



Jeb Bush  
Governor

Department of  
Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

October 9, 2006

Robert Strynar  
Branch Operations Manager, Industrial Chemicals  
Univar USA Inc.  
6049 Old Hwy 41A  
Tampa, FL 33619-9796

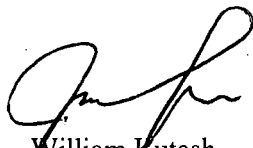
Re: Univar USA Inc.  
FLD 020 985 727, Hillsborough County  
Warning Letter #300020

Dear Mr. Strynar:

A review of the file indicates that the violations cited in the Warning Letter have been corrected. This enforcement action is now closed.

The Department appreciates your continued cooperation. Please direct any questions regarding this letter to Jill A. Seale in the Division of Waste Management at (813) 632-7600 ext 399.

Sincerely,

 EM  
William Kutash  
Administrator, Division of Waste Management  
Southwest District

WK/jas

cc: Kelley Boatwright, Hillsborough County SQG Program  
Compliance File

Memorandum

Florida Department of  
Environmental Protection

SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: William Kutash, Waste Program Administrator

FROM/THROUGH: James Dregne, Hazardous Waste Program Manager *10/2*

Elizabeth Knauss, HW Enforcement Coordinator

Jill A. Seale, Environmental Specialist II

DATE: October 9, 2006

FILE NAME: Univar USA Inc.

PROJECT #: 300020

PROGRAM: Hazardous Waste

COUNTY: HILLSBOROUGH

TYPE OF DOCUMENT: ☒ CASE CLOSED LETTER

DESCRIPTION OF VIOLATIONS:

This is a hazardous waste and used oil transfer facility and a large quantity generator. Facility had two minor violations: failure to mark number of containers on weekly inspection sheets and failure to mark one hazardous waste manifest with manifest number. This facility also reported a discharge from an above ground hypochlorite storage tank, which was released into a secondary containment area.

STATUS OF CORRECTIVE ACTION:

The two RCRA violations were corrected the day of the inspection. However, the Department requested the facility make immediate changes to their current AST/sump system to prevent future releases of hypochlorite. The facility submitted a new Operating Procedures section of their contingency plan titled "Containment and Neutralization of Waste Water" which addresses the issue to the Department's satisfaction.

STATUS OF PENALTY ASSESSMENT:

No penalties have been assessed in this case, as there are only two minor violations which were immediately corrected.


PENALTY:

Amount: 0

Costs & Expenses: 0

Total: 0

Agreed to by Respondent? na

	Operating Procedures Manual	Origination Date: 09-20-06
	Tampa, FL	
		Page 1 of 5
Subject: Containment and Neutralization of Waste Water		
Written By: Robert Strynar		Approved By: Lee Jarrett

*Rec'd by DEP 10/6/06  
via email - JAS*

## 1.0 PURPOSE


Procedures to contain, neutralize, and dispose storm water and rinse water from loading and unloading operations in the tank farm in a manner that does not require a RCRA permit.

## 2.0 OPERATING PREMISE

- 2.0.1 During these processes, a number of pieces of equipment are used, such as hoses, nozzles, valves, pumps, and transfer lines as well as the containers themselves. After these pieces of equipment are used, there will typically be some of the chemical left in them. Residual chemicals that cannot be recovered must be removed from the equipment before the equipment can be used again for another product.
- 2.0.2 With regard to chemical residues that remain after pumping or pouring, since many of the products are water soluble, it is common practice to use a water flush to clean any remaining residue out of the equipment, either by rinsing off (valves, nozzles), flushing through (hoses and transfer lines), or spraying down the sides (tankers, totes and drums). Each of these activities will generate what is commonly called rinse water (a small amount of chemical mixed with a somewhat larger amount of water). The residual rinse water must also be managed in a proper manner.
- 2.0.3 This procedure identifies how storm water and rinse water from the tank farm at Univar's Tampa facility will be contained, collected, neutralized and disposed of.

## 3.0 ELEMENTARY NEUTRALIZATION UNIT REQUIREMENTS

- 3.0.1 A RCRA hazardous waste permit will not have to be obtained for the activities described in this procedure provided the following two criteria are met that apply to an exempt "elementary neutralization unit" as defined in 40 C.F.R. §260.10 and OAC §252:205-3-2(b):
- 3.0.2 Neutralization must occur **only** in the neutralized wastewater tank or sump.
- 3.0.3 Any waste that is placed in the sump or neutralized wastewater tank **must be** non-hazardous or hazardous only for corrosivity (aqueous and  $\text{pH} \leq 2$  or  $\geq 12.5$ ). Unless otherwise approved by the Facility's Operations Manager, **only the following** chemical residues and rinse waters containing such chemicals may be placed in the sump or neutralized wastewater tank.

	Operating Procedures Manual	Origination Date: 09-20-06
	Tampa, FL	
		Page 2 of 5
Subject: Containment and Neutralization of Waste Water		
Written By: Robert Strynar <span style="float: right;">Approved By: Lee Jarrett</span>		

- Sulfuric Acid
- Phosphoric Acid
- Hydrochloric Acid
- Caustic Soda
- Caustic Potash

3.0.4 A base (Caustic) may be added as a neutralizing agent if the pH is low. An acid may be added as a neutralizing agent if the pH is high.


3.0.5 Residues from any other product container or equipment shall not be placed in the sump or neutralized wastewater tank unless specifically approved by the Facility's Operations Manager. Instead, such residues shall be collected in separate containers, and if the waste is hazardous, stored according to the less-than 90-day generator standards at 40 C.F.R. §262.34.

#### 4.0 UNITS AND MATERIALS REQUIRED

- 12,500 gallon polyethylene wastewater tank for receiving chemical residues and rinse waters and conducting neutralization
- Containment sump (approximately 20' wide x 20' long) for containing chemical residues and rinse water from cleaning containers (totes, tanker trucks and drums), hoses, valves, nozzles, pumps and miscellaneous equipment
- Water source
- Hose w/spinner
- Forklift
- Transfer lines
- Pump
- Acids and bases for neutralization

#### 4.1 PRIMARY HAZARDS

- Corrosive burns from contact with product.
- Back strain/sprain from repetitive lifting
- Compatibility


	Operating Procedures Manual	Origination Date: 09-20-06
	Tampa, FL	
		Page 3 of 5
Subject: Containment and Neutralization of Waste Water		
Written By: Robert Strynar <span style="float: right;">Approved By: Lee Jarrett</span>		

## 4.2 PPE (Personal Protective Equipment) REQUIRED

- 4.2.1 Rubber steel toed boots
- 4.2.2 Acid resistant gauntlet gloves.
- 4.2.3 Rain suit when washing (either washing outside of containers or washing inside of container.)
- 4.2.4 Goggles and hardhat w/face shield.

## 5.0 NEUTRALIZING PROCEDURE

- 5.0.1 Prior to shipping material offsite for disposal, thoroughly mix the rinse water in the neutralized wastewater tank by one of two means: air sparge or circulation. Mix the rinse water for at least 15 minutes.
- 5.0.2 Check sample for any sheens, separations, or unusual odors that would signify contamination of products not listed in section 3.0.3 such as chlorine bleach or petroleum solvents.
- 5.0.3 If the presence of chlorine or solvents is detected, **halt the neutralization process** and contact the Operations Manager or Supervisor **immediately**. No treatment will be performed. Hillsborough County will be contacted and arrangements will be made to dispose of the waste water.
- 5.0.4 Take a pH reading of the rinse water using pH paper.
- 5.0.5 If the pH is above 10, check for the presence of chlorine in the waste water. If no chlorine is detected, add an acid to the contents of the rinse water and measure the amount added.
- 5.0.6 If the pH is below 4, add a base (Caustic) to the contents of the rinse water and measure the amount added.
- 5.0.7 Thoroughly mix the rinse water in the neutralized water tank as described in Step 5.0.1.
- 5.0.8 Continue this process of adding base or acid solutions to the rinse water, mixing, etc., until the contents have a pH of between 6 and 9.

	Operating Procedures Manual	Origination Date: 09-20-06
	Tampa, FL	
		Page 4 of 5
Subject: Containment and Neutralization of Waste Water		
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## **6.0 DISPOSAL OF RinSEWATER**

- 6.0.1 Once the rinse water has been neutralized as described in the above procedure, it can then be hauled off and disposed of as a non-hazardous waste water and the Hillsbough County facility as permitted.

## **7.0 TRAINING**

- 7.0.1 Employees responsible for handling chemical residues, rinsing containers and equipment, collecting rinse water, or neutralization of rinse water will be trained in the above procedures upon first assignment to the area, and refresher training shall occur annually thereafter. All training shall be documented.

## **8.0 NEUTRALIZED WASTEWATER TANK**

- 8.0.1 A 12,500-gallon polyethylene tank has been designated as a holding tank for all rinse water and chemical residue that may be handled under this procedure. This tank will be used to collect liquids until full or until a tanker load has been accumulated. Once the tank is full, or a tanker load has been accumulated, the contents will be shipped to an offsite disposal facility as a non-hazardous waste once contents have been neutralized.



# Operating Procedures Manual

Tampa, FL

Origination Date: 09-20-06

Page 5 of 5

Subject: Containment and Neutralization of Waste Water

Written By: Robert Strynar

Approved By: Lee Jarrett

**Seale, Jill**

---

**From:** Robert Strynar [Robert.Strynar@univarusa.com]

**Sent:** Friday, October 06, 2006 9:44 AM

**To:** Seale, Jill

**Cc:** Lee Jarrett; Dennis Thornton

**Subject:** Procedure for Waste Water

Jill,

Here is a copy of the procedure for the containment and Neutralization of waste water. This will be added to appendix D in our contingency plan. Please do not hesitate to contact me with any questions you might have. Also, I would ask that you please send me an e-mail receipt of this message. Thank you.

Robert Strynar  
Operations Manager  
Univar USA Inc.  
Tampa Branch  
813-677-8414 (phone)  
813-671-2920 (fax)  
[www.univarusa.com](http://www.univarusa.com)

10/9/2006



STATE OF FLORIDA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
SOUTHWEST DISTRICT

CONVERSATION RECORD

Date 10/6/06 Subject Univar

Time 8:30 am

County Hillsborough

Bob Strynar Telephone No. (813) 713-4753

Representing Univar

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

Other Individuals Involved in Conversation/Meeting \_\_\_\_\_

Summary of Conversation/Meeting I was returning Bob's voicemail from yesterday. He asked if we needed him to mail is response, or if we would accept an email. I told him an email would be fine, and I gave him my email address. He said they have put together an SOP that will be part of their contingency plan to address the issues in the report, and asked to let him know if Univar needs to address anything else.

Signature Jill A. Seale

Title Environmental Specialist II

7004 1350 0002 5570 3811

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09/14/06

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MR. ROBERT STRYNAR  
 BRANCH OPERATIONS MANAGER  
 UNIVAR USA, INC.  
 6049 OLD HWY 41 A  
 TAMPA, FL 33619-9706

Sent To  
 Street, Apt. No.,  
 or PO Box No.  
 City, State, ZIP+

PS Form 3800, June 2002

See Reverse for Instructions

**SENDER:**

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- 1. ☐ Addressee's Address
- 2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

4a. Article Number

7004 1350 0002 5570 3811

MR. ROBERT STRYNAR  
 BRANCH OPERATIONS MANAGER  
 UNIVAR USA, INC.  
 6049 OLD HWY 41 A  
 TAMPA, FL 33619-9706

4b. Service Type

- ☐ Registered ☒ Certified
- ☐ Express Mail ☐ Insured
- ☒ Return Receipt for Merchandise ☐ COD

7. Date of Delivery

9-15-06

5. Received By: (Print Name)

Nancy Dello Byronu

6. Signature: (Addressee or Agent)

\*Nancy Dello Byronu

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

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TAMPA FL 336

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• Print your name, address, and ZIP Code in this box.

State of Florida  
Department of Environmental Protection  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

SEP 18 2006  
Southwest District  
Protection

*Jill Seale*

*Waste Mgt*

026 R073



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

September 14, 2006

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Robert Strynar  
Branch Operations Manager, Industrial Chemicals  
Univar USA Inc.  
6049 Old Hwy 41A  
Tampa, FL 33619-9796

Re: Univar USA Inc.  
FLD 020 985 727, Hillsborough County  
Warning Letter #300020

Dear Mr. Strynar:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste and used oil program field inspection conducted on August 15, 2006, indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. Section 10 of the report lists a summary of alleged violations of Department Rules.

Sections 403.161 and 403.727, Florida Statutes (F.S.) provides that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

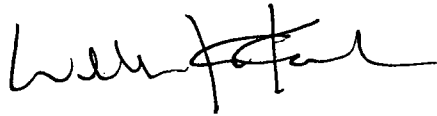
**You are requested to respond in writing within thirty (30) days with the requested documentation.** Please see Section 11 of the inspection report for a list of requested corrective actions. Alternatively, you may contact Jill A. Seale at (813) 632-7600, extension 399, within fifteen (15) days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter. You may also request a meeting to discuss the recommended corrective actions or negotiate a compliance schedule.


"More Protection, Less Process"

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Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. If you fail to respond and document a return to compliance within 90 days, under the Department's agreement with the United States Environmental Protection Agency (EPA), you may be designated as significantly out of compliance. This could result in issuance of a formal administrative complaint and assessment of civil penalties if the case is not resolved within 180 days of the date of the inspection. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely,



 J. M. Farley  
Interim District Director  
Southwest District

JMF/jas

Attachment

cc: Kelley Boatwright, Hillsborough County SQG Program  
Compliance File



Jeb Bush  
Governor

# Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926  
Telephone: 813-632-7600

Colleen M. Castille  
Secretary

## HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-Arranged

FACILITY NAME Univar USA Inc. EPA ID # FLD 020 985 727

STREET ADDRESS 6049 Old 41 A Highway, Tampa, FL 33619

COUNTY Hillsborough PHONE (813) 677-8414 DATE 8/15/06 TIME 10:00 am

NOTIFIED AS: ☐ N/A

### CURRENT STATUS:

- ☐ Non Handler  
☐ CESQG (<100 kg/mo.)  
☐ SQG (100-1000 kg/mo.)  
☒ Generator (>1000 kg/mo.)  
☒ Transporter  
☒ Transfer Facility  
☐ Interim Status TSD Facility  
☐ TSD Facility  
Unit Type(s):  
☐ Exempt Treatment Facility  
☒ Used Oil: Transporter/Transfer

- ☐ Non Handler  
☐ CESQG (<100 kg/mo.)  
☐ SQG (100-1000 kg/mo.)  
☒ Generator (>1000 kg/mo.)  
☒ Transporter  
☒ Transfer Facility  
☐ Interim Status TSD Facility  
☐ TSD Facility  
Unit Type(s):  
☐ Exempt Treatment Facility  
☒ Used Oil: Transporter/Transfer

### 2. APPLICABLE REGULATIONS:

- |  |   |   |   |
|--|---|---|---|
| <input checked="" type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262  | <input checked="" type="checkbox"/> 40 CFR 263  | <input type="checkbox"/> 40 CFR 264             |
| <input checked="" type="checkbox"/> 40 CFR 265   | <input type="checkbox"/> 40 CFR 266             | <input type="checkbox"/> 40 CFR 268             | <input checked="" type="checkbox"/> 40 CFR 273  |
| <input checked="" type="checkbox"/> 40 CFR 279   | <input checked="" type="checkbox"/> 62-710, FAC | <input checked="" type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

### 3. RESPONSIBLE OFFICIAL(s):

Robert Strynar, Branch Operations Manager, Industrial Chemicals

### 4. INSPECTION PARTICIPANTS:

Robert Strynar, Branch Operations Manager, Industrial Chemicals

Jill A. Seale, FDEP

5. LATITUDE/LONGITUDE: 27°58'50.3" 82°23'18.0"

6. SIC Code: 5169, 4212, 4213, 4214

7. TYPE OF OWNERSHIP: Private Federal State County Municipal

8. PERMIT: no RCRA permit

"More Protection, Less Process"

Printed on recycled paper.

## **9. PROCESS DESCRIPTION:**

Univar USA Inc. (Univar) was inspected August 15, 2006, to evaluate the facility's compliance with state and federal hazardous waste regulations. Robert Strynar, Univar's Branch Operations Manager of Industrial Chemicals, accompanied the inspector throughout the inspection. The Department's Hazardous Waste Section previously inspected this facility in May 2004 and March 2002.

Univar is a break-bulk chemical company, who specializes in purchasing product chemicals in bulk, and then repackaging them into drums or other containers prior to distributing the products to customers. This facility is a hazardous waste transfer facility, and hazardous waste is transported under Univar's Georgia EPA ID number. This facility also periodically generates hazardous waste from line flushes or damaged/off-spec chemicals, and is often a large quantity generator. All of Univar's registrations and certifications appear to be up-to-date with the Department.

There have been no significant changes to Univar's process or equipment since the Department's May 2004 inspection.

### **TRANSFER FACILITY**

At the time of the inspection, nine drums of hazardous waste, twenty-two drums of non-hazardous waste, and two containers of universal waste were being stored in the designated waste transfer area. All containers were appropriately labeled, had the appropriate amount of aisle space, and the area was well organized and well marked with signage. The ten day transfer facility storage limit is monitored by the waste coordinator in the office. A spot check of hazardous waste manifests showed no exceedances of the ten day storage limit.

Mr. Strynar stated that hazardous waste generated on-site is also stored in the transfer area prior to transport, but at the time of the inspection, no hazardous waste generated by Univar was on-site.

A running log is printed daily that meets the requirements of 62-732.171(2)(e) FAC. Note that 62-737.171(c) requires all records to be maintained in permanent form and to be available for inspection by the Department, and must be kept at the facility.

### **BLEACH SPILL/WASTE WATER TANKS**

On July 27, 2006, Univar reported an incident to the State Warning Point, and that incident was discussed during the inspection. Univar leases property to DPC Enterprises, a bulk distributor of chlorine and hypochlorite, who occupies a warehouse and outdoor storage area of Univar's parking lot. DPC's hypochlorite ASTs are a few feet away from Univar's wastewater secondary containment sump for Univar's wastewater ASTs. The hypochlorite ASTs somehow discharged a significant amount of hypochlorite into Univar's secondary containment sump.

When Univar analyzed the pH of their wastewater in preparation for transporting it to the City of Tampa for disposal, the pH was 12, and Univar then attempted to neutralize the wastewater with acid. This neutralization attempt caused a gas-generating reaction. Univar later discovered the hypochlorite discharge. It appears that Univar correctly disposed of the wastewater with the City of Tampa, and has disposal receipts for this wastewater.

This incident is of major concern to the Department. The Department requests that Univar take immediate steps to assure this situation will not occur in the future. Submit a detailed explanation that

documents what changes have been made to the AST and sump systems that will prevent future incidents to the Department.

Univar's Contingency Plan should be updated to address actions to be taken when the wastewater in the containment area is discovered to have an unusually high pH. Extreme high or low pH readings of the wastewater is apparently indicative of a possible discharge at this facility, and contingencies must be in place to address employee actions and to address safe guards that will be activated prior to attempting to neutralize the wastewater in the future.

## **OTHER**

One 55-gallon drum stored near the totes in the drum fill room was marked with only a small, hand written label that read "Line Flush Solvent." Mr. Strynar, after investigating the contents of this drum, stated that it contained only non-RCRA line flush material, and that it was not a waste, as it can be reused. This drum was stored with other drums that contain product. The Department requests that a more explanatory label be placed on this drum to avoid confusion, and that if it is not a waste, that the label clearly indicate it is a product.

## **RECORDS**

Training records and the contingency plan were reviewed and no discrepancies were noted. A Closure Plan is maintained on-site in accordance with 62-730.171(2)(b) FAC. One hazardous waste manifest for the disposal of hazardous waste generated by Univar did not have a manifest number in Box 1, in violation of **40 CFR 262.20(a)**. On August 15, 2006, Univar submitted a copy of the corrected manifest with the manifest number 64607.

Weekly inspections of hazardous waste containers were being performed and are well documented. However, at the time of the inspection, the number of hazardous waste storage containers was not being documented weekly, in violation of **Florida Administrative Code 62-737.160(6)**. On August 15, 2006, Univar submitted a revised inspection log that includes an area to document the number of hazardous waste storage containers.

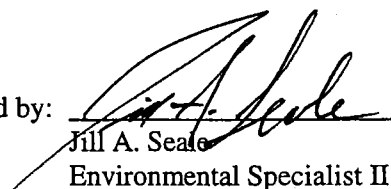
## **10. SUMMARY OF ALLEGED VIOLATIONS:**

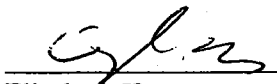
- |                   |  |
|-------------------|--|
| 40 CFR 262.20(a)  | Failure to include the manifest number on one hazardous waste manifest, dated 4/26/06. <i>corrected, manifest #64607</i> |
| 62-737.160(6) FAC | Failure to include number of hazardous waste containers on weekly inspection sheet. <i>corrected</i>                     |

## **11. REQUESTED ACTIONS:**

Within 30 days of receipt of this report, submit a detailed explanation that documents what changes have been made to the hypochlorite and wastewater AST and sump systems that will prevent future hypochlorite releases. Include a copy of Univar's updated Contingency Plan, which outlines what contingencies are in place that will be activated when extreme pH levels of Univar's wastewater are discovered. The Department will review Univar's submittals and provide comments if necessary.



Report prepared by:  Date 9/6/06  
Jill A. Seale  
Environmental Specialist II

Approved by:  Date 9/13/06  
Elizabeth Knauss  
Environmental Manager

## GENERATOR CHECKLIST

Facility Name: UNIVAR Date: 8/15/06  
 Facility Representative: R. STRYNAR Facility ID #: FLD 020 985 727  
 SIC Codes: \_\_\_\_\_ Inspectors: SEALE

### 40 CFR 262 Subpart A -- General Standards

1. Describe the facility's hazardous waste streams:

WASTE DESCRIPTION	EPA Waste Codes	Generation Rate	Disposal Facility and EPA ID	Correct ID?	Testing or Process Knowledge
NaOH Waste Flam.	D002 D001	Varies	POLL. CONTROL	Yes	
			TND 000 772 186		
Dichloromethane Hypochlorite Soln	U080 D002				

(describe discrepancies in waste identification in narrative)

2. Has the facility obtained an EPA ID number? (40 CFR 262.12) Y X N \_\_\_\_\_
3. Is the facility disposing of all its hazardous wastes to facilities permitted to accept the waste? Y X N \_\_\_\_\_
4. Are any hazardous wastes treated or disposed of on site?  
Describe in narrative. Y X N \_\_\_\_\_
5. Is the facility exempt from hazardous waste permit requirements?  
Describe in narrative. Y \_\_\_\_\_ N \_\_\_\_\_
5. Are hazardous wastes with more than 500 ppm by weight volatile organics recycled on site? Y \_\_\_\_\_ N X \_\_\_\_\_  
 If so, complete 265 Subparts AA and BB standards for process equipment checklists.

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

#### 40 CFR 262 Subpart B -- The Manifest

1. Does the facility use a manifest for all its hazardous wastes? (262.20) Y X N \_\_\_\_\_
2. Is the facility using the correct form (EPA 8700-22; OMB #2050-0039)? Y X N \_\_\_\_\_
3. Does the facility ship by rail or water? (If so, check 262.23(c)) Y \_\_\_\_\_ N X
4. Is the manifest filled out properly? Y \_\_\_\_\_ N X

#### Manifest Line Item No.:

1. -Generator EPA ID # Y X N \_\_\_\_\_  
-5 digit manifest document # Y \_\_\_\_\_ N X
3. -Generator name and mailing address Y X N \_\_\_\_\_
4. -Generator phone # Y X N \_\_\_\_\_
- 5-8. -Transporter names and ID #s Y X N \_\_\_\_\_
- D-F. -Transporter phone # (state requirement) Y X N \_\_\_\_\_
9. -TSD name and mailing address Y X N \_\_\_\_\_
10. -TSD # EPA ID # Y X N \_\_\_\_\_
- H. -TSD Phone # (state requirement) Y X N \_\_\_\_\_
11. -DOT description of the waste, including hazard class, ID #  
and packaging group Y X N \_\_\_\_\_
12. -Container # and type Y X N \_\_\_\_\_
- 13-14. -Quantity of waste and units Y X N \_\_\_\_\_
- I. -EPA waste code (state requirement) Y X N \_\_\_\_\_
- K. -Handling codes (state requirement) Y X N \_\_\_\_\_
16. -Name, handwritten signature of generator and date Y X N \_\_\_\_\_
- 17-18. -Name, handwritten signature of transporter and date Y X N \_\_\_\_\_
19. -Are any manifest discrepancies noted? Y X N \_\_\_\_\_
20. -Name, handwritten signature of TSD and date Y X N \_\_\_\_\_

Number of manifests examined 15  
Number of errors 1

Note manifest document numbers and dates of manifests with errors below:

Manifest #	Date	Destination	Error(s)
UNKNOWN	4/26/06		NO MANIFEST # IN
(#64607)			BOX ONE

5. Have any exception reports been filed? (262.42) Y \_\_\_\_\_ N X  
If so, did exception reports include legible copy of manifest and cover letter? Y \_\_\_\_\_ N X
6. Are manifests retained for 3 years? Y X N \_\_\_\_\_

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

#### 40 CFR 262 Subpart C -- Pre Transport Requirements

1. Does the facility accumulate the waste on-site prior to treatment or disposal? Y X N \_\_\_\_\_

Circle applicable accumulation units:

Containers Tanks Drip Pads Containment Buildings  
Waste Water tanks

2. Are containers used to ship the waste off-site? Y X N \_\_\_\_\_

3. Are any containers on-site prepared for shipment? Y \_\_\_\_\_ N X

a. If so, are the containers appropriate for the waste? (262.30) Y \_\_\_\_\_ N \_\_\_\_\_

b. Are the correct diamond-shaped DOT hazard class container labels used? (262.31) Y \_\_\_\_\_ N \_\_\_\_\_

c. Are containers of 110 g or less marked with the correct DOT shipping name and number? Y \_\_\_\_\_ N \_\_\_\_\_

Is a label with the language required under 262.32(b) used? Y \_\_\_\_\_ N \_\_\_\_\_

Is the generator's name, address and manifest document number on the label? Y \_\_\_\_\_ N \_\_\_\_\_

d. Are placards available to be provided to the transporter? (262.33) Y \_\_\_\_\_ N \_\_\_\_\_

e. Are bulk packagings used (over 400 kg solid or 118 g liquid)? Y \_\_\_\_\_ N \_\_\_\_\_

f. Are they marked and placarded properly? Y \_\_\_\_\_ N ✓

#### 40 CFR 262 Subpart C -- Accumulation Requirements

1. Does the facility comply with the 90-day accumulation time limit? Y X N \_\_\_\_\_

(262.34(a)) (Complete tank, container and/or drip pad checklists for units accumulating waste.)

2. If not, has the facility been issued an extension by the Department? (262.34(b)) Y \_\_\_\_\_ N NA X

3. Is each container marked with the beginning date of accumulation? (262.34(a)(2)) Y X N \_\_\_\_\_

4. Is each container and tank marked with the words "Hazardous Waste"? (262.34(a)(3)) Y X N \_\_\_\_\_

5. Are satellite accumulation points used? Describe in narrative. Y X N NA

6. Are satellite containers closed ((262.34(c)) and marked with the words "hazardous waste" or other words that describe the contents? Y X N \_\_\_\_\_

7. Do satellite accumulation points hold 55 gallons of waste or less? Y X N \_\_\_\_\_

8. If not, is the excess marked with the date the excess waste began accumulating? (The date must be within 3 days of the date of inspection (262.34(c)(2)) Y \_\_\_\_\_ N NA X

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

**40 CFR 262 Subpart C -- Personnel Training -- (265.16)**

1. Do facility personnel complete hazardous waste training?  
Comments: Y X N \_\_\_\_\_
2. Is the trainer adequately trained in hazardous waste management procedures? Y X N \_\_\_\_\_
3. Does the training cover safety? Y X N \_\_\_\_\_
4. Does the training cover emergency response procedures, including equipment handling and inspection? Y X N \_\_\_\_\_
5. Does the training cover hazardous waste identification and handling procedures? Y X N \_\_\_\_\_
6. Does the facility maintain personnel training records? Y X N \_\_\_\_\_
7. Does the facility maintain job titles and position descriptions for employees managing hazardous waste? Y X N \_\_\_\_\_
8. Do the job descriptions include the requisite skills, education and experience? Y X N \_\_\_\_\_
9. Do the job descriptions include a list of the positions' duties? Y X N \_\_\_\_\_
10. Are people trained within 6 months of hiring? Y X N \_\_\_\_\_
11. Do they work unsupervised prior to training? Y \_\_\_\_\_ N X
12. Is training reviewed annually? Date of last training 2006 Y X N \_\_\_\_\_
13. Are records maintained for three years? Y X N \_\_\_\_\_

**265 Subpart C -- Preparedness and Prevention**

1. Is there evidence of a fire, explosion or release of hazardous waste or hazardous waste constituents to the environment? (265.31) Y \_\_\_\_\_ N X
2. Does the facility have an internal communication or alarm system? (265.32(a)) Y X N \_\_\_\_\_
3. Is there a telephone, alarm, 2-way radio or other device at the scene of operations immediately available and capable of summoning assistance? (265.32(b)) Y X N \_\_\_\_\_
4. Describe fire control equipment. Is it adequate? (265.32(c)) Y X N \_\_\_\_\_  
*Fire Ext: Pye Barker Dec 2005, and monthly in-house*
5. Is spill control and decontamination equipment present? (265.32(c)) Y X N \_\_\_\_\_

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure? (265.32(d)) Y \_\_\_\_\_ N \_\_\_\_\_

7. Is the emergency equipment inspected and tested periodically? Y X N \_\_\_\_\_  
Frequency? Fire Ext: monthly

8. Is there adequate aisle space to allow unobstructed movement of facility personnel and emergency equipment to any area of the facility where needed? (265.35) Y X N \_\_\_\_\_

9. Has the facility made emergency response arrangements with the following: (265.37)

Fire Department: _____	Y <u>X</u> N _____
Police: _____	Y <u>X</u> N _____
Hospital: _____	Y <u>X</u> N _____
Emergency Response Contractor: _____	Y <u>X</u> N _____

10. If not, has the facility attempted to do so and is the refusal documented? Y \_\_\_\_\_ N A X

#### 265 Subpart D -- Contingency Plans and Emergency Response

1. Does the facility have a contingency plan? 265.51) Y X N \_\_\_\_\_

2. Is it at the facility and easily available? (265.53) Y X N \_\_\_\_\_

3. Does the plan include:		
Fire Response Procedure:	N/A _____	Y <u>X</u> N _____
Spill Response Procedures:	N/A _____	Y <u>X</u> N _____
Explosion Response Procedures:	N/A _____	Y <u>X</u> N _____
A description of arrangements with local authorities:	N/A _____	Y <u>X</u> N _____
Emergency Coordinators: (Name) <u>Robert Strynar</u>		Y <u>X</u> N _____
Addresses and telephone numbers of Emergency Coordinators:		Y <u>X</u> N _____
Emergency equipment list:		Y <u>X</u> N _____
Specifications and capabilities of emergency equipment:		Y <u>X</u> N _____
Locations of emergency equipment:		Y <u>X</u> N _____
An evacuation plan and routes:		Y <u>X</u> N _____
Evacuation/alarm signals:		Y <u>X</u> N _____

4. Is the plan up to date, with no changes to the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? Phone # change needed Y \_\_\_\_\_ N X

5. Has the plan been distributed to the local police, fire department, ERT and hospital? Circle omitted authorities. (265.53) Y X N \_\_\_\_\_

6. Is the emergency coordinator authorized to commit funds for incident response? Y X N \_\_\_\_\_

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

#### 40 CFR 262 Subpart D -- Record keeping and Reporting

1. Is the generator keeping the following records:

Biennial Reports (262.41)  
Exception reports (262.42)  
Test Results:

N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_  
N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_  
N/A \_\_\_\_\_ Y \_\_\_\_\_ N \_\_\_\_\_

2. Where are records kept? Robert Stynar's Office
3. Who is in charge of keeping records? Name Robert Stynar  
Title Manager
4. Any additional reporting, such as contingency plan implementation reports? (262.43) NA X Y \_\_\_\_\_ N \_\_\_\_\_
5. Are records kept for a minimum of 3 years? Y X N \_\_\_\_\_

#### 40 CFR 262 Subpart E -- Exports N/A X

1. Has the facility exported any hazardous waste? Y \_\_\_\_\_ N \_\_\_\_\_
2. Has the exporter notified EPA 60 days prior to the initial shipment? Y \_\_\_\_\_ N \_\_\_\_\_
3. Has the receiving country consented to receive the waste? Y \_\_\_\_\_ N \_\_\_\_\_
4. Has a copy of the EPA Acknowledgment of Consent accompanied the shipment? Y \_\_\_\_\_ N \_\_\_\_\_
5. Did the shipment conform, and was the manifest completed as required by 40 CFR 262.54? Y \_\_\_\_\_ N \_\_\_\_\_
6. Has the exporter received confirmation of delivered shipment? Y \_\_\_\_\_ N \_\_\_\_\_
7. Has the exporter submitted an annual report to EPA? Y \_\_\_\_\_ N \_\_\_\_\_
8. Are all records kept a minimum of three years? (262.57) Y \_\_\_\_\_ N \_\_\_\_\_

#### 40 CFR 262 Subpart F -- Imports N/A X

1. Has the facility imported any hazardous waste? Y \_\_\_\_\_ N \_\_\_\_\_
2. Has the manifest been completed per 262.60(b)? Y \_\_\_\_\_ N \_\_\_\_\_

Facility: \_\_\_\_\_  
Date: \_\_\_\_\_

#### 40 CFR Part 265 Subpart I - Use and Management of Containers

1. Are the containers in good condition (265.171)?  
(Check for leaks, corrosion, bulges, etc.) Yes X No \_\_\_\_
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Yes \_\_\_\_ No \_\_\_\_
3. Is the waste compatible with the containers and/or its liner (265.172)? Yes X No \_\_\_\_
4. Are the containers closed except when adding or removing wastes (265.173(a))? Yes X No \_\_\_\_
5. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (265.173(b))? Yes \_\_\_\_ No X
6. Are each of the containers inspected at least weekly? (265.174) Yes X No \_\_\_\_  
Are records kept including: (62-730.160 (6) F.A.C.)  
Date? Yes X No \_\_\_\_  
Time? Yes X No \_\_\_\_  
Legibly written name of the inspector? Yes X No \_\_\_\_  
Number of Containers? Yes \_\_\_\_ No X  
Condition of containers? Yes X No \_\_\_\_  
Notes of observations made? Yes X No \_\_\_\_  
Date and nature of repairs or corrective actions? Yes X No \_\_\_\_
7. Are ignitable and reactive wastes stored at least 50 feet from the property boundary? (265.176) Yes X No \_\_\_\_
8. Are incompatible wastes stored in the same containers? Yes \_\_\_\_ No X
9. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? (265.35) Yes X No \_\_\_\_
10. Is there sufficient aisle space allow to allow full inspection of the containers and labels? (62-730.160(7) F.A.C.) Yes X No \_\_\_\_

#### 265 Subpart CC

1. Do containers hold waste with more than 500 ppm by weight of volatile organic compounds? Yes \_\_\_\_ No \_\_\_\_  
If so, are the containers either < 26 gallons, satellite containers or kept sealed in appropriate DOT specification containers? Yes \_\_\_\_ No \_\_\_\_  
If not, does the facility comply with 265 Subpart CC emissions controls and monitoring? Yes \_\_\_\_ No \_\_\_\_
2. Which types of containers are on site? (Describe Level 2 and 3 controls in narrative.)  
Level 1 Containers ( 26.4 g to 121.4 g or > 121.4 g not in light material service) \_\_\_\_  
Level 2 Containers ( > 121.4 g in light material service) \_\_\_\_  
Level 3 Containers ( >26.4 g used for waste treatment by stabilization) \_\_\_\_



EPA ID #: \_\_\_\_\_  
Date: \_\_\_\_\_

## TRANSPORTERS CHECKLIST

1. Site Name: \_\_\_\_\_  
Location where records are maintained: \_\_\_\_\_

### Transporter Requirements (40 CFR 263)

- |   |                  |
|---|------------------|
| 1. Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500)             | Y _____ NA _____ |
| 2. Does transporter have an EPA identification number? (263.11(a))  | Y _____ N _____  |
| 3. Does the transporter use the manifest system as required by 263.20?<br>Do the manifests contain at least:    | Y _____ N _____  |
| a. Name, address, and EPA ID of transporter?  | Y _____ N _____  |
| b. Name, address, and EPA ID code of generator?   | Y _____ N _____  |
| c. Name, address, identification code of designated permitted facility?   | Y _____ N _____  |
| d. Corresponding manifest document number?  | Y _____ N _____  |
| e. Description and quantity of each hazardous waste?  | Y _____ N _____  |
| f. Signature of subsequent transporters?  | Y _____ N _____  |
| g. Signatures signifying proper delivery or reasons why delivery could not be certified?                        | Y _____ N _____  |
| h. EPA waste codes?   | Y _____ N _____  |
| 4. International shipments: (Exports - 263.20(g))   | NA _____         |
| a. Are records kept of the dates waste left the U.S.?   | Y _____ N _____  |
| b. Presence of one signed manifest copy in the transporter's records?   | Y _____ N _____  |
| c. Is a signed copy of the manifest returned to the generator?  | Y _____ N _____  |
| d. Is a copy of the manifest given to a U.S. Customs official at the point of departure from the United States? | Y _____ N _____  |
| 5. Tolling Agreements for SQG waste: _____ N/A  |                  |
| a. Is all waste transported by tolling agreements generated by SQGs?  | Y _____ N _____  |
| b. Is following information recorded on a shipping paper:<br>Name, address, and EPA ID of waste generator       | Y _____ N _____  |
| Quantity of waste accepted  | Y _____ N _____  |
| DOT - required shipping info  | Y _____ N _____  |
| Date waste is accepted  | Y _____ N _____  |
| c. Does transporter carry this shipping paper during transport?   | Y _____ N _____  |
| d. Are records maintained for three years after termination or expiration of reclamation agreement?             | Y _____ N _____  |
| 6. Are copies of the manifest retained for 3 years? (263.22)  | Y _____ N _____  |
| 7. Is there evidence of discharge of hazardous waste? (263.30)  | Y _____ N _____  |

DOESN'T  
TRANSPORT  
UNDER  
THIS EPA  
ID#

8. Has transporter demonstrated the financial responsibility required under 62-730.170(2) Y \_\_\_\_\_ N \_\_\_\_\_
9. Does the transporter verify financial responsibility with the Department annually (62-730.170(3))? Y \_\_\_\_\_ N \_\_\_\_\_
10. Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)? Y \_\_\_\_\_ N \_\_\_\_\_  
If yes, complete the Generator checklist.

**Transfer Facility Requirements (62-730.171)**

1. Does transporter comply with 10 day storage limit for transfer facilities? (263.12) Y ☒ N \_\_\_\_\_
- a.. Is the hazardous waste packaged according to 262.30? (263.12) Y ☒ N \_\_\_\_\_
2. Has the facility notified the department on Form 62-730.900(6) (Transfer facility notification form)? (62-730.171(3)) Y ☒ N \_\_\_\_\_
3. Does the transfer facility have an EPA/DER ID number? Y ☒ N \_\_\_\_\_
4. Is a written log maintained for all waste entering or leaving the transfer facility? (62-730.171(2)(e)) Y ☒ N \_\_\_\_\_
- Does the log contain:
- |  |   |
|--|---|
| Generators' names?                           | Y <input checked="" type="checkbox"/> N _____ |
| Manifest numbers?                            | Y <input checked="" type="checkbox"/> N _____ |
| Dates when waste enters and leaves facility? | Y <input checked="" type="checkbox"/> N _____ |
5. Does facility have a written closure plan satisfying requirements of closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112(c), 265.114, 265.115? (62-730.171(2)(b)) Y ☒ N \_\_\_\_\_
- Has the facility supplied DEP with a copy of the plan? Y ☒ N \_\_\_\_\_

General Facility Standards (265 Subpart B, adopted by reference in 62-730.171)

1,500 yds from hospital, prison, school, nursing home facility, day care facility, stadium, place of assembled worship, or any other similar site

1,000 yd from any residence

Evacuation route (egress) must not fall within 1,000 yds of site boundary

1. Security (265.14)
- (a) Is the facility security system adequate to minimize unauthorized entry? Y ☒ N \_\_\_\_\_
- (b) Are signs posted and legible for 25 feet? Y ☒ N \_\_\_\_\_
2. Inspection Requirements (265.15)
- (a) Does the facility have a copy of the Inspection Plan? Y ☒ N \_\_\_\_\_
- (b) Does the facility have completed inspection logs? Y ☒ N \_\_\_\_\_
- (c) Were the deficiencies corrected in a timely manner? Y ☒ N \_\_\_\_\_
- (d) Are the inspection logs maintained at the facility for 3 years? Y ☒ N \_\_\_\_\_

3. Personnel Training (265.16)

- (a) Do management personnel complete hazardous waste training? Y X N \_\_\_\_\_  
Do laborers who handle hazardous waste complete training? Y X N \_\_\_\_\_  
Is training on the job? \_\_\_\_\_ in the classroom? \_\_\_\_\_ both? X
- (b) Does training include:  
Emergency response procedures? Y X N \_\_\_\_\_  
Inspection procedures? Y X N \_\_\_\_\_  
Operation of hazardous waste handling equipment? Y X N \_\_\_\_\_
- (c) How often is training reviewed? ANNUALLY
- (d) Does the facility have personnel training records including:  
Job title and description of position? Y X N \_\_\_\_\_  
Description of employee's training Y X N \_\_\_\_\_
- (e) Is training successfully completed within 6 months of hiring/  
transfer to HW position? Y X N \_\_\_\_\_
- (f) Are records maintained for three years at the facility? Y X N \_\_\_\_\_

4. Ignitable, Reactive, or Incompatible Waste (265.17)

- (a) Is the waste separated and confined from sources of ignition or  
reaction, sparks, spontaneous ignition, and radiant heat? Y \_\_\_\_\_ N \_\_\_\_\_
- (b) Are "No Smoking" signs posted in the area? Y \_\_\_\_\_ N \_\_\_\_\_

Preparedness and Prevention (265 Subpart C adopted by reference in 62-730.171)

1. Is there evidence of fire, explosion or contamination of the  
environment? (265.31 Maintenance and Operation of Facility) Y \_\_\_\_\_ N X
- If yes, use narrative explanation.
2. Is the facility equipped with (265.32 - required equipment):
- (a) Internal communications or alarm system? Y X N \_\_\_\_\_  
Is it easily accessible in case of emergency? Y X N \_\_\_\_\_
- (b) Telephone or two-way radio to call emergency response personnel? Y X N \_\_\_\_\_
- (c) Portable fire extinguishers, fire control equipment, spill control  
equipment and decontamination equipment? Y X N \_\_\_\_\_  
Is this equipment tested to assure its proper operation? Y X N \_\_\_\_\_  
How frequently? ANNUALLY AND MONTHLY
- (d) Water of adequate volume for hoses, sprinklers or water spray system? Y \_\_\_\_\_ N \_\_\_\_\_
- (1) Describe source of water. \_\_\_\_\_
- (2) Indicate flow rate and/or pressure and storage capacity, if applicable. \_\_\_\_\_
3. Is there sufficient aisle space to allow unobstructed movement of personnel and  
equipment? (e.g., adequate aisle space in between barrels to check for leakage,  
corrosion and proper labeling, etc.) (265.35 -Required Aisle Space) Y X N \_\_\_\_\_

4. Has the facility made emergency response arrangements with the following: (265.37)

Fire Department: _____	Y _____ N _____
Police: _____	Y _____ N _____
Hospital: _____	Y _____ N _____
Emergency Response Contractor: _____	Y _____ N _____

If NA, explain \_\_\_\_\_

5. If not, has the facility attempted to do so and is the refusal documented?

6. Does the owner/operator have phone number of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements with Local Authorities)

Are they readily available to the emergency coordinator?

SEE LOG CHECK LIST

Contingency Plan and Emergency Procedures (265 Subpart D adopted by reference in 62-730.171)

- |   |                 |
|---|-----------------|
| 1. Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)                                       | Y _____ N _____ |
| 2. Is it maintained at the facility? (265.53 - Copies of Contingency Plan)  | Y _____ N _____ |
| 3. Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan)   | Y _____ N _____ |
| (a) Does the plan include:  |                 |
| (1) Action personnel will take?   | Y _____ N _____ |
| (2) Evacuation routes?  | Y _____ N _____ |
| (3) Emergency Equipment?  | Y _____ N _____ |
| (4) Is the emergency equipment properly inspected and maintained?   | Y _____ N _____ |
| 4. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator)     | Y _____ N _____ |
| 5. Who is the emergency coordinator? _____  |                 |
| 6. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Plan) | Y _____ N _____ |
| 7. Has the facility supplied DEP with a copy of the Contingency Plan? (62-730.171(2)(a)).   | Y _____ N _____ |

SEE LQG  
CHECKLIST

Container Management (see 62-730.171(2)(a))

1. Is hazardous waste that is stored in containers or vehicles stored on a man made surface which is capable of preventing spills or releases to the ground? (62-730.171(2)(d)) Y \_\_\_\_\_ N \_\_\_\_\_
2. Are the containers in good condition (265.171)?  
(Check for leaks, corrosion, bulges, etc.) Yes \_\_\_\_\_ No \_\_\_\_\_
3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Yes \_\_\_\_\_ No \_\_\_\_\_
4. Is the waste compatible with the containers and/or its liner (265.172)? Yes \_\_\_\_\_ No \_\_\_\_\_
5. Are the containers kept closed except when adding or removing wastes (265.173(a))? Yes \_\_\_\_\_ No \_\_\_\_\_
6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak (265.173(b))? If Yes, explain using narrative. Yes \_\_\_\_\_ No \_\_\_\_\_
7. Are each of the containers inspected at least weekly? (265.174)? Yes \_\_\_\_\_ No \_\_\_\_\_

Are records kept including: (62-730.160 (6) F.A.C.)

Date of inspection?	Yes _____ No _____
Time of inspection?	Yes _____ No _____
Legibly printed name of the inspector?	Yes _____ No _____
Number of Containers?	Yes _____ No _____
Condition of containers?	Yes _____ No _____
Notes of observations made?	Yes _____ No _____
Date and nature of any repairs or corrective actions?	Yes _____ No _____

8. Are incompatible wastes stored in the same containers? Yes \_\_\_\_\_ No \_\_\_\_\_
9. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? (n/a to wastes loaded per DOT standards) Yes \_\_\_\_\_ No \_\_\_\_\_
10. Is there sufficient aisle space to allow full inspection of the containers and labels of containers not loaded in vehicles? Yes \_\_\_\_\_ No \_\_\_\_\_

Unregulated Wastes – HHW/CESQG Waste N/A \_\_\_\_\_

1. Does the transporter have documentation that this waste was generated by an unregulated source? Y \_\_\_\_\_ N \_\_\_\_\_
2. If no, is the transporter assuming responsibility as the generator of this waste? Y \_\_\_\_\_ N \_\_\_\_\_

If yes, complete the applicable Generator or Small Quantity Generator checklist.

If not, explain circumstances in narrative, including a discussion of applicable exemptions.

# Memorandum

# Florida Department of Environmental Protection

## SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO: \_\_\_\_\_ J. M. Farley, Interim District Director

FROM/THROUGH:

WA

William Kutash, Waste Program Administrator

JD

James Dregne, Hazardous Waste Program Manager <sup>9/13</sup>

JK

Elizabeth Knauss, HW Enforcement Coordinator

JS

Jill A. Seale, Environmental Specialist II

DATE:

September 6, 2006

FILE NAME: Univar USA Inc.

PROJECT #: 300020

PROGRAM: Hazardous Waste

COUNTY: HILLSBOROUGH

TYPE OF DOCUMENT: ☒ WARNING LETTER ☒ INSPECTION REPORT

### DESCRIPTION OF VIOLATIONS:

This is a hazardous waste and used oil transfer facility and a large quantity generator. Facility had two minor violations: failure to mark number of containers on weekly inspection sheets and failure to mark one hazardous waste manifest with manifest number. This facility also reported a discharge from an above ground hypochlorite storage tank, which was released into a secondary containment area.

### STATUS OF CORRECTIVE ACTION:

The two RCRA violations were corrected the day of the inspection. However, the Department is requesting the facility make immediate changes to their current AST/sump system to prevent future releases of hypochlorite. The Department is requesting a written explanation of the changes from the facility within 30 days of receipt of the report.

### STATUS OF PENALTY ASSESSMENT:

No penalties have been assessed in this case, as there are only two minor violations which were immediately corrected.

PENALTY:

Amount: 0

Costs & Expenses: 0

Total: 0

Agreed to by Respondent? na

ATTACHMENTS:

Warning Letter #300020 and Inspection Report

**Seale, Jill**

---

**From:** Bryant, Kimberly  
**Sent:** Thursday, September 07, 2006 11:31 AM  
**To:** Seale, Jill  
**Subject:** RE: DPC Enterprises

The water is from an overflow of their cooling tower which is on the roof. They were having a problem last week but had fixed the valve between your visit and our visit.

-----Original Message-----

**From:** Seale, Jill  
**Sent:** Thursday, September 07, 2006 11:08 AM  
**To:** Bryant, Kimberly  
**Subject:** RE: DPC Enterprises

Great, thanks for the update on DPC. Just out of curiosity, do you know what they usually do with the city water from that spigot?

And, thanks for visiting them so quickly!

Jill A. Seale  
 Environmental Specialist II  
 Florida Department of Environmental Protection  
 Hazardous Waste Section  
**13051 North Telecom Parkway**  
**Temple Terrace, FL 33637-0926**  
**phone (813) 632-7600, x399**  
**fax (813) 632-7664**

-----Original Message-----

**From:** Bryant, Kimberly  
**Sent:** Thursday, September 07, 2006 11:04 AM  
**To:** Seale, Jill  
**Cc:** Paula Noblitt (E-mail); Balcom, Ilia  
**Subject:** DPC Enterprises

Good Morning Jill,

Paula and I visited DPC Enterprises yesterday and spoke with Mr. C. David McCutcheon (District Manager). The water that you saw gushing from the pipe was city water. It was not gushing while we were there. We will not be taking any further action at this point. Thanks for the referral, please let me know if you'd like to go do any inspections together in the future.

Thanks,

*Kim*

*Kimberly Beth Bryant  
 Environmental Specialist II  
 Industrial Wastewater Program*

*Please note our new address and phone number:  
 FDEP Southwest District  
 13051 N. Telecom Parkway*

9/7/2006

CLOSURE PLAN

Univar USA Inc.  
6049 Old Hwy 41 A  
Tampa, Florida 33619

EPA ID NO. FLD 02 098 5727

Rec'd via  
email  
9/5/06  
-JAS



Univar USA Inc.

Closure Plan  
Tampa Florida

This section outlines the steps which the subject Univar USA Inc. ("Univar") facility will follow in a closure situation in order to comply with applicable section of Chapter 12-30.171 of Rules of the Florida Department of Environmental Regulations.

Because this facility functions as only an accumulation and transfer point of containerized waste products destined for recycling or destruction at an off-site facility, partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous waste is but a small portion of the total business at this facility, and due to the fact that this hazardous wastes activity is the sole reason for Univar's being involved in the requirements of this legislation, there exists no partial closure situations.

It should be further noted that because of the nature of the hazardous waste activity at this facility – only the accumulation and temporary storage of waste products in containers until economic truckloads can be shipped to a destruction or recycling facility – a post-closure plan is not required.

The plan will be amended whenever changes in operating plans or facility design affect the closure plan, or whenever there is a change in the expected date of closure of the facility. The plan will be amended within 60 days of such changes.

Univar will maintain a copy of this closure plan at the facility. The company is aware that should this branch contemplate closure of this site, the Director of the Florida Department of Environmental Regulations must be notified at least 180 days prior to the date the company begins to close the facility.

The maximum number of drums expected to be held at any one time – the number assumed to be in inventory at the time of closure – will be 96. Univar will continue to operate a business at this facility as long as it is deemed economically viable by the company; an “anticipated” date of closure is established as 2012.

The company is aware that upon completion of closure, it shall be required to submit to the Florida Department of Environmental Regulation certification by both Univar and an independent Florida registered professional engineer that the facility has been closed in accordance with the outlined proceedings contained in the approved Closure Plan.

In practice, once Univar has decided to close this site as a hazardous waste transfer facility, the required 180 days notice period would be filed and notices sent to customers (the generators) employing Univar’s services to inform them of the pending discontinuation of receiving their hazardous wastes. All materials would be removed from the site within 10 days of receipt of the final volume of waste and total closure activities will be completed within 120 days.

Although it is expected that all waste in storage would be economically recoverable material for the purpose of closure cost calculation the most expensive case – payment to an outside permitted facility for outright disposal of the maximum inventory – has been used. No credit is taken for recoverable values of the waste products.

No pretreatment would be required before material would be ready for shipment. Prior to being loaded, all containers would be inspected for leakage, damage and proper labeling. They would be transported on pallets to a staging area by conventional forklift handling and then placed in trucks for transport. Proper manifest forms would be prepared for each movement.

Because of the remoteness of the waste holding area relative to any earth, no decontamination of soil or earth is envisioned during closure.

A schedule of the closure steps is depicted on the appended graph.

After closure, it is expected that the waste holding area will revert to general warehouse usage.

This closure plan and the following cost estimate will be kept on file at the Univar facility. It will be revised and resubmitted whenever a change in the closure plan affects the cost of closure. It will be reviewed and adjusted annually to reflect changes in the closure brought about by inflation, utilizing published indices.

The actual physical steps to be followed in the closure of this facility are directed toward demonstration that there is not contamination of the waste holding area. The following procedures have been found adequate in the closure of other company facilities:

### Cleaning

The area in which the waste were held will be mopped with a strong detergent solution – a 1% solution of a 50/50 mixture of Tergitol R NP-4 and Tergitol R NP-9 has proved satisfactory elsewhere – and then rinsed twice with city tap water. A separate mop and rinse bucket will be used for each mop and rinse cycle. The wash and rinse water will be collected and held in a sound container. Most likely this will be 55 gallon steel or polyethylene drums. Alternately, it would be steel, stainless steel, or polyethylene portable tanks of approximately 400 to 500 gallon capacity. It depends on where the waste water will be destined for disposal. The waste water in these containers will be held on site and will be inspected daily.

### Sampling

Duplicate samples will be collected in septum VOA vials from each of the three wash/ rinse cycles and analyzed for each of the waste species held at one time or another in the proscribed area. The list of waste/ components is attached as “List 1”.

### Parameters Indicating Decontamination

The attached, “List 1” contains a column titled Regulatory Limit – ppm. The values in this column were taken variously from 40 CFR 261.24, or from the federal register vol. 55/ Friday, July 27, 1990, pages 20865 – 30867. This list will be reviewed every other year in odd numbered years, prior to March first of that year, and waste not previously shown on the list, but since handled at the facility will be added to the list. If contamination is indicated, the entire cleaning process will be repeated.

Any contaminated cleaning equipment will be discarded as a hazardous waste at a permitted waste disposal site.

LIST 1. 09/02/93

LIST OF TRANSFER WASTE AT UNIVAR – TAMPA

Page: 1

<u>EPA WASTE CODE</u>	<u>WASTE PARAMETER</u>	<u>REGULATORY LIMIT – PPM</u>
D001	STYRENE	0.14
D005	BARIUM	100
D006	CADMIUM	1.0
D007	CHROMIUM (HEXAVALENT)	5.0
D008	LEAD	5.0
D009	MERCURY	0.2
D010	SELENIUM	1.0
D011	SILVER	5.0
D018	BENZENE	0.5
D019	CARBON TETRACHLORIDE	0.5
D022	CHLOROFORM	6.0
D028	1,2 DICHLOROETHANE	0.5
D029	1,1 DICHLOROETHYLENE	0.7
D035	METHYL ETHYL KETONE	200
D039	TETRACHLOROETHYLENE	0.7
D040	TRICHLOROETHYLENE	0.5
F001	111 TRICHLOROETHANE	0.054
F001	METHYLENE CHLORIDE	0.2
F001	TETRACHLOROETHYLENE	0.7
F001	TRICHLOROETHYLENE	0.5
F002	111 TRICHLOROETHANE	0.054
F002	METHYLENE CHLORIDE	0.2

LIST 1. 09/02/93

LIST OF TRANSFER FACILITY WASTE AT UNIVAR – TAMPA

Page: 2

<u>EPA WASTE CODE</u>	<u>WASTE PARAMTER</u>	<u>REGULATORY LIMIT – ppm</u>
F002	TETRACHLOROETHYLENE	0.7
F002	TRICHLOROETHYLENE	0.5
F003	ACETONE	0.05
F003	ETHYL BENZENE	0.057
F003	METHYL ISOBUT. KETONE	0.05
F003	XYLENE	0.32
F005	ISOBUTANOL	5.6
F005	METHYL ETHYL KETONE	0.05
F005	TOLUENE	0.08
F019	CHROMIUM (HEXAVALENT)	0.32
F019	CYANIDE	1.2
K086	CHROMIUM (HEXAVALENT)	0.32
K086	LEAD	0.037
NONE	NICKEL	0.15
U002	ACETONE	0.28
U080	METHYLEN CHLORIDE	0.044
U226	111 TRICHLOROETHANE	0.054
U239	XYLENE	0.32

UNIVAR USA INC.  
TAMPA, FLORIDA  
CLOSURE COST ESTIMATE  
For 2006

I.	<u>Basic Disposal Charge</u>		
	96 drums @ \$250.00		\$24,000.00
II.	<u>Warehouse Labor (loading)</u>		
	At hourly rate including fringe		
	Benefits – 6 hours		\$150.00
III.	<u>Transportation</u>		
	To Pollution Control Industries, Millington, Tennessee		
	Two loads		\$3,600.00
IV.	<u>Equipment Cost</u>		
	Forklift at \$25.00/ hour – 6 hours required		\$150.00
V.	<u>Decontamination Cost</u>		
	Secondary Containment Area Cleaning		
	4 hours @ \$85.00/ hour	\$340.00	
	Disposal of Cleanup residue		
	4 drums @ 250.00	\$1000.00	
	Laboratory Services		
	(sampling, analyses, report)	\$5,500.00	\$6,840.00
VI.	<u>Contingencies at 20% of Subtotal of</u>	\$34,740.00	\$6,948.00
VII.	<u>Engineer Certification</u>		\$2,500.00
	Total Cost of Closure		\$44,076.00

UNIVAR USA INC.  
Projected Closure Schedule

Tampa, Florida

Activity	Days
	0-180 / 190/ 200/ 210/ 220/ 230/ 240/ 250/ 260/ 270/ 280/ 290/ 300/ 310
1. Notification of intent to close to FL DER	-----]
2. Notification to customers of intent to close	-----]
3. Final use of storage area	-----]
4. Cleaning of waste holding area	-----]
5. Rinseate profile and analysis	-----]
6. Disposal of Rinseate	-----]
7. Certification by Univar and FL licensed engineer	-----]
8. Report of certification To FL DER	-----]



**Seale, Jill**

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**From:** Robert Strynar [Robert.Strynar@univarusa.com]  
**Sent:** Tuesday, September 05, 2006 2:27 PM  
**To:** Seale, Jill  
**Cc:** Lee Jarrett; Dennis Thornton  
**Subject:** RE: RCRA Inspection

Jill,

Here is a copy of our closure plan for Tampa. IF you need anything else, please call me. Thank you.

Robert Strynar  
Operations Manager  
Univar USA Inc.  
Tampa Branch  
813-677-8414 (phone)  
813-671-2920 (fax)  
[www.univarusa.com](http://www.univarusa.com)

---

**From:** Seale, Jill [mailto:Jill.Seale@dep.state.fl.us]  
**Sent:** Thursday, August 31, 2006 9:09 AM  
**To:** Robert Strynar  
**Subject:** RCRA Inspection

Good morning Robert. I am in the process of completing your facility's inspection report from my 8/15/06 inspection. Can you please submit a copy of your facility's closure plan as required per Florida Administrative Code 62-737.171(2)(b)? I see from the Department's 2002 inspection report that the Closure Plan was marked as being reviewed, but we do not have a copy of this document in our compliance file.

Please forward me a copy either by email, fax, or mail within the next week or so. I also wanted to let you know that I did receive your fax dated 8/15/06 with your corrective actions.

Thank you very much,

Jill A. Seale  
Environmental Specialist II  
Florida Department of Environmental Protection  
Hazardous Waste Section  
**13051 North Telecom Parkway**  
**Temple Terrace, FL 33637-0926**  
**phone (813) 632-7600, x399**  
**fax (813) 632-7664**

9/5/2006

**Seale, Jill**

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**From:** Balcom, Ilia  
**Sent:** Thursday, August 31, 2006 1:32 PM  
**To:** Seale, Jill; Bryant, Kimberly; Paula Noblitt (E-mail)  
**Subject:** RE: Possible IW Concern

Jill, thanks for the information.

Kim and Paula, please look into this.

Thanks!

Ilia

-----Original Message-----

**From:** Seale, Jill  
**Sent:** Thursday, August 31, 2006 1:29 PM  
**To:** Balcom, Ilia  
**Subject:** Possible IW Concern

Hello Ilia. I wanted to bring this situation to IW's attention incase it is a regulatory concern. I recently performed a RCRA compliance inspection at a facility called Univar. Univar leases part of their facility to DPC, who deals with bleaches and chlorine gases. Though I did not inspect DPC, while I was inspecting Univar's two aboveground wastewater storage tanks, DPC's building is adjacent to the AST area. A large pipe was exiting the DPC warehouse, clearly visible near DPC's two large hypochlorite tanks, which is also near Univar's ASTs.

Water was gushing out of this pipe onto the ground, with no apparent collection system. This area was covered with smooth landscaping stones, and I did not determine what was beneath the stones. This entire area was very soaked. And it was really gushing, not just a drip, a pretty fast flow rate. When I asked the Univar representative if he knew what his tenant was discharging, he stated that it was condensate water from DPC's extensive cooling system.

Again, I did not inspect DPC that day, but the more I think about it, the more unusual that pipe was. Another issue regarding these two facilities in case IW is interested: the hypochlorite (bleach) tanks had some kind of discharge recently into Univar's secondary containment sump, causing the pH of the resultant waste water/bleach mixture to be around 12, and Univar attempted to neutralize it, not knowing the hypochlorite was the source of the high pH, and it caused chlorine gas to be released, and they evacuated their employees and contacted the State Warning Point to report the incident. It seems Univar resolved this accident correctly, but it may be an indicator of DPC's perhaps poor management practices.

DPC Enterprises  
6051 Old Hwy 41 A  
Tampa, FL 33619

Please feel free to contact me with any questions. I unfortunately managed to not get one single photo of these items. And this is not really a request, but just wanted to share this information incase the alleged condensate water discharge is and IW concern.

Thank you,

Jill A. Seale  
Environmental Specialist II  
Florida Department of Environmental Protection

8/31/2006

Hazardous Waste Section  
**13051 North Telecom Parkway**  
**Temple Terrace, FL 33637-0926**  
**phone (813) 632-7600, x399**  
**fax (813) 632-7664**

**Tampa Branch**  
6049 Old 41 A Highway  
Tampa, Fl. 33619  
T 813-677-8414 or 800-944-4489  
F 813-671-2920



August 15, 2006

To: Jill Seale  
Environmental Specialist  
D.E.P.

From: Robert Strynar  
Operations Manager  
Univar USA

Re: Branch Inspection

Jill,

The manifest dated April 25, 2006 has been corrected to include the manifest number.

Univar USA has also amended the weekly hazardous waste container inspection log to included the container count.

Attached is the corrected copy of the manifest and the inspection log.

If you should have any more questions, please contact me at 813-677-8414, ext. 107. Thank you.

Bob Strynar

*emailed Bob 8/31 requesting  
closure plan -JAS*

ORDER # 364507

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

Form Approved. OMB No. 2050-0039.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. T L D 0 2 0 9 8 5 7 2	Manifest Document No. 104007	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address UNIVAR USA INC. 6049 HWY 41A SOUTH TAMPA, FL 33619				A. State Manifest Document Number 364507	
4. Generator's Phone ( 813 ) 677-8414 EMERGENCY CONTACT: BOX 15				B. State Generator ID	
5. Transporter 1 Company Name NU-WAY INDUST SVCS PKG		6. US EPA ID Number S C D 9 8 7 5 9 8 3 3		C. State Transporter ID	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 803-987-9175	
9. Designated Facility Name and Site Address POLLUTION CONTROL MILLINGTON 5405 VICTORY LANE MILLINGTON, TN 38053		10. US EPA ID Number T N D 0 0 0 7 7 2 1 8 6		E. State Transporter ID	
				F. Transporter's Phone	
				G. State Facility ID	
				H. Facility's Phone 901-353-5291	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol
a. X RQ, WASTE FLAMMABLE LIQUID, N.O.S (ISOPROPANOL) 3, UN1993, PG II, (RQ=100), (EPA D001), (ERG 128)		003 D		001656	0001
b. X RQ, WASTE SODIUM HYDROXIDE SOLUTION 8, UN1824, PG II, (RQ=100), (EPA D002), (ERG 154)		002 D		001106	0002
c. NON RCRA REGULATED WASTE		001 D		000555	
d.					
J. Additional Descriptions for Materials Listed Above 11a. 00100428VI FLUSH WASTE 11b. 00100832NT CAUSTIC WASTE 11c. 02048051LS SURFACTANT OH-28958				K. Handling Codes for Wastes Listed Above 501	
15. Special Handling Instructions and Additional Information WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING. EMERGENCY CONTACT: CHEMICAL: 1-800-424-9300. CALLER MUST IDENTIFY UNIVAR USA AS SHIPPER. PLACARDS PROVIDED BY CARRIER/SHIPPER YES/NO DRIVER SIGNATURE _____					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment 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 government 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 N. Micire		Signature N. Micire		Month Day Year 10/4/2006	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name ERIC BOLERT		Signature [Signature]		Month Day Year 10/4/2006	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space 1 ADDED manifest (SR)					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Tamarra Braker					
Signature Tamarra Braker		Month Day Year 10/4/2006			

**WEEKLY HAZARDOUS WASTE CONTAINER INSPECTION LOG**

Date: \_\_\_\_\_

ITEM INSPECTED	S	U	CORRECTIVE ACTION
<b>Waste Accumulation Area</b>			
Compatibility			
Debris, Refuse			
Able Space / Stacking			
Base/Berm Integrity			
<b>Container Labeling</b>			
Hazardous Waste Labels			
DOT Hazard Labels			
Accumulation Start Date			
Other Markings			
<b>Container Condition</b>			
Dents/Creases			
Rust			
Bung Closures			
Leaks/Spills			

(\$ = Satisfactory U = Unsatisfactory)

Quantity of drums on hand: \_\_\_\_\_

Inspector: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
(Signature)

Print: \_\_\_\_\_

I certify that all unsatisfactory items noted on this report have been corrected.

Branch Operations Manager/

Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_  
(Signature)

Rec'd <sup>ing</sup>  
8/15/06 inspection  
-JAS

## WEEKLY HAZARDOUS WASTE CONTAINER INSPECTION LOG

Date: \_\_\_\_\_

ITEM INSPECTED	S	U	CORRECTIVE ACTION
<b>Waste Accumulation Area</b>			
Compatibility			
Debris, Refuse			
Aisle Space / Stacking			
Base/Berm Integrity			
<b>Container Labeling</b>			
Hazardous Waste Labels			
DOT Hazard Labels			
Accumulation Start Date			
Other Markings			
<b>Container Condition</b>			
Dents/Creases			
Rust			
Bung Closures			
Leaks/Spills			

(S = Satisfactory U = Unsatisfactory)

Inspector: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_  
(Signature)

I certify that all unsatisfactory items noted on this report have been corrected.

Branch Operations Manager/  
Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_  
(Signature)

Close	Add Comment	Show docs related to...
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**Incident #: SWP060727 - 4410**

SWP 411 on 07/27 at 11:50 AM

Last Modified: 07/27 at 11:50 AM

County: Hillsborough

## Chlorine Gas Release

### Incident Details

Incident Type:	Hazardous Materials
Incident Status:	Closed
Incident Severity:	Level 2
	2 - Any spill or release of a Section 304 or CERCLA material, or a fire/spill/release of any hazardous material with limited protective actions and/or minor injuries (1 - 4 people)
Incident Occurred Date/Time:	07/27/2006 11:25 AM EDT
Caller:	Robert Strynar
Caller Address:	6049 Old Highway 41A Tampa, FL 33619
Callback #:	813-713-4753 Time of Call: 07/27/2006 11:44 AM EDT
Caller Represents:	UNIVAR USA

### Comments

Caller stated that a water pit that was being neutralized with acid caused the release of chlorine gas. 15 people were evacuated, but no injuries were reported.  
UPDATE: NRC fax # 805691 <411>

### ▼ Incident Location

On Scene Contact:	Robert Strynar
On-Scene Phone #:	813-713-4753
Facility Name:	UNIVAR USA
Facility Address:	6049 Old Highway 41A
Facility City:	Tampa

Number Injured:	
Number of Fatalities:	
Number Missing:	
Evacuations/Shelters:	
Damage:	
File Attachment:	



**Hazardous Materials Details (Items in RED are required for 304 reporting.)**

Responsible Party:	UNIVAR USA
Responsible Party Address:	6049 Old Highway 41A
Responsible Party Phone:	813-677-8414
Materials Involved:	Chlorine Gas Gas
Cas #:	7782-50-5
Section 304?	Unknown
Container:	Other: Water pit
Container Size:	
Amount Released:	Unknown
Rate of Release:	
Cause of Release:	Natural chemical reaction
Time Release Began:	11:25 AM EDT
Time Discovered:	11:25 AM EDT
Time Release Ended:	11:30 AM EDT
Late Report Reason:	
Weather:	Temp: Wind Dir: Speed:
Potential Health Risk:	On-Site
Area(s) Involved:	Fixed Facility, Air Other:

NATIONAL RESPONSE CENTER - FLASH FAX  
\*\*\*GOVERNMENT USE ONLY\*\*\*GOVERNMENT USE ONLY\*\*\*  
DO NOT RELEASE this information to the public without  
permission from the NATIONAL RESPONSE CENTER 1-800-424-8802

Incident Report # 805691

#### INCIDENT DESCRIPTION

•Report taken by: CIV LOTTIE JOHNSON at 11:27 on 27-JUL-06  
Incident Type: FIXED  
Incident Cause: OTHER  
Affected Area:  
The incident occurred on 27-JUL-06 at 11:25 local time.  
Affected Medium: AIR / ATMOSPHERE

#### REPORTING PARTY

Name: ROBERT STRYNAR  
Organization: UNIVAR  
Address: 6049 OLD HWY 41A  
TAMPA, FL 33619  
UNIVAR called for the responsible party.  
PRIMARY Phone: (813)6778414  
Type of Organization: PRIVATE ENTERPRISE

#### SUSPECTED RESPONSIBLE PARTY

Name: ROBERT STRYNAR  
Organization: UNIVAR  
Address: 6049 OLD HWY 41A  
TAMPA, FL 33619  
PRIMARY Phone: (813)6778414  
Type of Organization: PRIVATE ENTERPRISE

#### INCIDENT LOCATION

6049 OLD HWY 41A County: HILLSBOROUGH  
City: TAMPA State: FL Zip: 33619

#### RELEASED MATERIAL(S)

CHRIS Code: NCC Official Material Name: NO CHRIS CODE  
Also Known As: CHLORINE GAS  
Qty Released: 0 UNKNOWN AMOUNT

#### DESCRIPTION OF INCIDENT

CALLER IS REPORTING A WATER PIT THAT WAS BEING NEUTRALIZED WITH ACID  
WHICH CAUSED THE RELEASE OF CHLORINE GAS.

#### INCIDENT DETAILS

Building ID:  
Type of Fixed Object: CHEMICAL FACILITY  
Power Generating Facility: NO  
Generating Capacity:  
Type of Fuel:  
NPDES:  
NPDES Compliance: UNKNOWN

#### DAMAGES

Fire Involved: NO Fire Extinguished: UNKNOWN  
INJURIES: Hospitalized: Emp/Crew: Passenger:  
FATALITIES: Emp/Crew: Passenger: Occupant:  
EVACUATIONS: 15 Who Evacuated: EMPLOYEES Radius/Area:

## Damages:

Closure Type Description of Closure

Air: N

Road: N

Waterway: N

Track: N

Hours Closed Direction of Closure

Major N  
Artery:

Passengers Transferred: NO

Media Interest: NONE Community Impact due to Material: NO

## REMEDIAL ACTIONS

NOT A THIS TIME

Release Secured: YES

Release Rate:

Estimated Release Duration: 5 MINUTE

## WEATHER

Weather: SUNNY, ||F

## ADDITIONAL AGENCIES NOTIFIED

Federal:

State/Local:

State/Local On Scene:

State Agency Number:

## NOTIFICATIONS BY NRC

CHEM SAFETY AND HAZARD INVEST BOARD (PRIMARY)  
(877)2758207DOT CRISIS MANAGEMENT CENTER (PRIMARY)  
27-JUL-06 11:33 (202)3681863U.S. EPA IV (PRIMARY)  
(404)6504955NATIONAL INFRASTRUCTURE COORD CTR (PRIMARY)  
27-JUL-06 11:33 (202)2829201NOAA RPTS FOR FL (PRIMARY)  
27-JUL-06 11:33 (208)3288344NATIONAL RESPONSE CENTER HQ (PRIMARY)  
(202)2671138

NTSB PIPELINE (PRIMARY)

27-JUL-06 11:33 (202)3148293

FL EMERGENCY RESPONSE COMMISSION (PRIMARY)  
27-JUL-06 11:33 (850)4138811TSA MARITIME AND LAND (PRIMARY)  
27-JUL-06 11:33 (703)5833236

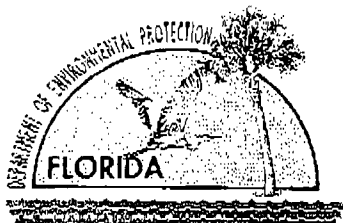
## ADDITIONAL INFORMATION

CALLER WILL NOTIFY FL DEP.

\*\*\* END INCIDENT REPORT 805881 \*\*\*

Report any problems or Fax number changes by calling 1-800-424-8802  
PLEASE VISIT OUR WEB SITE AT <http://www.nrc.uscg.mil>

Florida Department of Environmental Protection  
Division of Law Enforcement  
Bureau of Emergency Response



8402 Laurel Fair Circle, Suite 110  
Tampa, Florida 33610

813/744-6462 or SUNCOM 512-1089  
FAX 813/744-6464 or SUNCOM 512-1091

FACSIMILE MESSAGE

DATE: 7/27 NUMBER OF PAGES: 5 (including coversheet)

TO: Bill Seale

FAX NUMBER: \_\_\_\_\_

FROM: Chris

REFERENCE: As Discussed

*[Handwritten signature]*