

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

(2nd page)

NO.	DATE	TO	FROM	REFERENCE
34 92	Nov 18	K. McCann UW & T	L. Clark DER - Tallah	Receival of closure cost estimate
35 92	Dec 14	L. Milanian DER - Tampa	David Brown UW & T	Outline of procedure for acceptance of hazardous waste for transportation
36 92	Dec 16	David Brown UW & T	L. Milanian DER - Tampa	Hazardous waste manifests
1 93	Jan 26	L. Milanian DER - TPA	J. Taylor UW & T	Stauffer Chemical Co. site info.
2 93	Jan 26	R. Garrity DER - TPA	L. Milanian DER - TPA	Permit cover memo - Modification to issued operating permit
3 93	Feb 9	K. Williams EPA	B. Kothur DER - Tallah	RFA work plan replacement
4 93	Mar 29	B. Knauss DER - Tallah	L. Milanian DER - Tpa	Non compliance with permit application
5 93	April 7	A. Farmer EPA	S. Kastury DER - Tallah	Draft RCRA facility assessment report (RFA)
6 93	June 30	S. Kastury DER - Tallah	A. Farmer EPA	Comments on draft RCRA Facility Assessment Report
7 93	Oct 5	J. Swabough EPA	M. Pliske City Manager	Financial documents
8 93	Oct 6	S. Kastury DER Tall.	L. Milanian DER Tmp	File copy of 7/93
9 93	Dec 13	F. Wick DER Tall.	B. Knauss DER Tmp	Subpart H Compliance for transfer station
10 93	Dec 16	F. Wick DER Tall.	D. Brown DER RCRA	Subpart H Compliance for transfer station
11 93	Dec 17	B. Knauss DER Tmp		" " " " " "
12 94	2-7-94	R. Vanderschuer FOEP	J. Taylor U.W.T	discussion of stormwater pretreatment system
13 94	2-14-94	L. Milanian FOEP	J. Taylor UWT	Submittal of revised Contingency Plan
14 94	2-22-94	J. Taylor UWT	L. Milanian FOEP	Comments on revised Contingency Plan (12/94)
15 94	8-18-94	File		Attendees
16 94	8-22-94	J. Taylor	B. Crawford	Notice of potential QAPP requirements
17 94	9-16-94	W. Crawford	J. Taylor	Submittal of G.W. monitoring results
18 94	9-22-94	K. D'Arcy	J. Taylor	submittal of information on property west of UWT
19 94	11-1-94	B. Crawford	W. Horn	Discussion of QAPP needs
20 94	11-2-94	File		Minutes & Attendees of meeting
21 94	11-17-94	F. Ashwood	R. Evans	F.A.X. of information
22 94	11-22-94	K. McCann	D. Mason	acceptance of financial responsibility
23 95	2-16-95	S. Kastury	B. Crawford	Transmittal of records
23 95	2-16-95	L. Charlton	B. Knauss	Information on compliance record

EXHIBIT "B"

Universal Waste

CHRONOLOGICAL ENTRY FORM FOR FOLDERS

HO29-171163

-02/86

	DATE	TO	FROM	REFERENCE
1		W. Crawford	J. Garabrant	
90	MAY 14	DER-TMP	EPA IV	comment on draft permit
2		R. Bedore	L. Clark	
90	MAY 29	Universal	DER-TMP	Financial stuff is OK
3		L. Milanian	S. Roehm	
90	JUL 31	DER-TMP	Universal	revised inspection logs
4		J. Klemm	S. Roehm	
90	AUG 190	DER-TMP	Universal	Collection of HW from site will occur on-site
5		S. Kasting	L. Milanian	
90	AUG 13	DER-TMP	DER-TMP	Fyi on 3/90
6		L. Milanian	S. Roehm	
90	AUG 24	DER-TMP	Universal	Emergency Coord. change
7		S. Kasting	L. Milanian	
90	AUG 30	DER-TMP	DER-TMP	Fyi copy of 6/90
8		R. Garrity	S. Roehm	
90	SEP 24	DER-TMP	Universal	TCLP wastes
9		S. Kasting	L. Milanian	
90	SEP 25	DER-TMP	DER-TMP	Fyi copy of 8/90
10		S. Roehm	L. Milanian	
90	OCT 4	Universal	DER-TMP	cannot authorize TCLP wastes
11		R. Garrity	S. Roehm	
90	OCT 5	DER-TMP	Universal	request further waste code additions
12		R. Garrity	S. Roehm	
90	OCT 22	DER-TMP	Universal	requested compliance items from CEI
13		S. Roehm	R. Garrity	
90	OCT 5	Universal	DER-TMP	Permit modification
14		R. Garrity	L. Milanian	
90	NOV 5	DER-TMP	DER-TMP	sign permit modification
15		C. Polk	W. Horn	
90	12-7-90	FOER	UW&T	Invitation to demonstration
16		L. Milanian	T. Turnbull	
90	12-4-91	FOER	UW&T	Request Class I modification Looking to tank trucks
17		FILE	L. Milanian	
91	2-21-91	FILE	FOEL	Attendees sheet - Plans of Tank Farm
18		V.S. Agustin	T. Turnbull	
91	2-24-91	FOER	UW&T	Request for status on modification application (16/91)
19		FILE	B. Crawford	
91	2-29-91	FILE	FOER	Telephone conversation w S. Roehm UW&T on Mod Request (16/91)
20		B. Crawford	K. Batzel	
91	MAY 30	DER-TMP	CDM	PERMIT REVISIONS
21		T. Turnbull	L. Clark	
91	6-19-91	CMC	FOER	COMMENTS ON FINANCIAL TEST
22		M. Andrews	J. Russell	
91	6-23-91		FOER	RETURN OF LETTER OF CREDIT
23		V. Guinyard	T. Turnbull	
91	SEPT 30	Universal	Universal	response to notice of violation
24		R. Bedore	L. Clark	
91	NOV 14	Universal	DER-TMP	resubmit on appropriate form
25		R. Garrity	T. Turnbull	
91	OCT 2	DER-TMP	CITY MAY	request Class I Permit Modif.
26		R. Garrity	T. Turnbull	
91	DEC. 20	DER-TMP	CITY MAY	revised contingency plan & alarm permit modif.
27		FILE		
92	APR 3	FILE		meeting attended
28		FILE		
92		FILE		unknown waste handling
29		W. Crawford	J. Taylor	
92	APR 22	DER-TMP	Universal	meeting minutes of Apr 3
30		J. Taylor	L. Milanian	
92	APR 24	Universal	DER-TMP	response to 29/92
31		R. Bedore	L. Clark	
92	OCT 5	UW&T	DER-TMP	Financial. insurance. out of dates
32		J. Taylor	L. Clark	
92	OCT 7	UW&T	DER-TMP	Financial. insurance. out of dates
33		D. Brown	R. Garrity	
92	NOV 17	UW&T	DER-Tampa	Adoption of EPA authorization for TCLP regulations

Memorandum

Florida Department of
Environmental Protection

PERMIT COVER MEMO

TO: x RICK GARRITY, Director of District Management

FROM/THROUGH:

William Kutash, ENVIRONMENTAL ADMINISTRATOR
Bill Crawford, SUPERVISOR WCL 5-13-96
Roger Evans, ENGINEER RL

DATE: May 13, 1996

FILE NAME: Universal Waste & Transit
PROGRAM : Hazardous Waste

PERMIT #: HO29-171163
COUNTY : Hillsborough

TYPE OF PERMIT ACTION: ISSUE DENY x MODIFY
TRANSFER OWNER NOD
PUBLIC NOTICE INTENT TO ISSUE

PUBLIC NOTICE PERIOD CLOSED? N/A This is a Class 1 (Minor)
Modification

PERMIT SUMMARY: UWT has requested this permit modification to allow for the storage of containers along the north and south walls of Bay 2. All areas in Bay 2 (which store ignitable & reactive wastes) are at least 50 feet from the property line. This modification does not increase their permitted storage capacity.

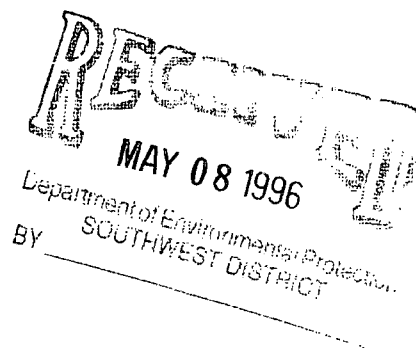
PROFESSIONAL RECOMMENDATION: x APPROVE DENY

1:/uwtmod2

revised specific condition in
file folder 2-f

25/96

May 8, 1996



Mr. Roger Evans
Florida Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619-8218

Dear Mr. Evans:

Enclosed is the additional information you requested for the permit modification
(Permit H029-17-1163) for the CESF/UWT facility.

You may contact me at (813) 623-5302 should you have any questions regarding this
matter.

Sincerely,

John A. Taylor
Technical Services Manager



BAY 2 (IGNITABLE / REACTIVE WASTES) PERMIT MODIFICATION

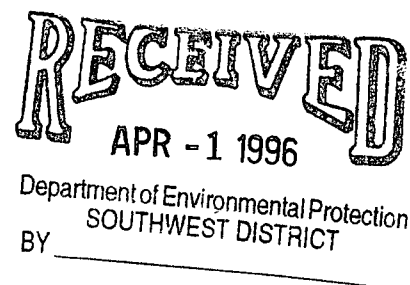
Bay 2, the ignitable/reactive wastes storage bay, of the City Environmental Services, Inc. of Florida (CESF) formerly known as Universal Waste & Transit, Inc. hazardous waste TSDF (permit # H029-171163) is being modified to allow container storage along the interior bay walls. Container storage along the walls will not block any exits, entrances, or safety equipment. Storage of containers will be as indicated on Figure 5.12-A. A minimum of two feet of aisle space will be maintained. This modification does not increase the facility capacity. The changes (if any) to the permit are summarized below.

1. Application - No changes.
Note: Renewal of this permit is in process independent of this modification.
2. General Information. No changes other than containers in Bay 2 may now be stored along the walls. A minimum of two feet of aisle space will be maintained between single rows of containers along the walls and double rows of containers within the bay. This is indicated on Figure 5.12-A.
3. General Facility Standards - No changes. Standards for ignitable/reactive wastes remain unchanged. Ignitable / reactive waste is still at least fifty feet from all property boundaries.
4. Waste Analysis - No changes.
5. Inspections - No changes.
6. Training - No changes.
7. Preparedness and Prevention Procedures - The existing 1,000-gallon containment sump remains unchanged. It provides containment for greater than 10% of the maximum inventory of the bay. The bay design and safety equipment remain unchanged. A minimum of two feet of aisle space is maintained.
8. Contingency Plan & Emergency Procedures - A copy of Figure 5-12A has been added to the Contingency Plan. Copies are being submitted to all applicable agencies.
9. Recordkeeping - No changes.
10. Closure - No changes.
11. Financial Assurances - No changes.
12. Containers - no changes.
13. Processes - no changes.

BAY 2 (IGNITABLE / REACTIVE WASTES) PERMIT MODIFICATION

Bay 2, the ignitable/reactive wastes storage bay, of the City Environmental Services, Inc. of Florida (CESF) formerly known as Universal Waste & Transit, Inc. hazardous waste TSDF (permit # H029-171163) is being modified to allow container storage along the interior bay walls. Container storage along the walls will not block any exits, entrances, or safety equipment. Storage of containers will be as indicated on Figure 5.12-A. A minimum of two feet of aisle space will be maintained. This modification does not increase the facility capacity. The changes (if any) to the permit are summarized below.

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4. Waste Analysis - No changes.
5. Inspections - No changes.
6. Training - No changes.
7. Preparedness and Prevention Procedures - The existing 1,000-gallon containment sump remains unchanged. It provides containment for greater than 10% of the maximum inventory of the bay. The bay design and safety equipment remain unchanged. A minimum of two feet of aisle space is maintained.
8. Contingency Plan & Emergency Procedures - A copy of Figure 5-12A has been added to the Contingency Plan. Copies are being submitted to all applicable agencies.
9. Recordkeeping - No changes.
10. Closure - No changes.
11. Financial Assurances - No changes.
12. Containers - no changes.
13. Processes - no changes.



Revision 01
Date 5/7/96

Container storage is as indicated on Figure 5.12-A. Containers in the ignitables bay (Bay 2) may be stored along the north and south interior walls (as indicated on Figure 5.12-A) as long as a minimum of two feet of aisle space is maintained and the containers do not block any exits, entrances, or safety equipment.

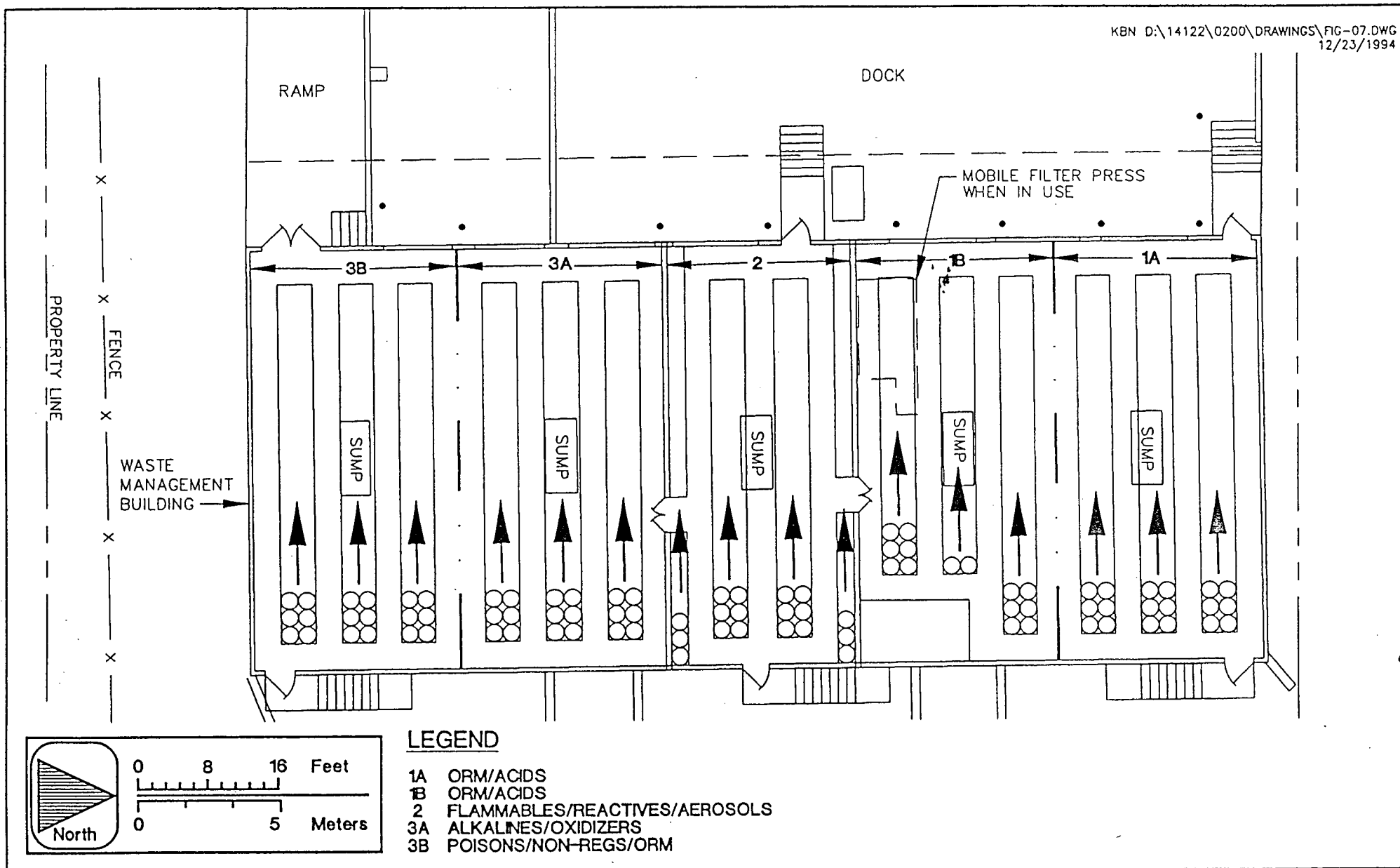


FIGURE 5.12 A
CONTAINER STORAGE DIAGRAM



Universal Waste
& Transit, Inc.



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

February 16, 1995

Ms. Lea Anne Chorlton
Petro Chemical Products
2910 W. Beaver Street
Jacksonville, FL 32254

Dear Ms. Chorlton:

Attached per your request is a copy of the most recent inspection report I could find for Universal Waste and Transit, in Tampa, Florida. The Warning Letter from this report was resolved through a short form Consent Order, with a penalty of less than \$6,000. The case has been closed. The facility was last inspected January 19, 1995, but the report has not been finalized. Roger Evans, the inspector, should be able to tell you if any significant violations were noted. He can be reached at ext. 388.

Sincerely,

Elizabeth Knauss
Environmental Manager



Department of Environmental Protection

Lawton Chiles
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Virginia B. Wetherell
Secretary

November 18, 1994

Kathleen McCann, CPA
Corporate Controller, Waste Group
City Management Corporation
3400 East Lafayette
Detroit, Michigan 48207

D.E.P.
NOV 22 1994
SOUTHWEST DISTRICT
TAMPA

Re: FLD 981932494 - Universal Waste & Transit, Inc., Tampa, Florida

Dear Ms. McCann:

I reviewed the documentation submitted to demonstrate financial responsibility for the above referenced facility and find it in order. The Certificate of Liability demonstrates adequate liability coverage. The financial test accompanying your letter of September 27, 1994, adequately demonstrates financial assurance for closure in the amount of \$97,484. Therefore, Universal Waste & Transit, Inc. is in compliance with 40 CFR Par 264, Subpart H as adopted by reference in Rule 62-730, Florida Administrative Code.

If I can be of any assistance, please call me at (904) 488-0300.

Sincerely,

David W. Mason
Environmental Specialist

cc: Fred Wick
Merlin Russell
Doug Outlaw
Bill Crawford
Jeff Pallas



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

FAX TRANSMITTAL SHEET

11/17/94
Date

FAXED

TO: Janet Ashwood

DEPT.: Hazardous Waste

FAX #: (904) 921-8018

FROM: Roger Evans

DEPT.: D.E.P., Tampa Office

PHONE: 813-744-6100 or SunCom 542-6100 Ext. 388
FAX(local) 744-6125 or (SunCom) 542-6125

SUBJECT: Monitoring Wells at Universal Waste

COMMENT: Sorry for the delay in obtaining the info

TOTAL NUMBER OF PAGES, INCLUDING COVER PAGE: 4

RECEIVED BY: _____

PHONE: _____

File 2-C
2/94

**Universal Waste & Transit, Inc.**

A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

November 16, 1994

Mr. Roger Evans
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Evans:

Enclosed is the information you requested concerning the groundwater monitoring program at UWT. Included is a one-page summary of our groundwater program and a map of the well locations. The general well information is also listed below:

<u>WELL NO.</u>	<u>INSTALLATION DATE</u>	<u>GENERAL LOCATION</u>
MW1	October 20, 1989	Northeast
MW2	October 20, 1989	Southeast
MW2A	May 23, 1994	Northwest
MW3	October 20, 1989	Northwest
MW4	May 23, 1994	Southwest

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in dark ink, appearing to read 'John A. Taylor', with a stylized flourish at the end.

John A. Taylor
General Manager

The UWT facility is in a heavily industrialized area (Orient Park) in Tampa, Florida. The previous use of the UWT property was residential (one residence) and vacant land. There is significant documented groundwater contamination in the area. Two NPL (Superfund) sites adjacent to the UWT facility are being investigated and remediated under the direction of the EPA. There are also several other sites or former sites potentially contributing to the documented Orient Park groundwater contamination.

UWT voluntarily monitors the groundwater from its property for liability protection. Several regulated compounds have been detected by the UWT groundwater monitoring program. All hazardous waste stored at UWT is in a specially designed totally enclosed storage building with over 5,000 gallons of secondary containment. There have been no known releases of hazardous waste to the environment at the UWT facility. There is no statistical correlation between downgradient and upgradient analytical results to confirm contribution to any groundwater contamination by UWT. It is the belief of UWT that any elevated levels of regulated compounds detected in the groundwater at the UWT property is either background or the result of offsite migration from other sites. This is supported by the previously stated information.

The firm PBS&J has been contracted to investigate and document groundwater quality at the UWT property. They have recommended the re-installation of one well and installation of another new well to confirm previous results and further document the migration of offsite regulated materials to the UWT property.



Lawton Chiles
Governor

Florida Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

DATE: Nov 2 1994

TIME: 900 AM

SUBJECT: Universal Waste : Transport

A T T E N D E E S

Name	Affiliation	Telephone
<u>Bill Crawford</u>	<u>FDEP</u>	<u>813-744-6100 ext 372</u>
<u>John Taylor</u>	<u>UWT</u>	<u>813 623-5302</u>
<u>SAI RAD</u>	<u>KNW</u>	<u>813-287-1717</u>
<u>Roger Evans</u>	<u>FDEP</u>	<u>744-6100 x 388</u>
<u>1) RENEWAL Fee -</u>		
<u>2) Exact Applicability of AA/BB</u>		
<u>3) Management of Empty Drums</u>		
<u>4) Staging of in/out bound containers</u>		
<u>5) Bulking operations</u>		

TPA-02
06/93

Universal Waste and Transit

8-18-94

Purchase property to South

Environmental Audit

UST - Petroleum

Detection of RCRA metal also metal in water
coming onto property -

Permitting -

Construct new facility on new property -

Treatment of 2004-2008 metal

Contain storage -

Transfer facility

New RCRA waste management

Transfer facility operation -

1) Storage incidental to transportation

2) Storage awaiting capacity at permitted TSD

Additional Questions

1) Aerial can draining operation

2) Treatment Technology (4-11) (18-45)

a)

b)

Air

Stormwater -

New - Pre-existing condition -

Questions - Fuel blending operation @ existing facility



Universal Waste & Transit, Inc.

A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

RECEIVED
NOV 01 1994

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

October 31, 1994

Mr. Bill Crawford
DEP, Hazardous Waste Section
3804 Coconut Palm Drive
Tampa, FL 33619 - 8318

RE: Adoption of Standard Operating Procedures (SOPs) for Sampling

Dear Mr. Crawford,

In response to your quality assurance letter of August 22, 1994 and in summary of our phone conversation last week, Universal Waste & Transit, Inc. (UWT) currently intends to adopt the hazardous waste program SOPs once they have been developed. Until the program is developed, all sampling and testing will be in accordance with applicable SW-846 methods. For methods not addressed in SW-846, ASTM or comparably standardized laboratory methods will be used. It is UWT's understanding that this will be acceptable since our sampling and analysis at the facility are primarily for "fingerprint screening" of incoming wastes to assure that they meet profiled parameters. With the exception of flash point and pH methods, sampling and analysis for removal of waste codes will be carried out under an approved Comprehensive Quality Assurance Plan (CompQAP) through a contract laboratory. It is our understanding that the SW-846 methods for flash point and pH are acceptable to the department and these two analyses will be address as part of the department SOPs. Should it be deemed necessary, UWT will submit an application for its own CompQAP at some future date.

Should you have any questions or concerns, please do not hesitate to give us a call.

Sincerely,

UNIVERSAL WASTE & TRANSIT

William C. Horn
Technical Services

File 2-c
12/94



Universal Waste & Transit, Inc.

A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

September 22, 1994

RECEIVED

SEP 22 1994

Ms. Kimberly D'Arcy
Dept. of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Ms. D'Arcy:

Enclosed is the additional information pertaining to the Environmental Site Assessment (ESA) of the property that Universal Waste & Transit, Inc. (UWT) is contracting to purchase.

We wish to arrange an informal meeting with Bill Crawford and you or Mary Yeargan to discuss remediation implications related to this property. We would like to have this meeting as soon as possible since closing on the property is scheduled for the end of this month.

Sincerely,

John A. Taylor
General Manager

JAT:kc

cc: Mary Yeargan
Bill Crawford

file 2-c
18/94



Universal Waste & Transit, Inc.

A Division of City Management Corporation

9280 Bay Plaza Blvd.
Suite 707
Tampa, FL 33619-4453
(813) 623-5302
FAX: (813) 628-0842

September 16, 1994

RECEIVED
SEP 16 1994

Department of Environmental Protection
BY _____
SOUTHWEST DISTRICT

Mr. William Crawford
Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Crawford:

Universal Waste & Transit, Inc. (UWT) is in the process of purchasing property for potential expansion of its permitted TSD site. An Environmental Site Assessment (ESA) was conducted and indicates the presence of elevated levels of regulated metals.

The ESA was conducted by PBS&J (FDEP No. 910005G). Analyses were performed by Enseco-Wadsworth / ALERT Laboratories (FDEP No. E84059). Two monitor wells were installed (total depth of about 16 feet) and the following data was obtained (all results in ug/l - parts per billion):

<u>Constituent</u>	<u>Upgradient</u>	<u>Downgradient</u>	<u>Guidance Concentration</u>
Chromium	239	203	50
Selenium	24	22	10
Lead	103	107	15

PBS&J has advised us that lacking physical or historical evidence of the use, storage, or discharge of materials containing these metals at the property, it appears that this may be a background condition or the result of offsite migration from other properties. Please confer with Mary Yeargan on this matter. We would like to arrange an informal meeting with you to discuss if any further action would be required for this property.

Sincerely,

John A. Taylor
General Manager

JAT:kc

File 2-c
17/94



Department of Environmental Protection

Lawton Chiles
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Virginia B. Wetherell
Secretary

AUG 22 1994

John Taylor
Universal Waste and Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619-3356

RE: Universal Waste and Transit, Inc. FLD 981 932 494
Operating Permit HO29-171163
Waste Analysis Plan

Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) has revised the regulations associated with the quality assurance / quality control (QAQC) of sample procurement, sample handling and sample analysis. These rules are codified in the Florida Administrative Code (FAC), Chapter 62-160 (formerly 17-160).

Section 62-160.300(7)(z) and (aa) specifies the requirements for generators and treatment, storage and disposal facilities regulated by the RCRA regulations. The rule, effective in February 1994, required the submittal of QAQC plan by March 31, 1993. This letter is notification that these regulations apply to your facility, and request that you contact this office within the next two weeks to establish a date for the submittal of the required plan as needed.

Please contact Beth Knauss at 813-744-6100 ext. 383 or myself at ext. 372.

Sincerely,

William C. Crawford
RCRA Permitting Engineer
Division of Waste Management

c.c. Alan Farmer, Chief RCRA Branch, EPA Region IV
Satish Kastury, Administrator, FDEP - Tallahassee

UNIVERSAL 10100

8/18/94

Roger Evans	FDEP	744-6100
Bhram Kothur	4)	904-488-0300
TIMYIN RICE	FDEP	744-6100 x473
GARY SAWYER	FDEP	x380
B.II Crawford	FDEP	K372
John Taylor	UWT	813 623-5302
Tom Maurer	Foley & Gardner	407 423 7656
Warren Pandorf	KBN	813-287-1717
Sri Rao	KBN	"
Doug Outlaw	FDEP	904-488-0300

file 2-C

15/94



Lawton Chiles
Governor

Florida Department of
Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619
813-744-6100

Virginia B. Wetherell
Secretary

February 22, 1994

Mr. John A. Taylor
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, FL 33619-3356

Re: ***Universal Waste & Transit, Inc., FLD 981 932 494
Operating Permit HO29-171163 Hillsborough County
Revised Contingency/Emergency Plan***

Dear Mr. Taylor:

The Florida Department of Environmental Protection (FDEP) is in receipt of your revised Contingency/Emergency Plan. A review of this document will be performed in the future. A quick examination of the document revealed that UW&T has proposed supplying copies of the plan to all appropriate parties, however, proof of this is not evident as Attachment 5 did not contain any information. Further more, UW&T has identified two emergency spill response contractors for additional support.

In accordance with Title 40 CFR Part 264.53, UW&T is required to furnish copies of the plan to local authorities, and State and local emergency response teams. Additionally, UW&T was required to submit a contingency plan with the Part B Permit Application as detailed in 40 CFR Part 270 14(b)(7). Any amendment to this plan will require resubmission of the entire document to each of the noted agencies as stated in 40 CFR Part 264.54.

In order to satisfy the intent of the rule requiring submission of your plan to the State emergency response team, please provide a copy of the document to Ms. Leslie Webster, Supervisor of the Southwest District Office Emergency Response Unit. The copy received by the permitting staff will be placed in your Part B Permit Application.

14/94

Do not hesitate to contact me at 744 - 6100 extension 372, should you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lynne R. Milanian".

Lynne R. Milanian
District Permitting Engineer
Hazardous Waste Regulation
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDEP - Tallahassee

uwtlet.doc



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619-3356
813-623-5302

EF
2-e

February 14, 1994

Florida Dept. of Environmental Protection
Attention: Ms. Lynne Milanian
3804 Coconut Palm Drive
Tampa, Florida 33619

RECEIVED
FEB 17 1994

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

Dear Ms. Milanian:

Universal Waste & Transit, Inc. (UWT) operates a permitted hazardous waste treatment, storage, and transfer facility at 2002 North Orient Road, Tampa, Florida. Non-hazardous and hazardous wastes are stored and transported in Department of Transportation (DOT) approved containers at the facility. All wastes are shipped off-site for disposal in accordance with all local, state, and federal regulations.

Enclosed is a revised copy of our Contingency/Emergency Response Plan. The plan is designed to minimize hazards to human health and environment. It describes actions which would be taken if a fire, explosion, or release of hazardous waste should occur.

Universal has a staff of trained and experienced employees. Universal has maintained an outstanding safety record since it began operations in 1990. However, in the unlikely event that an emergency should occur, we wish to call upon you for assistance. Please review our enclosed Contingency/Emergency Response Plan and sign the attached letter indicating your agreement to provide emergency assistance. You may contact me at (813) 623-5302 should you have any questions or wish to schedule a familiarization tour of the facility.

Sincerely,

John A. Taylor
General Manager

Enclosures

Revised plan placed 13/94
in Vol 2 ATTACHED 2-E



Mr. John A. Taylor
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Dear Mr. Taylor:

I have reviewed the revised UWT Contingency/Emergency Response Plan and our agency agrees to provide emergency assistance to Universal Waste & Transit, Inc.

Signature

Typed/Printed Name

Title

Agency

Date



PA - ps code into 17 2-e EF RKV 2/17
this is Discus
UNIVERSAL WASTE & TRANSIT, INC. WK

2002 N. Orient Rd.
Tampa, Florida 33619-3356
813-623-5302

D.E.P.

FEB 16 1994
SOUTHWEST DISTRICT
TAMPA

February 7, 1994

Mr. Robert Vanderslice
Industrial Waste Program
Florida Department of Environmental Protection
3804 Coconut Palm Drive
Tampa, Florida 33619

Dear Mr. Vanderslice:

Enclosed is the information you requested in our recent telephone conversation. This is information on our stormwater pretreatment system. Victor San Augustin mentioned a potential industrial waste permitting requirement for the system. Please notify me of any permit requirements which are applicable to this system.

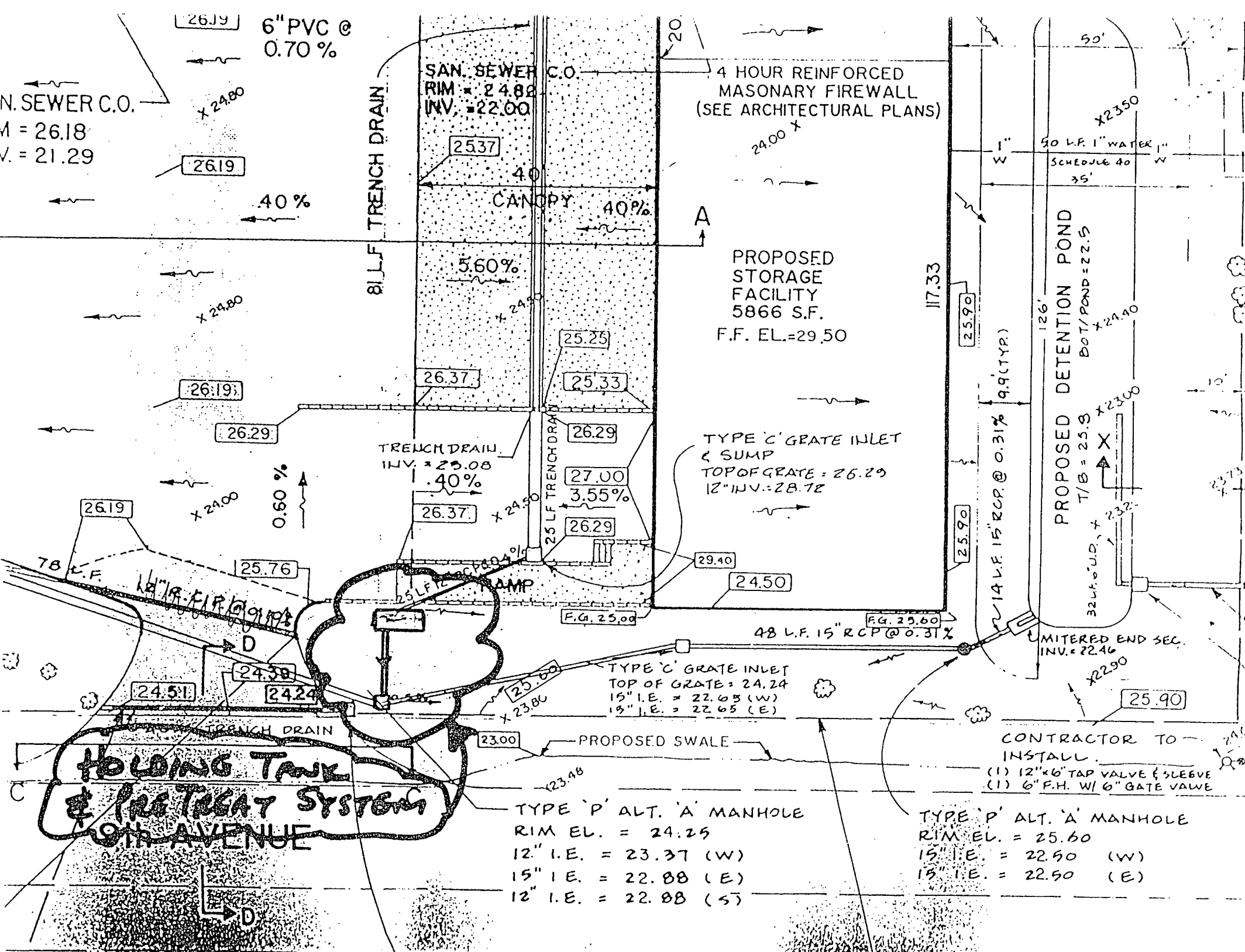
Sincerely,

John Taylor
General Manager

JAT:kc

- ① CHECK ON PROCESS DESCRIPTION
- ② CHECK W/HW TO SEE IF THIS COULD BE A HW TREATMENT
- ③ NOTIFY MR. TAYLOR OF FINDINGS

12/94



N. SEWER C.O.
M = 26.18
V = 21.29

26.19
6" PVC @
0.70 %

SAN. SEWER C.O.
RIM = 24.82
INV. = 22.00

4 HOUR REINFORCED
MASONRY FIREWALL
(SEE ARCHITECTURAL PLANS)

PROPOSED
STORAGE
FACILITY
5866 S.F.
F.F. EL. = 29.50

PROPOSED DETENTION POND
BOT/ POND = 22.5
T/B = 25.5

TYPE 'C' GRATE INLET
& SUMP
TOP OF GRATE = 26.29
12" INV. = 28.72

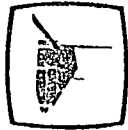
TYPE 'C' GRATE INLET
TOP OF GRATE = 24.24
15" I.E. = 22.65 (W)
15" I.E. = 22.65 (E)

TYPE 'P' ALT. 'A' MANHOLE
RIM EL. = 25.60
15" I.E. = 22.50 (W)
15" I.E. = 22.50 (E)

TYPE 'P' ALT. 'A' MANHOLE
RIM EL. = 24.25
12" I.E. = 23.37 (W)
15" I.E. = 22.88 (E)
12" I.E. = 22.88 (S)

CONTRACTOR TO
INSTALL
(1) 12" x 6" TAP VALVE & SLEEVE
(1) 6" F.H. W/ 6" GATE VALVE

HOLDING TANK
& PRETREAT SYSTEM
ON AVENUE



TOWNS AND BOTUM, INC

COMPUTATION SHEET

TITLE

FLOW SCHEMATIC

SHEET NO.

1 OF 3

JOB

UNIV. WASTE & TRANSIT

PREPARED BY

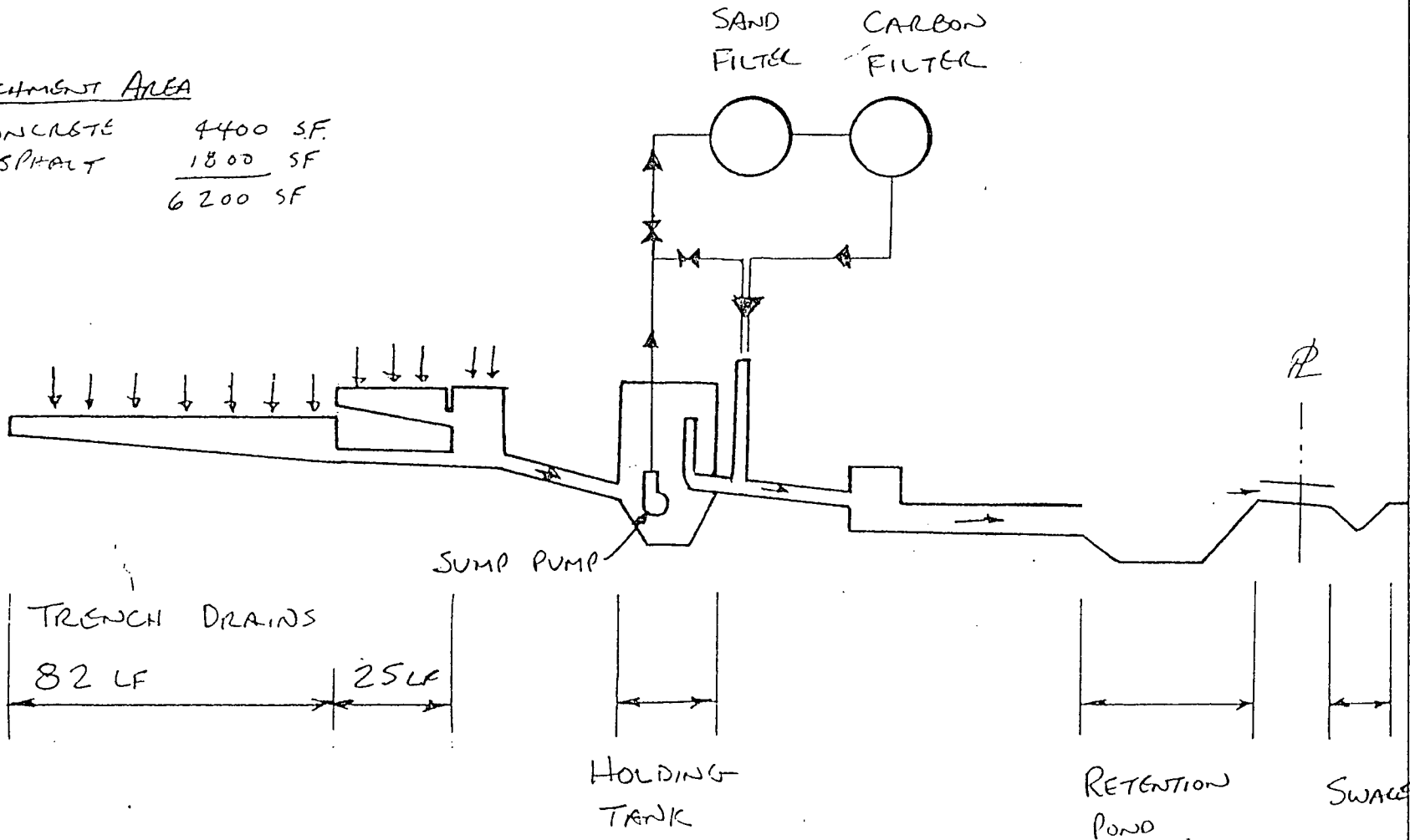
FBM

DATE

7-20-89

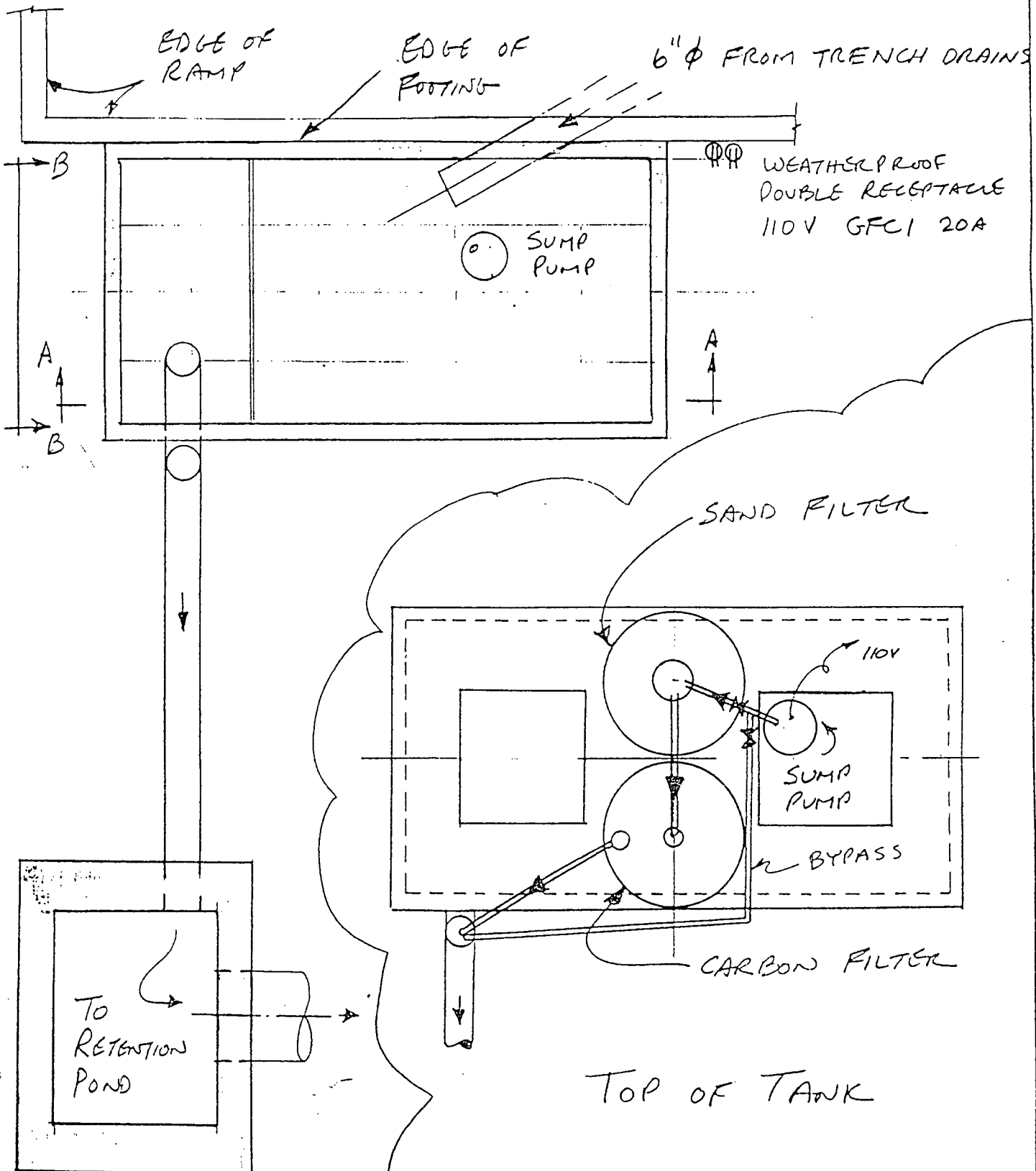
CATCHMENT AREA

CONCRETE 4400 SF.
ASPHALT 1800 SF
6200 SF



FLOW SCHEMATIC

N.T.S.

TITLE HOLDING TANK - PLAN VIEWSHEET NO. 2 OF 3JOB UNIV. WASTE & TRANSITPREPARED BY PBMDATE 7-19-89



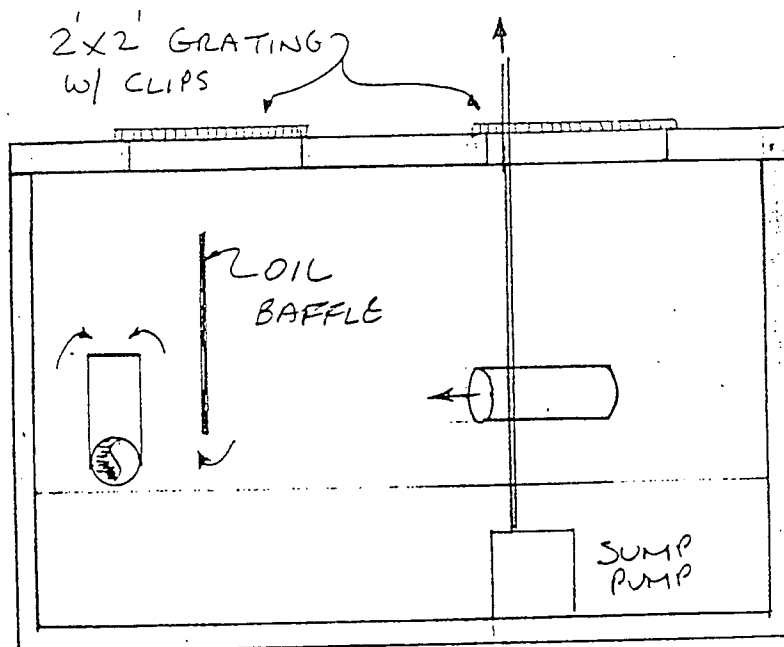
TITLE HOLDING TANK - SECTION 101

SHEET NO. 3 OF 3

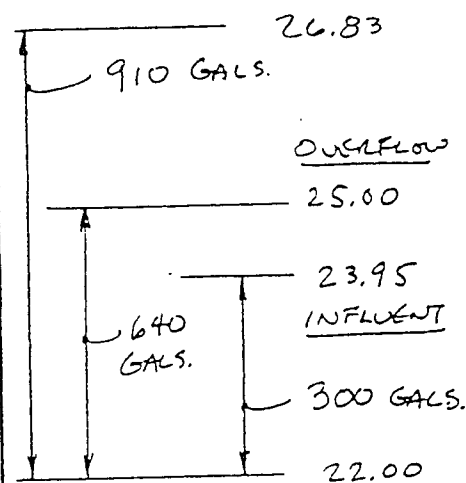
JOB UNIV. WASTE & TRANSIT

PREPARED BY FBM

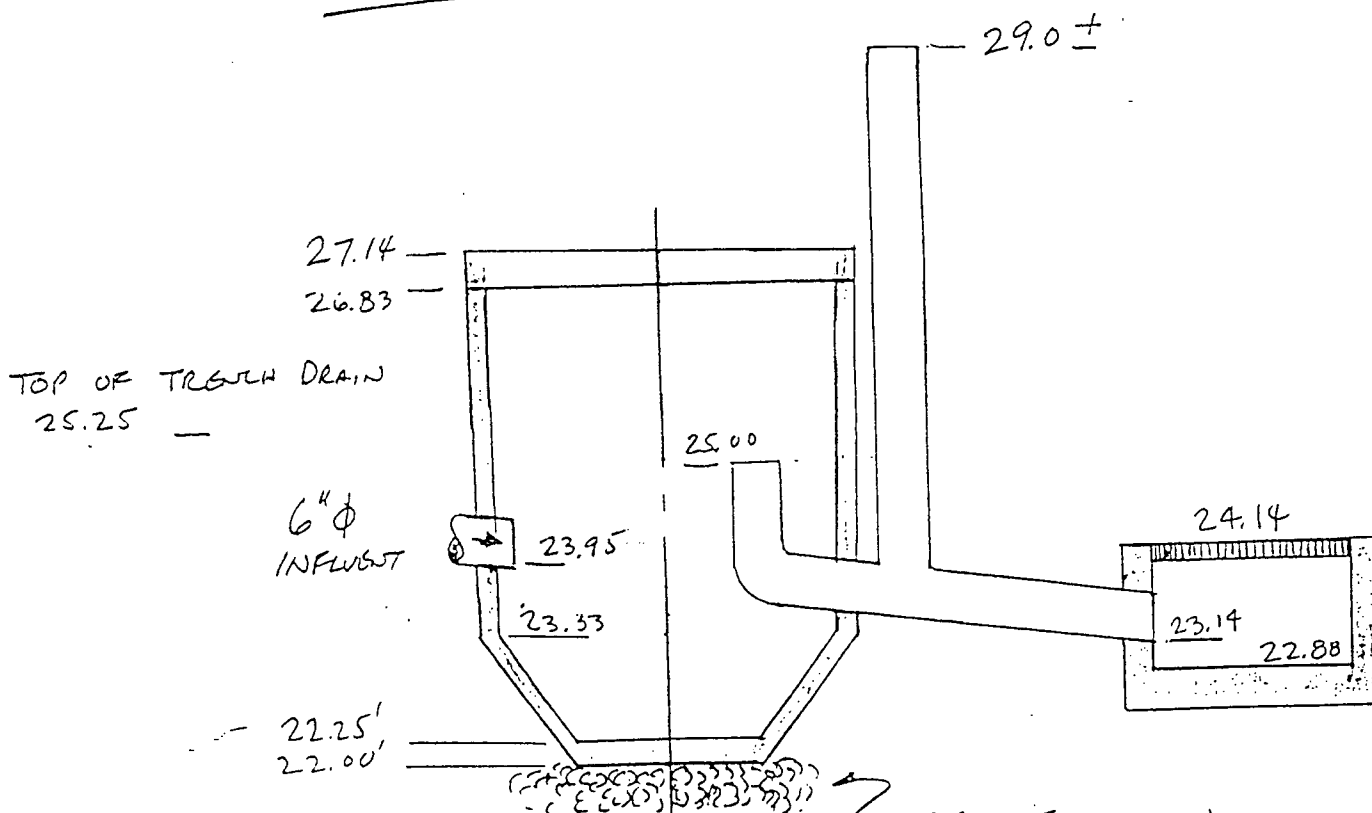
DATE 7-11-89



TANK VOLUMES



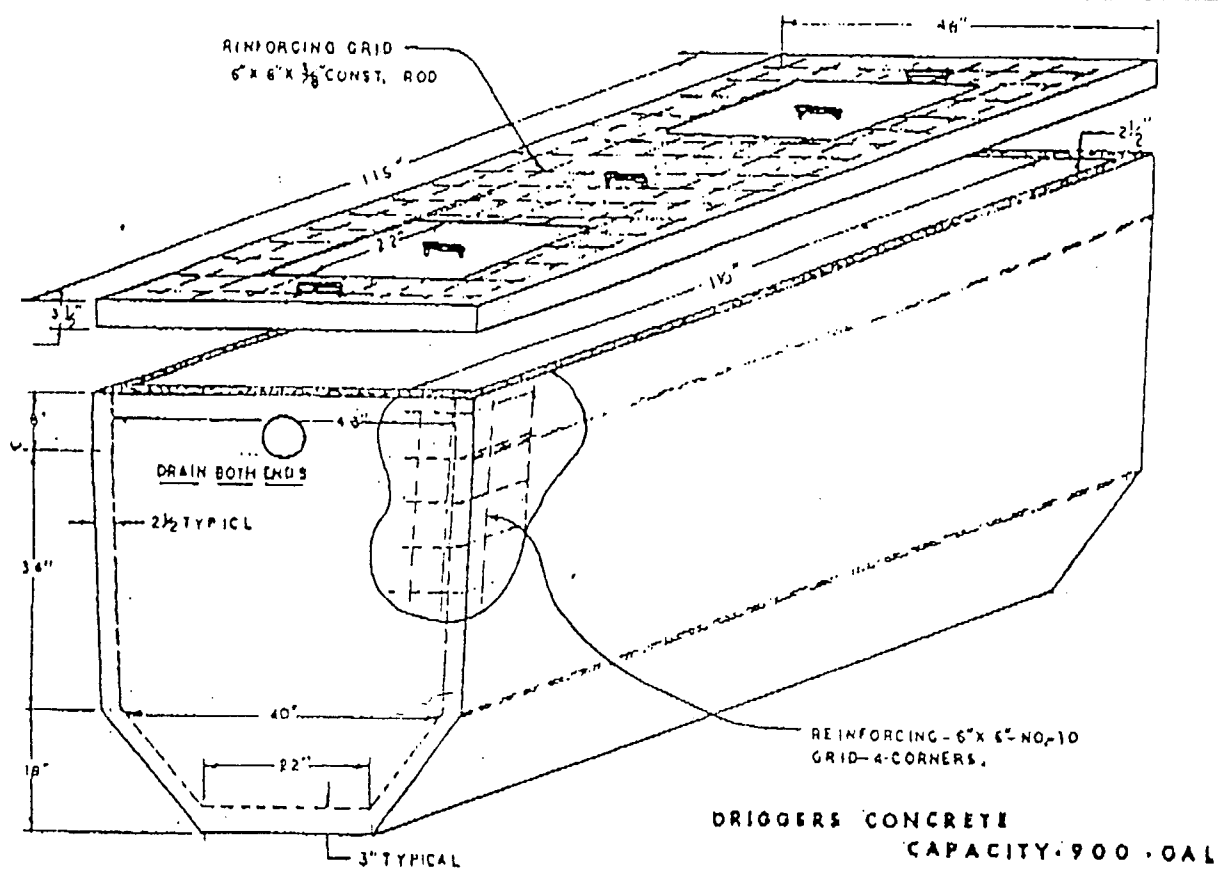
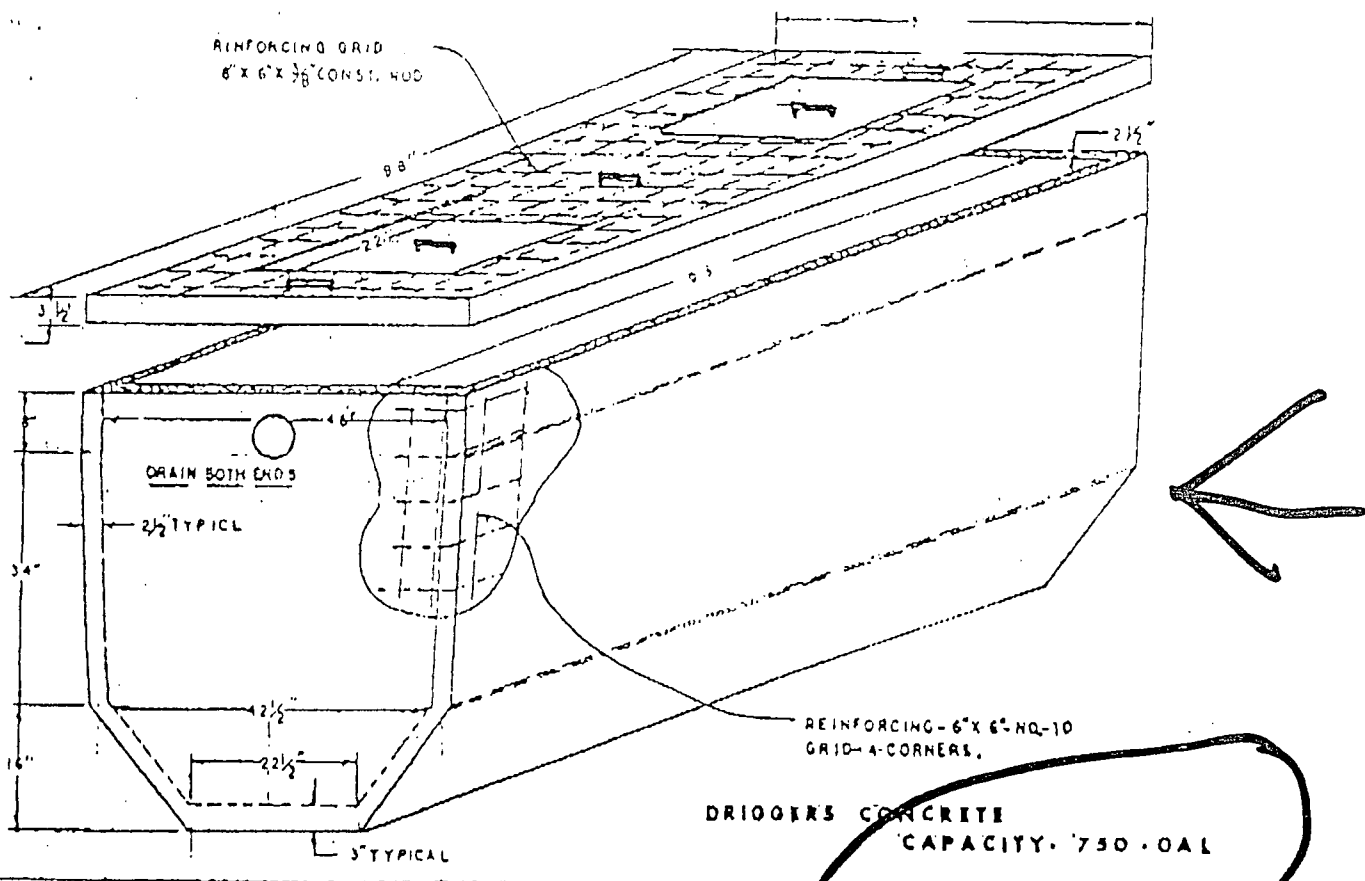
SECTION A-A



SECTION B-B

SET TANK ON
6" GRAVEL (MINIMUM)

PAGE NO. _____



DOMESTIC
WATER
SYSTEMS

RESIDENTIAL SUMP PUMPS

1/4 TO 1/2 HP SUBMERSIBLE SUMP PUMPS



Fig.	Stock No.	HP	NPT Discharge	GPM @ Total Head in Feet, Maximum Diameter Pipe					Dimensions		Cord Length
				5 Ft.	10 Ft.	15 Ft.	18 Ft.	23 Ft.	H	W	
A	3P639	1/4	1 1/4"	2750	1750	750	Shut-off	—	6 1/4"	9 1/4"	8 1/2"
A	3P641	1/3	1 1/4"	3250	2500	1550	900	Shut-off (22.9)	6 1/4"	9 1/4"	10 1/2"
B	3P640	1/4	1 1/4"	2750	1750	750	Shut-off	—	6 1/4"	9 1/4"	10 1/2"
B	3P642	1/3	1 1/4"	3250	2500	1550	900	Shut-off	6 1/4"	9 1/4"	25 1/2"
C	3P643	1/2	1 1/4"	4200	3800	2700	1825	Shut-off	10 1/4"	9 1/4"	25 1/2"

For draining flooded excavations, basements, construction sites, swimming pools. Come with 3-conductor cord. Do not run dry. Use with non-flammable liquids compatible with pump component materials. Manual pumps convert to automatic with 2P353 switch below.

1/4 & 1/3 HP Models—Epoxy coated cast iron or corrosion resistant bronze housings, polypropylene bases with intake screen, polycarbonate tops and glass-filled polypropylene impellers. Steel motor shafts never touch water. Automatic pumps with preset diaphragm switch cut-in at approximately 7-10" and cut-out at 1-3" from bottom of pump. Manual pumps start and run continuous. 1 1/4" NPT discharge. No. 3P640 is equipped with a 3/4" garden hose adapter. 1/4 and 1/3 HP, 1500 RPM, 115VAC, 60 Hz single phase thermally protected motors sealed in oil for cool running. Sleeve bearings.

1/2 HP Model—Automatic pump with preset diaphragm switch which cuts-in at 8 1/2-12" and cut-out at 1 1/4-4" from pump base. Epoxy coated cast iron housing and base with intake screen and glass-filled nylon impeller. Steel motor shaft never touches water. 1 1/4" NPT discharge. 1/2 HP, 1500 RPM, 115VAC, 60 Hz shaded pole motor with ball bearings, permanently lubricated and thermally protected.

Fig.	HP	Operation	Housing	Pump Materials	Mfr's Model	Stock No.	List	Each	Shpg. Wt.
A	1/4	Automatic	Cast Iron	Polypro. Polycarb. Polypro.	6-CIA	3P639	\$164.10	\$104.13	18.5
A	1/3	Automatic	Cast Bronze	Polypro. Polycarb. Polypro.	8-CBA	3P641	\$271.90	\$170.85	19.3
B	1/4	Manual	Cast Iron	Polypro. Polycarb. Polypro.	6-CIM	3P640	\$133.80	\$84.85	16.0
B	1/3	Manual	Cast Iron	Polypro. Polycarb. Polypro.	8-CIM-W/25	3P642	\$241.70	\$146.83	19.0
C	1/2	Automatic	Cast Iron	Cast Iron Cast Iron Nylon	10-CIA-W/25	3P643	\$414.65	\$262.15	38.0

(*) Polypropylene. (†) Polycarbonate. (‡) Glass-filled polypropylene. (§) Glass-filled nylon.

SUBMERSIBLE UTILITY PUMP

Designed for draining garages and basements and powering waterfalls. Removes water to 18" from floor. Converts to automatic sump pump operation by using the optional 2P353 Automatic Switch, listed below. 5 amp, 380 watt, 1/8 HP motor. Oil-filled cast aluminum motor housing for cooler running and longer life. 1" NPT outlet with 3/4" garden hose adapter included. Viton "O" ring, 302 stainless steel shaft, 18 ft. 18/3 SJTW-A cord with 3-prong grounding plug. Little Giant brand. (S-MSP-18).

No. 2P352. Shpg. wt. 7.0 lbs. List. \$92.60
Each. \$71.58

AUTOMATIC SWITCH

Converts manual Little Giant pumps as 1/4, 1/3 or 1/2 HP to automatic operation. Preset at 10 amp, 115V, switch cuts in at 10 ft., 18/3 SJTW-A cord and piggyback 3-prong grounding plug/receptacle. Not for use with split-phase, capacitor start or 3-phase motors. Little Giant brand (RS-5-18).

No. 2P353. Shpg. wt. 1.8 lbs. List \$38.00. Each \$27.72

BACK-UP SUMP PUMPS

SIMER STAND-BY PUMP

2 VDC pump provides emergency service when electrical interruption or mechanical failure prevents main pump from operating.

System components include pump, check valve, mounting bracket, 120V UL Listed transformer, leads, power cord, polypropylene battery box with control panel, and adapters for batteries with side or top terminals.

Battery box cover has built-in control panel with integrated circuits and LED lights which indicate the battery and system conditions. Audible alarm sounds when primary pump fails. Test reset switch indicates system is operational.

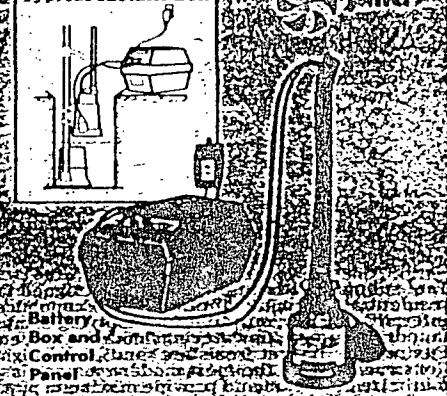
2 VDC permanent magnet motor has phenolic/ceramic mechanical face type seals.

Pump cover, base and impeller are die-cast 360 aluminum with epoxy coating. 1 1/4" FNPT outlet. VDC check valve with weighted flapper and stepped shape accepts 1 1/4, 1 1/2, or 2" discharge hose. 8-foot SJO 12-2 power cord has polarized connector. For use with nonflammable liquids compatible with pump component materials. Simer brand (A5000).

Heavy-duty automotive battery with reserve capacity of at least 130 minutes is recommended (not included). Use 24C, 24VCM, 24F, 27C, 27CM, or 27F size. Dimension including terminals should not exceed 12L x 8W x 9H.

No. 2P090. Shpg. wt. 19.0 lbs. List. \$443.62
Each \$275.88

Typical Installation



PUMP PERFORMANCE @ 12V DC

Total Head in Feet	Gallons per Minute	Amperes
5	22	10.5
10	18	10.5
15	15	10.5
20	12	10.5
25	10	10.5
30	8	10.5
35	6	10.5
40	4	10.5
45	3	10.5
50	2	10.5
55	1	10.5
60	0	10.5

FLO-TEC EMERGENCY SUMP PUMP

Battery-powered reserve pump operates when primary pump fails due to power outage or product malfunction. 115V charger converts to 12 VDC. 10.5 amp draw at 5 ft. head. For use with nonflammable liquids compatible with pump component materials. Flo-tec brand.

Construction: All noncorrosive plastic battery case, pump and switch housing. Completely enclosed mercury float switch.

Dimensions: Maximum battery dimensions, 12 1/4" L x 7 1/4" W x 9 1/4" H; battery case, 16L x 9W x 10 1/4" H; pump, 7W x 7H.

Battery Requirement: Use only deep or high-cycle marine or RV battery with a minimum rating of 160 min RC (reserve capacity).

Features Include:

Time limit on charging. Charger shuts off after 24 hours, regardless of battery voltage.

Charge completion setting and upper and lower battery voltage limits. Microprocessor senses when battery has been completely charged and completes cycle with 1/2 hour timed charge. Prevents overcharging and extends battery life.

Reverse connection protection. If positive and negative connections from charger to battery are reversed, charger will remain off.

Spark prevention. After charger is connected to battery a short time delay occurs before charging starts.

Lights to indicate charging state—whether battery is in a charging mode or is fully charged.

Power-up system check verifies that all components are properly attached and operating.

Audible alarm sounds to indicate primary pump failure, power failure, and/or defective battery.

No. 2P667. Shpg. wt. 14.0 lbs. List. \$322.29
Each \$149.44



DOMESTIC
WATER
SYSTEM

POOL AND SPA FILTERS

DIATOMACEOUS EARTH FILTER

Bottom-to-top circulation. Water enters through the bottom of the filter, carrying the filter medium upward with it. DE medium (customer supplied) is deposited evenly on eight vertical grids for maximum contact between water and filter medium.

High-impact, high-temperature styrene grids are covered with a tough, monofilament polypropylene cloth, onto which the filter medium is deposited.

Top-to-bottom back-washing. Top-mounted manifold forces clean water downward, through the grids, washing the filter medium out through the waste outlet.

Machine-polished 18-gauge, 304 stainless steel tank with heliarc-welded seams.

Inlet and outlet ports have 1½ to 2" quick-coupled union fitting adapters.

Filters come complete with pressure gauge, air control valve, and 1½" mounting tee and fittings for either 1½ or 2" connections.

SAND FILTERS

High-luster stainless steel shell or triple-wrapped fiberglass windings on a seamless water-tight polymeric inner shell. All internal components are high-temperature, high-strength plastic.

Efficient, easy-to-maintain underdrain uses eight threaded lateral arms, which can be removed for maintenance or repair. The arms are arranged radially around a central hub, so incoming water is spread evenly throughout the filter medium (customer supplies, 20-grade silica sand recommended).

Overdrain assembly removes easily to add media, and is hydraulically balanced to maintain a level sand bed during filtration.

External drain fitting. Internal automatic air bleed and see-through threaded access port.

Plumbing connections come complete with flush-mount bulkhead unions for quick initial installation or easy retrofit on existing plumbing.

CARTRIDGE FILTERS

Cartridge filter system incorporates the finest materials into an efficiently designed, highly functional unit. Nonwoven polyester fiber cartridge is secured in an ABS/PVC tank, held in place with interlocking stainless steel rod, and held securely at top with a large, easy-to-remove knob. Heavy-duty injection-molded ABS body has extruded PVC core.

SPECIFICATIONS AND PERFORMANCE DATA

Stock No.	Required Clearance	Suggested Pump HP	Filter Height	Filter Area	GPM per Sq. Ft. Filter	Total GPM	8-Hour Turnover
2P676	22L x 22"W	1½	42"	48.0 sq. ft.	2.5*	120	57,600 Gal.
2P677	22 x 22	1	42	48.0	2.0*	96	43,200
2P677	22 x 22	¾ or 1	42	3.1	20.0	62	29,760
2P682	24½ x 37½	¾ or 1	37½	3.1	20.0	62	29,760
2P678	18½ x 28½	1½ or 2	28½	1.8	20.0	38	18,240
2P679	24"H	1½	28	50.0	1.0	50	24,000
2P680	15"H	¾	18½	25.0	1.0	25	12,000

(*) Recommended rate for residential applications.

(†) Recommended rate for commercial applications.

FILTER ORDERING DATA

Type	Filter Area	Material	Mfr's. Model	Stock No.	List	Each	Shpg. Wt.
DE	48.0 sq. ft.	Stainless Steel	584090	2P676	\$543.00	\$426.32	75.0
Sand	3.1	Stainless Steel	542090	2P677	617.00	467.37	65.0
Sand	3.1	Fiberglass	557000	2P682	302.00	265.31	33.0
Sand	1.8	Fiberglass	556000	2P678	246.00	216.07	35.0
Cartridge	50.0	ABS Plastic	562090	2P679	156.00	136.86	20.0
Cartridge	25.0	ABS Plastic	561090	2P680	118.00	103.61	14.0

POOL AND SPA ACCESSORIES

DOMESTIC
WATER
SYSTEMS

BACKWASH VALVES FOR POOL AND SPA FILTERS

ABS PUSH-PULL VALVE

Highly efficient valve locks easily into backwash or filter position with one easy movement.

- Corrosion-Resistant ABS Body
- Glass-Reinforced Piston Assembly
- Glass-Reinforced Polymeric Handle
- O-Ring Shaft Seals
- 2" S Ports and 2" Male Fittings with 1½" S Ports at Bottom

No. 2P674, 2" Push-Pull Valve. Shpg. wt. 3.3 lbs. List \$45.42. Each \$39.89

MULTIPORT ROTARY VALVE

Six operating positions permit operation of all types of DE and sand filters. Control handle locks into each operating position. Filter inlet and outlet ports permit horizontal, vertical, or horizontal and vertical plumbing to valve. An internal one-piece molded neoprene gasket surrounds all ports with extra sealing surfaces to ensure a positive seal. ABS plugs close ports not in use.

- Glass Reinforced Lever-Action Handle
- Heavy-Duty Stainless Steel Spring
- Abrasion-Resistant Noryl® Rotor and Shaft
- Dual O-Rings and Teflon Shaft Seals
- Corrosion-Free Cyclocast® Body and Lid with Quad-Ring Seal

- Neoprene Sealing Gasket
- Built-In Lexan® Sight Glass
- 1½" FIP Threaded Ports

No. 2P675, 1½" Multiport Valve. Shpg. wt. 5.4 lbs. List \$42.62. Each \$37.39

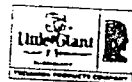
SPA AND HOT TUB AIR BLOWER

The American Supercharger II blower supplies added bubbles to spas, hot tubs, and jetted tubs. Air can be supplied through air channels or as an air boost for therapy jets.

Flame-retardant ABS housing has built-in 2" check valve on the air outlet. 1 HP, 120V, 6.6 amp motor has thermal overload protection. Air discharge of blower must be installed on a 2" or larger pipe, with the base of the blower no less than 12" above the water line.

No. 2P681, Air Blower. Shpg. wt. 8.7 lbs. List \$143.06. Each \$125.72

SWIMMING POOL COVER PUMP



No. 2P526

- Manual on/off swimming pool cover pump draws down to 1/8" of standing water
- Epoxy-coated die-cast aluminum motor housing
- Removable volute for cleaning
- 18-ft., 3-conductor, oil-resistant cord and garden hose adapter included
- 1/200 HP 115V, 60 Hz, oil-filled motor with stainless steel shaft
- Little Giant brand
- See index under "Pumps, Swimming Pool Cover"

CHOOSE FROM A WIDE SELECTION OF PUMP MOTORS

Jetted Tub and Spa Motors
3/4 and 1 HP single and 2-speed motors available with or without pumpjack.

Industrial Pump Motors
Totally Enclosed Fan-Cooled 1/3 to 1½ HP 56C and 56J, single-phase and 1/2 to 3 HP 56C and 56J, in 3-phase available.

Square Flange Pool Pump Motors
1/3 to 2 HP 56 YZ, in high or low service factors available.

Jet Pump Motors
1/3 to 1½ HP, 56C and 56J, single or three-phase motors. Base mount motors available.

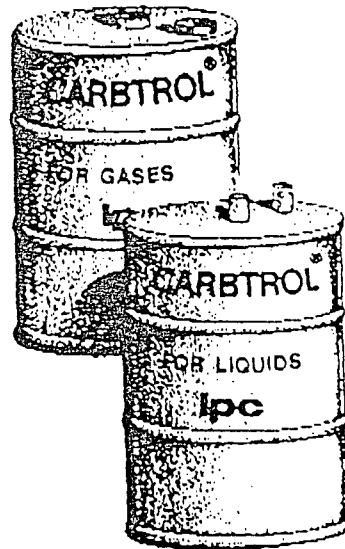
Swimming Pool Motors
1/2 to 2 HP, 56C and 56J, available with cast-iron or aluminum flange. High-efficiency pool motors from 3/4 to 1½ HP ratings.

Uniseal Flange Pool Pump Motors
3/4 and 1 HP, for use on pool cleaner pumps.

SEE INDEX TO LOCATE A PARTICULAR PUMP MOTOR

CARBOTROL®

Activated Carbon Adsorption Canisters



CARBOTROL®: A modular system
designed for removal of contaminants
from liquids and gases.

Typical Carbtrol® Applications:

Gas Phase:

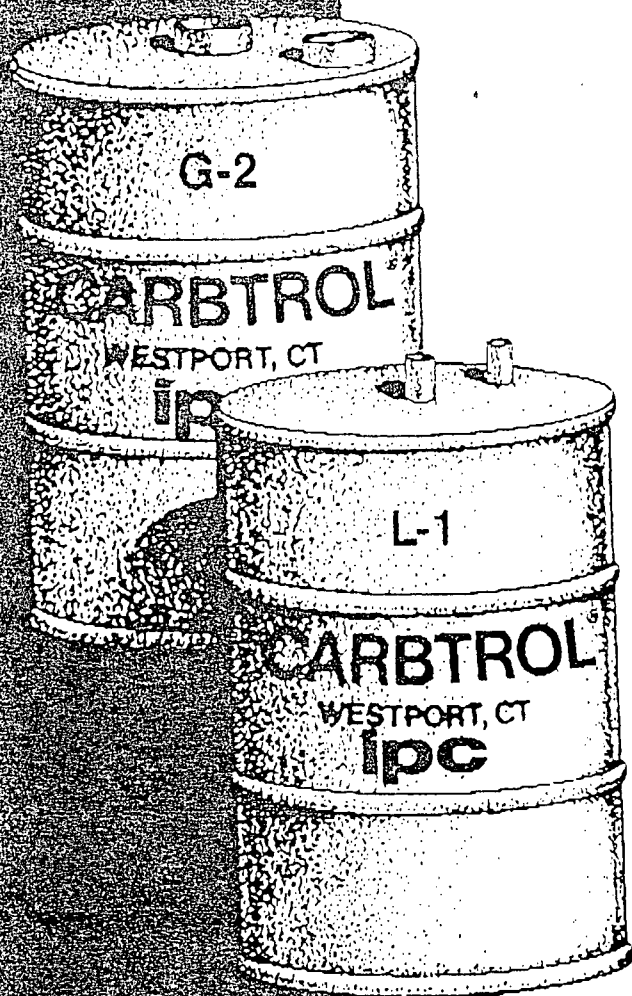
- SEWAGE PLANT ODOR CONTROL
- TANK VENTS
- AIR STRIPPER EXHAUSTS
- EXHAUST HOODS
- WORK AREA AIR PURIFICATION

Liquid Phase:

- GROUNDWATER TREATMENT
- PRODUCT PURIFICATION
- WASTEWATER TREATMENT
- FUEL REMOVAL
- LEACHATE TREATMENT

IPC Systems, Inc. 39 Riverside Avenue, Westport, CT 06880

ipc

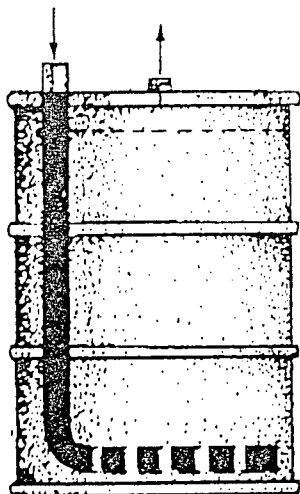


- CARBTROL® canisters utilize the proven effectiveness of granular activated carbon to provide economical and effective removal of organic contaminants from air and water.
- The canisters are designed for treatment of gas streams to 500 CFM and liquid systems to 10 gpm.
- CARBTROL® adsorption units consist of heavy-duty steel canisters, double epoxy-lined, fitted with chemically inert internal distribution and collection systems.
- The canisters contain between 140 and 200 lbs. of custom-selected activated carbon media (depending on model and application) and can be operated at temperatures to 200°F and pressures to 10 PSIG.
- The CARBTROL® adsorption canister system is shipped to your facility ready for easy installation. Normally, all that is required is connection of inlet and outlet piping or ducting.
- When exhausted, the CARBTROL® canister can be shipped to an appropriate landfill or incinerator for disposal, since the canister is a D.O.T. approved container for handling hazardous waste.
- The service life of the CARBTROL® canister will vary according to application and concentration of contaminant to be removed. IPC Systems can provide an estimate of expected service life upon review of proposed operating conditions. (Listing of typical compounds removed by CARBTROL® on back page.)

CARBTROL® options:

- Custom activated carbon and synthetic adsorption media can be provided, including:
 - Potassium Hydroxide Impregnated Carbon
 - Silver Impregnated Carbon
 - Molecular Sieve
 - Silica Gel
 - And others depending on the contaminants to be removed.

CARBOTROL® for gases



Model G-1

SPECIFICATIONS

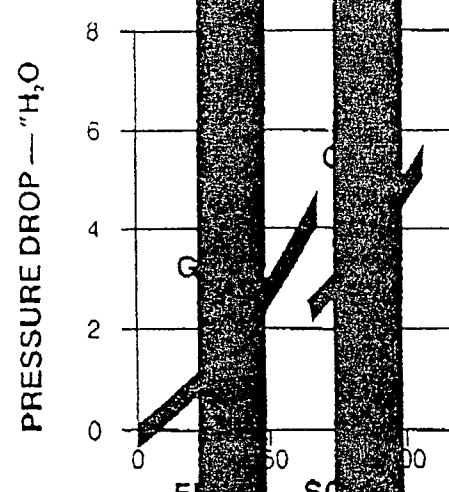
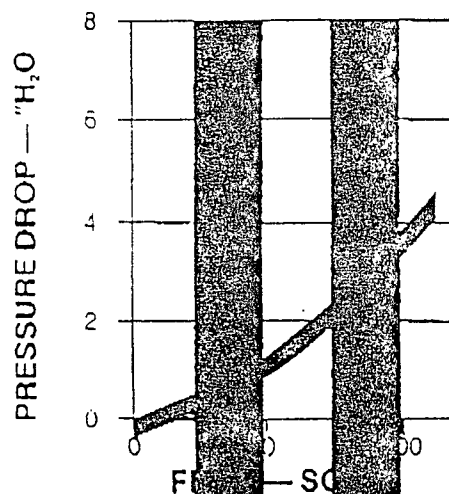
Diameter/Height	24/36"
Carbon	200 lbs.
Shipping Weight	250 lbs.
Inlet	2" NPT
Outlet	2" Bung
Max. Flow	100 CFM



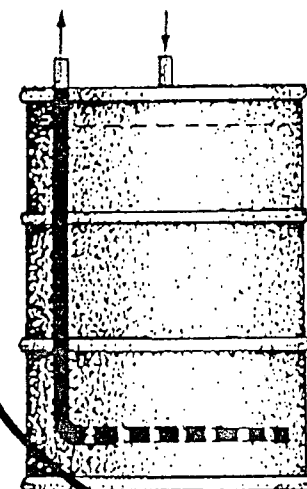
Models G-2, G-3

SPECIFICATIONS

Diameter/Height	24/36"
Carbon (G-2)	165 lbs.
Carbon (G-3)	140 lbs.
Shipping Weight	250 lbs.
Inlet	4" NPT
Outlet	4" NPT
Max. Flow: G-2	300 CFM
Max. Flow: G-3	500 CFM



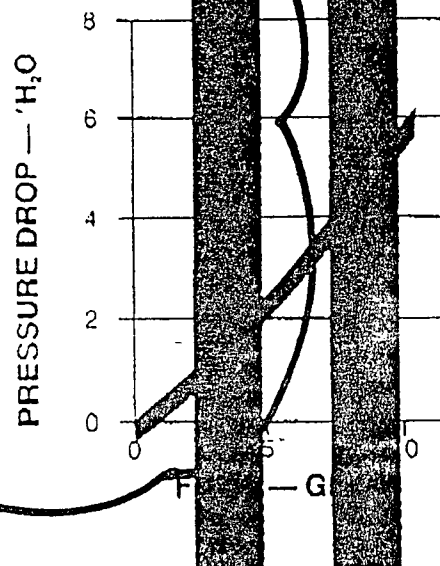
CARBOTROL® for liquids



Model L-1

SPECIFICATIONS

Diameter/Height	24/36"
Carbon	200 lbs.
Shipping Weight	250 lbs.
Inlet	1" NPT
Outlet	1" NPT
Flow: 5 GPM @ 10 Minute Contact Time	



I N T E R O F F I C E M E M O R A N D U M

Date: 17-Dec-1993 07:40am EST
From: Beth Knauss TPA
KNAUSS_B@A1@TPA1
Dept: Southwest District Offi
Tel No: 813/744-6100
SUNCOM:

TO: See Below

17463 2-f

Subject: RE: Universal Waste & Transit \ Subpart H Compliance

I agree. Who is going to review Safety-Kleen, Sparkle, Laidlaw, Chem. Con, Chemical Waste Management, Ashland and Universal's closure plans and financial responsibility documents to make sure that the increased costs of closing the transfer facility are covered?

Do we also need to modify any permits?

Beth

Distribution:

TO: Diana Davis TAL

(DAVIS_D@A1@DER)

CC: Fred Wick TAL

(WICK_F@A1@DER)

CC: Beth Knauss TPA

(KNAUSS_B @ A1 @ TPA1)

CC: Gary Santti TPA

(SANTTI_G @ A1 @ TPA1)

CC: Lynne Milanian TPA

(MILANIAN_L @ A1 @ TPA1)

CC: Chris McGuire TAL

(MCGUIRE_C@A1@DER)

I N T E R O F F I C E M E M O R A N D U M

Date: 16-Dec-1993 03:53pm EST
From: Diana Davis TAL
DAVIS_D@A1@DER
Dept: Office General Counsel
Tel No: 904/488-9730
SUNCOM:

TO: Fred Wick TAL (WICK_F@A1@DER)
TO: Beth Knauss TPA (KNAUSS_B @ A1 @ TPA1)
CC: Gary Santti TPA (SANTTI_G @ A1 @ TPA1)
CC: Lynne Milanian TPA (MILANIAN_L @ A1 @ TPA1)
CC: Chris McGuire TAL (MCGUIRE_C@A1@DER)

Subject: Universal Waste & Transit \ Subpart H Compliance

A TSD that also operates a transfer facility must include the transfer facility in its closure cost estimates. Fred Wick and Chris McGuire agree with this approach.

Facility is defined in 40 CFR 260.10 to include "all contiguous land and structures, other appurtenances..."

I believe that closure of "the facility" as referenced in 40 CFR 264.142(a), includes the increase in closure costs associated with closure of the transfer facility.

I N T E R O F F I C E M E M O R A N D U M

Date: 13-Dec-1993 12:56pm EST
From: Beth Knauss TPA
KNAUSS_B
Dept: Southwest District Offi
Tel No: 813/744-6100
SUNCOM: 542-6100 Ext. 383

TO: Fred Wick TAL

(WICK_F @ A1 @ DER)

CC: Gary Santti TPA

(SANTTI_G)

CC: Lynne Milanian TPA

(MILANIAN_L)

Subject: universal Waste & transit Subpart H compliance

I understand that you are filling in until we hire a new RCRA financial compliance person. I have a question about a TSD that also operates a transfer facility, and therefore holds waste in the truck parking area. The facility's original closure plan did not include this storage-- they started holding waste in the parking lot later. (Actually several facilities have this kind of arrangement.)

The State transfer facility rules require the transfer facility to have a closure plan. Universal Waste has modified its TSD facility closure plan to comply with this requirement. However, as transfer facilities do not need to provide financial assurance for closure, I'm not sure we can require financial assurance for the increased closure costs. To be fair, if we require Universal to do this under our omnibus authority, we should require all the TSD's who have transfer facilities to do the same thing.

Do you think we can require financial assurance for TSDs who also operate transfer facilities?

Thanks,

Beth

Memorandum

Florida Department of Environmental Protection

TO: Satish Kastury
Administrator, Tallahassee

FROM: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 10/6*

DATE: October 6, 1993

SUBJECT: *Universal Waste & Transit Inc., FLD 981 932 494*
Operating Permit File No. HO29-171163 2-A
Notice of Financial Documents

Attached, please find correspondence dated September 27, 1993 and submitted October 5, 1993 which is subject to the referenced permit. The package includes the following items:

1. One four page cover letter discussing the financial assurance for closure costs.
And 2 attachments.

Attachments

lrm

cc: ~~Alan Farmer, Chief RCRA Branch, EPA Region IV~~

skmhcptl.doc

September 27, 1993

Region V Administrator
U.S. E.P.A.
230 S. Dearborn Avenue
Chicago, Illinois 60604
Attn: Mr. Karl Bremmer

Region VII Administrator
U.S. E.P.A.
726 Minnesota Avenue
Kansas City, Kansas 66101
Attn: Mr. Alan Wehmeyer

Region IV Administrator
U.S. E.P.A.
345 Courtland St., N.E.
Atlanta, Georgia 30365
Attn: Mr. James Scarbrough

D.E.P.

OCT 05 1993

SOUTHWEST DISTRICT
TAMPA

Gentlemen:

I am the chief financial officer of City Management Corporation, 3400 East Lafayette, Detroit, Michigan 48207. This letter is in support of this firm's use of the financial test to demonstrate financial assurance for closure and/or post-closure cost, as specified in subpart H of 40 CFR parts 264 and 265.

1. This firm is the owner or operator of the following facilities for which financial assurance for closure or post-closure care is demonstrated through the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility:

A.	City Environmental - Frederick EPA I.D. No. MID 980 991 566 1923 Frederick Street Detroit, Michigan 48211	\$923,991 (Closure only)
B.	City Environmental - Harper EPA I.D. No. MID 054 683 479 1550 Harper Avenue Detroit, Michigan 48211	\$437,794 (Closure only)

2. This firm guarantees, through the guarantee specified in subpart H of 40 CFR parts 264 and 265, the closure or post-closure care of the following facilities owned or operated by the guaranteed party. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility:

NONE



3. In States where EPA is not administering the financial requirements of subpart H of 40 CFR parts 264 or 265, this firm, as owner or operator or guarantor, is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in subpart H of 40 CFR parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test are shown for each facility:

C.	Universal Waste & Transit	\$ 96,093
	EPA I.D. No. FLD 981 932 494	(Closure
	2002 North Orient	only)
	Tampa, Florida 33619	
D.	City Environmental - Kansas City	\$186,769
	EPA I.D. No. MOD 981 706 856	(Closure
	901 Woodswether Road	only)
	Kansas City, Missouri 64101	

4. This firm is the owner or operator of the following hazardous waste management facilities for which financial assurance for closure or, if a disposal facility, post-closure care, is not demonstrated either to the EPA or a State through the financial test or any other financial assurance mechanism specified in subpart H of 40 CFR parts 264 and 265 or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility:

NONE

5. This firm is the owner or operator of the following UIC Facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility:

NONE

This firm is not required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on June 30. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended June 30, 1993.

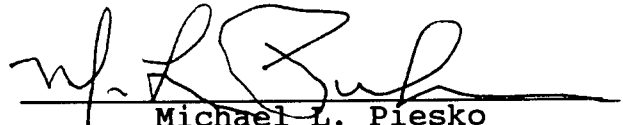
ALTERNATIVE I

1. Sum of current closure and post-closure cost estimate	\$ 1,644,647
*2. Total liabilities	130,494,035
*3. Tangible net worth	39,951,755
*4. Net worth	53,660,290
*5. Current assets	66,245,077
*6. Current liabilities	28,615,484
7. Net working capital	37,629,593
*8. The sum of net income plus depreciation, depletion, and amortization	28,126,826
*9. Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S).	

	Yes	No
10. Is line 3 at least \$10 million?	x	
11. Is line 3 at least 6 times line 1?	x	
12. Is line 7 at least 6 times line 1?	x	
*13. Are at least 90% of firm's assets located in the U.S.? If not, complete line 14.	x	
14. Is line 9 at least 6 times line 1?		
15. Is line 2 divided by line 4 less than 2.0?		x
16. Is line 8 divided by line 2 greater than 0.1?	x	
17. Is line 5 divided by line 6 greater than 1.5?	x	

U.S. E.P.A.
September 27, 1993
Page No. 4

I hereby certify that the wording of this letter is identical to the wording specified in 40 CFR 264.151(f) as such regulations were constituted on the date shown immediately below.



Michael L. Piesko
Chief Financial Officer
City Management Corporation

September 27, 1993

cc: Ms. Sharon Ferman
Waste Management Division
Michigan Department of
Natural Resources
38980 Seven Mile Road
Livonia, Michigan 48152

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

1. Commerce and Industry Insurance Company (the "Insurer"), of 70 Pine Street, New York, NY 10270, hereby certifies that it has insured liability insurance covering bodily injury and property damage to **City Management Corporation** (the "Insured"), of **3400 East Lafayette, Detroit, MI 48207**, in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147. The coverage applies at:

A. MID 054 683 479 City Environmental, Inc. - Harper
1550 Harper
Detroit, MI 48211

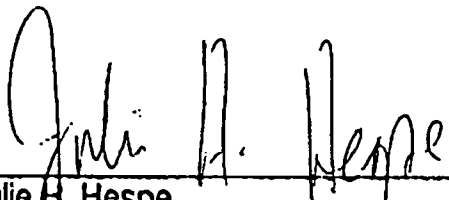
B. MID 980 991 566 City Environmental, Inc. - Frederick
1923 Frederick
Detroit, MI 48211

for sudden and nonsudden accidental occurrences. The limits of liability are \$1,000,000 each occurrence and \$5,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number **PLL 5872905** issued on **July 1, 1993**. The effective date of said policy is **July 1, 1993**.

2. The Insurer further certifies the following with respect to the Insurance described in Paragraph 1:
 - (a) Bankruptcy of insolvency of the Insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147 (f) or 265.147 (f).
 - (C) Whenever requested by a Regional Administrator of the U.S. Environmental Protection Agency (EPA), the Insurer agrees to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.

- (d) Cancellation of the Insurance, whether by the insurer or the Insured, a parent corporation providing insurance coverage for its subsidiary or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of 60 days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is(are) located.
- (e) Any other termination of the insurance will be effective only upon written notice and only after expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is(are) Located.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j) as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.



Julie H. Hespe
Cleveland Pollution Manager

Authorized Representative of Commerce and Industry Insurance Company

1375 E. Ninth Street, Cleveland, Ohio 44114

PAGE .003

T 444 P. 02

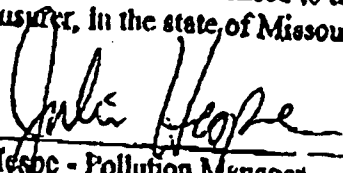
JUL -29 '93 13:34 FROM WILLIS-CORROON-DETROIT
JUL 29 '93 11:38 TO 313 462 2085 FROM ALN

PAGE.004

T-444 P.03

- (c) Any other termination of the insurance shall be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the Director of the MDNR.

I hereby certify that the wording of this endorsement is identical to the wording specified in 10 CSR 25-13.010 as such regulation was constituted on the date first above written, and that the insurer is licensed to transact the business of insurance as an excess or surplus lines insurer, in the state of Missouri.


Julie Hespe - Pollution Manager
Authorized Representative and Title

Commerce and Industry Insurance Company
1375 E. Ninth Street
Cleveland, Ohio 44114

JUL 29 '93 11:30 TO 313 462 2085

FROM RMR

1-444 P.04

STATE OF FLORIDA

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE
(Primary Policy)

1. Commerce and Industry Insurance Company
 (the "Insurer"), of 70 Pine Street, New York, NY 10270
 [Name of Insurer]
 [Address of Insurer]
 hereby certifies that it has issued liability insurance covering bodily injury and property damage to Universal Waste & Transit, Inc.
 [Name of Insured]
 (the "Insured"), of 2002 North Orient Road, Tampa, Florida 33619
 [Address of Insured]
 in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147, as adopted by reference in Section 17-30.180, Florida Administrative Code (F.A.C.). The coverage applies at

EPA/DER I.D. No.NameAddress

FLD-981-932-494 Universal Waste & Transit, Inc.
 2002 North Orient Road
 Tampa, FL 33619

for:

- ☒ sudden accidental occurrences
☐ nonsudden accidental occurrences
☐ sudden and nonsudden accidental occurrences

(If coverage is for multiple facilities and the coverage is different for different facilities, indicate which facilities are insured for sudden accidental occurrences, which are insured for nonsudden accidental occurrences, and which are insured for both.)

The limits of liability are \$ 1,000,000. each occurrence and
 \$ 2,000,000. annual aggregate, exclusive of legal defense costs. The
 coverage is provided under policy number WL 5872905, issued on
July 1, 1993. The effective date of said policy is July 1, 1993.
 [Date] [Date]

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

DER FORM 17-30.900(4)(k)

Certificate of Liability Insurance
 (Primary Policy)
 Page 1 of 2

JUL 29 '93 13:35 FROM WILLIS-CORROON-DETROI

PAGE.005

JUL 29 '93 11:31 TO 313 462 2005

FROM RMH

Y-444 P.05

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f), as adopted by reference in Section 17-30.180, F.A.C.

(c) Whenever requested by the Secretary of the Florida Department of Environmental Regulation (FDER), the insurer agrees to furnish to the Secretary a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the insurer or the insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Secretary of the FDER.

(e) Any other termination of the insurance (e.g., expiration, non-renewal) will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDER.

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 264.151(j), as adopted by reference in Section 17-30.180, F.A.C., as such regulation was constituted on the date first above written, and that the insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States including Florida.


[Signature of Authorized Representative of Insurer]

Julie Happe
[Type Name]

Pollution Manager
[Title]

Authorized Representative of

Commerce and Industry Insurance Company
[Name of Insurer]

1375 E. Ninth Street, Cleveland, Ohio 44114
[Address of Representative]

DER FORM 17-30.200(4)(k)

Certificate of Liability Insurance

JUL 29 '93 12:29

216 479 8888

PAGE.005

** TOTAL PAGE.005 **

DRAFT

September 27, 1993

To the Shareholder and Management of
City Management Corporation:

We have audited, in accordance with generally accepted auditing standards, the balance sheet of City Management Corporation as of June 30, 1993 and 1992, and the related statements of income, shareholder's equity, and cash flows for the years then ended, and have issued our report thereon dated September 27, 1993.

At your request, we have read the letter and the attachment thereto from the Corporation's chief financial officer, dated September 27, 1993, in support of the Corporation's use of the financial test to demonstrate financial assurance, as specified in Subpart H of 40 CFR Parts 264 and 265.

We compared the data presented in items 2 through 17, under Alternative I in the attachment to the aforementioned letter, with the financial statements of City Management Corporation for the year ended June 30, 1993.

In connection with the procedures referred to above, no matters came to our attention that caused us to believe that the specific data should be adjusted. This report is intended solely for the information and use of the shareholder and management of City Management Corporation and the U.S. Environmental Protection Agency and should not be used for any other purpose.

Very truly yours,

DRAFT

SHE

Attachment



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 28 1993

D.E.R.
JUN 30 1993
SOUTHWEST DISTRICT
TAMPA

4WD-RCRA

Mr. Satish Kastury
Environmental Administrator
Hazardous Waste Regulation
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RE: Comments on Draft RCRA Facility Assessment (RFA) Report
Universal Waste and Transit, Tampa, Florida
EPA I.D. No. FLD 981 932 491

171163 2-e

Dear Mr. Kastury:

The United States Environmental Protection Agency (EPA) has reviewed the Draft RFA Report for the above referenced facility. This report was submitted to EPA by the Florida Department of Environmental Regulation (FDER) in fulfillment of a corrective action workplan commitment in the FY-93 grant. Enclosed herewith are specific comments on the report.

Please have your staff review these comments and address them as appropriate in the final RFA report. I sincerely hope these comments prove helpful in preparing future RFA reports. If you have any questions in this matter, please contact Harry Desai, of my staff, at (404) 347-3433.

Sincerely yours,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: Ms. Lynn Milanian, FDER, Southwest District, Florida

COMMENTS ON THE DRAFT RFA REPORT
UNIVERSAL WASTE AND TRANSIT
EPA I.D. NO. 981 932 494

1. The Executive Summary should include only the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) related activities. The list of hazardous wastes stored at the storage facility should be deleted from the Executive Summary because they are listed in the RCRA permit. In addition, Appendix C - "Permitted RCRA Wastes Summary", in the RFA Report, provides this information. A reference in this matter should also be made in Section II F - "Regulatory Applicability and History".
2. The last paragraph of the Executive Summary should include a short explanation regarding the purpose of the monitoring wells and a background history of the Universal Waste and Transit site. Specifically the status of the Stauffer Chemical and Helena Chemical sites, since the reference regarding groundwater monitoring is made in the Executive Summary of the RFA Report.
3. Page I-1 - Executive Summary - Last Paragraph - The report mentioned that at the time of the VSI site inspection by the Environmental Protection Agency (EPA) in August 1988, this was a new facility. Please note that the construction of the facility was not completed at the time of inspection by EPA. The error regarding the new facility should be corrected.
4. Facility Description - A clarification is needed regarding physical treatment. The RCRA permit includes a filter press for physical treatment. However, the permittee cannot use the filter press because the storage in the tank, which is essential for the operation of the filter press, is not permitted. The status of the permit application or permit modification for the storage tank should be clarified in this section.
5. Waste Management Practices - Are "tote tanks" and "jumbo sacks" permitted for storage? This should be clarified. Also, is storage on open pallets permitted? Since the pictures of this practice are included in the RFA Report, the waste management practices need to be discussed in detail.
6. Waste Management Practices - The report mentioned that inspection of the containers and the containment areas are performed daily. Does the facility maintain an inspection log?. Detailed description is needed.

7. Facility Waste Generation - This section needs to discuss, in detail, the waste generated and the activities at all identified SWMUs. Information should be provided as to where waste is generated and how it is handled. This section in the report does provide descriptions of SWMUS, but fails to discuss the waste generation and handling practices.
8. Facility Waste Generation - SWMU #4 (Filter Press) - The dimensions and capacity of this SWMU should be provided. Since this is a regulated unit, the text should provide more information about specific uses of this unit and the reason for permitting it. Particularly, since it is not operable without the storage tank permit.
9. Figure No.2 - SWMU #3 is cut off. Please include a new location map showing all SWMUs.
10. Facility Waste Generation - SWMU #6 (Storm Water Pretreatment Unit) - The limitations of the sump pump flow rate (30 gals. per minute) and the flow rate to the pretreatment unit (5 gals. per minute) from the sump tank, should be explained. Also, the possibility of over flow from the pretreatment unit (SWMU #6) to the ground should be addressed.
11. Regulatory Applicability and History - The Waste Minimization and Land Disposal Restriction provisions are mentioned in the report. The Air Emission Standards for process vents - 40 CFR § 264.1030, Subpart AA and Air Emission Standards for Equipment Leaks, 40 CFR 264.1030, Subpart BB, should also be included in this section of the report.
12. Release History - Figure 3, "Monitoring Well Location Map", A reference regarding the Helena Chemical Superfund site is made in the report. However, the site map does not show the location of the site. Include this Superfund site on the map and also, include the direction of the groundwater flow.
13. Flood Plain - Figure 4 - The UW&T site location is not shown on the map.
14. Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) - Why are three groundwater monitoring wells considered AOCs?. These monitoring wells are used to monitor the contaminant levels at the Universal Waste and Transit's (UW&T) site. The facility wants to establish that the contaminants are coming from the adjoining Stauffer Chemical and Helena Chemical Superfund sites and not from UW&T. The three monitoring wells do not seem to fit the definition of AOC (see below). Therefore, if it is necessary the AOC (three monitoring wells) should be renamed.

Definition - Area of Concern

Any area having a probable release of a hazardous waste or hazardous constituent which is not from a solid waste management unit and is determined by the Regional Administrator to pose a current or potential threat to human health or the environment.

15. The groundwater samples from the three monitoring wells at the UW&T's site indicate the presence of hazardous waste contaminants. Therefore, the whole of UW&T's site will require further investigation. UW&T should demonstrate that the contaminants found in the groundwater samples are not from any SWMUs on the site. This information should be included in the text of the RFA Report.
16. As background information, a brief summary of contaminants that have been found in the three monitoring wells should be provided in the report.
17. Table 1 - SWMU Identification Summary
 - a. The Pollution Migration Pathways column should include groundwater, soil and/or surface water for SWMU #1, SWMU #2, SWMU #4 and SWMU #5. It is conceivable that a spill in the storage area could cause the pollutants to move in other migration pathways.
 - b. Table 2 - Delete this table if it is established that the three monitoring wells are not Areas of Concern.
18. SWMU Data Sheets
 - a. SWMU #1 - In the comments it should be mentioned that this is a regulated unit.
 - b. SWMU #2 - Loading Dock -This is not a Concrete Surface Impoundment. It should be renamed.
 - c. SWMU #2 - If there is a crack in the concrete, soil and groundwater might be pollutant release pathways. Please address these on the data sheet.

- d. SWMU #6 - Pretreatment Unit- Sump tank is part of the pretreatment unit, therefore it should be included in this SWMU. The limiting factors are size of the tank and capacity of the sump pump and the feed rate to the pretreatment unit.
- e. Photographs - There are many photos that are unrelated to the RFA (e.g. batteries stored on a pallet, picture #25 showing a storage area....., Are these SWMUs?). Explanation about RFA related photos should be provided in the text of RFA Report. Please review all photographs and remove unrelated photos or provide explanation in the text of the report as to why these photos are pertinent.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

March 31, 1993

171163 2-e

Mr. Alan Farmer, Chief
Division of Waste Management
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

RE: Draft RCRA Facility Assessment (RFA) Report; Universal
Waste & Transit, Inc., Tampa, Florida; FLD981932494.

PLACED IN FILE 2-g

Dear Mr. Farmer:

The draft Resource Conservation Recovery Act (RCRA) Facility Assessment (RFA) report for Universal Waste & Transit, Inc., located in Tampa, Florida, has been completed and is being forwarded along with two (2) copies, to your office, and one copy is being forwarded to the applicable district office for review and comment prior to finalization. The findings of the Visual Site Inspection (VSI) conducted on February 25, 1993, is incorporated in this report and recommendations are made regarding the need for further investigation of the solid waste management units (SWMUs) at the facility.

Any corrections, questions or concerns that you or your staff may have will be considered along with the comments from the facility prior to our finalization of the document.

If you have any questions regarding this matter, please contact Wanda Parker or Bheem Kothur of my staff at (904)488-0300.

Sincerely,

Satish Kastury
Environmental Administrator
Hazardous Waste Regulation

SK/bk/wp
enclosures

cc: Gary Santini-DER Southwest (w/enclosure)
Merlin Russell - DER

D.E.R.

APR - 7 1993

SOUTHWEST DISTRICT
TAMPA

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

Interoffice Memorandum

To: Beth Knauss, Supervisor, Tampa
Enforcement Compliance
Hazardous Waste Regulation

Thru: Gary Santi, Professional Engineer II, Tampa
Hazardous Waste Regulation *gj*

From: Lynne R. Milanian, District Permitting Engineer, Tampa
Hazardous Waste Regulation *Lynne 3129*

Date: March 29, 1993

Re: *Universal Waste & Transit, Inc., FLD 981 932 494*
Operating Permit HO29-171163 Hillsborough County
Non Compliance With Permit Application *2-e*

The facility is not complying with two issues addressed in their current active application as follows:

Issue 1. UW&T is currently using some containers for storage of hazardous waste called tote tanks and jumbo sacks. The jumbo sacks are made of a cloth like material with liners and are knot tied to close the container.

In Volume I Tab 22 pages 83 thru 84 of the application (copy attached) UW&T identifies the type of containers that will be utilized to store containerized waste on-site and a jumbo sack is not identified. Specific Condition Part II. 1. states that ...any change in container type other than that mentioned on pages 83 thru 84 of the application shall be approved by FDER prior to usage.

Issue 2. UW&T has not been replacing the activated carbon and sand filters on a regular basis for their treatment system.

In Volume I Tab 14 pages 39 and 40a of the application (copy attached) UW&T stated that on a quarterly basis the sand filter would be inspected and replaced if necessary. On a semi-annual basis the activated carbon canister would be removed

Beth Knauss

UW&T

Page 2

from service and regenerated/replaced. These maintenance activities are to be recorded in the facility operating record. Records documenting any of these events (both maintenance and inspections) have not been kept.

Recommendation

Perhaps issuance of a warning letter is justified.

I believe it would be appropriate to have UW&T begin keeping records of the maintenance and inspection activities performed on the sand and activated carbon filtration system which serves primarily to handle stormwater leaving the parking lot and truck loading bay as it accumulates in the collection sump.

There is a containment trench provided in the out side truck loading area designed to receive spills of RCRA waste should an accident occur. This trench proceeds to the same sump via gravity. There is a pump associated with the sump with is suppose to be manually operated and definitely off during any truck transfers. During non truck transfer events the pump is supposed to be active such that any rain accumulating in the containment trench will be released to the stormwater retention pond via the treatment system. I believe including some provisions to ensure the pump is on or off during truck transfers is warranted.

The outside sump and its pump and the treatment system are not included on any inspection logs currently utilized by the facility. Logs are presented in Volume VI Tab 14 (copies attached).

If the jumbo sack is an authorized DOT container then UW&T should request a minor modification to their permit indicating their desire to use this particular unit.

cc: Wanda Parker, FDER - Tallahassee,
Harry Desei, EPA Region IV-Atlanta,

Get to go can give permit
specific conditions - if any are violated

INTEROFFICE MEMORANDUM

Date: 03-Mar-1993 12:36pm EST
From: Wanda Parker TAL
PARKER W
Dept: Waste Management
Tel No: 904/488-0300
SUNCOM: SUNCOM 278-0300

TO: Lynne Milanian TPA

(MILANIAN_L)

CC: Beth Knauss TPA

(KNAUSS_B)

Subject: Universal Waste and Transit VSI

Lynn,

During the VSI at Universal Waste and Transit we observed a couple of activities that may be of interest to you. The facility is currently using containers for storage of hazardous waste called tote tanks and jumbo sacks. The jumbo sacks are made of a cloth-like material with liners and are knot-tied to close the container. During the VSI John Taylor mentioned that the carbon and sand filters within the pre-treatment system have never been replaced.

If I can be of any assistance please don't hesitate to contact me.

Volume I

tab 14

Page 40a

Volume I

tab 22

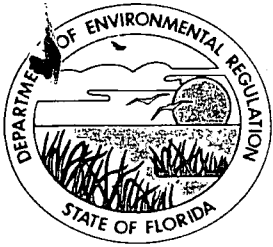
Page 83-84

(copy these 3 pages
attach to memo)

also sump pump

is to be not
actuated

thus it is manually
operated → pg 39
- did we require
record b.e kept
of releases?



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 11, 1993

D. E. R.

FEB 17 1993

SOUTHWEST DISTRICT
TAMPA

Mr. John Taylor
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

RE: Universal Waste & Transit; Tampa, Florida; EPA ID No.
FLD981932494; VSI Notification Letter and Agenda

Dear Mr. Taylor:

The Florida Department of Environmental Regulation (FDER) is conducting a RCRA Facility Assessment (RFA) of the Universal Waste & Transit, Inc. facility in Tampa, Florida on February 25, 1993. The Hazardous and Solid Waste Amendments (HSWA) of 1984 provide EPA authority under RCRA to require comprehensive corrective actions on releases of hazardous constituents to air, surface water, soil, and ground water at all facilities which manage hazardous wastes. The RFA includes a review of the facility files at the Regional, State, and District offices, a Visual Site Inspection (VSI) of the facility, and if necessary, a Sampling Visit.

The objectives of the VSI are to identify all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) located at the facility in order to determine their potential for past or ongoing releases of hazardous constituents to the environment. The VSI will be conducted by EPA and FDER staff inspectors.

Attachment A is a tentative agenda for the VSI. Attachment B is a summary of information needed in order to update and fill in information gaps. Please develop a response to each of these questions listed in Attachment B so that the RFA Report reflects only accurate information

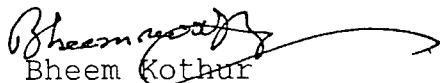
Mr. John Taylor
Page 2

regarding your facility. It is requested that the responses be presented during the VSI, although if the information is readily available and can be sent prior to the scheduled date it will enable the VSI staff to make any necessary revisions to the agenda and facilitate drafting the RFA Report. The attachments will be reviewed with facility personnel at the beginning of the VSI to determine if there will be a need to adjust the VSI agenda to allow a complete, thorough, and expeditious inspection of all current and past waste SWMUs, and a review of current waste management practices at the facility. The inspection will encompass all current and past waste handling, storage, treatment, staging, transfer, and disposal areas including both indoor and outdoor units. During the VSI, photographs will be taken to document the condition and location of all SWMUs and AOCs identified during the VSI, and facility waste management practices in general.

The VSI team will tentatively consist of one (1) EPA inspector and three (3) FDER inspectors. FDER staff will contact you prior to the VSI in order to obtain specific information on health and safety requirements at your facility, and specific information on the material handled there.

If you have any questions concerning the VSI, please contact me at (904)488-0300.

Sincerely,



Bheem Kothur
Professional Engineer
Hazardous Waste Regulation

wp/BK
Enclosure

cc: Allan Farmer - EPA
Lynn Milanian - FDER
Merlin Russell - FDER

Attachment A

Proposed VSI Agenda

February 25, 1993

Time	Activity
8:30 - 8:45	Inroductory meeting with facility representatives; discuss agenda, safety and health considerations, information needs, transportation arrangements.
8:45 - 10:30	Detailed discussion of information needs, past and present facility operations, waste streams, and waste management practices. Identify any SWMUs nad AOCs not on tentative list, resolve any other problems with SWMUs and AOCs.
10:30 - 12:00	Begin facility tour of SWMUs and AOCs.
12:00 - 1:00	Lunch Break
1:00 - 3:00	Continue facility tour of SWMUs and AOCs.
3:00 - 4:00	Close-out meeting with facility representatives. Discuss additional information needs generated by VSI. Obtain copies of any facility offered information.

February 26, 1993

Reserved, if additional time is needed.
To be determined by VSI Team Leader.

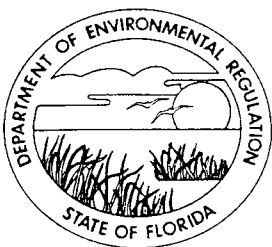
Attachment B

RFA Information Request

1. Provide description of waste management practices, dates implemented, and any changes in these practices.
2. Provide type and volume of waste generated.
3. Provide most recent biennial report.
4. Provide surrounding land use information (e.g., distance to population centers).
5. Provide descriptions of drum storage area:
 - Location
 - Type and volume of waste
 - Secondary containment
 - Frequency of pick-up for disposal/treatment
 - Treatment/disposal method
6. For each accumulation area, provide:
 - Description
 - How long was waste normally stored
 - Secondary containment
 - Type and number of containers
 - Type waste generated
 - Waste management procedures
 - Spill/release history
7. Identify each past or present SWMU and AOC, provide:
(Note: Units include, but are not limited to the following: Above ground and underground waste storage tanks, abandoned storage tanks, waste storage units for solid and hazardous wastes which fall under the 90-day exemption from RCRA, all waste handling areas and associated activities including loading zones, transfer areas and waste accumulation areas, and runoff collection sumps.)
 - Date unit began operating
 - Date operations ceased (if applicable)
 - Dimensions of unit
 - Location of unit in facility
 - Description of waste handled
 - Unit function
 - Source and destination of waste managed

- Volumes of waste handled
 - Release controls
 - History of release
 - Whether unit is in the 100-year flood plain
 - Inspection and maintenance procedures to assure unit integrity
8. Provide information on any spills or accidental fires which have occurred, including:
- Date(s) of spill(s)
 - Type and volume(s) and/or fire(s)
 - Location
 - Notification report(s)
 - Description of clean-up activities including any sampling results
9. Does the facility generate any waste oil? if so, how is this waste handled?
10. Please provide information concerning the number of potable water sources within a one-mile radius of the facility. Where does the city of Tampa, Florida get its drinking water? Are there any existing streams, intermittent streams, or surface waters within a one-mile radius of the site? Where does the facility obtain its drinking and process water?
11. Estimate the population of Tampa, Florida and identify any endangered species which may live in the area.
12. If available, provide an up-to-date large scale topographic map of the facility.
13. Provide a site map of suitable scale to show boundaries of all contiguous property which can be used to show the locations of the SWMUs and AOCs on the property.
14. Provide copies of any historical aerial photographs of the facility.
15. Identify the former location(s) of any process units and provide other relevant information (i.e., waste managed, operating and design information). This includes active units and units which have been closed or abandoned.
16. Are there any existing or former underground storage tanks at the facility? If so, provide inspection reports if available.

17. Do facility personnel perform onsite vehicle maintenance? If so, how re these wastes handled?
18. What types of laboratory tests are conducted at the facility, and how are these wastes handled?
19. Provide a current flow diagram of all the processes.
20. Provided any recent sampling results:
 - Ground water
 - Soil
 - Waste streams
21. Provide sanitary, storm water, and industrial sewer maps.
22. Provide information from any soil borings performed at the facility and any hydrogeological studies performed there.
23. Explain the NPDES permit status of the facility. Provide the results of the most recent compliance monitoring test results and documentation of nay violations.
24. Provide a list of any air pollution control devices utilized at the facility and provide the most recent permit and permit applications.
25. Provide the start-up date of the facility and submit a history of the facility prior to the start-up date, including former owners, site uses, manufacturing processes used, waste generated, and existing buildings and/or structures.
26. How are domestic refuses and sanitary wastes handled at the facility?
27. Provide copies of all current Federal and State permits granted.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Virginia B. Wetherell, Secretary

February 4, 1993

C.E.R.

HO29-171163 2-e

FEB 09 1993

Kent Williams
Division of Waste Management
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

SOUTHWEST DISTRICT

RE: RFA Work Plan Replacement of Universal Waste Transit
(FLD981932494)

Dear Mr. Williams:

Per our conversation concerning the withdrawal of HOWCO Environmental Services' (FLD152764767) status as a Treatment, Storage, and Disposal (TSD) facility, I am currently replacing that RFA Work Plan commitment with Universal Waste Transit (FLD981932494).

If you have any questions regarding this matter, please contact me at (904)488-0300.

Sincerely,

Bheem Kothur
Professional Engineer
Hazardous Waste Regulation

wp/BK

cc: Satish Kastury
Wanda Parker
Fletcher Herrald
Michael Hatcher
Michael Redig
Merlin Russell
Lynn Milanian ✓

PERMIT COVER MEMO

modification placed in 2-f

TO: RICK GARRITY, DIRECTOR OF DISTRICT MANAGEMENT

FROM/THROUGH: *WR 2/1/93*

William Kutash , ENVIRONMENTAL ADMINISTRATOR

for Gari Santti , PROFESSIONAL ENGINEER II

Lynne R. Milanian, DISTRICT PERMITTING ENGINEER *Lynne 1/26*

DATE: January 26, 1993

FILE NAME: Universal Waste & Transit PERMIT #: HO29-171163
PROGRAM : Hazardous Waste COUNTY : Hillsborough

TYPE OF PERMIT ACTION: ☐ ISSUE ☐ DENY ☒ MODIFY
☐ TRANSFER OWNER ☐ NOD
☐ PUBLIC NOTICE ☐ INTENT

PUBLIC NOTICE PERIOD CLOSED? Not Applicable

PERMIT SUMMARY: Attached is a permit cover letter which amends the issued operating permit via identification of TCLP waste codes that the State of Florida is now authorized to regulate.

PROFESSIONAL RECOMMENDATION: ☒ APPROVE ☐ DENY

EVALUATION SUMMARY: This facility has previously requested a Class I modification to their operating permit to include the new TCLP waste codes. The state of Florida has adopted these TCLP rules and as such the permit modification is necessary.

tclpcovm.doc

4-13-93 TUE 12:07

UNIVERSAL WASTE AND TRAN

FAX NO 813-622-8765

P.01

UW&T

UNIVERSAL WASTE & TRANSIT INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-622-8762

PHONE: (813) 622-8762
OFFICE FAX: (813) 628-0342
FACILITE FAX: (813) 622-8765

TRANSMISSION INFORMATION SHEET

DATE 1/26/93 TIME 11:00

TO: Lynn Milanian

COX-ANY: D.E.R.

FROM: John Taylor

NUMBER OF PAGES: 2

[Including Cover Sheet]

SPECIAL INSTRUCTION/MEMO

Stauffer site info

Show D. Tremm

Please return for filing!



ICI Americas Inc.
ENGINEERING NORTH AMERICA
ENVIRONMENTAL SERVICES
& OPERATIONS

P.O. Box 1207
Tarpon Springs, FL 34688-1207

Telephone (813) 937-4113
Facsimile (813) 938-6517

November 18, 1992

Dear Neighbor:

We wish to advise you of plans concerning the former Stauffer Chemical Company plant located at 2009 Orient Road near Broadway in Tampa.

The site is managed by Stauffer Management Company (SMC). SMC was formed as a result of the 1987 divestiture of Stauffer Chemical Company, which operated the plant from 1951 until shutdown in 1986. ICI Americas, a Delaware-based affiliate of SMC, provides support services to SMC.

As you may be aware, the plant formulated and packaged agricultural chemicals, and employed approximately 70 Tampa-area residents, until operations were discontinued. After the shutdown, products and raw materials were removed from the site. The entire site has been fenced to restrict unauthorized access.

During the past several years, Stauffer and its consultants have been assessing the site's environmental situation. This work continues today, in cooperation with the U. S. Environmental Protection Agency (EPA) and the State of Florida Department of Environmental Regulation.

During the next several weeks, a contractor for SMC will begin site work including the excavation of buried drums and associated soils. We expect the excavation to begin in December. This is being accomplished under a voluntary order between SMC and the EPA.

There is no evidence, to date, of any health-related issues.

Be assured that appropriate precautionary measures will be followed during the excavation to ensure environmental safety and protection of the community. Odors may become noticeable as the excavation proceeds, but all efforts will be made to prevent this.

After the appropriate environmental studies have been completed, additional clean-up work may follow. There are no plans to resume manufacturing at the site. The final disposition of property has not yet been determined.

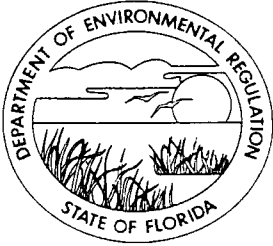
If you have any questions about the site and the activities currently under way, please do not hesitate to call me at (813) 937-4113. For your information, the EPA contact for this project is Art Smith (404) 347-3931.

Sincerely,

A handwritten signature in cursive script that reads 'Jerry F. Harris'.

Jerry F. Harris
Manager, Environmental Operations
Environmental Services & Operations

JP:epk
1E102792



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Carol M. Browner, Secretary

DEC 16 1992

Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, FL 33619

171163

2-e

Attention: Mr. David Brown
General Manager

Re: Universal Waste & Transit, Inc., FLD 981 932 494
Operating Permit HO29-171163 Hillsborough County
Hazardous Waste Manifests

Dear Mr. Brown:

The Florida Department of Environmental Regulation (FDER) will take the following position regarding our phone conversation of December 8, 1992. A storage facility receiving hazardous waste from a generator via a transporter, must sign the manifest upon receipt of the waste and provide this document to the transporter. The storage facility then has thirty days to provide a signed copy to the generator.

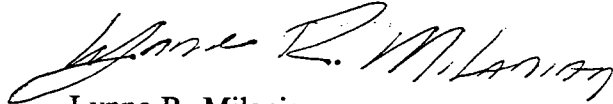
You had proposed providing the transporter with a photo copy of the signed manifest rather than an original in the event that waste sampling determined that an error in waste identification occurred. Your reasoning behind this procedure, was that the transporter would then have an original document of the noted manifest discrepancy upon your facility discovering that an error had been made. However, in order to meet the requirement of signing the manifest for the transporter prior to the transporter leaving your facility you would provide the transporter a photo copy of the signed manifest.

The FDER understands your reasoning behind this proposal, however, providing the transporter a *photo copy* of a signed manifest *will not meet* the requirements of 40 CFR 263.20 (d) (1) and (2) for the transporter nor 40 CFR 264.71 (a) (3) for the receiving facility. Should you wish to discuss the contents of this letter, do not hesitate to contact me at (813) 744 - 6100 extension 372.

Mr. David Brown
Manifests
Page 2

DEC 16 1992

Sincerely,



Lynne R. Milanian
District Permitting Engineer
Hazardous Waste Regulation
Division of Waste Management

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee

uwtlet.doc



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

D. E. R.

DEC 14 1992

DECEMBER 10, 1992

MRS. LYNNE MILANIAN
FLORIDA DEPARTMENT OF
ENVIRONMENTAL REGULATIONS
4520 OAKFAIR BLVD.
TAMPA, FL 33610-7347

SOUTHWEST DISTRICT
TAMPA

SUBJECT: ACCEPTANCE OF HAZARDOUS WASTE FOR TRANSPORTATION
PURPOSES ONLY.

DEAR LYNN;

PER OUR CONVERSATION ON DECEMBER 8, 1992 I HAVE DICUSSED
THE ACCEPTANCE OF SHIPMENTS WITH THE DEPARTMENT OF TRANSPOR-
TATION. ELIZEBETH BROWN OF THE DOT (904) 681-7462 STATED THAT
FOR DOT PURPOSES SIGNING ONLY THE TRANSPORTERS COPY OF THE
MANIFEST TO SHOW ACCEPTANCE OF THE LOAD FOR PIECE COUNT WOULD
FULFILL THE GUIDLINES IN 49 CFR.

MY UNDERSTANDING OF THE CONVERSATION WE HAD ON THIS SUB-
JECT HAD THE SAME OUTCOME AS LONG AS WE SEND THE GENERATOR
THEIR COPY WITHIN 30 DAYS PER 40 CFR 264.71 (a) (4) AND ANY
DISCREPANCIES ARE ADDRESSED WITHIN 15 DAYS PER 40 CFR 264.72
(b).

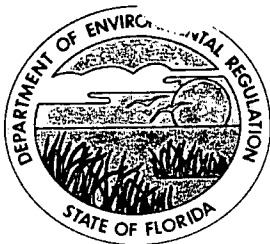
YOUR SIGNATURE WILL CERTIFY THAT THIS PRECEDURE WOULD
MEET WITH THE REQUIMENTS OF YOUR OFFICE.

THANK YOU FOR YOU ASSISTANCE IN THIS MATTER.

SINCERELY;

A handwritten signature in cursive script that reads 'David C. Brown'.

DAVID C. BROWN
MANAGER



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 10, 1992

Ms. Kathleen B. McCann
Corporate Controller
Waste Group
City Management Corporation
3400 East Lafayette
Detroit, Michigan 48207

Dear Ms. McCann:

Re: Universal Waste, Tampa, Florida FLD 981 932 494

I have reviewed your financial test dated October 26, 1992 which shows the closure cost estimate to be \$92,580. The demonstration meets the financial responsibility requirements of 40 CFR Part 264 Subpart H. As you explained in your cover letter, your company will be changing its fiscal year ending to December 31 and you will be submitting an updated demonstration in March 1993.

If I can be of further assistance, I may be reached at 904/488-0300.

Sincerely,

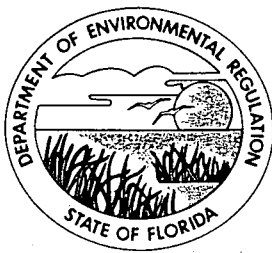
Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

cc: J. R. Finney, EPA, Atlanta
Jeff Pallas, EPA, Atlanta
Lynn Milanian, DER, Tampa

D.E.R.
NOV 16 1992
SOUTHWEST DISTRICT
TAMPA



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

NOV 17 1992

Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, FL 33619

Attention: Mr. David Brown
General Manager

Re: Universal Waste & Transit, Inc., FLD 981 932 494
Operating Permit HO29-171163 Hillsborough County
Hazardous Waste

Dear Mr. Brown:

This letter is to inform you that on July 20, 1992 the Florida Department of Environmental Regulation (FDER) received EPA authorization for the Toxicity Characteristic Leaching Procedure (TCLP) regulations. All permit conditions related to TCLP requirements are now effective and all TCLP waste codes must now be managed in accordance with the permit. Revision of your EPA/Region IV HSWA permit, if issued, to delete TCLP waste code authorization is not required.

This letter must be attached to the original permit and becomes part of that permit. If you have any questions regarding state TCLP authorization, please call Lynne R. Milanian of the Hazardous Waste Program at (813) 744 - 6100 extension 372.

Sincerely,

Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

lrm

cc: Alan Farmer, Chief RCRA Unit, EPA Region IV
Satish Kastury, Administrator, FDER - Tallahassee

uwlet.doc

State of Florida
Department of Environmental Regulation

District Routing Slip

To: Gay Santui

Date: 10-1-92

C.C. To:

	Pensacola	Northwest District	
	Panama City	Northwest District Branch Office	
	Tallahassee	Northwest District Branch Office	
	Apalachicola	Northwest District Satellite Office	
✓	Tampa	Southwest District	
	Punta Gorda	Southwest District Branch Office	
	Bartow	Southwest District Satellite Office	
	Orlando	Central District	
	Melbourne	Central District Satellite Office	
	Jacksonville	Northeast District	
	Gainesville	Northeast District Branch Office	
	Fort Myers	South District	
	Marathon	South District Branch Office	
	West Palm Beach	Southeast District	
	Port St. Lucie	Southeast District Branch Office	
Reply Optional <input type="checkbox"/>		Reply Required <input type="checkbox"/>	Info Only <input type="checkbox"/>
Date Due _____		Date Due: _____	

Comments:

D. E. R.

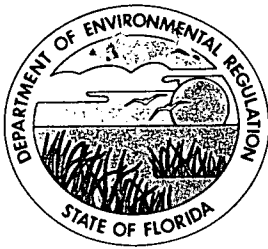
OCT - 5 1992

SOUTHWEST DISTRICT
TAMPA

From:

Lorraine Clark

Tel.:



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

September 30, 1992

CERTIFIED MAIL

Mr. Robert Bedore
President
Universal Waste and Transit, Inc.
7217 Gulf Boulevard
St. Petersburg, Florida 33702

Warning Notice H92-17

RE: Universal Waste and Transit, St. Petersburg, Florida
FLD 981 932 494

Dear Mr. Bedore:

A recent EPA audit of your financial assurance records shows that your facility is out of compliance with the financial responsibility requirements of 40 CFR Part 264 Subpart H. Your financial test dated June 21, 1991 which demonstrated financial assurance for closure cost activities was based on your fiscal year of 1990 and was valid until September 1991. 40 CFR Part 264.143(f)(5) requires you to update your financial test within 90 days of the close of each fiscal year. The updated financial test must show an adjustment for inflation using the 1992 inflation factor of 1.036 for 1991 dollars or by recalculating costs of closure in current dollars. I have included blank forms for your use.

Please submit demonstration for financial assurance within fourteen days receipt of this letter. Failure to comply by this date may result in the initiation of formal administrative enforcement proceedings though the issuance of a Notice of Violation and the assessment of penalties. If the Department issues a Notice of Violation and you are named as a party, you will be informed of your right to contest any determination made by the Department in the Notice of Violation.

If you have any questions about this matter, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

cc: Jeff Pallas, EPA, Atlanta
Gary Santti, DER, Tampa ✓
Doug Outlaw, DER, Tallahassee

D. E. R.

OCT - 5 1992

SOUTHWEST DISTRICT
TAMPA

3192



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

October 7, 1992

Carol M. Browner, Secretary

CERTIFIED MAIL

Mr. John A. Taylor
Plant Manager
Universal Waste and Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Warning Notice H92-17

RE: Universal Waste and Transit, St. Petersburg, Florida
FLD 981 932 494

Dear Mr. Taylor:

A recent EPA audit of your financial assurance records shows that your facility is out of compliance with the financial responsibility requirements of 40 CFR Part 264 Subpart H. Your financial test dated June 21, 1991 which demonstrated financial assurance for closure cost activities was based on your fiscal year of 1990 and was valid until September 1991. 40 CFR Part 264.143(f)(5) requires you to update your financial test within 90 days of the close of each fiscal year. The updated financial test must show an adjustment for inflation using the 1992 inflation factor of 1.036 for 1991 dollars or by recalculating costs of closure in current dollars. I have included blank forms for your use.

Please submit demonstration for financial assurance within fourteen days receipt of this letter. Failure to comply by this date may result in the initiation of formal administrative enforcement proceedings though the issuance of a Notice of Violation and the assessment of penalties. If the Department issues a Notice of Violation and you are named as a party, you will be informed of your right to contest any determination made by the Department in the Notice of Violation.

If you have any questions about this matter, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

Enclosures

cc: Jeff Pallas, EPA, Atlanta
Gary Santti, DER, Tampa
Doug Outlaw, DER, Tallahassee



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-620-6100

Carol M. Browner, Secretary

April 29, 1992

Mr. John A. Taylor
Manager, Technical Services
Universal Waste & Transit, Inc.
2002 N. Orient Road
Tampa, Florida 33619

Re: Tampa Facility, FLD 981 932 494
Operating Permit HO29-171163
Pre-Application Meeting of April 3, 1992

Dear Mr. Taylor:

The Florida Department of Environmental Regulation (FDER) is providing the following comments concerning the issues presented in your recent letter dated April 16, 1992.

1. Permit Application

Universal Waste & Transit, Inc. (UWT) currently has several options to select from in deciding the manner of operating the filter press. Based upon your choice of options, permit modification is possible. Should you select to install one or more treatment tanks, however, a permit modification would not be appropriate.

The installation of a tank (or tanks) will require your submission of a construction permit application to be followed by a new operating permit application. This construction permit application is the document that would contain the descriptions of the waste analysis, contingency plan, etc. as related to the proposed tank system. Your current operating permit does not include operating provisions for a tank system (as this was not mentioned in the original application). Your construction permit application will detail all these issues as related to the tank system.

Should UWT elect to conduct treatment in containers/drums prior to placement of waste into the press, no modifications to the existing permit would be required. This activity was presented in the original operating permit application.

2. Filter Press

UWT is correct, as mentioned above, no modification to the existing permit would be necessary should UWT decide to treat the appropriate wastes in their containers/drums prior to placement in the press.

3. Effluent Discharge


UWT is correct, a groundwater discharge or a surface water discharge of treated effluent is not advised. In accordance with Title 40 CFR Section 261.4(a)(1) and (2) a Public Owned Treatment Works (POTW) hook-up would relieve UWT of costly studies and continuous effluent monitoring to ensure ground water or surface water discharge limitations were being met.

4. TC Waste Code

UWT has received a permit modification authorizing storage of waste codes F020 through F028. You are correct to point out that TCLP waste codes have not been identified in the actual permit language itself. As a matter of fact, these waste codes are identified as hazardous due to the fact that they exhibit the characteristic of toxicity as determined by the Toxicity Characteristic Leaching Procedure (TCLP) established in 40 CFR 261 Appendix II. The toxicity characteristic rule, including the TCLP has been adopted by the Department in Rule 17-730, Florida Administrative Code. The United States Environmental Protection Agency (EPA) has not yet authorized the Department to administer that portion of the RCRA program pursuant to 40 CFR 6926 and 40 CFR Part 271. Therefore, until the Department has been authorized by the EPA to exercise primary regulatory authority over these wastes, they shall be managed in accordance with EPA authority, including permits issued by that agency. Within 15 days of the Department's receipt of authorization to administer the TCLP provisions of the RCRA program, the Department shall notify the permittee that the TC waste codes shall be managed in accordance with the provisions of this permit and possible permit modifications will be addressed and facilitated by the Department.

Do not hesitate to contact me should you have any further concerns.

Sincerely,


Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: Alan Farmer, EPA Region IV
Satish Kastury, FDER/Tallahassee



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

D. E. R.

April 16, 1992

APR 22 1992

Mr. William Crawford
State of Florida
Department of Environmental Regulation
4520 Oakfair Blvd.
Tampa, Florida 33610-7347

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Crawford:

Below is the meeting minutes DER/Universal Waste meeting of April 3, 1992.

Attendees are listed on the enclosed attendance sheet. Four major topics were discussed as follows:

1. Structure of permit application

Universal will be submitting a modification to its existing permit (H029-171163). The modification will possibly include requests for hazardous waste treatment and treatment units such as a neutralization tank. It was agreed that, even though there would be only one permit covering storage (existing) and treatment (proposed), the modifications for treatment should be submitted as a "Stand-alone" document (waste analysis, contingency, and so on).

2. Existing filter press operation

The existing (permitted) filter press has not been used. Specifically, to use the permitted filter press for characteristic hazardous waste, the waste must be treated by neutralization and/or precipitation before the press can be utilized.

Universal asked whether or not the filter press could be used without any permit modification. Universal would propose to use the filter press by neutralizing or precipitating characteristic wastes in their D.O.T. approved containers so that the waste can be processed through the press as was intended in the original permit application. It was noted that generators are allowed to treat characteristic waste in containers and that the resulting waste may be handled as non-hazardous waste if it no longer exhibits the characteristic. It was agreed that this request should be put in writing to the D.E.R.

2992

3. Industrial Waste/NPDES discharge

Universal is investigating the options available for the discharge of non-hazardous industrial waste waters which result from treatment processes at the facility. Universal informed D.E.R. that the Hooker Point POTW had indicated strong reluctance to accept waste water discharges from the facility. D.E.R. indicated that an industrial waste discharge permit would require comprehensive water quality based effluent limitation (WQBEL) and antidegradation studies. These studies would include bioassays and would be designed to simulate the impact of the discharge upon the receiving waters. Such studies are quite expensive. At the conclusion of the studies if the discharge was permissible it would be required to meet Class III surface water quality standards which exceed drinking water standards. D.E.R. discouraged the use of a surface water discharge and indicated a strong preference for a discharge to the POTW if at all possible. D.E.R. noted that a facility such as the one proposed by Universal Waste could be of significant benefit to POTW if at all possible. D.E.R. noted that a facility such as the one proposed by Universal Waste could be of significant benefit to POTW's by making a variety of waste streams amenable to treatment at such facilities.

4. Clarification of TC waste codes (D018-D043) on existing permit

Upon review of the existing permit and correspondence Universal believes the existing permit needs clarification for these waste codes. Although correspondence implies that the wastes are permitted, it is not stated specifically. It is agreed that Universal should request written clarification from E.P.A. Region IV regarding the storage of D018 through D043 wastes.

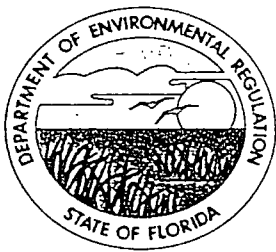
Thank you again for your time and effort in discussing these matters. Should you require additional information please feel free to call me.

Sincerely,



John A. Taylor
Manager, Technical Services

cc: Tom Maurer
Mike Carolan
Tom Turnbull
William Crawford



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

DATE: APRIL 3, 1992

TIME: 10:30 AM

SUBJECT: Universal Waste & Transit FLD 981 932 494
Pre application Meeting

A T T E N D E E S

Name	Affiliation	Telephone
<u>William Crawford</u>	<u>FDER-RCRA Permitting</u>	<u>813-620-2100 ext 388</u>
<u>GARY SANTTI</u>	<u>FDER</u>	<u>"</u>
<u>THOMAS K. MAUREN</u>	<u>Foley & Cardozo - Universal Waste</u>	<u>407 423 7656</u>
<u>John A. Taylor</u>	<u>Universal Waste & Transit (813)</u>	<u>(813) 623-5302</u>
<u>MICHAEL J. CAROLAN</u>	<u>" " "</u>	<u>" "</u>
<u>Lynne M. Mianian</u>	<u>FDER - RCRA permitting</u>	<u>813-620-6100 ext 389</u>
<u>Robert K. Vanderschuer</u>	<u>FDER - IW</u>	<u>(813) 620-6100 EXT 402</u>



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

April 16, 1992

Mr. Harry Desai
R.C.R.A. Permitting
U.S. E.P.A. Region IV
Air & Hazardous Materials Division
345 Courtland Street, N.E.
Atlanta, Georgia 30365

Subject: Universal Waste & Transit RCRA Permit
H029-171163
I.D. # FLD981932494

Dear Mr. Desai:

Please find enclosed copies of correspondence with the Florida Department of Environmental Regulations (F.D.E.R.) and Universal Waste & Transit (U.W.T.) pertaining to permitted storage of waste codes D018-D043, as you requested in our phone conversation of April 10, 1992.

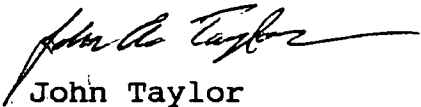
Originally U.W.T. had requested a permit modification from the F.D.E.R. for the storage of waste codes D018-D043 (see September 24, 1990 correspondence from U.W.T. to F.D.E.R.). The response from the F.D.E.R. indicated that "for facilities currently managing the new waste codes no additional notification is required" and that a further modification would be required for waste code F027 in order to manage waste codes D037, D041 and D042 (see October 4, 1990 correspondence from F.D.E.R. to U.W.T.). U.W.T. submitted follow-up correspondence to the F.D.E.R. (October 4, 1990) requesting modification to include the F027 waste code so that all T.C. codes D018-D043 (including D037, D041 and D042) would be covered in the permit. The November 5, 1990 correspondence from F.D.E.R. to U.W.T. granted the permit change to include the F027 code. An April 3, 1992 meeting with the F.D.E.R. indicated that the original intent was to include the D018-D043 codes as well as F026-F028 (see attachment 10, revision #2: 10/01/90).

UW&T

Since jurisdiction is with the E.P.A. for waste codes D018-D043, the F.D.E.R. advised U.W.T. to request verification that the paperwork is correct for permitted storage of waste codes D018-D043 at the UWT facility.

Call me if you should require any additional information or assistance.

Sincerely,



John Taylor
Manager, Technical Services

cc: Mike Carolan
Tom Turnbull
Tom Maurer
William Crawford ?

JT:ss



UNIVERSAL WASTE & TRANSIT, INC.

September 24, 1990

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

Dr. Richard Garrity
State of Florida
Department of Environmental Regulation
Division of Waste Management
Hazardous Waste Program
4520 Oak Fair Blvd.
Tampa, FL 33610-7347

RE: Universal Waste & Transit, Inc.
EPA Id Number: FLD 981 932 394
Permit Number: H029-171163

Dear Dr. Garrity:

Pursuant to 40CFR Part 270.42 and Florida Administrative Code 17-730.290, Universal Waste & Transit, Inc. (UW&T) is requesting a Class 1 Permit Modification to comply with the Toxicity Characteristics Final Rule as published in the Federal Register, Vol. 53, No. 61, pages 11798 - 11877, on March 29, 1990. A list of these new characteristics is found in Vol. 5, Attachment 10, page 3, as they are added to Attachment 10, line 4. The "Waste Analysis Plan" Volume 3, page 3, will be revised as attached.

No increase in capacity is anticipated. If, through operational experience, it is evident that an increase in storage capacity is necessary as a result of TCLP rule a separate permit amendment will be submitted.

NO change in facility design is required. No change in daily operational procedures is deemed necessary. No changes in the preparedness or prevention aspects of the facility are necessary. No changes in the Training Program or Contingency Plan are necessary as a result of this amendment.

NO other changes in the referred permit are requested by this modification. Unless indicated otherwise by your office, these changes will be incorporated into our permit and made part of the Facility Operating Record.

If questions arise, please contact either myself or Mr. Will Horn, at your convenience.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.

Sharon M. Roehm
General Manager

Generator Requirements

Universal Waste & Transit will require all generators who intend to use this facility to submit at least the following:

- a completed Universal Waste & Transit Request for Disposal form
- a one quart pint (minimum) sample of any bulk waste (samples are not required for lab packs)
- all required Certification Statements as specified by the RCRA Reauthorization Act (land ban restrictions)

In lieu of the analytical data required on the Universal Waste & Transit Request For Disposal form the generator may submit a Material Safety Data Sheet(s) or analytical data obtained on a representative sample of the waste. The analytical data must be obtained from a DER or HRS certified laboratory. The laboratory must employ approved sampling and analytical techniques (as specified in 40 CFR Part 261, Appendix I. II & III).

On an annual basis all waste stream analytical data must be updated by the generator. This will include re-submission of a representative sample of the waste in question (minimum one quart pint sample volume).

WASTE ANALYSIS PLAN

Since the responsibility for Waste Analysis rests with the generator, no changes in Universal Waste & Transit's Waste Analysis Plan are required.

UW&T will recommend to all generators that a laboratory with TCLP capabilities and one which is certified by DER/HRS be employed for all waste analyses. The list of laboratories having TCLP capabilities and which was disseminated by FDER on August 14 through August 16, 1990, will be available for any waste generator who requests this information from UW&T.

Universal Waste & Transit, Inc.
Permit Number: H039-171163
Revision #1: 09-20-90

ATTACHMENT 10

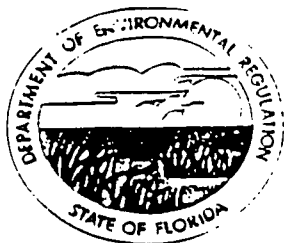
ANTICIPATED ANNUAL HAZARDOUS WASTE VOLUME FOR STORAGE & TREATMENT

<u>Process Code</u>	<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity</u>
S01;OTHER	D001	Ignitable	100,000 gallons
S01;OTHER	D002	Corrosive	25,000 gallons
S01;OTHER	D003	Reactive	5,000 gallons
S01;OTHER	D004 thru D017	E.P. Toxic	60,000 gallons
<u>S01;OTHER</u>	<u>D004 thru D043</u>	<u>Toxic Characteristic</u>	<u>60,000 gallons</u>
S01;OTHER	F001 & F002	Halogenated Solvents	100,000 gallons
S01;OTHER	F003 & F005	Non-Halogenated Solvents	Included in D001
S01;OTHER	F004	Non-Halogenated Solvents	10,000 gallons
S01;OTHER	F006	Electroplating Sludges	Included in D003 thru D017
S01;OTHER	F007 thru F012	Electroplating Wastes	Included in D003
S01;OTHER	F020 thru F024	HCL Manufacturing	1,000 gallons
S01;OTHER	K001	Wood Preservative	1,000 gallons
S01;OTHER	K002 thru K008	Inorganic Pigments	3,000 gallons
S01;OTHER	K009 thru K011 K013 thru K030 K093 thru K096 K083 & K085 K103 thru K105	Organic Chemicals	3,500 gallons
S01;OTHER	K071;K073;K106	Inorganic Chemicals	600 gallons
S01;OTHER	K031 thru K043 K097 thru K099	Pesticides	1,500 gallons
S01:OTHER	K048 thru K052	Petroleum Refining	8,000 gallons

UNIVERSAL WASTE & TRANSIT, INC.
PERMIT NUMBER: H029-171163
REVISION #1: 09/20/90

<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity (Gal.)</u>
D018	Benzene	5000
D019	Carbon Tetrachloride	2000
D020	Chlordane	1000
D021	Chlorobenzene	1000
D022	Chloroform	2000
D023	o-Cresol	500
D024	m-Cresol	500
D025	p-Cresol	500
D026	Total Cresol	1500
D027	1,4-Dichlorobenzene	1000
D028	1,2-Dichloroethane	2000
D029	1,1-Dichloroethylene	1000
D030	2,4-Dinitrotoluene	500
D031	Heptachlor (& Hydroxides)	500
D032	Hexachlorobenzene	500
D033	Hexachlorobutadiene	500
D034	Hexachloroethane	500
D035	Methylethylketone	5000
D036	Nitrobenzene	500
D037	Pentachlorophenol	1000
D038	Pyridine	1500
D039	Tetrachlorethylene	2500
D040	Trichloroethylene	4000
D041	2,4,5-Trichlorophenol	1000
D042	2,4,6-Trichlorophenol	1000
D043	Vinyl Chloride	500

Unviersal Waste & Transit, Inc.
 Permit Number: H029-171163
 Revision #1: 09/20/90



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garnitt, Deputy Assistant Secretary

October 4, 1990

Ms. Sharon Roehm
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Re: Universal Waste & Transit, Inc., FLD 981 932 494
Hazardous Waste Operation Permit HC29-171163
Permit Modification for TCLP Waste

Dear Ms. Roehm:

The Florida Department of Environmental Regulation (FDER) acknowledges receipt of your request for a Class I modification to the referenced permit. The addition of the requested waste codes to the current waste codes permitted for storage will indeed be a Class I modification.

FDER is currently preparing the paper work required to adopt the revised federal regulations. Until the adoption process is complete, the management of the new waste codes will be a United States Environmental Protection Agency (EPA) matter. EPA, has on this matter, determined that for facilities currently managing the new waste codes no additional notification is required.

The referenced permit will be modified to include the new waste codes shortly after the state has adopted and received authorization for the new regulations.


You have included waste codes D037, D041 and D042. These particular wastes are derived from the "F" listed waste F027 which includes tri, tetra and pentachlorophenol. As Universal Waste has not sought approval for storage of "F" listed waste F027, receipt and storage of the characteristic wastes constituting the make-up of F027, which would specifically be D037, D041 and D042 is not authorized at this time. Should Universal Waste desire to store "F" listed waste F027 and its subsequent "characteristic" wastes D037, D041, and D042 a permit modification would be required.

Ms. Sharon Roehm
Universal Waste & Transit, Inc.

October 4, 1990
Page Two

Should you have additional questions, please feel free to contact me
at (813) 623-5561, ext. 389.

Sincerely,


Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: James Scarbrough, EPA Region IV
Satish Kastury, FDER/Tallahassee

October 4, 1990

COPY

Dr. Richard Garrity
State of Florida Dept. of
Environmental Regulation
HAZARDOUS WASTE PROGRAM
4520 Oak Fair Blvd.
Tampa, FL 33610-7347

RE: Universal Waste & Transit, Inc.
EPA I.D. Number: FLD 981 932 394
Permit Number: H029-171163

Dear Dr. Garrity:

Pursuant to 40 CFR Part 270.42 and Florida Administrative Code 17-730.290, Universal Waste & Transit, Inc., is requesting two (2) Class 1 Permit Modifications.

The first change is in the Contingency Plan, volume 2, tab B, page 8, changing the Florida DER Emergency Response telephone number.

The 2nd change is in the Attachments, volume 5, Attachment 10, page 1, adding EPA Waste Codes F026-F028 Pesticiding Manufacturing for storage. Page 2 of Attachment 10 has been retyped simply for continuity within the Attachment. No changes have been made to page 2.

No other changes in the permit are requested by these modifications. Unless indicated otherwise by your office, these changes will be incorporated into our permit and made part of the Facility Operating Record.

If questions arise, please contact either myself or Mr. Will Horn at your convenience.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.



Sharon M. Roehm
General Manager

cc: Mike Carolan
Engineering

ATTACHMENT 10

ANTICIPATED ANNUAL HAZARDOUS WASTE VOLUME FOR STORAGE & TREATMENT

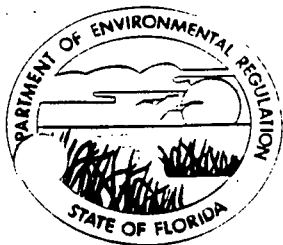
<u>Process Code</u>	<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity</u>
S01;OTHER	D001	Ignitable	100,000 gallons
S01;OTHER	D002	Corrosive	25,000 gallons
S01;OTHER	D003	Reactive	5,000 gallons
S01;OTHER	D004 thru D043	Toxic Characteristic	60,000 gallons
S01;OTHER	F001 & F002	Halogenated Solvents	100,000 gallons
S01;OTHER	F003 & F005	Non-Halogenated Solvents	Incl. in D001
S01;OTHER	F004	Non-Halogenated Solvents	10,000 gallons
S01;OTHER	F006	Electroplating Sludges	Included in D003 thru D017
S01;OTHER	F007 thru F012	Electroplating Wastes	Included in D003
S01;OTHER	F020 thru F024 F028	HEB Manufacturing <u>Pesticide Manufacturing</u> <u>& Other Dioxin-Related</u> <u>Waste</u>	1,000 gallons
S01;OTHER	K001	Wood Preservative	1,000 gallons
S01;OTHER	K002 thru K008	Inorganic Pigments	3,000 gallons
S01;OTHER	K009 thru K011 K013 thru K030 K093 thru K096 K083 & K085 K103 thru K105	Organic Chemicals	3,500 gallons
S01;OTHER	K071;K073;K106	Inorganic Chemicals	600 gallons
S01;OTHER	K031 thru K043 K097 thru K099	Pesticides	1,500 gallons
S01:OTHER	K048 thru K052	Petroleum Refining	8,000 gallons

UNIVERSAL WASTE & TRANSIT, INC.
 PERMIT NUMBER: H029-171163
 REVISION #2: 10/01/90

ATTACHMENT 10, cont.

<u>Process Code</u>	<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity</u>
S01;OTHER	K061 & K062	Iron & Steel	10,000 gallons
S01;OTHER	K069 & K100	Secondary Lead	1,500 gallons
S01;OTHER	K084;K101;K102	Veterinary Pharmaceuticals	1,500 gallons
S01;OTHER	K086	Ink Formulation	20,000 gallons
S01;OTHER	K060 & K087	Coking	1,500 gallons
S01;OTHER	"P"Listed Waste	Acute Hazardous Wastes	4,000 gallons
S01;OTHER	"U"Listed Waste	Toxic Wastes	20,000 gallons

TOTAL: 377,100/gallons/year or 6,856 fifty-five gallon drums
at 260 working days/year. This equals 26 drums/day
entering the facility.



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

NOV 5 1990

Ms. Sharon Roehm
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Re: Modification of Conditions
Permit No. HO29-171163

Dear Ms. Roehm:

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

<u>Condition:</u>	<u>From</u>	<u>TO</u>
Description of Permitted Waste	F020 - F024	F020 - F028

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

RDG/lrmb

cc: James Scarbrough, EPA Region IV
Satish Kastury, DER Tallahassee



UNIVERSAL WASTE AND TRANSIT
PROCEDURE FOR HANDLING UNKNOWN WASTE

In the event that the constituents of a waste material have not or cannot be determined prior to being transported to the UW&T facility, the waste will temporarily be classified as an "unknown waste".

Every attempt will be made to gather information about the unknown waste. If the generator of the waste is known he/she will be questioned as to the contents and any relevant information which may help in identifying the waste. This information together with on site analytical parameters may be sufficient to identify the material. If identification is determined by UW&T the waste will then be handled in accordance with UW&T established procedures for known waste. If identification is not possible at the site and transportation of the waste to UW&T is necessary, the following procedure will be implemented.

Step 1

Where applicable, prior to the unknown waste being loaded onto an EPA licensed truck for transportation to Universal Waste & Transit certain on site parameters will be run. Universal Waste and Transit personnel will analyze the waste for color, density, physical state, pH, and any noticeable odor will be documented at this time. See attached Unknown Waste Characterization Form.

The data obtained from these physical parameters will determine whether the waste will be transported as a Hazardous Waste Liquid, or as a Hazardous Waste Solid. Once this determination is made the waste will be labeled as an unknown hazardous waste and transported to Universal Waste and Transit.

Step 2

Upon arrival at the facility the unknown waste will be segregated from the known waste by placing it in the North Bay, lab packing area. Ignitability, corrosivity and reactivity will be run as part of the UW&T in house quality control. One hundred percent (100%) of all unknowns entering UW&T will have these QC analyses performed within an appropriate time frame.. A less than 24 hour time frame is perceived for completion of the QC analyses.

Step 3

Upon completion of the QC analyses the waste will be classified as Flammable, Reactive, Acidic or Alkaline and moved to the corresponding bay within the facility. If the waste does not fall into any of the above mentioned of the above mentioned categories, further analytical parameters for identification will be determined on a case by case basis. Samples of the unknown waste along with the required chain of custody form (see attached) will be sent to a certified laboratory for analysis. All analytical information will be kept on a UW&T Unknown Waste Characterization Form, a copy which is attached.

Upon receipt of the outside analytical the waste will be classified and shipped off site for final disposal at a Universal Waste & Transit approved waste disposal site.

UNIVERSAL WASTE & TRANSIT
UNKNOWN WASTE
CHARACTERIZATION FORM

Field parameters

Color

Density

pH

Physical State

Odor

QC Parameters

Ignitability

Corrosivity

Reactivity

Follow-up Analytical

Parameter

Result



Florida Department of Environmental Regulation

Southwest District

4520 Oak Fair Boulevard

Tampa, Florida 33610-7347

Lawton Chiles, Governor

813-623-5561

Carol M. Browner, Secretary

DATE: April 3, 1992

TIME: 10:30 AM

SUBJECT: Universal Waste & Transit FLD 981 932 494
Preapplication Meeting

A T T E N D E E S

Name	Affiliation	Telephone
<u>William Crawford</u>	<u>FDER-RCRA Permitting</u>	<u>813-620-2100 ext 388</u>
<u>GARY SANTTI</u>	<u>FDER</u>	<u>"</u>
<u>THOMAS K. MAUREN</u>	<u>Foley & Cardozo - Universal Waste</u>	<u>407 423 7656</u>
<u>John A. Taylor</u>	<u>Universal Waste & Transit (813)</u>	<u>623-5302</u>
<u>MICHAEL J. CAROLAN</u>	<u>" " "</u>	<u>" "</u>
<u>Lynn Milanian</u>	<u>FDER - RCRA permitting</u>	<u>813-620-6100 ext 389</u>
<u>Robert K. Vanderschuer</u>	<u>FDER - IW</u>	<u>(813) 620-6100 EXT 402</u>

TPA-02
06/81

December 16, 1991

Dr. Richard Garrity
State of Florida
Department of Environmental Regulation
Division of Waste Management
Hazardous Waste Program
4520 Oak Fair Boulevard
Tampa Florida 33610-7347

SUBJECT: EPA I.D. No.: FLD 981 932494
Universal Waste & Transit, Inc.

Dear Dr. Garrity:

Pursuant to 40 CFR, Part 270.42 and Florida Administrative Code, Universal Waste & Transit, Inc. (UWT) is submitting the enclosed revised and updated Contingency/Emergency Response Plan as a Class I Permit Modification for its waste treatment, storage and transfer facility at 2002 N. Orient Avenue, Tampa, Florida. This document is Volume 2 of 5 of the UWT Operating Plan. This plan was revised and updated to reflect changes at supporting agencies and at the facility.

Also revised at this time is Volume 1 - General Information, Page 31. Please replace Page 31 with the enclosed Page 31.

As noted in the revised plan, there has been a change in emergency coordinators. The current emergency coordinators are:

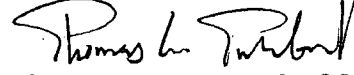
Mr. David Brown
Mr. Jay Haaf

Both of the emergency coordinators listed above are authorized to commit corporate funds on behalf of UWT as emergency coordinators.

Should you have any questions, please contact me at (313) 567-4700, Ext. 443.

Sincerely,

CITY ENVIRONMENTAL, INC.


Thomas A. Turnbull
Environmental Engineer

/mys

Encs.

cc: File 12.2
P. Sgriccia
W. Wood
Y. Levin



DEC 27 1991

SOUTHWEST DISTRICT
TAMPA
D.E.R.

DEC 20 1991

SOUTHWEST DISTRICT TAMPA

26
41

September 30, 1991

Dr. Richard Garrity
State of Florida
Department of Environmental Regulations
Division of Waste Management
Hazardous Waste Program
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

D. E. R.

OCT 02 1991

SOUTHWEST DISTRICT
TAMPA

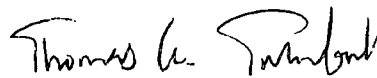
SUBJECT: Universal Waste & Transit, Inc.
EPA ID #FLD981-932-494
Permit #H029-171163

Dear Dr. Garrity:

Pursuant to 40 CFR, Part 270.42 and the Florida Administrative Code, Universal Waste & Transit, Inc. is requesting the following Class 1 Permit Modification. This change is to Volume 1 - General Information, Page 2. Please replace Page 2 with the enclosed Page 2.

Sincerely,

CITY MANAGEMENT CORPORATION



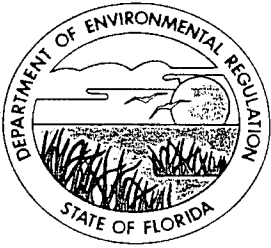
Thomas A. Turnbull
Environmental Engineer

/mys
Encs.

cc: File 12.2
P. Sgriccia
W. Wood
S. Roehm



2592



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

November 14, 1991

H029-171163

AI, 2-e

Mr. Robert Bedore
President
Universal Waste and Transit, Inc.
7217 Gulf Boulevard
St. Petersburg, Florida 33706

Re: Universal Waste and Transit, Inc.
FLD 981 932 494

Dear Mr. Bedore:

I have received your financial test dated October 16, 1991. I am requesting that you resubmit your test using our form. Since the State of Florida has program authority for RCRA financial responsibility, you are required to use the state's forms showing original signatures. The Florida Department of Environmental Regulation is cited as the governing agency both for the financial test and corporation guarantee.

I have enclosed the appropriate forms for your use. If you need assistance, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

Enclosure

cc: Jeff Pallis, EPA
Bill Crawford, DER, Tampa ✓
Doug Outlaw, DER, Tallahassee

D.E.R.
NOV 19 1991
SOUTHWEST DISTRICT
TAMPA



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

D. E. R.

September 30, 1991

OCT 04 1991

SOUTHWEST DISTRICT
TAMPA

Donald J. Guinyard
Acting Director, Waste Management Division
U.S. EPA, Region IV
345 Courtland Street, N.E.
Atlanta, Georgia 30365

SUBJECT: Notice of Violation
FLD 981-932-494
4WD-RCRA and FFB

Dear Mr. Guinyard:

In response to your letter received September 13, 1991, the following actions have been taken:

Violations 1 and 2:

Universal Waste & Transit, Inc. (UWT) inadvertently omitted two (2) waste codes from Manifest #30004, going to Quadrex Environmental on January 15, 1991. UWT has notified Quadrex of the additional F003 and F005 Waste Codes.

Attached is the land ban notification and the letter written to Quadrex Environmental referencing the waste codes. Also attached is the response from Quadrex and documentation, that the wastes were disposed of as F003 and F005 waste.

UWT now has two (2) people reviewing outbound manifests, therefore, assuring this will not happen again.

Violation 3:

Storage of a D002 pint sample jar for more than a year.

UWT has now adopted as company policy, not to store samples for more than three (3) months, unless they are in the process of being analyzed. We also now inventory all samples on a monthly basis, keeping a log of when the sample came in, and where and when it was disposed of.

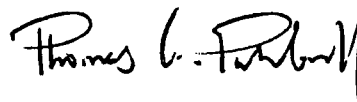
Donald J. Guinyard
Acting Director
U.S. EPA

September 30, 1991 - 2

Thank you for your time in this matter. If any questions arise, please contact me at your convenience.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.



Thomas A. Turnbull
Environmental Engineer

/mys

cc: File 12.2
Statish Kastury, Acting Chief, FDER
Dr. Richard Garrity, Deputy Assistant FDER/SW District
P. Sgriccia
W. Wood
S. Roehm

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

FLD981432494

Manifest Document No.
3-0-0-0-4

2. Page 1 of 2

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address

UNIVERSAL WASTE & TRANSIT, INC.
2002 N. Orient Road, Tampa, FL 33619

4. Generator's Phone (813) 623-5302

5. Transporter 1 Company Name

A. R. Paquette

7. Transporter 2 Company Name

6. US EPA ID Number
F.L.D. 9-8-2-1-0-5-8-8-4

8. US EPA ID Number

10. US EPA ID Number

9. Designated Facility Name and Site Address

QUADREX HPS, INC.
1940 Northwest 67th Place
Gainesville, FL 32606

A. State Manifest Document Number

B. State Generator's ID

C. State Transporter's ID

D. Transporter's Phone 904-736-1978

E. State Transporter's ID

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone

904-373-6066

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol

1. Waste No.

a. ☒ Waste Paint Related Material
☒ Flammable Liquid UN1263

(D001)

0.23 D.M. - 9.2.0.0

P

D001

b. ☒ Waste Paint Related Material
☒ Flammable Liquid UN1263

(D035)

(D001, F003, F005)

0.02 D.M. - 8.0.0.0

P

D001
F003 F005
D035

c. ☒ Waste Flammable Liquid, N.O.S. (Xylene,
☒ Flammable Liquid UN1993 Toluene)

(D001, F003, F005)

0.03 D.M. - 1.2.0.0

P

D001
F003 F005

d. ☒ Waste Flammable Liquid, N.O.S. (Methanols
☒ Flammable Liquid UN1933 Methylene Chloride)

(D001, D035, F003, F005)

0.01 D.M. - 3.75

P

D001 D035
F002 F005

J. Additional Descriptions for Materials Listed Above

11a. 1857-(Paint cans)
11b. 1858 (Liquid)
11c. 1860 (c) 85 OP
11d. 1861 (Liquid)

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

Emergency Phone Number 813-623-5302

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this shipment are truly and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment.
OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Will Horn

Signature

Will Horn

Month Day Year
10/1/59

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JEFFREY C SLABODNIK

Signature

Jeffrey C Slabodnik

Month Day Year
10/1/59

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

RUSSELL H. PENDLETON

Signature

Russell H. Pendleton

Month Day Year
10/1/59

ORIGINAL - RETURN TO GENERATOR

**UNIFORM HAZARDOUS
WASTE MANIFEST
(Continuation Sheet)**

21. Generator's US EPA ID No.

F.L.D.9.8.1.9.3.2.4.9.4 | 3.0.0.0.4

Manifest
Document No.

22. Page

2

Information in the shaded areas is not
required by Federal law.

23. Generator's Name

 UNIVERSAL WASTE & TRANSIT, INC.
 2002 N. Orient Road, Tampa, FL 33619
 (813) 623-5302

L. State Manifest Document Number

M. State Generator's ID

24. Transporter Company Name

25. US EPA ID Number

N. State Transporter's ID

O. Transporter's Phone

26. Transporter Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers

No Type

30. Total
Quantity31. Unit
Wt/Vol

R. Waste No.

 a. R Waste Combustible Liquid, N.O.S. (Benzene)
 Q Combustible Liquid (D001 D018)
 UN1993

006 DM

2400

P

D001

D018

 b. R Waste Paint Related Material
 Q Flammable Liquid (D001 F005 D035)
 UN1263

001 DM

400

P

D001

F005

D035

 c. R Waste Flammable Liquid, N.O.S. (Benzene,
 Q Flammable Liquid UN1993 (D001) Toluene)

001 DM

400

P

D001

D001

5. Additional Descriptions for Materials Listed Above

28a) 1859

28b) 1858

28c) 1860

T. Handling Codes for Wastes Listed Above

32. Special Handling Instructions and Additional Information

EMERGENCY PHONE = 813-623-5302

33. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

34. Transporter Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

35. Discrepancy Indication Space

UW&T UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

May 3, 1991

Mr. Raymond Whittle
QUADREX EPS, INC.
1940 Northwest 67th Place
Gainesville, FL 32606

Dear Mr. Whittle:

Please be aware that on January 15, 1991, Universal Waste & Transit, Inc. sent Quadrex a waste shipment, manifest document #30004. Line item 28c should have listed the following E.P.A. waste codes D001, D018, F003 and F005.

28c reads:	RQ Waste Flammable Liquid, N.O.S. (Benzene, Toluene) Flammable Liquid UN1993 (D001)	E.P.A. waste #'s D018 D001
------------	--	-------------------------------

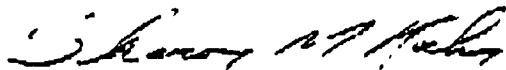
It should have read:	RQ Waste Flammable Liquid, N.O.S. (Toluene, Acetone) Flammable Liquid UN1993 (D001 D018 F003 F005)	E.P.A. waste #'s D001 D018 F003 F005
----------------------	---	--

The corresponding Land Ban Form is attached.

Please correct your records to reflect these "P" listed waste codes and attach this letter to your copy of the manifest.

We apologize for any inconvenience which this may have caused.

Sincerely,



Sharon M. Roehm
General Manager

cc: File #12.17
R. Garrity, FDER

UNIVERSAL WASTE & TRANSIT, INC.
CUSTOMER NOTIFICATION AND CERTIFICATION
ONLY SIGNATURE FOR PERSONAL SIGNATURE USE OF INDIVIDUAL

Generator Name/Location: UNIVERSAL WASTE & TRANSIT

EPA ID Number: FLD981977UG4 Manifest Number: 30004 Profile Number: 1960

This waste is a ☐ Wastewater ☒ Nonwastewater. Is analytical available? Yes ☐ No ☐ (If yes, please attach copy.)

EPA Waste Code Number(s): DC01 DC18 FCC3 FCC5

PART I

WASTE CATEGORY (Check appropriate line(s))

☐ **Unrestricted Waste Notification**

The disposal of this waste is not restricted as specified in 40 CFR 268, Subpart D and all prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

☒ **Restricted Waste Notification**

☐ This is a restricted waste which meets the treatment standards as specified in 40 CFR 268, Subpart D.

☒ This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated to the appropriate standard and/or in such a manner which renders it non-liquid by chemical fixation or solidification prior to land disposal. (See treatment standard below or see attached Part II section(s).)

Corresponding treatment standard: SEE PART II

☐ **Restricted Waste Variance Notification**

This waste is not prohibited from land disposal at this time due to a case-by-case exemption, an exemption, or a nationwide capacity variance. This waste may be subject to landfill restriction after the date below.

Applicable Variance/Date: _____

☐ **Treated Waste Certification**

☐ I believe that the treatment process used to treat this waste has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste.

☐ I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with the applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents.

☐ **Lab Pack Certification**

☐ **Organometallic (inorganic)**

This lab pack contains only the wastes specified in Appendix IV to 40 CFR 268 or solid waste not subject to regulation under 40 CFR 261. (See attached appendix I for acceptable material)

☐ **Organic**

This lab pack contains only organic wastes specified in Appendix V to 40 CFR 268 or solid waste not subject to regulation under 40 CFR 261. (See attached appendix I for acceptable material)

I certify that I personally have examined and am familiar with the waste, treatment technology, and/or operation of the treatment process through analysis and testing or through personal knowledge sufficient to support the above checked certification. I believe that the information I submitted is true, accurate, and complete. I am also aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

SIGNATURE: Sherry Rahn DATE: 5/3/01

PRINTED NAME: Sherry Rahn TITLE: General Manager



QUADREX ENVIRONMENTAL COMPANY, INC

August 6, 1991

Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, FL 33619

Please reference Hazardous Waste Manifest Number 30004, dated January 15, 1991 signed by Will Horn. This material was blended into fuels and sent to Oldover Corporation on January 26, 1991, in accordance with all applicable Federal, State, and local laws and regulations.

Sincerely,

Raymond Whittle
Manager, Support Services

QUADREX ENVIRONMENTAL COMPANY
WASTE MANAGEMENT
POST OFFICE BOX 4100
GAINESVILLE, FLORIDA 32613

09-May-91

UNIVERSAL WASTE & TRANSIT INC
ATTN: WILL HORN
2002 N ORIENT ROAD
TAMPA, FL 33619

REF: MANIFEST NUMBER: 30004
SHIPMENT NUMBER: FLB-189H

CERTIFICATE OF DISPOSAL

THIS IS TO CERTIFY THAT THE WASTE MATERIALS RECEIVED FROM:
UNIVERSAL WASTE & TRANSIT INC
MANIFEST NUMBER: 30004
HAVE BEEN DISPOSED OF IN FULL BY RECLAMATION OR REUSE. THIS
MATERIAL WAS DISTILLED AND/OR BLENDED INTO FUELS FOR ROTARY KILN
INCINERATION, IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE,
AND LOCAL LAWS AND REGULATIONS.

BY:



RAYMOND WHITTLE
WASTE MANAGEMENT SERVICES

50500 6238 gals

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

F.L.D.9.8.0.7.1.1.0.7.1

Manifest
Document No.

G.1.0.1.9

2. Page 1
of 1Information in the shaded areas is
not required by Federal law.

3. Generator's Name and Mailing Address

QUADREX ENVIRONMENTAL
1940 NW 67TH PLACE
GAINESVILLE, FL 32606

A. State Manifest Document Number

91019

B. State Generator's ID

FLD980711071

4. Generator's Phone (904) 373-6066

5. Transporter 1 Company Name

OLDOVER CORPORATION

6. US EPA ID Number

V. A. D. Q. 4. 0. 1. 5. 9. 4. 3. 6

C. State Transporter's ID

FLAD 040159436

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (804) 798-7981

E. State Transporter's ID

F. Transporter's Name

9. Designated Facility Name and Site Address

OLDOVER CORPORATION
3000 COUNTY ROAD 209A
GREEN COVE SPRINGS, FL 32043

10. US EPA ID Number

E. L. D. Q. Q. 0. 7. 3. 7. 3. 1. 2

G. State Facility's ID

FLD00073731Z

H. Facility's Phone

(904) 269-6206

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

HAZ

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vol

15. Waste No.

a. ☒ RQ WASTE FLAMMABLE LIQUID N.O.S. (CONTAINS XYLENE
& TOLVENE) FLAMMABLE LIQUID UN XXX 1993 D001 F003
F005

1

T T

6238

G

D001
F003
F005

b.

c.

d.

J. Additional Descriptions for Materials Listed Above

TO BE BENEFICIALLY REUSED AS HAZARDOUS WASTE FUEL

K. Handling Codes for Wastes Listed Above

13. Special Handling Instructions and Additional Information

24 HOUR EMERGENCY CONTACT (904) 538-3436

14. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this manifest are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

ORIN PETTO

Signature

Month Day Year

01 28 91

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

JAMES S. SCOTT

Signature

Month Day Year

01 12 89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

. . .

19. Discrepancy Indication Space

Line # 13 omitted

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Buckash Schaffer

Signature

Month Day Year

01 28 91

ORIGINAL — RETURN TO GENERATOR

Land Use Zoning Restriction Classification

Geological Name: QUADREX ENVIRONMENTAL

Abstract

1940 N.W. 67TH PLACE

GAINESVILLE, FL 32606

Generator EPA ID Number: FLD980711071

Manifest Number 91019

This form is submitted to OLDOVER CORPORATION in accordance with the regulations published by EPA in 40 CFR 268, which govern the land disposal of certain untreated hazardous wastes. In accordance with the waste analysis and recordkeeping requirements specified in 40 CFR 268.7, I have indicated how my waste must be managed to conform to the land disposal restrictions. F Solvent and California Listed Wastes are shown on the back of this form. Treatment standards for all waste codes and/or categories can be found in 40 CFR 268.

This is a Non-Wastewater unless this box is checked ☐ indicating Wastewater.

[illegible]

I am the generator of an untreated waste identified either above or on the back of this form which must be treated to the appropriate treatment standard set forth in 40 CFR 268. This information is based upon (check appropriate box) ☐ an analysis of the waste (attach if available) or ☒ knowledge of the waste stream or generating process.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 28, 1991

14029-171163

CERTIFIED MAIL

At 2, 2-e

Ms. Mary J. Andrews
Michigan National Bank
International Services
300 River Place, Suite 260D
Detroit, Michigan 48207

Re: Universal Waste and Transit, Tampa, Florida
FLD 981 932 494

Dear Ms. Andrews:

I am returning the Letter of Credit, SB-15135, issued to City Management Corporation (enclosed). The facility has satisfied the requirements of 40 CFR Part 264.143(d)(10) by substituting alternative financial assurance and meets the financial responsibility requirements for a hazardous waste facility.

Sincerely,

John M. Ruddell, Director
Division of Waste Management

JMR/mh

Enclosure

cc: Doug Outlaw, DER Tallahassee
Bill Crawford, DER Tampa ✓
Thomas A. Turnbull, City Management Corporation



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

June 19, 1991

14029-171163

AI, 2-e

Mr. Thomas A. Turnbull
Environmental Engineer
City Management Corporation
3400 East Lafayette
Detroit, Michigan 48207

Re: Universal Waste and Transit, Tampa, Florida
FLD 981 932 494

Dear Mr. Turnbull:

I have reviewed your financial test and corporate guarantee, both dated June 10, 1991 and find them acceptable. The financial responsibility requirements of 40 CFR Part 264 Subpart H are satisfied. Under separate cover, the Letter of Credit is being returned to Michigan National Bank.

For 1992, adjustment of the closure cost estimate and re-issuance of the financial instrument will be due September 30 (ninety days after the close of the fiscal year).

If I can be of further assistance, I may be reached at 904/488-0300.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

cc: Betty Willis, EPA
Bill Crawford, DER, Tampa ✓
Doug Outlaw

For: Bill Crawford

From: Kurt Tatzel
COM

Re: Universal Waste & Transit

D.E.R.

MAY 30 1991

D.E.R.
SOUTHWEST DISTRICT

TAMPA
MAY 30 1991

SOUTHWEST DISTRICT
TAMPA

I was in the area and wanted to drop off the enclosed material for your reference. These are various letters related to UW&T's pending request to begin bulking of waste at their facility. I thought it would be helpful to pull this together for you so you would have it available to discuss in a week or so.

Thanks.

FAX COVER SHEET

UNIVERSAL WASTE & TRANSIT, INC.
2002 N. Orient Road
Tampa, FL 33619

FAX: 813-528-0842

PHONE: 813-523-5302

TO: Tom Tangle DATE: 5/22/91
COMPANY: CITY MAN
FROM: SAMSON
OF PAGES: 2
(Including this cover sheet)

MESSAGE:

Tom,

THIS IS THE ADDITION THAT
I WENT OVER WITH KIM FORD
YESTERDAY.

KIM SAID WE MUST GET
APPROVAL FROM EPC BEFORE DEPT.
THEREFORE I SHOULD FORWARD
THIS TO EPC.

I HAVE SPOKE WITH
EPC THEY SAY THERE IS A
\$1620 APPLICATION FEE.

MEETING WITH EPC 5/28/91

OK

cc Ben Woods
Mike Cannon
Paul Sciacca

May 21, 1991

ATTACHMENT TO LETTER DATED MAY 6, 1991
SOLID WASTE TRANSFER FACILITY PERMIT APPLICATION

2. ~~UNIVERSAL~~ WASTE AND TRANSFER IS
REQUESTING TO BULK NON-REGULATED
MATERIALS FROM DRUMS INTO ROLL-OFF
CONTAINERS FOR DISPOSAL. THE ROLL-OFF
CONTAINERS WILL NOT GENERALLY ACCUMULATE
WASTE FOR LONGER THAN 30 DAYS
AT ANY ONE TIME. NO DRUM
WILL BE IN THE FACILITY FOR
LONGER THAN 1 YEAR PRIOR TO
DISPOSAL. WASTE TO BE HANDLED UNDER
THIS PERMIT WILL BE PRIMARILY SOIL
FROM SELLER CLEAN-UP & WILL NOT CONTAIN
MSW.

8. THIS GENERAL PERMIT DOES NOT
APPLY TO ANY HAZARDOUS OR
INFECTIOUS WASTE.

10. PRESENTLY THERE IS NO NEW
CONSTRUCTION PLANNED FOR THIS
GENERAL PERMIT. CERTIFICATION HAS
BEEN COMPLETED AS PART OF THE HAZARDOUS
WASTE PERMIT.

Sharon Roehm
(SHARON ROEHM) - GENERAL MANAGER



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

May 6, 1991

*TT - 11
out
signed?
ms*

Mr. Ernest Weeks
Florida Department of Environmental Regulation
Division of Waste Management
Solid Waste Section
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

RE: Solid Waste Transfer Facility Permit Application
Universal Waste and Transit, Inc. Facility

Dear Mr. Weeks:

Universal Waste and Transit, Inc. (UWT) is pleased to submit the attached solid waste transfer station permit application. We have also enclosed a check in the amount of \$25 for permitting fees associated with processing of this application.

Please note that our Resource Conservation and Recovery Act (RCRA) hazardous waste permit contains a number of detailed procedures regarding handling of waste materials at the UWT facility. We have incorporated these procedures into our transfer station permit application, with appropriate sections of the RCRA permit application being referenced to demonstrate compliance with the transfer station permit information requirements

If you have any questions concerning the permit application, please contact Sharon Roehm at (813) 623-5302.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.

Thomas A. Turnbull
Environmental Engineer

cc: File # 12.2
M. Carolan
P. Sgriccia
W. Wood
S. Roehm

SOLID WASTE TRANSFER STATION
GENERAL PERMIT INFORMATION

UNIVERSAL WASTE & TRANSIT, INC. (UWT)
TAMPA, FLORIDA

May 6, 1991

1. Written Notice of Intent to Use General Permit Conditions:
This submittal represents UWT's written notice of intent to use general permit provisions for construction and operation of a solid waste transfer facility. This permit information is being submitted to allow onsite handling of solid wastes in association with the UWT commercial waste management operations.

2. Description of Proposed Transfer Station Operation: Waste handling operations are described in detail in the UWT RCRA Part B Operating Permit. Significant sections of the permit

* Waste Handling - Volume 1, Tab 3, Page 18

* Waste Loading/Unloading - Volume 1, Tab 12, Page 34

The transfer operations will consist of bulking containerized solid wastes (drums) into bulk transport vehicles (roll-off containers, bulk tanker trucks, and intermodal boxes for ultimate rail transport). The facility is designed to manage industrial wastes and spill cleanup residues, and will not manage municipal solid wastes. Waste transfer activities include vacuuming or pumping out containers with liquid or semi-solid wastes into bulk transport vehicles, as well as emptying solids from containers into bulk transport vehicles. All waste handling is conducted within the confines of the secure UWT facility, with all waste transfer activities being conducted in paved areas providing these containment structures and the security provisions followed at the UWT facility, an extension of the 48 hour holding period requested to allow for indefinite storage of solid wastes within the capacity constraints of the facility.

The UWT facility is currently operating under Florida Department of Environmental Regulation (FDER) RCRA permit number H029-171163 and has been issued EPA identification number 981 932 494. The facility is permitted to manage a wide variety of hazardous wastes and proposes to use existing procedures for hazardous waste management in conducting solid waste transfer activities. In supplying information for this solid waste transfer permit,

the operating RCRA permit (Attached) will be referenced to show that the existing operating procedures meet the FDER solid waste transfer station requirements.

3. Drawing or Aerials Depicting the Project Site: A site drawing is provided in the RCRA Part B application as follows:

- * General site Boundaries and Facility Layout - Volume 5, Sheets 1 and 2.
- * Topographic Maps - Volume 5, Attachment 4.
- * Site Survey Map - Volume 5, Attachment 6.
- * Site Aerial Photograph - Volume 5, Attachment 7.
- * Safety Equipment Locations - Volume 5, Attachment 17

The site is surrounded by a security fence which ensures that unauthorized entry or dumping of waste is prohibited. Site security provisions will be maintained throughout the life of the UWT solid waste transfer station permit.

4. List of Operational Appurtenances Necessary for Clean and Orderly Operation: The facility is equipped with the following equipment which is available for use in waste handling:

- * An internal communications device consisting of telephone and intercom.
- * A number of portable air horns which can be activated in case of an emergency.
- * A set of emergency telephone numbers which are posted above every telephone/intercom system location.
- * Portable, multipurpose fire extinguishers located throughout the facility.
- * A fire protection system for interior waste storage areas consisting of smoke detectors and a sprinkler system.
- * Spill control and personnel safety equipment.
- * A support building providing office space with bathrooms and shower.

A complete description of this equipment and the established plans for responding to emergency situations is described in the Facility Contingency Plan which comprises Volume 2 of the UWT RCRA Part B. This formal emergency response program will be followed for all waste transfer activities. As indicated in item 3 of this information submittal, the location of all safety equipment is shown on the map provided in Volume 5, Attachment 17 of the RCRA permit.

5. List and Location of Any Department-Recommended Equipment: The site includes potable water, bathrooms which provide handwashing and toilet facilities, electric service for site operations, and indoor storage for small-scale equipment used in waste transfer. These site features are shown on the series of drawings referenced in item 3 of this submittal. An employee training program, including training related to emergency response, has been established by UWT and comprises Volume 4 of the UWT RCRA permit. This training program will be used for all personnel involved in solid waste transfer activities.

6. Methods for Maintaining Accurate Records: UWT has existing waste manifest system which allows accurate records of the volume of material handled at the facility to be maintained. This manifest system includes computerized tracking and inventory control of all waste material processed by the facility. A description of each element of the records maintenance procedures is provided in the RCRA permit as follows:

- * Manifest System Description - Volume 1, Tab 20, Page 65

- * Maintenance of Operating Records - Volume 1, Tab 21, Page 69

- * Example Printout form computerized Inventory control System - Volume 5, Attachment 20.

These waste manifest procedures will be followed for all solid wastes handled at the UWT facility. No onsite material recovery or recycling is currently proposed.

7. Hours of Operation and Number of Employees - The UWT facility will not be open to the general public and will only receive waste through scheduled deliveries. Facility working hours are 7:00 a.m. to 6:00 p.m./ as described in Volume I, Tab 9, page 30 of the RCRA

permit. Sufficient employees are always present onsite to ensure that health, fire, or safety problems are not inflicted upon or caused by the public.

8. Hazardous or Infectious Waste Management: The UWT facility is adequately equipped and permitted by FDER to manage hazardous wastes. All hazardous waste management will be conducted in accordance with the conditions of the existing UWT RCRA permit. An air emission source construction permit (Permit Number AC29164513) had been issued by FDER for an infectious waste incinerator at this facility, but UWT does not currently handle infectious wastes. In the event that infectious wastes are to be handled in the future, a modification to this permit will be prepared.

9. Detailed Discussion of Onsite Materials Recovery or Salvaging: No materials recovery or salvaging is currently proposed for the UWT facility.

10. Name of Engineer of Record: The engineer of record that will certify completion of construction for this permit application is as follows:

Mr. Kurt R. Batsel
Florida P. E. License Number 39701
Camp Dresser & McKee Inc.
1111 East Tennessee Street, Suite 102
Tallahassee, Florida 32308

Tb/ph

A:ew.tb



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

April 24, 1991

Victor Sanagustin, P.E.
Florida Department of Environmental Regulation
Division of Waste Management
Hazardous Waste Section
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

SUBJECT: Universal Waste and Transit, Inc.
Permit File No. H029-171163
Fld 981 932 494

Dear Mr. Sanagustin:

Universal Waste and Transit, Inc. (UWT) is writing as a follow-up to our previous letter of February 4, 1991 to Ms. Lynn Milanian of the Florida Department of Environmental Regulation (FDER) which requested a Class I modification to our Resource Conservation and Recovery Act (RCRA) permit. We are now writing to determine the status of our request as we understand that FDER must approve Class I permit modifications prior to UWT implementation of the change.

Our previous letter indicated that the UWT waste load out procedure would be modified to allow for containerized waste (drums) to be loaded into bulk transport vehicles (roll-off containers, bulk tanker trucks, and intermodal boxes for ultimate rail transport). These bulked wastes would then be transported off-site for disposal. This procedure would apply to both solid and hazardous wastes handled by the UWT facility, although the Class I modification is only being requested due to the hazardous waste handling component.

In accordance with Florida Administrative Code 17-730.290(3), we are awaiting the FDER's decision on this request prior to implementation of the change. We would like to implement the change as soon as possible and are available to answer any questions you may have related to our request.


Victor Sanagustin, P.E.
Florida Department of Environmental Regulation

April 24, 1991 - 2

If you have any questions concerning the modification request,
please contact Sharon Roehm at (813) 623-5302.

Sincerely,

UNIVERSAL WASTE AND TRANSIT, INC.

A handwritten signature in dark ink, appearing to read "Thomas A. Turnbull". The signature is fluid and cursive, with the first name "Thomas" and last name "Turnbull" clearly distinguishable.

Thomas A. Turnbull
Environmental Engineer

/mys

cc: File 12.2
M. Carolan
P. Sgriccia
W. Wood
J. Ridgway
S. Roehm



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

M E M O R A N D U M

TO: Tom Turnbull
FROM: Sharon Roehm *SMR*
SUBJECT: Letter to DER Dated 04/24/91
DATE: April 29, 1991

Mr. Bill Crawford contacted me today regarding our letter to Victor. Bill had the following comments:

Bulking vehicle may be on site too long...specify time frames. Ideally, DER would prefer we accumulate in drums, bulk into tanker one day and the tanker leave the next day. In otherwords, they do not want to see flammables in the parking lot for an extended period of time.

DER wants to see the tracking method used for what is being bulked into tanker, i.e. if it's going to fuels blending, must have 5000 BTU/#.

What portions of OP will this effect?

No modifications needed to bulk non-regs.

Want to know more specific waste types and intended disposal methods.

Also, please be aware that there is a bill before the House to raise permitting fees 100% We need to get permit modifications into official form and into DER as soon as possible.

Lynn is on maternity leave, so call Bill if you have any questions; 813-623-5561, ext. 388. Thanks.

SMR

RECEIVED
MAY 2 1991
ENGINEERING

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION
SOUTHWEST DISTRICT

CONVERSATION RECORD

H029-171163

AL 2-e

Date April 29, 1991

Subject UW:T Request for Minor Mod

Time 10:30 AM

Permit No. H029-171163

County Hillsborough

Ms Sharon Robinson

Telephone No. 813-623-5302

Representing Universal Waste and Transit (UW:T)

☐ Telephoned Me ☒ Was Called ☐ Scheduled Meeting ☐ Unscheduled Meeting

Other Individuals Involved in Conversation/Meeting _____

Summary of Conversation/Meeting I discussed two letters from UW:T regarding a request for a Class I modification to the permit. [Feb 4 and April 24, 1991]. I explained that the department had two concerns and would need some additional information

1. Concerns:

- a) The vehicles would become storage containers
- b) The incorrect disposal of hazardous waste

2. Information:

- a) Types of bulking operation to be addressed
- b) Modification to application to address bulking
- c) How long vehicles would remain on site.

(continue on another
sheet, if necessary)

Signature William C. Crawford

Title Eng IV



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

April 24, 1991

14029-171163

AI, 2-e

Victor Sanagustin, P.E.
Florida Department of Environmental Regulation
Division of Waste Management
Hazardous Waste Section
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

D.E.R.

SUBJECT: Universal Waste and Transit, Inc.
Permit File No. H029-171163
Fld 981 932 494

APR 26 1991

SOUTHWEST DISTRICT
TAMPA

Dear Mr. Sanagustin:

Universal Waste and Transit, Inc. (UWT) is writing as a follow-up to our previous letter of February 4, 1991 to Ms. Lynn Milanian of the Florida Department of Environmental Regulation (FDER) which requested a Class I modification to our Resource Conservation and Recovery Act (RCRA) permit. We are now writing to determine the status of our request as we understand that FDER must approve Class I permit modifications prior to UWT implementation of the change.

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In accordance with Florida Administrative Code 17-730.290(3), we are awaiting the FDER's decision on this request prior to implementation of the change. We would like to implement the change as soon as possible and are available to answer any questions you may have related to our request.

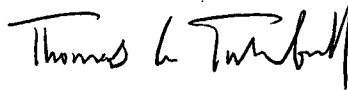
Victor Sanagustin, P.E.
Florida Department of Environmental Regulation

April 24, 1991 - 2

If you have any questions concerning the modification request,
please contact Sharon Roehm at (813) 623-5302.

Sincerely,

UNIVERSAL WASTE AND TRANSIT, INC.

A handwritten signature in dark ink, appearing to read "Thomas A. Turnbull". The signature is fluid and cursive, with the first name "Thomas" and last name "Turnbull" clearly distinguishable.

Thomas A. Turnbull
Environmental Engineer

/mys

cc: File 12.2
M. Carolan
P. Sgriccia
W. Wood
J. Ridgway
S. Roehm



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

DATE: 2/21/91

4029-171163

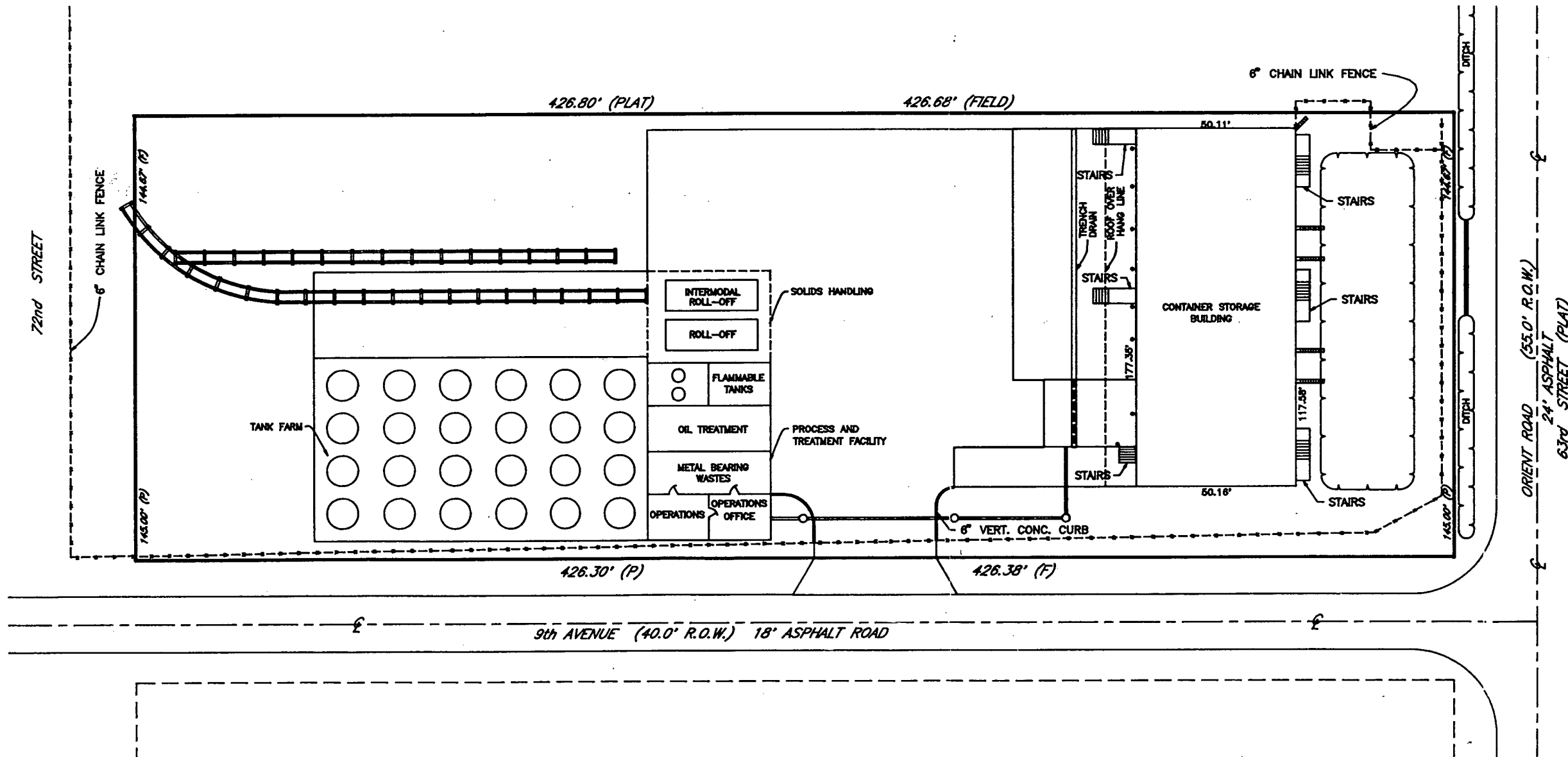
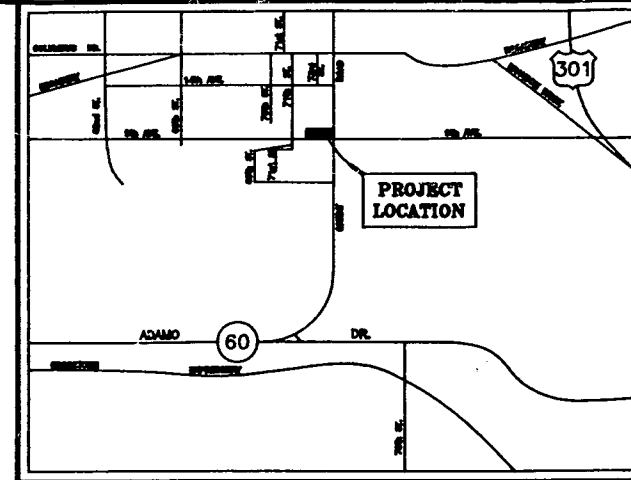
TIME: 9:00 AM

AI, 2-C

SUBJECT: Universal Waste & Transit

A T T E N D E E S

Name	Affiliation	Telephone
<u>Victor San Agustin</u>	<u>FDER</u>	<u>(813) 623-5561, ext. 390</u>
<u>Tom Fordsell</u>	<u>CITY MANAGEMENT Corp</u>	<u>(313) 567-4700 ex 243</u>
<u>Jim Ridgway</u>	<u>CITY Environmental, Inc</u>	<u>(313) 923-0080</u>
<u>Kurt Batsel</u>	<u>Camp Dresser & McKee Inc</u>	<u>(404) 982-8643</u>
<u>SHARON ROEHLY</u>	<u>UNIVERSAL WASTE & TRANSIT</u>	<u>(813) 623-5302</u>
<u>LYNN MILANIAN</u>	<u>FDER - room</u>	<u>813-623-5561 (389)</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____



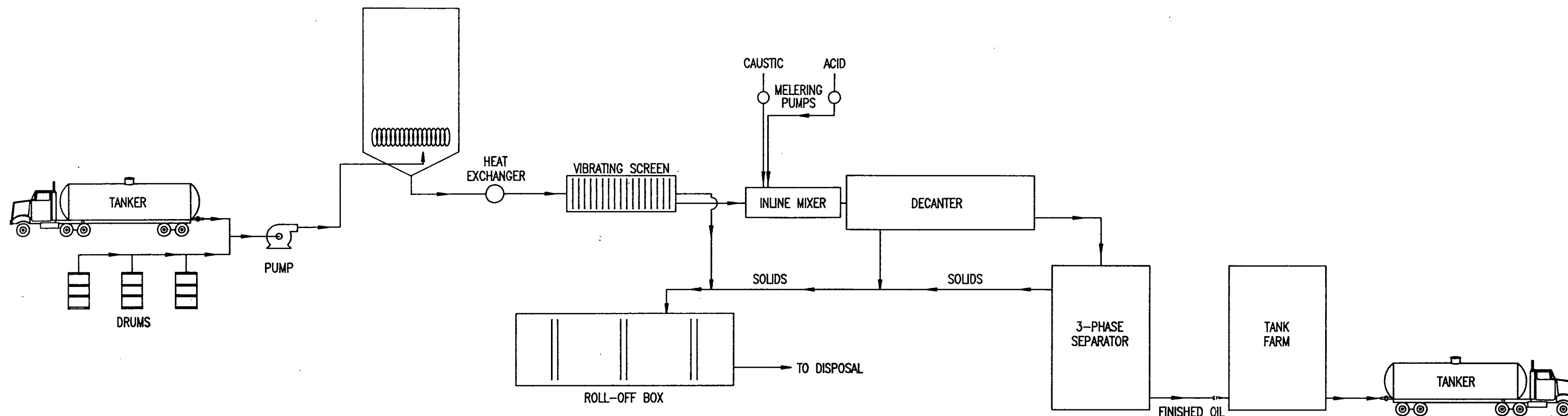
LEGAL DESCRIPTION

A SURVEY OF LOTS 8, 9, 10, 11, 12, 13 AND 14, BLOCK I, OF ORIENT PARK SUBDIVISION ACCORDS TO THE MAP OR PLAT THEREOF AS RECORDED IN PLAT BLOCK II, PAGE 7, OF THE PUBLIC RECORDS OF HILLSBOROUGH COUNTY, FLORIDA.

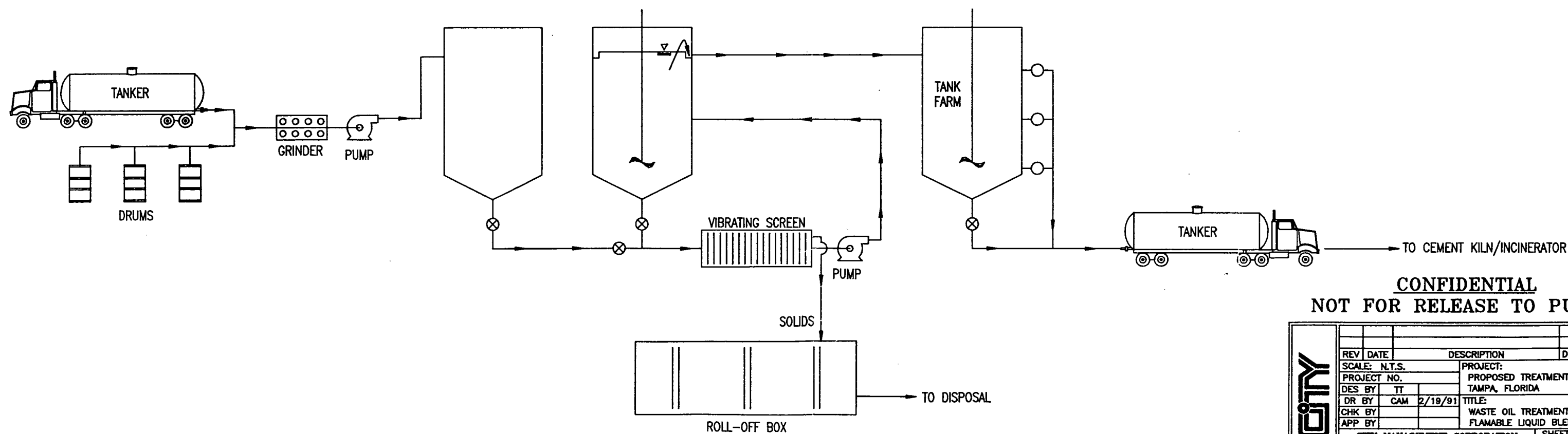


REV	DATE	DESCRIPTION	DR BY	APP BY
SCALE:	N.T.S.	PROJECT:	UNIVERSAL WASTE & TRANSIT, INC.	
DES BY	TT	PROJECT NO.		
DR BY	CAM	2/19/91	TITLE:	SITE PLAN
CHK BY				
APP BY				
CITY MANAGEMENT CORPORATION			SHEET 1 OF 1	
3400 E. Lafayette, Detroit, MI. 48207			FILE NAME:	
Ph. (313) 567-4700			UWT-SMAL	

OIL TREATMENT

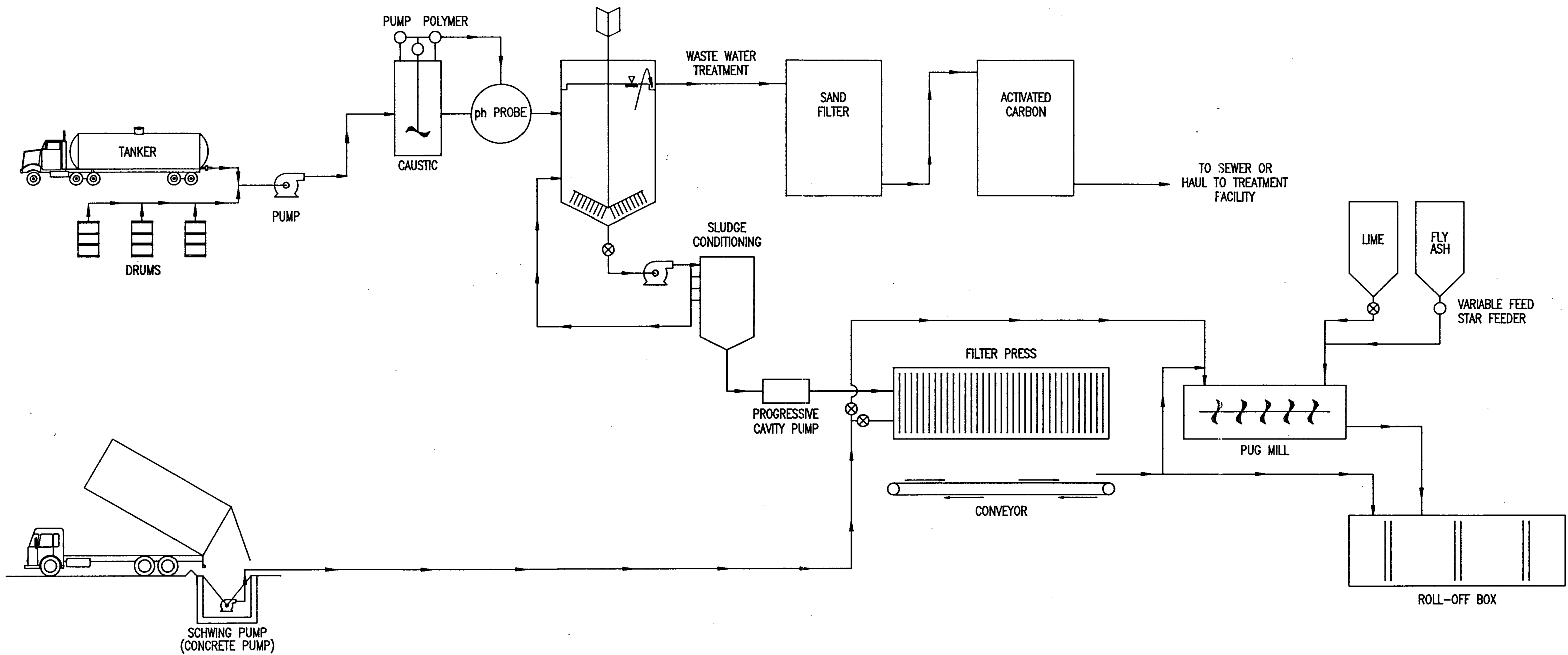


FLAMMABLE LIQUIDS




CONFIDENTIAL
NOT FOR RELEASE TO PUBLIC

	REV	DATE	DESCRIPTION	DR BY	APP BY
	SCALE: N.T.S.		PROJECT:		
	PROJECT NO.		PROPOSED TREATMENT		
	DES BY	TT	TAMPA, FLORIDA		
	DR BY	CAM 2/19/91	TITLE:		
	CHK BY		WASTE OIL TREATMENT		
APP BY		FLAMMABLE LIQUID BLENDING			
CITY MANAGEMENT CORPORATION			SHEET ___ OF ___		
3400 E. Lafayette, Detroit, MI. 48207			FILE NAME:		
Ph. (313) 567-4700			UWT-FLW2		



CONFIDENTIAL
NOT FOR RELEASE TO PUBLIC

	REV	DATE	DESCRIPTION	DR BY	APP BY
	SCALE: N.T.S.		PROJECT:		
	PROJECT NO.		PROPOSED TREATMENT		
	DES BY TT		TAMPA, FLORIDA		
	DR BY CAM 2/19/91		TITLE:		
	CHK BY		METAL BEARING WASTE ACIDS & CAUSTIC		
CITY MANAGEMENT CORPORATION					SHEET ____ OF ____
3400 E. Lafayette, Detroit, MI. 48207					FILE NAME:
Ph. (313) 567-4700					UWT-F-SM



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302
February 4, 1991

Lynn R. Milanian
Florida Department of Environmental Regulation
Division of Waste Management
Hazardous Waste Section
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347

RE: Permit File No. H029-171163
Filed 981 932 494

AI 2-e

D. E. R.

FEB 8 1991
SOUTHWEST DISTRICT
TAMPA

Dear Ms. Milanian:

Pursuant to Florida Administrative Code, Universal Waste & Transit, Inc. (UWT) is submitting the following notification of operation change as a Class 1 modification to the referenced permit.

UWT waste load out procedure will be modified from its current process of loading containerized wastes (drums) into transport vehicles to also include the procedure of vacuuming or pumping out containers (drums) containing liquid and semi-solid waste (both hazardous and non-hazardous) into bulk waste transport vehicles. The bulked wastes will be transported for off-site disposal. The empty waste containers will be inspected to confirm that they are empty as per 40 CFR 261.7 and properly disposed of off-site. Waste transfer will take place within the UWT facility containment area.

Should you have any questions concerning this modification, please contact Sharon Roehm at (813) 623-5302.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.

Thomas A. Turnbull
Environmental Engineer

/mys
Encs.
cc: File 12.2
S. Roehm

2/11/91
Lynne,
These vehicles should
not be assumed to remain
on site for longer than
the time required to
perform the bulkering
operation.
Bep
16/90

Part I
II gen

tanks

Closure



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

HO29-171163

AT, 2-e

December 7, 1990

Mr. Clabe Polk,
Environmental Administrator
DER
4520 Oak Fair Blvd.
Tampa, FL 33610

Dear Mr. Polk:


Per our phone conversation, Universal Waste & Transit, Inc. would like to extend you an invitation to a demonstration of membrane technology for the treatment of certain organic contaminated waste waters. This demonstration will be held on Friday, December 14, 1990, from 1:30 p.m. - 4:00 p.m. at our facility (see attached map). There will be a short oral presentation given at 2:00 p.m. followed by an open question and discussion period until 4:00 p.m.

Even if prior commitments make it impossible for you to attend the presentation, we do feel it will be worthwhile and hope that you will be able to stop by sometime during the demonstration. Also, feel free to extend this invitation to colleagues whom you feel would be interested in this new technology.

We look forward to seeing you on the 14th and if in the meantime we can help you in any way, please give us a call.

Sincerely,

Universal Waste & Transit, Inc.


William C. Horn
Facility Manager

Enclosure

D. E. R.

DEC 10 1990

SOUTHWEST DISTRICT
TAMPA

15/9p

WHAT:

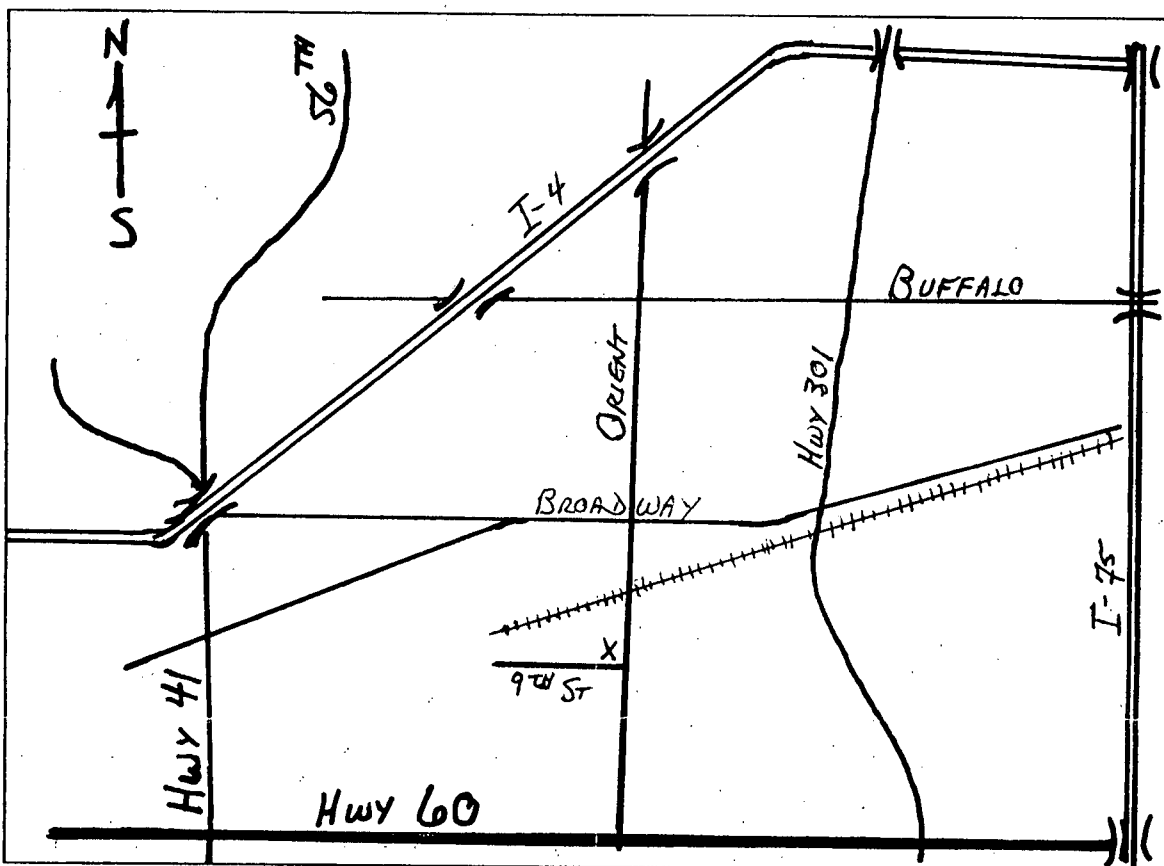
Demonstration of Membrane Technology for the treatment of certain organic wastewaters

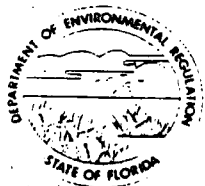
WHERE:

Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619
(813) 623-5302

WHEN:

Friday, December 14th, 1990
1:30 - 4:00 p.m.





State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Rick Garrity
THRU: Clabe Polk *11/1/90*
Victor San Agustin, P.E. *VSA 11/1/90*
Bill Crawford *11/1/90*
FROM: Lynne R. Milanian *Lynne 10/31*
DATE: October 31, 1990
SUBJECT: Universal Waste & Transit, Inc., FLD 981 932 394
Operating Permit HO29-171163
Minor Permit Modification, Addition of a few waste codes

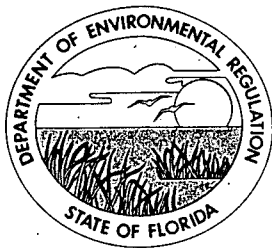
11-5
Clabe
5'd like a briefing
please.
48

Universal Waste has requested a Class I modification (minor change category) to their recently issued permit for the storage of acutely hazardous dioxin containing wastes F026, F027, and F028.

As Universal has established provisions for managing acutely hazardous wastes, F020, F021, F022 and F023, the three additional wastes should be easily handled. Permit modification is recommended.

LRM/ab
Attachment

14
90



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

Dr. Richard Garrity, Deputy Assistant Secretary

Nov 5, 1990

Ms. Sharon Roehm
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Re: Modification of Conditions
Permit No. HO29-171163

Dear Ms. Roehm:

We are in receipt of your request for a modification of the permit conditions. The conditions are changed as follows:

<u>Condition:</u>	<u>From</u>	<u>TO</u>
Description of Permitted Waste	F020 - F024	F020 - F028

This letter must be attached to your permit and becomes a part of that permit.

Sincerely,

Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

RDG/lrmb

cc: James Scarbrough, EPA Region IV
Satish Kastury, DER Tallahassee





UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

October 18, 1990

Dr. Richard Garrity
State of Florida Department of
Environmental Regulation
Hazardous Waste Program
5420 Oak Fair Blvd.
Tampa, FL 33610-7347

D. E. R.

OCT 22 1990

SOUTHWEST DISTRICT
TAMPA

RE: Universal Waste & Transit, Inc.
EPA I.D. Number: FLD981932494
Permit Number: H029-171163

Dear Dr. Garrity:

Pursuant to 40 CFR Part 270.42 and the Florida Administrative Code 17-1730.290, Universal Waste and Transit, Inc. is requesting three (3) Class 1 Permit Modifications.

The first change is to the Contingency Plan, Volume 2, Tab D. Please replace page 29 and add the Safety Locker Inspection pages 34 and 35. Also add the SCBA and SAR inspection plan as pages 36 and 37.

The second change is to the Attachment Volume 5, Tab 19. Please insert the enclosed job description for the General Manager.

The third change is in the Training Program, Volume 4, Tab 11. Please insert the enclosed Land Bay Certification Form.

These changes are per the Department's request and will be incorporated into our permit and made part of the Facility Operating Record.

If questions arise, please contact either myself or Mr. Will Horn at your convenience.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.

Sharon M. Roehm
General Manager

cc: Mike Carolan
Engineering

PURPOSE

This chapter describes the emergency equipment and alarm systems at the Universal Waste & Transit, Inc. facility.

The North Bay and South Bay Safety Locker Inventories are included in this section as well as the Self Contained Breathing Apparatus and the Supplied Air Respirator Inspection program.

North Bay Locker 1

Gloves:							
Solvex (green) 5							
Leather palm 5							
Rubber (black) 5							
Elbow length 1							
Disposable 5							
Splash Suits:							
Saranex 2							
Tyvek 10							
Rain Suit 1							
Spill Supplies:							
Sorbent pads 10							
Magic sox 1							
Hazorb Sorbent 1							
Oil Dri/Sawdust 1							
Ca Carbonate 1							
Plug & Dike 1							
Other P.P.E:							
Dust & mist masks 2							
Ear plugs 25							
Hard hats 2							
Goggles 2							
Tools:							
Bung wrench 1							
Socket wrench 1							

Remarks: _____

South Bay Locker 3

Gloves:							
Solvex (green) 5							
Leather palm 5							
Rubber (black) 5							
Elbow length 1							
Disposable 5							
Splash Suits:							
Saranex 2							
Tyvek 10							
Rain Suit 1							
Spill Supplies:							
Sorbent pads 10							
Magic sox 1							
Hazorb Sorbent 1							
Oil Dri/Sawdust 1							
Other P.P.E:							
Dust & mist masks 2							
Ear plugs 25							
Hard hats 2							
Goggles 2							
Tools:							
Bung wrench 1							
Socket wrench 1							
Sample jars:							
Glass 25							
Plastic 25							

Remarks: _____

UNIVERSAL WASTE & TRANSIT, INC.

Volume 2, Tab D

10/10/90

Revision 1

Universal Waste & Transit

SCBA and SAR Inspections

Universal Waste & Transit has established the following inspection program for its Scott-Brand Self-Contained Breathing Apparatus, (SCBA), and Supplied Air Respirator, (SAR). The following inspection form will be completed before each use and also on a regular monthly basis. This form will be modified to accomodate any additional units in the Universal Waste & Transit network.

All units will be inspected biannually by Safety Equipment Company. They will also be hydrostatically tested by Safety Equipment Company every five years. Safety Equipment Company is an authorized Scott Service Center.

SCBA and SAR Inspections
Universal Waste & Transit

SCBA Inspection:

Serial # _____

1. Visually check mask, lense, and face seal, all hoses and couplings, and the harness for integrity.
2. See that the air tank gauge reads full.
3. Inspect equipment by opening the cylinder valve. Push in on the valve knob and rotate it counterclockwise until fully open. The vibrating alarm should sound and then turn off.
4. Hold facepiece to face and breathe. There should be no restrictions to breathing.
5. Open the purge valve briefly to check operation. A free flow of air should be noted in the facepiece. Close the purge valve and note that there is no further airflow.
6. Test the low pressure warning signal by closing the cylinder valve knob, pushing in and rotating it fully clockwise. Take slow, shallow breaths until the signal sounds at around 25% capacity. If it does not sound, repeat the test, breathing very slowly.

SAR Inspection:

Serial # _____

1. Carefully check to see that all the major parts are presented and working properly. These include the mask, the exhalation valve, lense, hose from the escape bottle, the hose couplings, and the harness.
2. Check all the couplings and connections for damage.
3. Check that the escape bottle gauge reads full.
4. Connect the airline and see that the bottle pressure is approximately 2000 psi. Bleed off air pressure noting that the alarm goes off just under 500 psi.

Inspector: _____ Date: _____

Problems: _____

Correction Date: _____

UNIVERSAL WASTE & TRANSIT, INC.

Volume 2, Tab D, 10/10/90 Rev. 1 -37-

POSITION: GENERAL MANAGER

BASIC FUNCTION: Continual Facility update of safety features and compliance measures. Effectively coordinate the activities of the Sales staff and the operational team to service clients and achieve certain profit criteria.

POSITION RESPONSIBILITIES & DUTIES:

- Reports to Vice President of the chemical group
- Assures timely and complete communications at all levels
- Preparation and presentation of required reports, plans and all documentation requested by superiors
- Oversee that the company equipment receives proper care and maintenance
- Assumes responsibility for loyalty to the company and encourages subordinates to do likewise
- Coordinates with Vice Presidents and General Managers to insure compliance with all laws, regulations, company policies and procedures
- Controls on a daily basis, the operational sales costs
- Insures a total work force that is trained, organized and motivated to effectively meet the company's current and future needs, objectives and goals
- Reviews from an economics and organizational standpoint, the feasibility of major capital expenditures
- Develops and maintains procedures designed to provide effective relationships between the company, the employees and the clients
- Initiates monthly, quarterly and yearly budgets; reports on profit and loss trends
- Responsible for development and submitting of Operating Permit modifications
- Final technical and cost review of all proposals, bids and sales quotes going to clients
- Conducts performance reviews while developing and arranging the right jobs for the right people

EXPERIENCE & QUALIFICATIONS:

- Degree in chemistry or related science field with both business and management experience (part of educational requirements may be met by qualifying experience).
- Ability to respond both effectively and quickly in critical situations
- Must possess personal people managing skills

UNIVERSAL WASTE & TRANSIT, INC.
CUSTOMER NOTIFICATION AND CERTIFICATION

ONLY STATEMENTS WITH ORIGINAL SIGNATURES WILL BE ACCEPTED!!

Generator Name/Location: _____

EPA ID Number: _____ Manifest Number: _____ Profile Number: _____

This waste is a ☐ Wastewater ☐ Nonwastewater. Is analytical available? Yes ☐ No ☐ (If yes, please attach copy.)

EPA Waste Code Number(s): _____

PART I

WASTE CATEGORY [Check appropriate line(s)]

☐ Unrestricted Waste Notification

The disposal of this waste is not restricted as specified in 40 CFR 268, Subpart D and all prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d).

☐ Restricted Waste Notification

☐ This is a restricted waste which meets the treatment standards as specified in 40 CFR 268, Subpart D.

☐ This waste does not meet the treatment standards specified in 40 CFR 268, Subpart D. Waste must be treated to the appropriate standard and/or in such a manner which renders it non-liquid by chemical fixation or solidification prior to land disposal. [See treatment standard below or see attached Part II section(s).]

Corresponding Treatment Standard _____

☐ Restricted Waste Variance Notification

This waste is not prohibited from land disposal at this time due to a case-by-case extension, an exemption, or a nationwide capacity variance. This waste may be subject to landfill restriction after the date below.

Applicable Variance/Date _____

☐ Treated Waste Certification

☐ I believe that the treatment process used to treat this waste has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR 268, Subpart D, and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d) without impermissible dilution of the prohibited waste.

☐ I believe that the nonwastewater organic constituents have been treated by incineration in units operated in accordance with the applicable technical requirements, and I have been unable to detect the nonwastewater organic constituents despite having used best good faith efforts to analyze for such constituents.

☐ Lab Pack Certification

☐ Organometallic (inorganic)

This lab pack contains only the wastes specified in Appendix IV to 40 CFR 268 or solid waste not subject to regulation under 40 CFR 261. (See attached appendix I for acceptable material)

☐ Organic

This lab pack contains only organic wastes specified in Appendix V to 40 CFR 268 or solid waste not subject to regulation under 40 CFR 261. (See attached appendix I for acceptable material)

I certify that I personally have examined and am familiar with the waste, treatment technology, and/or operation of the treatment process through analysis and testing or through personal knowledge sufficient to support the above checked certification. I believe that the information I submitted is true, accurate, and complete. I am also aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

SIGNATURE: _____ DATE: _____

PRINTED NAME: _____ TITLE: _____

PART II

[Check the appropriate box(es)]

EPA CODES	SUBCATEGORY or WASTE DESCRIPTION	CONSTITUENT CONCERN	NONWASTEWATER		WASTEWATER
			Total Composition (ng/kg)	TCLP (ng/L)	Total Composition (ng/L)
A. TREATMENT STANDARDS FOR CHARACTERISTIC WASTES					
[] D001	Ignitable liquids, high-TOC non-wastewater subcategory		RDRG; FSUBS; or INCIN	-	-
[] D001	Ignitable liquids, low-TOC non-wastewater subcategory (1X(TOC)(10X))		DEACT	-	-
[] D001	Ignitable liquids, wastewater subcategory ((1X TOC & (1X TSS))		-	-	DEACT
[] D001	Ignitable compressed gas		DEACT	-	-
[] D001	Ignitable reactives		DEACT	-	-
[] D001	Oxidizers		DEACT	-	DEACT
[] D002	Acid subcategory	pH <2.0	DEACT	-	DEACT
[] D002	Alkaline subcategory	pH >12.5	DEACT	-	DEACT
[] D002	Other subcategory		DEACT	-	DEACT
[] D003	Reactive subcategories	Total Cyanides	550	-	Reserved
		Amenable Cyanides	50	-	0.86
[] D003	Water reactive subcategory		DEACT	-	-
[] D003	Reactive sulfides subcategory		DEACT	-	DEACT
[] D003	Other reactives subcategory		DEACT	-	DEACT
[] D004	Arsenic	Arsenic	-	5.0	5.0
[] D005	Barium	Barium	-	100	100
[] D006	Cadmium	Cadmium	-	1.0	1.0
[] D006	Cadmium batteries subcategory		RTHRM	-	-
[] D007	Chromium	Chromium	-	5.0	5.0
[] D008	Lead	Lead	-	5.0	5.0
[] D008	Lead acid batteries		RLEAD	-	-
[] D009	Low-mercury subcategory (<260 ng/kg total mercury)	Mercury	-	0.2	0.2
[] D009	High-mercury subcategory (>260 ng/kg total mercury)	Mercury	RMERC or IMERC	-	-
[] D010	Selenium	Selenium	-	5.7	1.0
[] D011	Silver	Silver	-	5.0	5.0
[] D012	Endrin	Endrin	0.13	-	BIODG or INCIN
[] D013	Lindane	Lindane	0.066	-	CARBON or INCIN
[] D014	Methoxychlor	Methoxychlor	0.18	-	WETOX or INCIN
[] D015	Toxaphene	Toxaphene	1.3	-	BIODG or INCIN
[] D016	2,4-D	2,4-Dichlorophenoxyacetic acid	10.0	-	CHOXD, BIODG, or INCIN
[] D017	2,4,5-TP (Silvex)	2,4,5-TP (Silvex)	7.9	-	CHOXD or INCIN
[] D018	Benzene	Benzene		0.5	
[] D019	Carbon tetrachloride	Carbon tetrachloride		0.5	
[] D020	Chlordane	Chlordane		0.03	
[] D021	Chlorobenzene	Chlorobenzene		100	
[] D022	Chloroform	Chloroform		6.0	
[] D023	o-Cresol	o-Cresol		200	
[] D024	m-Cresol	m-Cresol		200	
[] D025	p-Cresol	p-Cresol		200	
[] D026	Cresol	Cresol		200	
[] D027	1,4-Dichlorobenzene	1,4-Dichlorobenzene		7.5	
[] D028	1,2-Dichlorobenzene	1,2-Dichlorobenzene		0.5	
[] D029	1,1-Dichloroethylene	1,1-Dichloroethylene		0.7	
[] D030	2,4-Dinitrotoluene	2,4-Dinitrotoluene		0.13	

PART II (Continued)

[Check the appropriate box(es)]

EPA CODES	SUBCATEGORY or WASTE DESCRIPTION	CONSTITUENT CONCERN	NONWASTEWATER		WASTEWATER
			Total Composition (ng/kg)	TCLP (ng/L)	Total Composition (ng/L)
A. TREATMENT STANDARDS FOR CHARACTERISTIC WASTES (Continued)					
[] D031	Heptachlor (as its hydroxide)	Heptachlor		0.008	
[] D032	Hexachlorobenzene	Hexachlorobenzene		0.13	
[] D033	Hexachlorobutadiene	Hexachlorobutadiene		0.5	
[] D034	Hexachloroethane	Hexachloroethane		3.0	
[] D035	Methyl ethyl ketone	Methyl ethyl ketone		200	
[] D036	Nitrobenzene	Nitrobenzene		2.0	
[] D037	Pentachlorophenol	Pentachlorophenol		100	
[] D038	Pyridine	Pyridine		5.0	
[] D039	Tetrachloroethylene	Tetrachloroethylene		0.7	
[] D040	Trichloroethylene	Trichloroethylene		0.5	
[] D041	2,4,5-TP (2,4,5-Trichlorophenol)	2,4,5-Trichlorophenol		400	
[] D042	2,4,6-Trichlorophenol	2,4,6-Trichlorophenol		2.0	
[] D043	Vinyl chloride	Vinyl chloride		0.2	
B. TREATMENT STANDARDS FOR "F" LISTED WASTES					
[] F001 - F005 Spent solvent wastes					
[]	Acetone	Acetone	-	0.59	0.05
[]	Benzene	Benzene	3.7	-	0.070
[]	n-Butyl alcohol	n-Butyl alcohol	-	5.0	5.0
[]	Carbon disulfide	Carbon disulfide	-	4.81	1.05
[]	Carbon tetrachloride	Carbon tetrachloride	-	0.96	0.05
[]	Chlorobenzene	Chlorobenzene	-	0.05	0.15
[]	Cresols (& Cresylic acid)	Cresols (& Cresylic acid)	-	0.75	2.82
[]	Cyclohexanone	Cyclohexanone	-	0.75	0.125
[]	1,2-Dichlorobenzene	1,2-Dichlorobenzene	-	0.125	0.65
[]	2-Ethoxyethanol	2-Ethoxyethanol	INCIN	-	BIODG or INCIN
[]	Ethyl acetate	Ethyl acetate	-	0.75	0.05
[]	Ethyl benzene	Ethyl benzene	-	0.053	0.05
[]	Ethyl ether	Ethyl ether	-	0.75	0.05
[]	Isobutanol	Isobutanol	-	5.0	5.0
[]	Methanol	Methanol	-	0.75	0.25
[]	Methylene chloride	Methylene chloride	-	0.96	0.20
[]	Methylene chloride (from the pharmaceutical industry)	Methylene chloride (from the pharmaceutical industry)	-	-	0.44
[]	Methyl ethyl ketone	Methyl ethyl ketone	-	0.75	0.05
[]	Methyl isobutyl ketone	Methyl isobutyl ketone	-	0.33	0.05
[]	Nitrobenzene	Nitrobenzene	-	0.125	0.66
[]	2-Nitropropane	2-Nitropropane	INCIN	-	(WETOX or CHOXD)
[]					fb CARBN; or INCIN
[]	Pyridine	Pyridine	-	0.33	1.12
[]	Tetrachloroethylene	Tetrachloroethylene	-	0.05	0.079
[]	Toluene	Toluene	-	0.33	1.12
[]	1,1,1-Trichloroethane	1,1,1-Trichloroethane	-	0.41	1.05
[]	1,2,2-Trichloroethane	1,2,2-Trichloroethane	7.5	-	0.030
[]	1,2,2-Trichloro-1,2,2-trifluoroethane	1,2,2-Trichloro-1,2,2-trifluoroethane	-	0.96	1.05
[]	Trichloroethylene	Trichloroethylene	-	0.091	0.062
[]	Trichlorofluoromethane	Trichlorofluoromethane	-	0.60	0.05
[]	Xylene	Xylene	-	0.15	0.05

PART II (Continued)
[Check the appropriate box(es)]

EPA CODES	SUBCATEGORY or WASTE DESCRIPTION	CONSTITUENT CONCERN	NONWASTEWATER		WASTEWATER
			Total Composition (mg/kg)	TCLP (mg/L)	Total Composition (mg/L)
B. TREATMENT STANDARDS FOR "F" LISTED WASTES (Continued)					
[] F006	Wastewater treatment sludges from electroplating operations	Cadmium	-	0.066	1.5
		Chromium	-	5.2	0.32
		Lead	-	0.51	0.040
		Nickel	-	0.32	0.44
		Silver	-	0.072	-
		Cyanides (Total)	590	-	1.2
		Cyanides (Amenable)	30	-	0.86
[] F007	Spent cyanide plating bath solutions from electroplating operations	Cadmium	-	0.066	-
		Chromium	-	5.2	0.32
		Lead	-	0.51	0.04
		Nickel	-	0.32	0.44
		Silver	-	0.072	-
		Cyanides (Total)	590	-	1.9
		Cyanides (Amenable)	30	-	0.10
[] F008	Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process	Cadmium	-	0.066	-
		Chromium	-	5.2	0.32
		Lead	-	0.51	0.04
		Nickel	-	0.32	0.44
		Silver	-	0.072	-
		Cyanides (Total)	590	-	1.9
		Cyanides (Amenable)	30	-	0.10
[] F009	Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process	Cadmium	-	0.066	-
		Chromium	-	5.2	0.32
		Lead	-	0.51	0.04
		Nickel	-	0.32	0.44
		Silver	-	0.072	-
		Cyanides (Total)	590	-	1.9
		Cyanides (Amenable)	30	-	0.10
[] F010	Quenching bath sludge from oil baths in metal heat treating operations where cyanides are used in the process	Cyanides (Total)	1.5	-	1.9
		Cyanides (Amenable)	-	-	0.10
[] F011	Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations	Cadmium	-	0.066	-
		Chromium	-	5.2	0.32
		Lead	-	0.51	0.04
		Nickel	-	0.32	0.44
		Silver	-	0.072	-
		Cyanides (Total)	110	-	1.9
		Cyanides (Amenable)	9.1	-	0.10

PART II (Continued)
[Check the appropriate box(es)]

EPA CODES	SUBCATEGORY or WASTE DESCRIPTION	CONSTITUENT CONCERN	NONWASTEWATER		WASTEWATER
			Total Composition (mg/kg)	TCLP (mg/L)	Total Composition (mg/L)
E. TREATMENT STANDARDS FOR "F" LISTED WASTES (Continued)					
[] F012	Quenching wastewater treatment sludges from metal heat treating operations where cyanides are used in the process	Cadmium	-	0.066	-
		Chromium	-	5.2	0.32
		Lead	-	0.51	0.04
		Nickel	-	0.32	0.44
		Silver	-	0.072	-
		Cyanides (Total)	110	-	1.9
		Cyanides (Amenable)	9.1	-	0.10
[] F019	Wastewater treatment sludges from the chemical conversion coating of aluminum	Chromium	-	5.2	0.32
		Cyanides (Total)	110	-	1.2
		Cyanides (Amenable)	9.1	-	0.86
F. TREATMENT STANDARDS FOR CALIFORNIA LISTED WASTES					
[]	Nickel (Liquid waste)	Nickel	134	-	-
[]	Thallium (Liquid waste)	Thallium	130	-	-
[]	Cyanide (Liquid waste)	Cyanide	1090	-	-
[]	Halogenated organic compounds (for list of HOC's, see appendix II)	HOCs	<1000		
[]	PCBs (Liquid waste)	PCBs	<50		

APPENDIX I LAB PACK MATERIALS

Two subcategories of lab pack wastes have been established, organic and organometallic. Lab packs that are 100% organic compounds are "organic" and all others are "organometallic".

Organic -

Organic lab packs may consist of any and/or all of the following characteristic and listed wastes.

D001, D012, D013, D014, D015, D016, D017

F001, F002, F003, F004, F005, F010, F020, F021, F023, F024, F026, F027, F028

K001, K009, K010, K011, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K054, K055, K056, K057, K058, K059, K060, K061, K062, K063, K064, K065, K066, K067, K068, K069, K070, K071, K072, K073, K074, K075, K076, K077, K078, K079, K080, K081, K082, K083, K084, K085, K086, K087, K088, K089, K090, K091, K092, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K107, K108, K109, K110, K111, K112, K113, K114, K115, K116, K117, K118, K119, K120, K121, K122, K123, K124, K125, K126, K127

P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P117, P118, P119, P120, P121, P122, P123

U001, U002, U003, U004, U005, U006, U007, U008, U009, U010, U011, U012, U013, U014, U015, U016, U017, U018, U019, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U031, U032, U033, U034, U035, U036, U037, U038, U039, U040, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U054, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U065, U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U100, U101, U102, U103, U104, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U134, U135, U136, U137, U138, U139, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U175, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U195, U196, U197, U198, U199, U200, U201, U202, U203, U204, U205, U206, U207, U208, U209, U210, U211, U212, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U223, U224, U225, U226, U227, U228, U229, U230, U231, U232, U233, U234, U235, U236, U237, U238, U239, U240, U241, U242, U243, U244, U245, U246, U247, U248, U249, U250, U251, U252, U253, U254, U255

Organometallic (inorganic)-

Organometallic lab packs may consist of any and/or all the the following characteristic and listed waste materials.

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017

F001, F002, F003, F004, F005, F006, F010, F020, F021, F023, F024, F026, F027, F028

K001, K002, K008, K009, K010, K011, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026, K027, K028, K029, K030, K031, K032, K033, K034, K035, K036, K037, K038, K039, K040, K041, K042, K043, K044, K045, K046, K047, K048, K049, K050, K051, K052, K053, K054, K055, K056, K057, K058, K059, K060, K061, K062, K063, K064, K065, K066, K067, K068, K069, K070, K071, K072, K073, K074, K075, K076, K077, K078, K079, K080, K081, K082, K083, K084, K085, K086, K087, K088, K089, K090, K091, K092, K093, K094, K095, K096, K097, K098, K099, K100, K101, K102, K103, K104, K105, K106, K107, K108, K109, K110, K111, K112, K113, K114, K115, K116, K117, K118, K119, K120, K121, K122, K123, K124, K125, K126, K127

P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P117, P118, P119, P120, P121, P122, P123

U001, U002, U003, U004, U005, U006, U007, U008, U009, U010, U011, U012, U013, U014, U015, U016, U017, U018, U019, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U031, U032, U033, U034, U035, U036, U037, U038, U039, U040, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U054, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U065, U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080, U081, U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U100, U101, U102, U103, U104, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U134, U135, U136, U137, U138, U139, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U175, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U195, U196, U197, U198, U199, U200, U201, U202, U203, U204, U205, U206, U207, U208, U209, U210, U211, U212, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U223, U224, U225, U226, U227, U228, U229, U230, U231, U232, U233, U234, U235, U236, U237, U238, U239, U240, U241, U242, U243, U244, U245, U246, U247, U248, U249, U250, U251, U252, U253, U254, U255

APPENDIX II HALOGENATED ORGANIC COMPOUNDS FOR CALIFORNIA LISTING

Aldrin	1,2-Dibromo-3-chloropropane	Kepone
Aroclor 1016	Dibromoethane	Methoxychlor
Aroclor 1221	1,2-Dibromoethane	Methylene chloride
Aroclor 1232	trans-1,4-Dichloro-2-butene	4,4'-Methylenebis(2-chloroaniline)
Aroclor 1242	m-Dichlorobenzene	PCB's not otherwise specified
Aroclor 1248	o-Dichlorobenzene	Pentachlorobenzene
Aroclor 1254	p-Dichlorobenzene	Pentachlorobenzo-p-dioxins
Aroclor 1260	3,3'-Dichlorobenzidine	Pentachlorodibenzofurans
alpha-BHC	Dichlorodifluoroethane	Pentachloroethane
beta-BHC	1,1-Dichloroethane	Pentachloronitrobenzene
delta-BHC	1,2-Dichloroethane	Pentachlorophenol
gamma-BHC	trans-1,2-Dichloroethene	Pronamide
Bis(2-chloroethoxy)methane	1,1-Dichloroethylene	Silvex (2,4,5-TP)
Bis(2-chloroethyl)ether	2,4-Dichlorophenol	2,4,5-T
Bis(2-chloroisopropyl)ether	2,6-Dichlorophenol	1,2,4,5-Tetrachlorobenzene
Bromochloroethane	2,4-Dichlorophenoxyacetic acid	2,3,7,8-Tetrachlorodibenzo-p-dioxin
Bromomethane	1,2-Dichloropropane	Tetrachlorodibenzo-p-dioxins
Carbon tetrachloride	cis-1,3-Dichloropropene	Tetrachlorodibenzofurans
Chloroacetylene	trans-1,3-Dichloropropene	1,1,1,2-Tetrachloroethane
2-Chloro-1,1,1-trifluoroethane	Dieldrin	1,1,2,2-Tetrachloroethane
p-Chloro-o-cresol	Endosulfan I	Tetrachloroethene
p-Chloroaniline	Endosulfan II	2,3,4,6-Tetrachlorophenol
Chlorobenzene	Endrin	Toxaphene
Chlorobenzilate	Endrin aldehyde	Tribromoethane
Chlorocyclohexane	Heptachlor	1,2,4-Trichlorobenzene
Chloroethane	Heptachlor epoxide	1,1,1-Trichloroethane
2-Chloroethyl vinyl ether	Hexachlorobenzene	1,1,2-Trichloroethane
Chloroform	Hexachlorobutadiene	Trichloroethene
Chloromethane	Hexachlorocyclopentadiene	Trichloroethoxyfluoromethane
2-Chloronaphthalene	Hexachlorodibenzo-p-dioxins	2,4,5-Trichlorophenol
2-Chlorophenol	Hexachlorodibenzofuran	2,4,6-Trichlorophenol
3-Chloropropene	Hexachloroethane	1,2,3-Trichloropropane
3-Chloropropionitrile	Hexachloropropene	Tris(2,3-dibromopropyl)phosphate
DDT	Hexachloropropene	Vinyl chloride
DDE	Isodrin	
DDB		

APPENDIX III
EFFECTIVE DATES

Waste Code	Waste Category	Effective Date	Waste Code	Waste Category	Effective Date
California list	Soil and debris	Nov. 8, 1990	K043	Soil and debris	June 8, 1991
	HOCs from CERCLA/RCRA corrective.		K046	Nonwastewater	Nov. 8, 1990
D004	Inorganic solid debris.	May 8, 1992	K049	Nonwastewater	Nov. 8, 1990
D004	Nonwastewater	May 8, 1992	K050	Nonwastewater	Nov. 8, 1990
D005	Inorganic solid debris.	May 8, 1992	K051	Nonwastewater	Nov. 8, 1990
D006	Inorganic solid debris.	May 8, 1992	K052	Nonwastewater	Nov. 8, 1990
D007	Inorganic solid debris.	May 8, 1992	K084	Nonwastewater	May 8, 1992
	Inorganic solid debris.	May 8, 1992	K093	Soil and debris	June 8, 1991
D006	Lead acid batteries.	May 8, 1992	K094	Soil and debris	June 8, 1991
D009	Inorganic solid debris.	May 8, 1992	K095	Soil and debris	June 8, 1991
D009	High mercury non-wastewater.	May 8, 1992	K096	Soil and debris	June 8, 1991
D009	Low mercury non-wastewater.	May 8, 1992	K101	Nonwastewater	May 8, 1992
D010	Inorganic solid debris.	May 8, 1992	K102	Nonwastewater	May 8, 1992
D011	Inorganic solid debris.	May 8, 1992	K106	High mercury non-wastewater.	May 8, 1992
F001-F005	Soil and debris	Nov. 8, 1990	K106	Low mercury non-wastewater.	May 8, 1992
F010	Soil and debris	June 8, 1991	K113	Soil and debris	June 8, 1991
F020	Soil and debris	Nov. 8, 1990	K114	Soil and debris	June 8, 1991
F021	Soil and debris	Nov. 8, 1990	K115	Soil and debris	June 8, 1991
F022	Soil and debris	Nov. 8, 1990	K116	Soil and debris	June 8, 1991
F023	Soil and debris	Nov. 8, 1990	P010	Nonwastewater	May 8, 1992
F024	Soil and debris	June 8, 1991	P011	Nonwastewater	May 8, 1992
	Soil and debris	Nov. 8, 1990	P012	Nonwastewater	May 8, 1992
	Soil and debris	Nov. 8, 1990	P036	Nonwastewater	May 8, 1992
F028	Soil and debris	Nov. 8, 1990	P038	Nonwastewater	May 8, 1992
F033	Nonwastewater	May 8, 1992	P039	Soil and debris	June 8, 1991
K009	Soil and debris	June 8, 1991	P040	Soil and debris	June 8, 1991
K010	Soil and debris	June 8, 1991	P041	Soil and debris	June 8, 1991
K011	Soil and debris	June 8, 1991	P043	Soil and debris	June 8, 1991
K013	Soil and debris	June 8, 1991	P044	Soil and debris	June 8, 1991
K014	Soil and debris	June 8, 1991	P052	Soil and debris	June 8, 1991
K023	Soil and debris	June 8, 1991	P065	High mercury non-wastewater.	May 8, 1992
K027	Soil and debris	June 8, 1991	P065	Low mercury non-wastewater.	May 8, 1992
K028	Soil and debris	June 8, 1991	P071	Soil and debris	June 8, 1991
K029	Soil and debris	June 8, 1991	P085	Soil and debris	June 8, 1991
K031	Nonwastewater	May 8, 1992	P087	All	May 8, 1992
K038	Soil and debris	June 8, 1991	P089	Soil and debris	June 8, 1991
K039	Soil and debris	June 8, 1991	P092	High mercury non-wastewater.	May 8, 1992
K040	Soil and debris	June 8, 1991	P092	Low mercury non-wastewater.	May 8, 1992
			P093	Soil and debris	May 8, 1992
			P094	Soil and debris	June 8, 1991
			P095	Soil and debris	May 8, 1992
			P097	Soil and debris	June 8, 1991

APPENDIX III (continued)
EFFECTIVE DATES

Waste Code	Waste Category	Effective Date	Waste Code	Waste Category	Effective Date
P108	Soil and debris	May 8, 1992	U091	Soil and debris	May 8, 1992
P109	Soil and debris	June 8, 1991	U092	Soil and debris	May 8, 1992
P111	Soil and debris	June 8, 1991	U093	Soil and debris	May 8, 1992
P116	Soil and debris	May 8, 1992	U095	Soil and debris	May 8, 1992
P118	Soil and debris	May 8, 1992	U097	Soil and debris	May 8, 1992
U003	Soil and debris	May 8, 1992	U102	Soil and debris	June 8, 1991
U006	Soil and debris	May 8, 1992	U107	Soil and debris	June 8, 1991
U007	Soil and debris	May 8, 1992	U110	Soil and debris	May 8, 1992
U010	Soil and debris	May 8, 1992	U114	Soil and debris	May 8, 1992
U011	Soil and debris	May 8, 1992	U116	Soil and debris	May 8, 1992
U014	Soil and debris	May 8, 1992	U119	Soil and debris	May 8, 1992
U015	Soil and debris	May 8, 1992	U130	Soil and debris	May 8, 1992
U017	Soil and debris	May 8, 1992	U132	Soil and debris	May 8, 1992
U020	Soil and debris	May 8, 1992	U136	Nonwastewater	May 8, 1992
U021	Soil and debris	May 8, 1992	U143	Soil and debris	May 8, 1992
U026	Soil and debris	May 8, 1992	U148	Soil and debris	May 8, 1992
U028	Soil and debris	June 8, 1991	U149	Soil and debris	May 8, 1992
U033	Soil and debris	May 8, 1992	U150	Soil and debris	May 8, 1992
U034	Soil and debris	May 8, 1992	U151	High mercury non-wastewater.	May 8, 1992
U035	Soil and debris	May 8, 1992	U151	Low mercury non-wastewater.	May 8, 1992
U038	Soil and debris	May 8, 1992	U151	Soil and debris	May 8, 1992
U041	Soil and debris	May 8, 1992	U153	Soil and debris	May 8, 1992
U042	Soil and debris	May 8, 1992	U156	Soil and debris	May 8, 1992
U046	Soil and debris	May 8, 1992	U163	Soil and debris	May 8, 1992
U049	Soil and debris	May 8, 1992	U164	Soil and debris	May 8, 1992
U058	Soil and debris	June 8, 1992	U167	Soil and debris	May 8, 1992
U059	Soil and debris	May 8, 1992	U168	Soil and debris	May 8, 1992
U060	Soil and debris	May 8, 1992	U170	All	May 8, 1992
U061	Soil and debris	May 8, 1992	U172	All	May 8, 1992
U062	Soil and debris	May 8, 1992	U174	All	May 8, 1992
U069	Soil and debris	June 8, 1991			
U073	Soil and debris	May 8, 1992			
U074	Soil and debris	May 8, 1992			
U087	Soil and debris	June 8, 1991			
U088	Soil and debris	June 8, 1991			



UNIVERSAL WASTE & TRANSIT, INC.

October 4, 1990

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

Dr. Richard Garrity
State of Florida Dept. of
Environmental Regulation
HAZARDOUS WASTE PROGRAM
4520 Oak Fair Blvd.
Tampa, FL 33610-7347

RE; Universal Waste & Transit, Inc.
EPA I.D. Number: FLD 981 932 394
Permit Number: H029-171163

AI, 2-c
D.E.R.

OCT 5 1990

SOUTHWEST DISTRICT
TAMPA

Dear Dr. Garrity:

Pursuant to 40 CFR Part 270.42 and Florida Administrative Code 17-730.290, Universal Waste & Transit, Inc., is requesting two (2) Class 1 Permit Modifications.

The first change is in the Contingency Plan, volume 2, tab B, page 8, changing the Florida DER Emergency Response telephone number.

The 2nd change is in the Attachments, volume 5, Attachment 10, page 1, adding EPA Waste Codes F026-F028 Pesticiding Manufacturing for storage. Page 2 of Attachment 10 has been retyped simply for continuity within the Attachment. No changes have been made to page 2.

No other changes in the permit are requested by these modifications. Unless indicated otherwise by your office, these changes will be incorporated into our permit and made part of the Facility Operating Record.

If questions arise, please contact either myself or Mr. Will Horn at your convenience.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.

Sharon M. Roehm
General Manager

cc: Mike Carolan
Engineering

ATTACHMENT 10

ANTICIPATED ANNUAL HAZARDOUS WASTE VOLUME FOR STORAGE & TREATMENT

<u>Process Code</u>	<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity</u>
S01;OTHER	D001	Ignitable	100,000 gallons
S01;OTHER	D002	Corrosive	25,000 gallons
S01;OTHER	D003	Reactive	5,000 gallons
S01;OTHER	D004 thru D043	Toxic Characteristic	60,000 gallons
S01;OTHER	F001 & F002	Halogenated Solvents	100,000 gallons
S01;OTHER	F003 & F005	Non-Halogenated Solvents	Incl. in D001
S01;OTHER	F004	Non-Halogenated Solvents	10,000 gallons
S01;OTHER	F006	Electroplating Sludges	Included in D003 thru D017
S01;OTHER	F007 thru F012	Electroplating Wastes	Included in D003
S01;OTHER	F020 thru F024 <u>F028</u>	HEB Manufacturing <u>Pesticide</u>	1,000 gallons
S01;OTHER	K001	Wood Preservative	1,000 gallons
S01;OTHER	K002 thru K008	Inorganic Pigments	3,000 gallons
S01;OTHER	K009 thru K011 K013 thru K030 K093 thru K096 K083 & K085 K103 thru K105	Organic Chemicals	3,500 gallons
S01;OTHER	K071;K073;K106	Inorganic Chemicals	600 gallons
S01;OTHER	K031 thru K043 K097 thru K099	Pesticides	1,500 gallons
S01:OTHER	K048 thru K052	Petroleum Refining	8,000 gallons

UNIVERSAL WASTE & TRANSIT, INC.
PERMIT NUMBER: H029-171163
REVISION #2: 10/01/90

ATTACHMENT 10, cont.

<u>Process Code</u>	<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity</u>
S01;OTHER	K061 & K062	Iron & Steel	10,000 gallons
S01;OTHER	K069 & K100	Secondary Lead	1,500 gallons
S01;OTHER	K084;K101;K102	Veterinary Pharmaceuticals	1,500 gallons
S01;OTHER	K086	Ink Formulation	20,000 gallons
S01;OTHER	K060 & K087	Coking	1,500 gallons
S01;OTHER	"P"Listed Waste	Acute Hazardous Wastes	4,000 gallons
S01;OTHER	"U"Listed Waste	Toxic Wastes	20,000 gallons

TOTAL: 377,100/gallons/year or 6,856 fifty-five gallon drums
at 260 working days/year. This equals 26 drums/day
entering the facility.

In the event of an emergency where environmental contamination is eminent, in addition to notifying the Tampa Fire Department, the following governmental agencies will be notified by the Universal Waste & Transit Emergency Coordinator or his designated representative:

- ~~In-addition-to-the-NRC-you-must-contact-the-government-officials designated-as-the-OSC.--This-can-be-accomplished-by-calling--(904) 488-1320.~~ These telephone numbers are correct as of May-207-1989 September 28, 1990.

8



file

Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347 • 813-623-5561

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary
Dr. Richard Garrity, Deputy Assistant Secretary

October 4, 1990

Ms. Sharon Roehm
General Manager
Universal Waste & Transit, Inc.
2002 North Orient Road
Tampa, Florida 33619

Re: Universal Waste & Transit, Inc., FLD 981 932 494
Hazardous Waste Operation Permit HO29-171163
Permit Modification for TCLP Waste

Dear Ms. Roehm:

The Florida Department of Environmental Regulation (FDER) acknowledges receipt of your request for a Class I modification to the referenced permit. The addition of the requested waste codes to the current waste codes permitted for storage will indeed be a Class I modification.

FDER is currently preparing the paper work required to adopt the revised federal regulations. Until the adoption process is complete, the management of the new waste codes will be a United States Environmental Protection Agency (EPA) matter. EPA, has on this matter, determined that for facilities currently managing the new waste codes no additional notification is required.

The referenced permit will be modified to include the new waste codes shortly after the state has adopted and received authorization for the new regulations.

You have included waste codes D037, D041 and D042. These particular wastes are derived from the "F" listed waste F027 which includes tri, tetra and pentachlorophenol. As Universal Waste has not sought approval for storage of "F" listed waste F027, receipt and storage of the characteristic wastes constituting the make-up of F027, which would specifically be D037, D041 and D042 is not authorized at this time. Should Universal Waste desire to store "F" listed waste F027 and its subsequent "characteristic" wastes D037, D041, and D042 a permit modification would be required.




Ms. Sharon Roehm
Universal Waste & Transit, Inc.

October 4, 1990
Page Two

Should you have additional questions, please feel free to contact me at (813) 623-5561, ext. 389.

Sincerely,


Lynne R. Milanian
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

LRM/ab

cc: James Scarbrough, EPA Region IV
Satish Kastury, FDER/Tallahassee



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

file

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury

THRU: Victor San Agustin *LSM*
Bill Crawford *LSM*

FROM: Lynne Milanian *lynne 9/25*

DATE: September 25, 1990

SUBJECT: Universal Waste & Transit, Inc.
FLD 981 932 394 HO29-171163
Minor Modification to Permit due to TCLP Requirements

Attached please find documents submitted on September 24, 1990 by the referenced facility which are supplement to the subject application.

LRM/jc

Enclosures

cc: James Scarbrough, EPA Region IV



UNIVERSAL WASTE & TRANSIT, INC.

September 24, 1990

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

Hand delivery close
@u

Dr. Richard Garrity
State of Florida
Department of Environmental Regulation
Division of Waste Management
Hazardous Waste Program
4520 Oak Fair Blvd.
Tampa, FL 33610-7347

AI, 2-e

RE: Universal Waste & Transit, Inc.
EPA Id Number: FLD 981 932 394
Permit Number: H029-171163

Dear Dr. Garrity:

Pursuant to 40CFR Part 270.42 and Florida Administrative Code 17-730.290, Universal Waste & Transit, Inc. (UW&T) is requesting a Class 1 Permit Modification to comply with the Toxicity Characteristics Final Rule as published in the Federal Register, Vol. 53, No. 61, pages 11798 - 11877, on March 29, 1990. A list of these new characteristics is found in Vol. 5, Attachment 10, page 3, as they are added to Attachment 10, line 4. The "Waste Analysis Plan" Volume 3, page 3, will be revised as attached.

No increase in capacity is anticipated. If, through operational experience, it is evident that an increase in storage capacity is necessary as a result of TCLP rule a separate permit amendment will be submitted.

NO change in facility design is required. No change in daily operational procedures is deemed necessary. No changes in the preparedness or prevention aspects of the facility are necessary. No changes in the Training Program or Contingency Plan are necessary as a result of this amendment.

NO other changes in the referred permit are requested by this modification. Unless indicated otherwise by your office, these changes will be incorporated into our permit and made part of the Facility Operating Record.

If questions arise, please contact either myself or Mr. Will Horn at your convenience.

Sincerely,

UNIVERSAL WASTE & TRANSIT, INC.

Sharon M. Roehm
General Manager

D.E.R.

SEP 24 1990

SOUTHWEST DISTRICT TAMPA

890

ATTACHMENT 10

ANTICIPATED ANNUAL HAZARDOUS WASTE VOLUME FOR STORAGE & TREATMENT

<u>Process Code</u>	<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity</u>
S01;OTHER	D001	Ignitable	100,000 gallons
S01;OTHER	D002	Corrosive	25,000 gallons
S01;OTHER	D003	Reactive	5,000 gallons
S01;OTHER	D004 thru D017	E.P. Toxic	60,000 gallons
<u>S01;OTHER</u>	<u>D004 thru D043</u>	<u>Toxic Characteristic</u>	<u>60,000 gallons</u>
S01;OTHER	F001 & F002	Halogenated Solvents	100,000 gallons
S01;OTHER	F003 & F005	Non-Halogenated Solvents	Included in D001
S01;OTHER	F004	Non-Halogenated Solvents	10,000 gallons
S01;OTHER	F006	Electroplating Sludges	Included in D003 thru D017
S01;OTHER	F007 thru F012	Electroplating Wastes	Included in D003
S01;OTHER	F020 thru F024	HCL Manufacturing	1,000 gallons
S01;OTHER	K001	Wood Preservative	1,000 gallons
S01;OTHER	K002 thru K008	Inorganic Pigments	3,000 gallons
S01;OTHER	K009 thru K011 K013 thru K030 K093 thru K096 K083 & K085 K103 thru K105	Organic Chemicals	3,500 gallons
S01;OTHER	K071;K073;K106	Inorganic Chemicals	600 gallons
S01;OTHER	K031 thru K043 K097 thru K099	Pesticides	1,500 gallons
S01:OTHER	K048 thru K052	Petroleum Refining	8,000 gallons

UNIVERSAL WASTE & TRANSIT, INC.
PERMIT NUMBER: H029-171163
REVISION #1: 09/20/90

<u>EPA Hazardous Waste Number</u>	<u>Waste Type</u>	<u>Estimated Annual Quantity (Gal.)</u>
D018	Benzene	5000
D019	Carbon Tetrachloride	2000
D020	Chlordane	1000
D021	Chlorobenzene	1000
D022	Chloroform	2000
D023	o-Cresol	500
D024	m-Cresol	500
D025	p-Cresol	500
D026	Total Cresol	1500
D027	1,4-Dichlorobenzene	1000
D028	1,2-Dichloroethane	2000
D029	1,1-Dichloroethylene	1000
D030	2,4-Dinitrotoluene	500
D031	Heptachlor (& Hydroxides)	500
D032	Hexachlorobenzene	500
D033	Hexachlorobutadiene	500
D034	Hexachloroethane	500
D035	Methylethylketone	5000
D036	Nitrobenzene	500
D037	Pentachlorophenol	1000
D038	Pyridine	1500
D039	Tetrachlorethylene	2500
D040	Trichloroethylene	4000
D041	2,4,5-Trichlorophenol	1000
D042	2,4,6-Trichlorophenol	1000
D043	Vinyl Chloride	500

Unviersal Waste & Transit, Inc.
Permit Number: H029-171163
Revision #1: 09/20/90

Generator Requirements

Universal Waste & Transit will require all generators who intend to use this facility to submit at least the following:

- a completed Universal Waste & Transit Request for Disposal form
- a one ~~quart~~ pint (minimum) sample of any bulk waste (samples are not required for lab packs)
- all required Certification Statements as specified by the RCRA Reauthorization Act (land ban restrictions)

In lieu of the analytical data required on the Universal Waste & Transit Request For Disposal form the generator may submit a Material Safety Data Sheet(s) or analytical data obtained on a representative sample of the waste. The analytical data must be obtained from a DER or HRS certified laboratory. The laboratory must employ approved sampling and analytical techniques (as specified in 40 CFR Part 261, Appendix I. II & III).

On an annual basis all waste stream analytical data must be updated by the generator. This will include re-submission of a representative sample of the waste in question (minimum one ~~quart~~ pint sample volume).

WASTE ANALYSIS PLAN

Since the responsibility for Waste Analysis rests with the generator, no changes in Universal Waste & Transit's Waste Analysis Plan are required.

UW&T will recommend to all generators that a laboratory with TCLP capabilities and one which is certified by DER/HRS be employed for all waste analyses. The list of laboratories having TCLP capabilities and which was disseminated by FDER on August 14 through August 16, 1990, will be available for any waste generator who requests this information from UW&T.

Universal Waste & Transit, Inc.
Permit Number: H039-171163
Revision #1: 09-20-90



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee

To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury
THRU: Victor San Agustin *VSA*
Bill Crawford *W*
FROM: Lynne R. Milanian *lyone 9/6*
DATE: August 30, 1990
SUBJECT: Universal Waste & Transit, Inc.
HO29-171163, FLD 981 937 494

Attached please find documents submitted on August 24, 1990 by the referenced facility which are supplement to the subject permit.

LRM/br

cc: James Scarbrough, EPA Atlanta

T90



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

D. E. R.

August 22, 1990

AUG 24 1990

Ms. Lynn Milanian
Department of Environmental
Regulations
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

SOUTHWEST DISTRICT
TAMPA

RE: Permit #H029 - 171163 - Operation of a Hazardous Waste
Treatment and Container Storage Facility

Dear Ms. Milanian:

Enclosed please find two permit amendments for the Universal Waste
& Transit (UW&T) hazardous waste treatment and storage facility.
Permit Number H029-171163.

As indicated within FAC 17-730-290 (4), we believe these
modifications to fall into the "Class 1" category and therefore
require only departmental action without public notice.

All reference to Pamela Day throughout the permit should be changed
to Sharon M. Roehm, 910 Pinellas Bayway, #102, Tierra Verde,
Florida 33715. The only exception to this will be within Vol.
2, "the Contingency Plan". The primary contact will be Mr. William
Horn, 17701 Rivendel Drive, Lutz, Florida 33549 (813) 949-2307.
The reason for this is due to Mr. Horn's close proximity to the
facility. He can respond to any emergency situation in a shorter
time frame than Ms. Roehm. The following pages will be affected
within Volume 2: 6, 14 and 38 (see enclosed pages).

Also enclosed is a copy of the facility inspection log which was
previously submitted on July 27, 1990.

Unless indicated otherwise by your office, these changes will be
incorporated into our permit and made part of the facility
operating record.

If questions arise, please contact me at your convenience.

Sincerely,

Sharon M. Roehm
Facility Manager

Enclosures

SMR/sjc

690

Headquarters will notify, via mobile telephone or voice pager, the required Universal Waste & Transit personnel for response to the scene. Universal Waste & Transit emergency response vehicles are equipped with necessary cleanup/safety materials and first aid supplies.

After normal working hours contact the following:

Universal Waste & Transit Emergency Coordinators:

William Horn	PRIMARY
17701 Rivendel Drive	
Lutz, FL 33549	
813-949-2307	

Sharon Roehm	ALTERNATE
910 Pinellas Bayway	
Tierra Verde, FL 33715	
813-864-2166	

All Emergency Coordinators have the authority to commit corporate funds during an emergency incident.

COMMUNICATION

The following people must be notified in the event of an emergency involving hazardous waste:

1. PRIMARY Emergency Coordinator

**William Horn
17701 Rivendel Drive
Lutz, FL 33549
813-949-2307**

2. ALTERNATE Emergency Coordinator

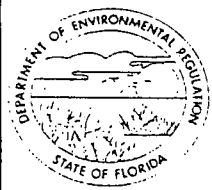
**Sharon M. Roehm
910 Pinellas Bayway
Tierra Verde, FL 33715
813-864-2166**

All other notifications are included in Chapter I.

EMERGENCY WASTE MOVEMENT COORDINATION

In the event of an emergency situation, where the movement of waste materials is required on a short-term basis, the following procedures are to be employed:

1. Contact William Horn at (813) 949-2307
Sharon Roehm at (813) 864-2166
2. Contact all Universal Waste & Transit drivers. All trucks are kept at the site.
3. Contact additional transportation firms if required:
- A.R. Paquette (904) 736-1978
4. All containers would temporarily be held on storage trailers in compliance with the Florida transfer facility regulations.
5. Contact Florida DER, Emergency Response Group, to inform them of the emergency waste movement. The number for Florida DER, Emergency Response is (904) 488-1900. Contact Florida DER District Office in Tampa at 623-5561 and notify them of same.



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

Interoffice Memorandum

TO: Satish Kastury *VSA 8/13*
THRU: Victor San Agustin
Bill Crawford *Dec 8/13/90*
FROM: Lynne R. Milanian *Lynne 8/13*
DATE: August 13, 1990
SUBJECT: Universal Waste & Transit, Inc., FLD 981 932 494
H029-171163 Revised Inspection Log

Attached please find documents submitted on July 31, 1990 by the referenced facility which are supplement to the subject permit.

LRM/ab

cc: James Scarbrough, EPA Atlanta



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

COPY

July 30, 1990

D.E.R.

AUG - 1 1990

SOUTHWEST DISTRICT
TAMPA

Ms. Jan Kleman
Hazardous Waste Management Section
Dept. of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Dear Mr. Kleman:

This is conformation of your telephone conversation with Mr. Jerry Snow of Hillsborough County Solid Waste Department on July 26, 1990.

Per our conversation, the County and Universal Waste & Transit has your consent that the collection of the Hillsborough County Conditionally Exempt Small Quantity Generator hazardous waste may occur at the UW&T facility located at 2002 North Orient Road, Tampa, Florida.

Both Hillsborough County officials and Universal Waste & Transit personnel will be on site at all times. Thank you for your cooperation in this matter.

Sincerely,

Sharon M. Roehm
General Manager

cc: Jerry Snow - Hillsborough County
Lynn Milanian - Tampa, DER ✓

SBR/sjc



UNIVERSAL WASTE & TRANSIT, INC.

2002 N. Orient Rd.
Tampa, Florida 33619
813-623-5302

D. E. R.

July 27, 1990

JUL 31 1990

SOUTHWEST DISTRICT
TAMPA

Ms. Lynn Milanian
Department of Environmental
Regulations
4520 Oak Fair Boulevard
Tampa, FL 33610-7347

RE: Permit #H029 - 171163 - Operation of a Hazardous Waste
Treatment and Container Storage Facility

Dear Ms. Milanian,

In reference to the following two specific conditions:

Part I - General, Item 9

Part II - Container Storage Conditions, Item 5

Universal Waste & Transit would like to submit the enclosed
Facility & Drum Inspection Log. This log, pages 4, 5, 6 & 7 will
replace pages 4, 5 & 6 of Volume 5 under tab 14.

The purpose of this new log is for safe facility operations.

The new log is more specific and will improve both personnel
and environmental safety within Universal Waste & Transit.

Thank you for your review in the matter.

Sincerely,

Sharon M. Roehm
Facility Manager

SMR/tns

UNIVERSAL WASTE & TRANSIT

FACILITY INSPECTION LOG

DATE: _____

TIME: _____

INSPECTOR: _____

APPROVED BY: _____

NORTH BAY 1

- | | | | |
|----|---|-----|----|
| 1. | Sumps are free of liquid? | yes | no |
| 2. | Fire extinguishers are at proper pressure level? | yes | no |
| 3. | Waste drums are secure & not leaking?
(If "no" see attached drum Inspection Log) | yes | no |
| 4. | Spill Control Box contains adequate supplies? | yes | no |
| 5. | Emergency eyewash & shower are operational? | yes | no |
| 6. | Foam tank & pipes in good condition | yes | no |
| 7. | Check for sufficient aisle space | yes | no |
| 8. | Check for telephone/intercom | yes | no |

Record any unusual findings in the lines provided.

SUMP STATUS

North Bay-1

Sump #1_____

Sump #2_____

Center Bay-2

Sump #3_____

South Bay-3

Sump #4_____

Sump #5_____

Truck Well_____

Remedial Action Taken (If Required)

Final Disposal of collected liquids:

Facility-_____

Amount-_____

Manifest-_____

Date-_____

CENTER BAY 2

- | | | | |
|----|---|-----|----|
| 1. | Sump is free of liquid? If no reference | yes | no |
| 2. | Fire Extinguishers are at the proper pressure level? | yes | no |
| 3. | Waste drums are secure and not leaking?
(if "no" see attached Drum inspection log) | yes | no |
| 4. | Spill control box contains adequate supplies | yes | no |
| 5. | Exhaust fans are operating properly | yes | no |
| 6. | LEL Meter sensors need replacement (2 each) | yes | no |
| 7. | Check for sufficient aisle space | yes | no |

SOUTH BAY 3

- | | | | |
|----|---|-----|----|
| 1. | Sumps are free of liquid? | yes | no |
| 2. | Fire Extinguishers are is at proper pressure level? | yes | no |
| 3. | Waste drums are secure & not leaking?
(If "no" see attached Drum Inspection Log) | yes | no |
| 4. | Spill Control Box contains adequate supplies? | yes | no |
| 5. | Emergency eye wash is operational? | yes | no |
| 6. | Compressor is in good condition? | yes | no |
| 7. | Check for sufficient aisle space | yes | no |
| 8. | Is telephone/intercom working? | yes | no |

Record any unusual findings in the lines provided

Return the completed form to the facility manager

Date

Inspectors Name

Universal Waste & Transit Drum Inspection Log

Date: _____

Time: _____

Approved By: _____

Inspector: _____

	17-E 55	17-H 55	Poly 55	Over Pack	17-E 30	17-H 30	37-A 5	Total Gallons
Area 1A/B								
Acids								
Area 1B								
Oxidizers								
Emptys								
Area 2A								
Flammable Liquid								
Flammable Solid								
Reactives								
Aerosols								
Area 3A/B								
ORM-A, B, C, D, E								
Non-Regulated								
Area 3C								
Alkalines								
Poisons								

Grand Total



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

May 24, 1990

H029-171163

A, 26

D.E.R.

MAY 29 1990

SOUTHWEST DISTRICT
TAMPA

Mr. Robert Bedore
President
Universal Waste and Transit, Inc.
7217 Gulf Boulevard, Suite 7
St. Petersburg, Florida 33706

Re: Universal Waste and Transit, Inc., Tampa, Florida
FLD 981 932 494

Dear Mr. Bedore:

I reviewed your financial documents for this permitted hazardous waste facility and found them in compliance with the requirements of 40 CFR 264 Subpart H.

Sincerely,

Lorraine G. Clark

Lorraine G. Clark
Environmental Specialist
Hazardous Waste Regulation

LGC/mh

cc: Alan Farmer, EPA
Bill Crawford, Tampa
Rabin Prusty, Permitting





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

MAY 10 1990

4WD-RCRA

Mr. William Crawford
Florida Department of Environmental
Regulation
Southeast District
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347


RE: Universal Waste and Transit, Inc.,

Dear Mr. Crawford:

We have reviewed the draft Intent to Issue, Public Notice and the Operation of a Hazardous Waste Treatment and Container Storage permit for the Universal Waste and Transit, Inc., Tampa, Florida. The recommended paragraph for Hazardous and Solid Waste Amendments (HSWA) requirements is not included in the cover page of the permit. (Ref. Jan 30, 1990, letter from James Scarbrough, to Barry Swihart).

Please make the necessary changes in the permit to include the recommended paragraph. If you have any questions, please call Mr. Harry Desai at (404) 347-3433.

Sincerely yours,


James H. Scarbrough, P.E., Chief
RCRA & Federal Facilities Branch
Waste Management Division

cc: Satish Kastury, FDER, Tallahassee

H039-171163

A, 2-6

D. E. R.

MAY 14 1990

SOUTHWEST DISTRICT
TAMPA