?	Y / N / (NA)
Shipping Bills attached?	Y / (N) / NA
Sample containers intact?	(Y) / N / NA
Samples within holding times?	(Y) / N / NA
Sufficient volume for all analyses?	(Y) / N / NA
Are vials head-space free?	Y / N / (NA)
Proper containers and preservatives?	(Y) / N / NA

SunLabs, Inc.
5460 Beaumont Center Blvd., Suite 520, Tampa, Florida 33634
Phone: 813-881-9401 / Fax: 813-354-4661
e-mail: info@SunLabsInc.com www.SunLabsInc.com

* See General Terms and Conditions on Reverse

202512

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
	FLD 981 932 494	3	(813) 623-5302	010264176 JJK

GENERATOR

5. Generator's Name and Mailing Address: EQ FLORIDA, INC.
7202 EAST 8TH AVENUE
TAMPA, FL 33619
Generator's Phone: (813) 623-5302

Generator's Site Address (if different than mailing address):
2002 N. ORIENT ROAD
TAMPA, FL 33619

6. Transporter 1 Company Name: AR PAQUETTE & COMPANY, INC.
U.S. EPA ID Number: FLD 982 105 884

7. Transporter 2 Company Name:
U.S. EPA ID Number:

8. Designated Facility Name and Site Address: EQ DETROIT, INC.
1923 FREDERICK
DETROIT, MI 48211
Facility's Phone: (313) 347-1300
U.S. EPA ID Number: MID 980 991 566

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, UN3266, Waste Corrosive liquid, basic, inorganic, n.o.s. (Sodium Hydroxide,Lead), 8, PGII, (D002,D007,D008,D010), ERG #154	008	DF	04199	P	D002 D007 D008 D010
X	2. RQ, UN3264, Waste Corrosive liquid, acidic, inorganic, n.o.s. (Phosphoric Acid,Sulfuric Acid), 8, PGII, (D002,D006,D007,D008), ERG #154	009	DF	05245	P	D002 D006 D007 D008
X	3. RQ, UN3264, Waste Corrosive liquid, acidic, inorganic, n.o.s. (Hydrochloric Acid), 8, PGII, (D002), ERG #154	003	DF	01242	P	D002
X	4. RQ, UN3265, Waste Corrosive liquid, acidic, organic, n.o.s. (Hydrofluoric Acid) 8, PGII, (D002), ERG #153	001	DF	00213	P	D002

14. Special Handling Instructions and Additional Information
1. 5676 2. 12781 3. 12781 4. 7557

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: MELISSA ARRENDALE
Signature: Melissa Arrendale
Month: 10 Day: 30 Year: 13

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: GEORGE FRAZER
Signature: George Frazer
Month: 10 Day: 30 Year: 13

Transporter 2 Printed/Typed Name:
Signature:
Month: Day: Year:

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name:
Signature:
Month: Day: Year:

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST (Continuation Sheet)

21. Generator ID Number: FLD 981 932 494

22. Page: 3

23. Manifest Tracking Number: 010264176JJK

24. Generator's Name: EQ FLORIDA, INC

25. Transporter _____ Company Name — U.S. EPA ID Number

26. Transporter _____ Company Name — U.S. EPA ID Number

GENERATOR

27a. HM	27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	28. Containers No.	28. Containers Type	29. Total Quantity	30. Unit Wt./Vol.	31. Waste Codes
X	15 RQ, UN3264, Waste corrosive liquid, acidic, inorganic, n.o.s. (Phosphoric Acid,Sulfuric Acid), 8, PGII, (D002), ERG #154	001	DF	00520	P	D002
X	16 RQ, UN3264, Waste Corrosive liquid, acidic, inorganic, n.o.s. (Hydrochloric Acid,Phosphoric Acid), 8, PGII, (D002,D006,D007), ERG #154	001	DF	00503	P	D002, D006, D007
	17 NON-REGULATED MATERIAL, SOLID	001	CF	00326	P	029L

32. Special Handling Instructions and Additional Information

15. 7553 16. 12781 17. 11969

TRANSPORTER

33. Transporter _____ Acknowledgment of Receipt of Materials — Printed/Typed Name — Signature — Month Day Year

34. Transporter _____ Acknowledgment of Receipt of Materials — Printed/Typed Name — Signature — Month Day Year

DESIGNATED FACILITY

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

15 | 16 | 17

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (If Required)