

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

TRANSFER FACILITY NOTIFICATION FORM

This form must be completed as required in Florida Administrative Code Rule 17-730.171(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 17-730.171. All information must be typed or printed clearly. The Complete of the Administrative Code Rule 17-730.171.

I.	Transporters Identification:	
	Company Name Van Waters & Rogers Inc.	
	EPA ID No. FLD 020 985 727	DECEIVED
	Company Mailing Address 6049 Highway 41A South	
	Tampa, FL 33619	FFR 4 1004
	Principal Contact Wayne Toth	HAZARDOUS WASTE
	Phone Number (813) 677-8414	
II.	Transfer Facility Identification: Name of Facility Van Waters & Rogers Inc.	
	Street Address 6049 Highway 41A South	•
	Tampa, FL 33619	
	Latitude 27°52' 03.2" Longitude 82°23' 00.5"	
	CountyHillsborough	•
	Waste Codes *	and the second of the second of the second
	Storage Volume 5280 Gallons	·
	* All RCRA Listed and characteristic except D003 or Radio	active wastes.



DER FORM 17-730.900(6) Effective October 14, 1992 Department invitation in Protection
TRANSOURHWESIDESINING TIFICATION FORM
BY Page 1 of 2



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Come 4. dece . 2. September

I CERTIFY UNDER PENALTY OF LAW THAT THE ABOVE INFORMATION IS ACCURATE AND COMPLETE. AS THE OWNER OR OPERATOR OF THE ABOVE REFERENCED HAZARDOUS WASTE TRANSFER FACILITY, I ALSO CERTIFY THAT THIS FACILITY IS IN COMPLIANCE WITH ALL PROVISIONS OF FAC 17-730.171.

Walter T. Goossen

Regional Regulatory Manager

PRINT/TYPE NAME

TITLE

Wit. Joose

January 27, 1994

SIGNATURE OF AUTHORIZED REPRESENTATIVE

DATE SIGNED

Please complete this form and mail to the following address:

Florida Department of Environmental Regulation Hazardous Waste Management Section 2600 Blair Stone Road Tallahassee, Florida 32399-2400

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Governor

Florida Department of **Environmental Protection**

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

Virginia B. Wetherell Secretary

November 16, 1993

Mr. Wayne Toth Van Waters & Rogers, Inc. Route 3, Box 498-A 6049 Old Highway 41A Tampa, FL 33619

Re: Warning Letter #93-0076HW29SWD

Hillsborough County

Dear Mr. Toth:

A review of the file for the referenced case indicates that all the violations cited in the Warning Letter have been corrected. Thank you for your cooperation. This enforcement action is now closed.

Sincerely,

William Kutash

Administrator

Division of Waste Management

WK/tjr

cc: Janet Ashwood, BWP&R Alan Farmer, USEPA, Region IV Compliance File

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Lawton Chiles

Governor

CERTIFIED MAIL

Florida Department of Environmental Protection

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

Virginia B. Wetherell Secretary

MOV 1 1993

Van Waters & Rogers Inc. Route 3, Box 498-A 6049 Old Highway 41A Tampa, FL 33619

RETURN RECEIPT REQUESTED

Attn: Wayne Toth

WARNING LETTER #WL93-0076HW29SWD

RE: Van Waters & Rogers Inc.

FLD020985727, Hillsborough County

Dear Mr. Toth:

A hazardous waste compliance inspection was conducted at your facility on October 19, 1993. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, in order to determine the compliance status of your facility with Title 40 Code of Federal Regulations Parts 260 through 268, as adopted in Florida Administrative Code Chapter 17-730.

During this inspection, possible violations of rules regarding hazardous waste management were noted. These possible violations are described as follows:

Failure to inspect hazardous waste storage areas at least weekly.

Failure to develop and implement a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment associated with the hazardous waste transfer area.

You are requested to contact Timyn J. Rice of this office at (813) 744-6100, ext. 473, within 10 calendar days of receipt of this Warning Letter, to arrange a meeting with Department personnel to discuss the issues raised in this Warning Letter.

PLEASE BE ADVISED that this Warning Letter is part of an agency investigation preliminary to agency action in accordance with Section 120.57(4), Florida Statutes. The purpose of this letter is to advise you of potential violations and to set up a meeting to discuss possible resolutions to any potential violations that may have occurred for which you may be responsible. If after further investigation, the Department determines that the violation occurred, you may resolve the violations by correcting the violations or, in some cases, by providing an acceptable time schedule within which the violations will be corrected.

Van Waters & Rogers Inc. WARNING LETTER #WL93-0076HW29SWD

Failure to respond in writing in 10 days may result in the initiation of a formal administrative enforcement proceedings through the issuance of a Notice of violation and the assessment penalties. If the Department issues a Notice of Violation, and you are named as a party, you will be informed of your rights to contest any determination made by the Department in the Notice of Violation.

Sincerely,

Richard D. Garrity, Ph.D.

Director of District Management

Southwest District

RDG/tjr

Enclosure

cc: Janet Ashwood, BWP&R
Alan Farmer, USEPA, Region IV
Compliance File



Florida Department of Environmental Protection

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

Virginia B. Wetherell Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. IN	SPECTION TYPE: _ C	MPLAINT	XROUTIN	IEF	OLLOW-UP	PERI	MITTING
FA	.CILITY NAME: Van Wa	ters & Roc	gers Inc.		_ DEP/EPA	ID FLDC	20985727
ST	REET ADDRESS: 6049	Old Hwy. 4	11A, Tamp	a, FL			
. MA	ILING ADDRESS: Route	e 3, Box 4	498-A, 60	49 Old	Hwy. 41A,	Tampa,	FL 33619
co	UNTY: Hills PHONE	: (813)67	7-8414	DATE:	10/19/9	3 TIME:	1:30 pm
		-					
		TYPE	OF FACI	LITY			
a		7			m		
Gener	nerator(>1000 kg/mo)	Storage	ainer		Treatme Tanl		
	G (100-1000 kg/mo)	Tank	IIICI			d Treatmo	ent
	SQG (<100 kg/mo)		e Pile			cmal	
	<u></u>		ace Impou	ndment		n/Phys/B	io
Trans	porter		•			inerator	
	ansporter	Disposal	L		Suri	face Imp	oundment
_X_Tr	ansfer Facility	Landf			Exer	npt Off-	Site
			ace Impou	ndment			
No:	n Handler	Waste	e Pile		Used	doil	
2. <u>Ap</u>	plicable Regulatio	ns:					
	40 555 061 5 40	0.60 .					
	_40 CFR 261.5 <u>X</u> 40 CF 40 CFR 265 40 CF					C	
	_40 CFR 20540 CF	K 200 _A '	40 CFR 20	°	-/30 F.A.	C.	
3. Re	sponsible Official	s:					
		<u></u>					
Wa	yne Toth, Branch Open	rations Ma	anager				
4 511	rvey Participants	and Drin	cinal In	snecto	r•		
1. <u>bu</u>	irvey rarerespanes	and IIIn	Cipai ii	эрсссо	<u>+</u> •		
Ti	myn J. Rice - FDEP						
	yne Toth - Van Water:	s & Rogers	5				
E ==			T amount t				
э. <u>га</u>	cility Latitude:		Longit	<u>iae</u> :			
270	52'03"		8202310	1"			
					•		
6. <u>Ty</u>	pe of Ownership:	FEDERAL	STATE	COUN	TY MUN	ICIPAL	PRIVATE
7. Pe	ermit No.: n/a	Date	Tssued.		F	Exp. Dat	e:

Van Waters & Rogers Inc.
FLD020985727

8. Process Description:

Van Waters & Rogers (VW&R) is a chemical manufacturer and distributor. The Tampa facility operates as a warehouse distribution center for industrial chemicals and solvents and agricultural, pesticides, herbicides and fertilizers. Several solvent products are repackaged for distribution from bulk storage. The facility also manufactures chlorine bleach and operates as a transfer facility in the transport of hazardous waste.

The manufacture of chlorine bleach takes place in a separate building and does not result in the production of any hazardous waste. Excess chlorine vented from filling tanks is mixed with caustic to produce the bleach. VW&R paints the chlorine cylinders with latex paint. Any enamel painting is done with spray cans that are used until empty.

The bulk solvent tanks all have dedicated pumps and piping so that no waste is generated from flushing the lines. One non-dedicated line generates flushing waste from time to time. At the time of inspection, three drums of D002 waste from flushing were being stored in the 180 day storage area. The date of accumulation on these drums was 7/1/93.

VW&R also operates as a hazardous waste transporter. The Tampa facility is used as a transfer facility. Transfer waste is stored for no longer than 10 days in a designated area of the warehouse before being shipped back out. At the time of inspection there were eight drums of paint waste in the transfer area. A computerized log of transfer waste is kept which is a record of all waste entering and leaving the facility. The record includes the date the waste was shipped in, the generator, the generator's EPA ID number, the manifest document number, and the date the waste was shipped out. A review of the log indicated that all waste had been shipped out before the 10 day storage limit had expired.

A review of the manifests, contingency plan, closure plan, arrangements with local authorities, and training records showed them to be complete and well organized. However, VW&R has not been documenting weekly inspections of the hazardous waste storage areas per 40 CFR 265.174. Blank weekly waste storage inspection logs were immediately available and the inspection policy was immediately implemented. Also, VW&R had not developed and followed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment in the transfer area per 17-730.171 F.A.C.

Van Waters & Rogers inc. FLD020985727

9. Summary of Violations:

40 CFR 265.174

Failure to inspect areas where hazardous waste containers are stored, at least weekly, looking for leaks and for deterioration caused by

corrosion or other factors.

17-730.171(2)(a) (40 CFR 265.15)

Failure to develop and follow a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment in the transfer area.

Date:

Inspected:

Timyn/J. Rice

Environmental Specialist II

Environmental Specialist III

PENALTY COMPUTATION WORKSHEET

Violator's Name:	Van Waters	& Rogers	Inc.	··-			
Identify Violator's Facility: same							
Name of Departme	nt Staff Res	ponsible f	or the Penalt	y Computat	ions:		
Timyn Rice		· 					
Date: October 2	5, 1993						
	PART I - Cla	ass B (no p	penalty) Dete	rmination			
Rationale for Class B Determination: 40 CFR 265.174 - VW&R had inspected the storage areas regularly but failed to document the inspections. Inspection logs were available and the inspection policy was immediately implemented. 40 CFR 265.15 - Although all safety equipment, security devices, etc. are inspected periodically, VW&R did not have a specific plan for the hazardous waste transfer area. The plan is in development and will be implemented immediately. PART II - Class A Penalty Determinations							
Violation Type	Potential for Harm	Extent of Dev.	Matrix Amount	Multi day	Adjustments	Total	
1							
2							
3							
4				- <u>-</u>			
5				_	_		
6.	<u>-</u>						
	-						
7		· · · · · · · · · · · · · · · · · · ·				· · · · · · · · · · · · · · · · · · ·	
8							
9			- · · · · · · · · · · · · · · · · · · ·		- 		

(Attach Part III for each violation for which an adjustment on multi-day penalty is determined.)

Total Penalties for all Violations: \$

Date	10/19/93	3	
Inspec	tor T	- RICE	
Facili	ty ID#_	FLDOZ	0985777

RCRA INSPECTION REPORT SMALL QUANTITY GENERATOR'S CHECKLIST

Not	e: O	n multiple part questions, check those not in compliance.	
Sec	tion	A - Site Identification	
1.	Site	Name: VAN DATERS & ROGERS, INC.	
Sec	tion	B - Hazardous Waste Determination (262.11)	
1.		generator generate hazardous waste(s) listed in art D (261.30-261.33 - List of Hazardous Waste)?	Yes _/No
	a.	If yes, list wastes, EPA numbers & quantities	
2.	haza reac	generator generate solid waste(s) that exhibit rdous characteristics? (corrosivity, ignitability, tivity, EP toxicity, 261.20-261.24 - Characteristics azardous Waste)	YesNo
	a.	If yes, list wastes, EPA numbers, and quantities. DCOZ	STRONG ACIDS
	b.	Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge?	No
		(1) If determined by testing, did generator use test methods in Part 261, Subpart C (or equivalent)?	YesNo
		(2) If equivalent test methods used, attach copy of the test methods used.	
Sec	tion	C - Manifest (262.2023)	
1.		generator shipped hazardous waste off-site since ember 22, 1986? (Subpart B - The Manifest)	✓_YesNo
	a.	If no, do not fill out Section C and D.	
	b.	If yes, identify primary off-site facilities. List facilities in narrative report.	

DATE		
FACILITY	ID	

2.		generator use manifest? (262.20 - General irements)	YesNo
	Is E	PA Form 8700-22 (Rev 9-88) used?	YesNo
		o, does the generator qualify for the contractural ement exemption? (262.20(e))	<i>V A</i> YesNo
	revi (262	es, inspect manifest at random. Do all manifests ewed include the following information? .21 - Required information) (Check items not on fest.)	
	a.	Generator EPA ID No.	YesNo
	b.	Manifest Document No.	YesNo
	c.	Generator's Name, Mailing Address, Tel No.	YesNo
	d.	Transporter(s) Name, EPA I.D. No., Telephone No.	YesNo
	e.	Facility Name, Address, and EPA I.D. No., Telephone No.	YesNo
	f.	DOT description of the waste	YesNo
	g.	(1) Containers (number and type)(2) Total Quantity (weight or volume)	Yes No
	h.	EPA Waste No.	No
	i.	Emergency Information (optional) (Special handling instruction, Phone No.)	YesNo
	j.	Is the following certification on each manifest form?	YesNo
		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 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.

DATE	·
FACILITY	ID

	k.	Signature and dates		
		(1) Generators	Yes	No
		(2) Transporter	Vyes	No
		(3) Disposer (returned copy)	Yes	
	1.	Indicate number of manifests inspected and number	6	
	••	of violations. Note type of violation in report.	0	
	m.	If copy of manifest from facility was not returned within 60 days, did generator file an exception report? (262.42(b) - Exception reporting)	//A Yes	No
		If yes, did it contain the following information? Legible copy of manifest.	N/A Yes	No
		and		
	•	Cover letter explaining generator's efforts to locate waste.	μ/A Yes	No
	n.	Does (will) generator retain copies for 3 years?	Yes	Nc
Sec	tion 1	D - Pre-Transport Requirements (262.30-34)	N/A	
1.	Does	generator package waste for transport?	Yes	
		o, skip to question 8. es, complete the following questions.		
2.		generator package wasted in accordance with 49 CFR and 179 (DOT requirements)? (262.30 - Packaging)		Nc
з.	Insp	ect containers to be shipped.		
	a.	Are containers to be shipped in good condition? (Describe containers and condition; i.e., leaking or corroding or bulging.)	<u>√</u> Yes	No
	b.	Is there evidence of heat generation from incompatible wastes in the containers?	Yes	No
4.	requ	re shipping, does the generator use DOT labeling irements in accordance with 49 CFR 172 (263.31 - ling)?	Yes	No
5.		the generator mark each package in accordance 49 CFR 172 (262.32 - Marking)?	Yes	Nc
6.		ach container of 110 gallons or less marked with following label (262.32 - Marking)?	Yes	Nc

				FACILITY I	D	
	Labe	l saying:	HAZARDOUS WASTE - Fed	leral Law Prohibits		
			Improper Disposal.]			
			the nearest police or			
			authority or the U.S.	Environmental		
			Protection Agency.			
			Generator's Name and	Address		
			Manifest Document Num	ber		
7.	haza	rdous waste	ny vehicles present or e, inspect for presence rative explanation sh	e of placards. Not	e this	
	a.		penerator have the appinitial transporter?	ropriate placards t	,	Nc
	b.	If no, who	provides placards? _			
8.	Accur	mulation T	me (262.34 - Accumula	tion Time)		
	a.		y a permitted storage ip to question #9.	facility?	Yes <u></u> !	ΝC
		If no, ans	wer rest of question	#8.		
	b.		acility comply with to on limit? (262.34(d)		✓Yesi	Νc
	c.		acility comply with t cumulation of hazardo (1))		Yes1	No
	d.	Are contain (262.34(d)	ners used to store wa (2))	stes?	✓Yesn	No
			mplete Containers Sto tity Generators.	rage Checklist for		
			inning date of accumu (262.34(a)(2))	lation time clearly	Yes1	
	e.	Are tanks	used to store wastes?	(262.34(d)(3))	Yes	NO.
		If yes, co	mplete Tanks Checklis	t for Generators.		
	f.	While beir clearly ma	g accumulated, is eac rked "Hazardous Waste	h container or tank "? (262.34(a)(3))		10
Sec	tion E	E - Record	eeping and Records (2	62.40-43)	N/A	
Exp	lain		on the second se			

DATE

1.	Is generator keeping the reports of test results where applicable? (262.40(c))	YesNo
2.	Where are records kept (at facility or elsewhere)?	
	AT. FACILITY	
3.	Who is in charge of keeping the records?	
	Name WAYNE TOTH Title OPERATONS MANAGE	ER
4.	Any additional reporting? (262.43 - Additional Reporting) If yes, describe in narrative.	Yes Yes
Sec	tion F - Special Condition (262.50 - International Shipments	N/A
Exp	lain	
1.	Has generator received from, or transported to a foreign source any hazardous waste?	Yes \checkmark _No
	a. If yes, has he filed a notice with the Regional Administrator?	<i>\\/</i> YesNo
	b. Is this waste manifested and signed by Foreign consignee?	بر/م YesNo
	c. If generator transported wastes out of the country, has he received confirmation of delivered shipment?	μ/A YesNo
<u>Sec</u>	tion G - Preparedness and Prevention (265,30-37)	
1.	Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility)	Yes Vo
	If yes, use narrative explanation.	
2.	Is the facility equipped with (265.32 - Required equpiment)	:
	a. Internal communications or alarm system? Is it easily accessible in case of emergency	YesNo
	b. Telephone or two-way radio to call emergency response personnel?	YesNo
	c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination? Is this equipment tested to assure its proper operation? How frequently? ANNUALLY	YesNo

FACILITY ID_

	d. Water of adequate volume for hoses, sprinklers or	/	
	water spray system?	Yes	No
	(1) Describe source of water $\mathcal{C}.\mathcal{O}.\mathcal{T}.$		
	(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)	Yes	No
4.	Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities)	Yes	No
	If N/A, explain.		
5.	In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities)N/A If yes, indicate primary authority	Yes	No
	Is the fire department a city or volunteer fire department?		
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)	Yes	No
	Are they readily available to the emergency coordinator?	Yes	No
7.	Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities)Yes	No
	If no, has the owner/operator attempted to do this?	Yes	No
8.	If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37(b) - Arrangements with Local Authorities)		No

FACILITY ID

Section H - Modified Contingency Plan and Emergency Procedure (262.34(d)(4))

1.	Is there an emergency coordinator on site or within short driving distance of the plant at all times?	✓ Yes	No	45 minutes
2.	Who is the emergency coordinator? WAYNE TOTH			
3.	Is the following information posted near the telephone:		-	
	a. Name and telephone number of emergency coordinator?	Yes	No	
	b. Location of fire extinguishers, spill control material and, if present, fire alarm?	√Yes	No	
	c. Telephone number of fire department if no direct alarm?	Yes	No	
4.	Are all employees thoroughly familiar with proper waste handling and emergency procedures as relevant to their responsibilities during normal facility operations and emergencies?	Yes	No	
5.	Does the emergency coordinator or his designee know what is the required response in the event of a fire, a spill which can be contained, or a fire, explosion or other release which could threaten human health outside the facility or reach surface water?	Ves	No	- -

Date			
Inspector			
Facility	ID#		

CONTAINERS STORAGE CHECKLIST FOR SMALL QUANTITY GENERATORS

(40 CFR Part 265 Subpart I - Use and Management of Containers)
Except 265.176

1.	Are the containers in good condition (265.171)? (Check for leaks, corrosion, bulges, etc.)	YesNo
2.	If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	✓YesNo
3.	Is the waste compatible with the containers and/or its liner (265.172)?	✓YesNo
4.	Are the containers kept closed except when adding or removing wastes (265.173(a))?	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))?	YesNo
	If yes, explain using narrative.	
6.	Are each of the containers inspected at least weekly (265.174)?	Yes No No doc.
	If no, explain using narrative concerning the frequency of inspection.	
7.	Are incompatible wastes stored in the same containers?	YesNo
	If yes, explain using narrative.	
8.	Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance?	YesNo
	If no, explain using narrative.	

Date	8/19/	193		
Inspecto	r	RICE		
Facility	ID#	FLD	02098	5727

TRANSPORTERS CHECKLIST

ı.	SITE	NAME:	VAN WATERS & ROGERS, INC.	
II.	TRANS	SPORTE	CR REQUIREMENTS (40 CFR 263)	
	1.	Do ve	chicles transporting hazardous waste have the opriate placards? (263.10)(49 CFR 172.500)	YesNo
	2.		transporter have an EPA identification er? (263.11(a))	✓YesNo
	3.		the transporter use manifest system as required 53.20?	YesNo
		Do th	ne manifests contain at least:	
		a.	Name, address, and EPA ID of transporter?	✓YesNo
		b.	Name, address, and EPA ID code of generator?	YesNo
		c.	Name, address, identification code of designated permitted facility?	✓YesNo
		ď.	Corresponding manifest document number?	✓YesNo
		e.	Description and quantity of each hazardous waste?	YesNo
		f.	Signature of subsequent transporters?	No
		g.	Signatures signifying proper delivery or reasons why delivery could not be certified?	_∕YesNo
		h.	EPA waste codes?	YesNo

		FACILITY ID	
•			
4.	Inte	ernational shipments: (263.20(g))	N/A
	a.	Record of date waste left U.S.?	YesNo
	b. ,	Presence of one signed copy in records?	YesNo
•	c.	Signed copy of manifest returned to the generator?	YesNo
	d.	Copy of the manifest given to a U.S. Customs official at the point of departure from the United States?	YesNo
5,.	For	SQG waste:	
	a.	Is waste transported according to reclamation agreement?	YesNo
	b.	Is following information recorded on a shipping paper:	
		Name, address, and EPA ID of waste generator Quantity of waste accepted DOT - required shipping info Date waste is accepted	YesNo YesNo YesNo
	c.	Does transporter carry this shipping paper during transport?	YesNo
	đ.	Are records maintained for three years after termination or expiration of reclamation agreement?	YesNo
6.		copies of the manifest retained for 3 years?	YesNo
7.		there evidence of discharge of hazardous waste? 3.30)	YesNo
8.		transporter demonstrated the financial ponsibility required under 17-30.170(2)	YesNo
9.		s the transporter verify financial responsibility with Department annually (17-730.170(3))?	√YesNo
[. <u>TR</u>	ANSFE	R FACILITY REQUIREMENTS (17-730.171)	
Α.		s transporter comply with 10 day storage limit transfer facilities? (263.12)	YesNo

Is the hazardous waste packaged according to

262.30? (263.12)

DATE		
FACILITY		

в.	Gene	ral F	acility Standards (265 Subpart B)	
	1.	Secu	rity (265.14)	
		a.	Is the facility security system adequate to minimize unauthorized entry?	YesNo
•		b.	Are signs posted and legible for 25 feet?	✓YesNo
	2.	Insp	pection Requirement (265.15)	
		a.	Does the facility have a copy of the Inspection Plan?	Yes $\sqrt{_{ m No}}$
•	•	b.	Does the facility have completed inspection logs?	YesNo
		c.	Were the deficiencies corrected in a timely manner?	P/A YesNo
		d.	Are the inspection logs maintained at the facility for 3 years?	//// YesNo
	3.	Pers	sonnel Training (265.16)	
		a.	Do management personnel complete hazardous waste training?	YesNo
			Is training on the job?Is training in the classroom?	Yes No
		b.	Do laborers who handle hazardous waste complete training?	YesNo
``			Is training on the job?Is training in the classroom?	Yes No
		c.	Does training include:	·
			Emergency response procedures?Inspection procedures?Operation of hazardous waste handling equipment?	YesNoYesNoYesNo
		d.	How often is training reviewed? Annually	
		e.	Does the facility have personnel training records including:	
			Job title and description of position?Description of employee's training	Yes No

		f.	Is training successfully completed within 6 months of hiring/transfer to HW position?	✓YesNo
		g.	Are records maintained for three years at the facility?	✓YesNo
•	4.	<u>Iqni</u>	table, 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?	✓YesNo
		b.	Are "No Smoking" signs posted in the area?	YesNo
c.	Prep	paredn	ness and Prevention (265 Subpart C)	
	1.	cont	there evidence of fire, explosion or tamination of the environment? (265.31 - atenance and Operation of Facility)	Yes <u>√</u> No
		If y	yes, use narrative explanation.	
	2.		the facility equipped with (265.32 - required ipment):	
		a.	Internal communications or alarm system? Is it easily accessible in case of emergency?	NoNo
		b.	Telephone or two-way radio to call emergency response personnel?	YesNo
		c.	Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?	YesNo
			Is this equipment tested to assure its proper operation?	YesNo
			How frequently? Monntly / YEARLY	
		d.	Water of adequate volume for hoses, sprinklers or water spray system?	YesNo
			(1) Describe source of water. C.O.T.	
			(2) Indicate flow rate and/or pressure and storage capacity, if applicable	· · · · · · · · · · · · · · · · · · ·

DATE______FACILITY ID___

	DATE_	
	FACIL	ITY ID
3.	Is there sufficient aisle space to allow unobstructed movement of personnel and e (e.g., adequate aisle space in between be check for leakage, corrosion and proper etc.) (265.35 - Required Aisle Space)	equipment? earrels to
4.	Has the owner/operator made arrangements the local authorities to familiarize the characteristics of the facility? (Layou facility, properties of hazardous waste and associated hazards, places where fac personnel would normally be working, entroads inside facility, possible evacuati (265.37 - Arrangements with Local Author	m with FIRE INSPECTOR 8/19/9 tof handled cility trances to on routes.)
	If N/A, explain	
5.	In the case that more than one police or department might respond, is there a desprimary authority? (265.37 - Arrangement Local Authorities)	ignated
	If yes, indicate primary authority.	
	Is the fire department a city or volunte department?	
6.	Does the owner/operator have phone number agreements with state emergency response emergency response contractors and equipage (265.37 - Arrangements with Local Author	e teams, oment suppliers? /
	Are they readily available to the emerge coordinator?	ency YesNo
7.	Has the owner/operator arranged to family hospitals with the properties of hazardo handled and types of injuries that could from fires, explosions, or releases at to (265.37 - Arrangements with Local Author	ous waste l result the facility?
٠.	If no, has the owner/operator attempted	to do this?

If the State, or local authorities decline to enter into the above referenced agreements, has this been

(265.37 - Arrangements with Local Authorities)

Yes ___No

documented in the operation record?

8.

DATE		
FACILITY	ID_	

C.	Cont	ingency Plan and Emergency Procedures (265 Subpart D)	
	1.	Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)	YesNo
	2.	Is it maintained at the facility? (265.53 - Copies of Contingency Plan)	YesNo
	3.	Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan)	YesNo
		a. Does the plan include:	
•		(1) Action personnel will take?	✓ YesNo
		(2) Evacuation routes?	YesNo
	,	(3) Emergency Equipment?	YesNo
		(4) Is the emergency equipment properly inspected and maintained?	YesNo
	4.	Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator)	YesNo
	5.	Who is the emergency coordinator? WAYNE TOTH	
	6.	Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Plan)	YesNo
D.	Cont	ainer Storage Checklist	
	(Sur	opart I - Use and Management of Containers 265.170)	
	1.	Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.)	YesNo
	2.	If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?	No
	3.	Is the waste compatible with the containers and/or its liner? (265.172)	YesNo

		DATE		
		FACILITY ID	<u></u>	
١.	Are containers holding hazardous was handled or stored in such a manner the container to rupture or leak?	as to cause	YesNo	
	If yes, explain using narrative.			
	Are each of the containers inspecte weekly (265.174)?	ed at least	Yes No	
	If no, explain using narrative confrequency of inspection.	cerning the	TED, BUT NO DOWN	e Mariba.
5.	Are containers holding ignitable of located at least 15 meters (50 feet facility property line? (265.176)		YesNo	
	If yes, explain using narrative.			
7.	Are incompatible wastes stored in containers?	the same	YesNo	
	If yes, explain using narrative.			
3.	Are containers holding incompatible apart by physical barrier or suffi		YesNo	
	If no, explain using narrative.	•		
requ deco	facility have a written closure plirements of closure performance, nontamination standards of 40 CFR 265 114, 265.115? (17-30.171(2)(b))	tification, and	YesNo	
vehi of p	azardous waste that is stored in co cles stored on a man made surface w reventing spills or releases to the 730.171(2)(d))	hich is capable	YesNo	
	written log maintained for all was eaving the transfer facility? (17-		✓YesNo	
Does	the log contain:			

E.

F.

G.

Generators' names?
Manifest numbers?

Dates when waste enters and leaves facility?

	н.	Has the facility notified the department on Form 17-730.900(6) (Transfer facility notification form)? (17-730.171(3))	
	I.	Does the transfer facility have an EPA/DER ID number?	YesNo
۲۷.		GULATED WASTES (HOUSEHOLD/CONDITIONALLY EXEMPT LL QUANTITY GENERATOR WASTES)	N/A
	1.	Does the transporter have documentation that this waste was generated by an unregulated source?	YesNo
	2.	If no, is the transporter assuming responsibility as the generator of this waste?	YesNo
		a. If yes, complete the applicable Generator or Small Quantity Generator checklist.	·
		b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the waste and will be reinspected to ensure that the applicable requirements are being satisfied. A follow-up inspection should be scheduled as follows:	
		i) 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg.	
		ii) 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.	•
	3.	Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?	YesNo
		If yes, complete the Generator checklist.	
J.	LANI	D BAN WASTE	
•	1.	Does the transporter manage restricted (land ban) wastes?	
		If yes, check appropriate box(es).	YesNo
		"California List" F List	

FACILITY ID

RCRA INSPECTION REPORT LAND DISPOSAL RESTRICTIONS CHECKLIST

Pacifity ID#: <u>PLD02899 \$727</u> Date of Inspection:
Facility Name: VAN WATERS & ROBERS INC.
Facility Address: ROUTE 3 BOX 498-A 6049 OLO HUY 41A.
TAMPA, FL 33619
Facility Phone #: (88) 677 - 8414 Facility Contact: WAYNE TOTH
Contact's Title: OPERATIONS MANAGER
Persons proceed (
WAYNE TOTH
1000 10114
Date and Time Inspection Began: 10/19/93 @ 1:30 pm
Date and Time In
Date and Time Inspection Ended: 10/19/53 & 4:00 pm
I. (a) Describe the generator's restricted waste streams (use the LDR Treatment Standards list) and the destination of each: TOO 1 - SOLVEATT LINE COURTS
DAGE ALLES PLOSPI
DOOZ - ACIDOR ATKATINE LINE FLUSH
Dovinia - "

(n)	Thirds WW, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Thirds includes variance until 8.8 co. Minimum 7.					
	waste and a second of the seco					
	lf an					
(c)	Is the generator storing restricted waste on site?					
. ,						
	yes					
	Is the generator complying with 268.50?					
	Uen					
	Mos.					
•						
	Is the generator complying with 262.34 as required by 268.50(a)(1)?					
!	Gos.					
-						
ı	Are the wastes identified correctly?					
	yes.					
•						
	<u>. </u>					

Revision # <u>1</u> Date <u>3-12-91</u>

LDR CHECKLIST

	Have LDR wastes been stored over 90 days (generator)?
	No, (180 p.mgs - 596)
	If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal?
(0	Does the generator have a case-by-case extension or a variance? (specify)
	110
II.	Waste with Treatment Standards
(a	a) Do the Notifications required by 268.7 include:
	EPA Hazardous Waste #: ()
	Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule):
	yes.
	Manifest Document #'s:
	Waste Analysis Data, where available:
	Certification Statement if Generator is Claiming to meet Treatment Standards: 423.
	Subject to a Case-By-Case Extension or Variance:
	Revision # 1

LDR CHECKLIST

i .	r maintain the above records on-site for five (5) years?
	. —
Additional Notes an	nd Comments:
(Check for soft ham	nmer compliance prior to May 8, 1990.)
	1 10 prior to may 0, 1330.
	·
	•

Revision # <u>1</u> Date <u>3-12-91</u>

GENERATOR LAND BAN CHECKLIST

Generator: VAN WATERS & ROGERS FLD 020985727

Date: 10/19/93 Inspector: T. Rice

						•
Manifest	Line Item		Notice Type	Waste Codes Included	Treat- ability Group	7
00001		6/17/93	R	F001	Grono	Defects - Comments
<i>∞347</i>		6/17/93	2	0001,0035, FOOS		
9300 z		6/11/13	R	2003 FOUS 2035		
93007		6/17/92		2007 po3, FC5		PIL TRANSFER FACILITY
20352		6/17/93 12/29/93 7/29/43	R	0001, 003, FOOS		WASTE WANIFESTS
92062		7/79/62	R	DOL, DOO), DOOS, DOLS, DOJS, FOOJ, FOOT		
		1121/75		0018,7035, FC03, FC05	<u> </u>	
						
.:						
						
						
						·
	ı				<u>-</u>	

PART 268 GENERATOR VIOLATIONS



- 1. Restricted waste identified as unrestricted.
- 2. No LDR notice sent to TSD for restricted waste.
- 3. Copy of LDR notice not kept (after 8-8-88) §268.7(a)(6).
- 4. Notice does not include all applicable EPA waste codes (effective 5-8-90 for all wastes -- effective as applicable for bulked shipments) §268.7.
- 5. Notice does not include all applicable treatment standards:
 - a. Standard for 1 or more waste code omitted or incorrect;
 - b. Standard for 1 or more hazardous constituent omitted or incorrect;
 - c. Incorrect determination of treatability group or subcategory;
 - d. California list restrictions omitted.
- 6. Notice does not reference manifest document number §268.7.
- 7. Insufficient analytical data to support generators certification that waste meets treatment standard §268.7(a)(2).
- 8. No waste analysis plan (§268.7(a)(4), 5/8/90).
- 9. Certification statement omitted or not signed by generator for wastes meeting treatment standards §268.7(a)(2).
 - 10. Notice omits or gives incorrect dates wastes subject to variance or case by case extensions will be prohibited from land disposal §268.7(a)(3)(v).
 - 11. Lab packs incorrectly certified contains wastes from both Appendix IV and $V \S 268.7(a)(7+8)$.
 - 12. Ineligible facility is using tolling agreement exemption §268.7(a)(9).
 - 13. No soft hammer certifications/demonstrations (n/a after 5/8/90).
 - 14. Copy of generators soft hammer certification/demonstration not forwarded by storage/treatment facility to disposal facility.
 - 15. Other

Notice Types

- N. Unrestricted from land disposal
- R. Restricted from land disposal requires treatment
- T. Restricted meets treatment standards -
- V. Restricted subject to variance
- E. Restricted subject to case by case extension or exemption
- S. SQG tolling agreement
- L. Lab pack with only Appendix IV or V wastes

<u>H._ARDOUS WASTE INSPECTION</u> <u>EXIT INTERVIEW</u>

FACILITY: VAN WATERS & ROGERS
I.D. NUMBER: FLD 020 985 727 DATE: 10 19 93 TIME:
INTERVIEW PARTICIPANTS: TIMYN RICE WAYNE TOTH
This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-730, which adopts Federal Regulations 40 CFR Parts 260-266 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater genalty liability.
The following violations have been tentatively identified:
1. Hazardous Waste Determination (262.11). 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11). 3. Manifest Deficiencies or Recordkeeping and Reporting (263 Subpart B or 264/263 Subpart E). 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16]. 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or 264 Subpart D) 6. Preparedness and prevention (265 Subpart C or 264 Subpart C). ✓ 7. Container Requirements (265.34 or 264/265 Subpart I). 8. Tank Requirements (262.34 or 264/265 Subpart J). 9. Operating a treatment, storage or disposal facility without a permit (403.722 F.S., F.A.C. 17-730, Section IV). 10. Security Requirements (264/265 .14). 11. Groundwater Monitoring (264/265 Subpart F). 12. Closure/Post-closure (264/265 Subpart G). 13. Failure to comply with the provisions of a Department issued permit or with the provisions of the Consent Order. ✓ 14. Other 265.15 General Insections
COMMENTS:
DER INSPECTOR SIGNATURE: Junion Rice
FACILITY PARTICIPANT SIGNATURE:

NOTE: BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. ● 2600 Blair Stone Road ● Tallahassee, Florida 32399-2400 Lawton Chiles, Governor

Carol M. Browner, Secretary

MAR - 1 1293

TRANSFER FACILITY NOTIFICATION FORM

Vicky Valade (NE District) TAMPA **ROUTING SLIP** TO: _____ Ed O'Connell (NW District) _____ John White (Central District) Beth Knauss (SW District) Jeff Smith (SE District) Charles Emery III (South District) Transporter: EPA ID#: Notification received in headquarters on: Jahrucry 25, 1993 To district on: Alba 25, 1993 Suspense date: District action: ____ Site inspection conducted Transfer facility approved Transfer facility denied _____ Site inspection not conducted Contingency/emergency plan received: _______ yes ______ no Closure plan received: _____ yes ____ no Comments: Date: Evaluated by: Headquarters action: Transfer facility approval certificate issued on: Transfer facility approval certificate not issued. Comments: Completed by: Date:

HWTF Routing Slip 11/92 (rev.0)

Van Waters & Rogers Inc.

subsidary of Univar

2145 SKYLAND COURT P.O. BOX 1677 NORCROSS, GA 30091-1677 PHONE (404) 246-7700 FAX (404) 409-1757

February 19, 1993

Florida Department of Environmental Regulation
Hazardous Waste Management Section
2600 Blair Stone Road
VIA CERTIFIED MAIL
Tallahassee, Florida 32399-2400

Dear Sir or Madam:

Enclosed you will find the annual update forms for the three transfer facilities operated by Van Waters & Rogers Inc. I am the Regional Regulatory Manager for this Southern Region of Van Waters & Rogers Inc. The three transfer facilities are in the Van Waters & Rogers Inc. Southern Region. I have elected to file these updates from this Regional Office.

If you have any questions, or need additional information, please don't hesitate to contact me.

Very truly yours,

Walter T. Goossen

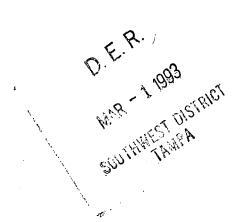
Regulatory Manager,

Southern Region

CC: Wayne Toth, Tampa Lloyd Gray, Delray Beach

Jon Moore

Robert Potochnik, Jacksonville Area Operations Manager, Atlanta DER - MAIL ROOM
1993 FEB 24 FH 2: 28





Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400 Lawton Chiles, Governor Carol M. Browner, Secretary

TRANSFER FACILITY NOTIFICATION FORM

This form must be completed as required in Florida Administrative Code Rule 17-730.171(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 17-730.171. All information must be typed or printed clearly.

I.	Transporters Identification:
	Company Name Van Waters & Rogers Inc.
	EPA ID NoFLD 020 985 727
	Company Mailing Address 6049 Highway 41A South
	Tampa, FL 33619
	Principal ContactWayne Toth
	Phone Number (813) 677-8414
II.	Transfer Facility Identification:
	Name of Facility Van Waters & Rogers Inc.
	Street Address 6049 Highway 41A South
	Tampa, FL 33619
	Latitude 27°52' 03.2" Longitude 82°23' 00.5"
	CountyHillsborough
	Waste Codes*
	Storage Volume 5280 Gallons
	* All RCRA Listed and characteristic except D003 or Radioactive wastes.

DER FORM 17-730.900(6) Effective October 14, 1992 TRANSFER FACILITY NOTIFICATION FORM Page 1 of 2



III. Certification

I CERTIFY UNDER PENALTY OF LAW THAT THE ABOVE INFORMATION IS ACCURATE AND COMPLETE. AS THE OWNER OR OPERATOR OF THE ABOVE REFERENCED HAZARDOUS WASTE TRANSFER FACILITY, I ALSO CERTIFY THAT THIS FACILITY IS IN COMPLIANCE WITH ALL PROVISIONS OF FAC 17-730.171.

Walter T. Goossen

PRINT/TYPE NAME

Regional Regulatory Manager

TITLE

February 19, 1993

SIGNATURE OF AUTHORIZED REPRESENTATIVE

DATE SIGNED

Please complete this form and mail to the following address:

Florida Department of Environmental Regulation Hazardous Waste Management Section 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Jeff-placevevier

Van Waters & Rogers Inc.

subsidiary of Univar

6049 OLD 41A HWY TAMPA, FL 33619-9796 PHONE (813) 677-8414 FAX (813) 671-2920

November 12, 1992

Florida Department of Environmental Regulation Southwest District 3804 Coconut Palm Drive Tampa, FL 33619-8218

To Whom it May concern:

In accordance with FAC 17-730.171(1) (a), enclosed you will find a copy of the contingency/emergency for the Van Waters & Rogers Inc. facility at the address shown on this letterhead. This facility has hazardous waste transfer facility status in the State of Florida. This Van Waters & Rogers Inc. facility has the EPA Id number FLD020985727.

If you have any questions, or need additional information, please don't hesitate to contact me.

Very Truly Yours,

VAN WATERS & ROGERS INC.

Wayne D. Toth

Branch Operations Manager

Enclosure(s)

/kml

D.E.R.

NOV 1 3 1992

SOUTHWEST DISTRICT



Florida Department of Environmental Regulation

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

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

29 October 1990

GARY TONRY
VAN WATERS & ROGERS
RT 3 BOX 498A
TAMPA, FL 33619

RE: Revisions to FAC 17-730.171 Transfer Facilities

Florida Administrative Code (FAC) 17-730.171 outlines the requirements for hazardous waste transfer facilities. A transfer facility is defined as a transportation related facility where shipments of waste are held during the normal course of transportation. The Department revised FAC 17-730.171 effective August 13, 1990.

The owner or operator of a transfer facility which stores manifested waste for more than 24 hours but ten(10) days or less must notify the Department using Form 17-730.900(6), the Transfer Facility Notification Form. This form must be submitted at least thirty(30) days before the storage of hazardous waste begins.

The owner or operator of a transfer facility must also obtain an EPA/DER identification number for each transfer facility location. In the past, a transporter could identify multiple transfer facilities in the state and use one identification number for all locations. Now, a transporter must request a separate EPA/DER identification number for each transfer facility. If a transfer facility is located on property that has been assigned an identification number because of other hazardous waste activities, no action in required.

To obtain an identification number please submit the enclosed EPA Form 8700-12 to the Department. In Section VIII of the form, mark Item 2 as a transporter. Under Mode of Transportation, mark #5 Other, and specify "Transfer Facility". Send 2 copies of the completed form to the Notification Coordinator in the Hazardous Waste Regulation Section at the address above.

If you have questions about the Transfer Facility rule, please call Linda Lakes at 904-488-0300.

Sincerely,

Satish Kastury

Administrator, Hazardous Waste Regulation Section

Enclosures:

Transfer Facility Information Sheet FAC 17-730.171 Transfer Facility Rule EPA Form 8700-12 Notification of Regulated Waste Activity

cc: SW District





Florida Department of Environmental Regulation

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

Bob Martinez, Governor Dale Twachtmann, Secretary John Shearer, Assistant Secretary

HAZARDOUS WASTE TRANSFER FACILITY INFORMATION SHEET

TRANSPORTER: VAN WATERS & ROGERS EPA ID: FLD020985727

TRANSFER FACILITY LOCATION: 6051 HWY 41A SOUTH, TAMPA
TRANSFER FACILITY EPA/DER ID: FLD020985727
STORAGE VOLUME: 5280 GALS

CONTACT: GARY TONRY

MAILING ADDRESS: RT 3 BOX 498A, TAMPA, FL 33619

PHONE: 813-677-8414

_X	IS INFORMATION ABOVE CORRECT? PLEASE UPDATE AND RETURN FORM TO THE DEPARTMENT.
	EPA/DER ID ASSIGNED TO TRANSFER FACILITY. NO ACTION NECESSARY.
	APPLY FOR EPA/DER ID FOR TRANSFER FACILITY LOCATION. EPA FORM 8700-12 IS ENCLOSED.
<u>:</u>	PROOF OF TRANSPORTER LIABILITY INSURANCE IS NOT CURRENT. SEND DER FORM 17-830.900(5) TO THE DEPARTMENT.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT 4520 OAK FAIR BLVD. TAMPA, FLORIDA 33610-7347 813-623-5561 Suncom--552-7612



BOB MARTINEZ GOVERNOR DALE TWACHTMANN SECRETARY DR. RICHARD D. GARRITY DISTRICT MANAGER

July 1, 1988

Van Waters & Rogers, Inc. Route 3, Box 498-A Tampa, Florida 33619

Attn: Mr. Gary Tonry

RE: Class II Hazardous Waste Violations
Van Waters & Rogers, Inc. - Hillsborough County
FLD 020 985 727

Dear Mr. Tonry:

A hazardous Waste compliance inspection was conducted at your facility on June 1, 1988. This inspection was conducted under the authority of Section 403.091, Florida Statutes and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 CFR 260-266, adopted in Florida Administrative Code Chapter 17-30.

During the inspection, violations of rules regarding hazardous waste management were noted. These violations are set forth in Section #9 of the attached inspection report.

A review of the information submitted on June 8, 1988 indicates these Class II violations have been corrected. This enforcement referral is now closed.

Thank you for your prompt attention in this matter. If you have any questions, please call Ms. Elizabeth Knauss at 813/623-5561.

Sincerely,

Diane Trommer

Clabe R. Polk
Program Manager
Waste Management Section

CRP/br

cc: Trussell Report
Hooshang Boostani, HCEPC

Trommer

REFERRAL	NO.	0121	

PROGRAM:	HW

ENFORCEMENT REFERRAL FORM

SOURCE: Van Waters & Rogers Inc.	RESPONSIBLE PARTY: Gary Tonry
ADDRESS: Route 3, Box 498-A	ADDRESS:
Tampa, FL 33619	
TELEPHONE: 813/677-8414	TELEPHONE:
EPA ID NO: FLD 020 985 727	TYPE: Transfer COUNTY: /-////5
G.P.S.I.: 4029P80870	SECTION: TOWNSHIP RANGE
ENGINEER:	ATTORNEY:
ADDRESS:	ADDRESS:
TELEPHONE:	TELEPHONE:
RECEIVING WATERS:	CLASSIFICATION:
DOMINANT PLANT COMMUNITY:	
I. VIOLATI	ON SUMMARY
RULE OR STATUTE	DESCRIPTION OF VIOLATIONS
See attached	
40CFR 265,16(d)(2)	
erior de la companya	
<u> </u>	
·	

BEST AVAILABLE COPY

II.	DESCRIPTION OF INTER	TION WITH VIOLATOR:
	WRITTEN:	DATE:
	TELEPHONE:	
	MEETINGS:	DATE:
	INSPECTIONS: X	DATE: 6-1-88
III.	OTHER AGENCIES INV)?
IV.	ATTACH ALL CURRENT :	AS WHICH PERTAIN TO THE VIOLATION:
	(in-house reference permitting file copies of all a	is must be accompanied by all current Outside referrals must be accompanied by evant files.)
V.	COMMENTS:	
	· · · · · · · · · · · · · · · · · · ·	
VI.	DESCRIPTION OF CORP.	IVE ACTION NEEDED: (Attach map of restoration lines, etc.).
		·
VII.	REFERRED BY: Elizab	eth Knauss DATE: 6-9-88
- •	SECTION SUPERVISOF:	
	(
PRIO	RITY: HIGH	MODERATE LOW

DEPARTMEN OF ENVIRONMENTAL GULATION

SOUTHWEST DISTRICT 4520 OAK FAIR BLVD. TAMPA, FLORIDA 33610-7347 813-623-5561 Suncom—552-7612



BOB MARTINEZ GOVERNOR DALE TWACHTMANN SECRETARY DR. RICHARD D. GARRITY DISTRICT MANAGER

June 10, 1988

Van Waters & Rogers, Inc. 6051 U.S. 41-A Route 3, Box 498-A Tampa, Florida 33617

Attn: Mr. Gary Tonry

Dear Mr. Tonry:

Thank you for your assistance during the RCRA compliance inspection conducted on June 1, 1988. Based upon the information gathered from this inspection, Van Waters & Rogers, Inc., was found not to be in compliance with the regulations governing hazardous waste transfer facilities as promulgated under 40 CFR Part 263, which the State of Florida adopts under Chapter 17-30, Florida Administrative Code.

However, all non-compliance items have since been corrected. Enclosed is the inspection report generated from this visit. Please retain this report as a part of your permanent records.

If you have any questions contact me at (813) 623-5561.

Sincerely,

Elizabeth Knauss

- slits 1/2

Environmental Supervisor Hazardous Waste Program

EK/br

REFERRAL NO	PROGRAM: HW
ENFORCE	MENT REFERRAL FORM
SOURCE: Van Waters & Rogers Inc.	RESPONSIBLE PARTY: Gary Tonry
ADDRESS: Route 3, Box 498-A	ADDRESS:
Tampa, FL 33619	
TELEPHONE: 813/677-8414	TELEPHONE:
EPA ID NO: FLD 020 985 727	TYPE: Transfer COUNTY:
G.P.S.I.: 4029P80870	SECTION: TOWNSHIP RANGE
ENGINEER:	ATTORNEY:
ADDRESS:	ADDRESS:
TELEPHONE:	TELEPHONE:
	CLASSIFICATION:
DOMINANT PLANT COMMUNITY:	
I. VIOLATI	ON SUMMARY
RULE OR STATUTE	DESCRIPTION OF VIOLATIONS
See attached	
	·

BEST AVAILABLE COPY

II.	DESCRIPTION OF INTER	TION WITH VIOLATOR:
	WRITTEN:	DATE:
	TELEPHONE:	DATE:
	MEETINGS:	DATE:
	INSPECTIONS: X	
III.	OTHER AGENCIES INV)?
IV.	ATTACH ALL CURRENT	as which pertain to the violation:
	(in-house reference) permitting fill copies of all	Is must be accompanied by all current Outside referrals must be accompanied by evant files.)
V.	COMMENTS:	
VI.	DESCRIPTION OF CORRAL lines, jurisdiction	IVE ACTION NEEDED: (Attach map of restoration lines, etc.).
VII.	REFERRED BY: Elizabe	eth Knauss DATE: 6-9-88
	SECTION SUPERVISOF:	1
	t.	•
PRIO	RITY: HIGH	MODERATE LOW

	•		HAZAI	RDOUS	E COMPLIANC	E MONITORIN	G AND ENFOR	RCEMENT LOC			_
1.	FPA I	.D. # FK	00209	1857	27			2a.	Type Facili	ty: (Circle One)	_
		ER NAME:	Van Wa	tes 1	Rage	15			Treat/Store Non-Handler	/Dispose	
		SS:	6051	154	1 A.				Transporter		
J.	100110		ROUTE	3 B	ox 49	8-A			Small Quan. Cond. Exemp		
			TAMPA	- , <i>F</i> = ;	33G	19			Exempt		
	COUNT	•• ———	141225B					26.	Federal County	hip: (Circle One) State Municipal)
		ENTRY: (Cir			DATE	/	6.1.	88 _	(Private)		-
			VALUATION WHICH				<u></u> /-				
5a.	AGENC.	Y RESPONSIBL	E FOR EVALUATION	ON: (Circ		State Contractor	/EPA	Other Contract Oversigh	or/State t		
	1 = Co 2 = So 3 = Ro 4 = Co	ompliance Ev ampling Insp ecord Review omprehensive ompliance Sc		(CEI)	7 = 0th 8 = 0th 9 = 0th 10 = 0th 11 = Cas 12 = 0 &	er – Part B er – Withdra er – Closed er – Genera e Developmer M Inspectio ormal Meetin	awal Candid Facility I nt Inspecti on	late	(Put Code in	Box)	
7.	ATE (OF EVALUATION	N COVERED BY TH	HIS REPORT	(Enter Onl	y if Differe	ent from 5)	:/_	_/		
		ATION COMMEN AND VIOLATION			Class of			Violation/	Releases		Ī
		Key			Violation	<u> </u>				Other Land-Ban	- 0-5
X = 1	iola:/iol.	tion; 0 = No & Specialty	Violation; Z = ; S = Same Viol	: Pending ./Spec.	I	ļ		X S X S Z Z O C B		X S X S Z(0)	transporte
		<u>Special</u>	<u>ties</u>		11	X S Z O X		Z o C B C	0 0 3 2	XS XSZO	
I = !	lo Ins	surance only	; C = CA Sched.	. Viol.	<u> </u>	 					1
R = .	1)8008	i)-like rele	ase; * = Class	Lonly							
8a. \	'iolai	tion Comment	: <u></u>								-
9. [NFOR	EMENT ACTION	NS: (Area of V	/iol./Rlse	. = GW, CP,	FR, PB, CS.	MA, OT, L	B, or AA)			•
	lass	Area of Viol./Rlse	Rule	Type (code)	Date Action Taken	Compliand Scheduled	e Oates Actual	Pe Assessed	nalty Collected	Resp. Ag. (use code)	
L		26516		je				\$20°		\$	•
	ϕ	other	265.16	10			6-8-85	-		_5	
							 	 			
-				+	····						
							ļ	ļ			
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L											
					İ		ļ				
_					2012 5:						
Тy	des f pes o	of E	Warning Letter EPA Warn. NOV L	.tr. 08	7 = 3013 Fir 3 = 7003 Adm	min. Order	16 = 3	008(h) CA F:	inal Order	Codes for Resp. Acency:	
	torce tions		PA Admin. Comp	1. 11		ivil Action	18 = C		al to AG/DOJ	E = EPA S = State	
		05 = 0 E	IO IPA Final Admin	. Order 13	3 = NOV to 3		on 19 = F	inal Judicia	al Order		
		06 = 3	3013 Complaint	14	= NOV to E	EPA					
10.	Enfor	cement Comme	ent:								-
											-
											-

Inspectors Name: Cffetf 15

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

4520 OAK FAIR BLVD. TAMPA, FLORIDA 33610-7347 813-623-5561 Suncom—552-7612



BOB MARTINEZ GOVERNOR DALE TWACHTMANN SECRETARY DR. RICHARD D. GARRITY DISTRICT MANAGER

HAZARDOUS WASTE INSPECTION REPORT

1.	INSPECTION REPORTCOMPLAINT_X_ROUT	INEFOLLOW-UPPERMITTING
	FACILITY NAME Van Waters & Rogers, Inc.	DER/EPA ID FLD 020 985 727
	ADDRESS 6051 U.S. 41 A - Tampa, FL 33	619
	COUNTY Hillsborough Phone (813) 677-	8414 DATE 6-1-88 TIME 1:30 p.m.
	TYPE OF F	'ACILITY:
Tra	Small Quantity Generator Generator Tank Waste Pile Surface Impoundment Transporter Disposal Landfill Surface Impoundment Waste Pile	TreatmentTankLand TreatmentThermalChem/Phys/BioIncineratorSurface Impoundment
2.	Applicable Regulations:	
	40 CFR 262X_40 CFR 26340 CFR	26440 CFR 265
3.	Responsible Official: (Name & Title)	
	Gary Tonry	
4.	Survey Participants & Principal Inspecto	<u>r</u>
	Gary Tonry Elizabeth Knauss - FDER Edith Morales - FDER	
5.	Facility Latitude:	Longitude:
6.		82° 38' 01" COUNTY MUNICIPAL <u>PRIVATE</u>
7.	Permit Number: n/a Date Issued:	Expiration Date:

8) PROCESS DESCRIPTION

In November, 1986, Van Waters and Rogers, Inc. acquired McKesson Chemical Company, including the Tampa distribution center for industrial chemicals and solvents. The Tampa facility maintains a warehouse storage area for virgin chemicals, a solvent repackaging process and a separate building where chlorine gas is repackaged into cylinders and bleach is produced. As part of the maintenance routine, gas cylinders are painted with a silver colored paint. The pais a blend of mineral spirits and powdered aluminum, with The paint 1,1,1- trichloroethane used as a thinner. No waste is generated from the process, besides empty containers and used brushes.

The bulk solvent tanks all have dedicated pumps and piping so that no waste is generated from flushing the lines. facility has not generated any hazardous waste from spills since the previous inspection.

As a service to its customers, Van Waters & Rogers picks up spent solvents and transports them back to the Tampa facility. The solvent drums are stored in a section of the warehouse for less than 10 days and transported by a second carrier to Safety-Kleen's Envirosystems' plant in New Castle, Kentucky. Most recently, St. Josephs Motor Lines has acted as the second transporter.

All of the facility's records were in order except that a job description for the position "Driver" was not on file. was corrected prior to the completion of this report.

SUMMARY OF VIOLATIONS

40 CFR 265.16(d)(2) - No written job description for the position of "Driver" was on file.

Approved

izabeth Knauss

Énvironmental Supervisor

Date 6-10-88

Date			
Inspector	·		
Facility	ID#	 	

RCRA INSPECTION REPORT GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in comp	liance.
Section A - Site Identification No.	
1. Site Name: Van Waters & (logus
Section B - Hazardous Waste Determination (262.11)	
1. Does generator generate hazardous waste(s) listed in S	ubpart D Yes No los orat
(261.30 - 261.33 - List of Hazardous Waste)?	
a. If yes, list wastes, EPA numbers & quantities.	
2. Does generator generate solid waste(s) that exhibit ha	izardous as and
characteristics? (corrosovity, ignitability, reactivi	ty, EP
toxicity) (261.20 - 261.24 - Characteristics of Hazard	ty, EP Yes No Ping
a. If yes, list wastes, EPA numbers, and quantities.	and the
b. Does generator determine characteristics by test	
product knowledge, or by applying process knowled	lae?
product withreade, or by approving process	
(1) If determined by testing, did generator use	Yes _No Storage
	:)?
	Contract the contract of the c
(2) If equivalent test methods used, attach copy	of
equivalent methods used.	الأراب المراجع والمتعاصر والمراجع والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض والمتعارض
	n neglina editudi. Edit in transiti di internationale di internationale di internationale di internationale di
3. Is generator subject to full regulation under Part 26	2?YesNo
(If no, check appropriate exemptions)	
Small quantity generator (261.5 - Special requirement	a)
Small quantity generator (261.) - Special requirements (Describe small quantity disposal practices & checkli	at)
	ang menangkan dingkan br>Mangang menangkan dingkan dingka
Produces non-hazardous waste at this time (261.4 - Ex	CTORIONS)
OR Recycles, reclaims, uses or reuses hazardous waste at	this time
Recycles, rectaims, uses or reduce mazardous waste at (261.6 - Exclusions) (Describe how this is achieved.)	
OR	and the second section is a second section of the second section of the second section is a second section of the second section is a second section of the
Being a farmer disposing of waste pesticides for his	
own use on his own property (262.51 - Farmers)	The second secon
OR 1	The state of the s
Burns hazardous waste as a fuel for the purpose of re	covering a management tensore in 1968
usable energy (261.1(c)(2))	and the state of t
	gare against the same for the same the same and the same same
11-1-	86 menesson Durse
	Olomical
	86 Mehesson Divise Claimted Divise Sold to Van water & Rosers
	South to
	flores
, <i>F</i>	

ection (C - Manifest (262.2023)	
	generator shipped hazardous waste off-site since Nov. 19, 1980?	N-
(Sub	bpart 8 - The Manifest)	_NO
a.	If no, do not fill out Section C and D.	
	To the tip of the facilities	
ь.	If yes, identify primary off-site facilities.	
	List facilities in narrative report.	•
	es generator use manifest? (262.20 - General requirements)Yes	No
2. Does	es generator use manifest? (202.20 - deneral reduirements)	
	If yes, inspect manifests at random. Do all manifests	NI X or
	reviewed include the following information?	
	(262.21 - Required information) (Check items not on manifest.)	سره ص
	(402.44 - 110404100 1111011001001)	No generator
	a. Manifest Document NoYes	_No 0\^_
		1 1
	b. Generator's Name, Mailing Address, Tel. No. Yes	_No
	c. Generator EPA I.D. No.	_No
	d. Transporter(s) Name and EPA I.D. No.	_No \
1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		en a grand de la companya de la comp
	e. Facility Name, Address and EPA I.D. No.	_No
	f. DOT description of the wasteYes	_No \
	g. (1) Quantity (weight or volume)	_No
	(2) Containers (type and number)	_No
	h. Emergency Information (optional)	
	(special handling instructions, Phone No.) Yes	_No
.*		
	i. Is the following certification on each manifest form?Yes	_No \
		1
	This is to certify that the above named	
***	/ materials are properly classified, described,	
	packaged, marked and labeled and are in proper	
	condition for transportation according to the	The state of the s
	applicable regulations of the Department of	
	Transportation and the EPA.	The state of the s
المساحية المساحدة	j. Signatures and dates	Service Company of the Company of th
The state of the s	ing Tolky. The state of the state Held Andrews the state of the state	
Contraction of the contraction o	(1) Generator	_No figure and the second
	(2) TransporterYes _	_No
	(3) Disposer (returned copy)	_No
	k. Indicate number of manifests inspected	_
	and number of violations.	
	Note type of violation in report.	

	1.	If copy of manifest from facility was not returned within	· ·	
		45 days, did generator file an exception report?		u I K
		(262.42 - Exception reporting)	Yes No	Pl
		If yes, did it contain the following information?		
		Legible copy of manifest	YesNo	
		AND		
	·	Cover letter explaining generators efforts to locate wast	YesNo	V
	m.	Does (will) generator retain copies for 3 years?	Yes No	
Sect	ion	D - Pre-Transport Requirements(262.30-34)	N/A	•
1.	Does	s generator package weste for transport?	YesNo	w:11
	1 6	no, skip to question 8.		USQ
		yes, complete the following questions.		correct.
	11	yea, complete die following quotizono.		proceed
2.	Does	s generator package waste in accordance with 49 CFR 173,		•
		, and 179 (DOT requirements)? (262.30 - Packaging)	Yes No	; (=
	Iner	spect containers to be shipped.		any is
	11101			generater
~ . /		Are containers to be shipped in good condition?	an in the ETV ON LOOP As an As PETER Bette To	general
	••	(Describe containers and condition; i.e., leaking or		
		corroding or bulging.)	YesNo	
	ь.	Is there evidence of heat generation from incompatible		
	- •3.	wastes in the containers?	NoYes	
- 1.2 P	* ' · '			
4.	Bef	fore shipping, does the generator use DOT labeling required	nents	
•		accordance with 49 CFR 172? (263.31 - Labeling)	YesNo	•
		- theterterterter in accordance with		
٥.		se the generator mark each package in accordance with	er an abandonate de	
	.49 (CFR 172? (262.32 - Marking)		Transfer - I to the first
6.	•	each container of 110 gallons or less marked with the	sin ende june en la contac	
$\phi: \mathcal{A}$	fol	llowing label? (262.32 - Marking)	YesNo	Crane -
	agradus en	स्थान स्वातंत्र परिप्राय प्राप्त सेन्यानात्र प्रतिकृति । या विस्तरिक्षात्र अस्य प्रतिकृति । विद्रारति । विस्तरि	Tan a bo quanzu (f. 113). Tan anto	
	Lab	pel saying: HAZARDOUS WASTE - Federal Law Prohibits Improp	per in the late	entration of the
ا م		Disposal. If found, contact the mearest police		
		or public safety authority or the U.S. Enviror]-	
	en been. Here of the	mental Protection Agency.	The state of the s	Miles and the control of the control
	en de la companya de La companya de la co	alle film and the contract of		
er en e		Generator's Name and Address	🚃 स्टाइन किये क्रिस्ट्रिकेड	राज्यां का 👫 🚅 -
	ا کی جائز مستدرست		्राप्ति द्व क्ष्मे जन्मे जन्म	
		ina di inita di <u></u>		
		Marie Bart Danisant Number	Salar Barrer	o astrono
		Manifest Document Number		\\\)

·	7.	WBS	there are any vehicles present on site loading or unloading hazardous te, inspect for presence of placards. Note this instance on narrative lanation sheet. (262.33 – Placarding)
rain Albania		٠.	Does the generator have the appropriate placards to offer the initial transporter? No. No.
SARAHA BARASA		b.	If no, who provides placards?
	8.	Acc	umulation Time (262.34 - Accumulation Time)
	•	8.	Is facility a permitted storage facility? Yes No If yes, skip to question #9.
			If no, answer rest of question #8.
		b.	Does the facility comply with the 90-day accumulation time limit? (262.34(a)) If no, has the generator been granted a 30-day extention? (262.34(b) YesNo
			If yes, explain the unforeseen/uncontrollable circumstances in the narrative.
	: ::	c.	Are containers used to store wastes? (262.34(a)(1)) Yes No in transfer Facility
			11 yes, complete containers secrage checking the dentaction.
	• • •	:	Is the beginning date of accumulation time clearly indicated? (262.34(a)(2)) Are tanks used to store wastes? (262.34(a)(1)) Yes No Yes No generally generally yes No no 51
		d.	Are tanks used to store wastes? (262.34(a)(1)) Yes No
3 - 3 - 3 - 3 - 3 - 3 - 3 - 3 - 3 - 3 -			If yes, complete Tanks Checklist for Generators
	•	e.	While being accumulated, is each container or tank clearly marked "Hazardous Weste"? (262,34(a)(3)) YesNo not observed on 5.16 If generator accumulates waste on site but is not a storage
	9.		Figure 1 is not a storage facility, fill out Appendix A to Generators Checklist. Cribe storage area. Use photos and narrative.
	Sec	tion	E - Recordkeeping and Records (262.40-43) N/A Explain
	-0.5	Is :	generator keeping the following reports? (262.40 - Record keeping) te: The following must be kept for a minimum of three years.)
			Annual reports (not applicable until January 1983). Yes No
		b.	Test results where applicable. Yes No MA

2.	Wher	e are records kept (at facility or elsewhere)?	2. lity	
3.	Who Name	is in charge of keeping the records? Gary Tonry Title Open	ations	manage
4.	Any	additional reporting? (262.43 - Additional Reporting)	Yes No	•
Sec		F - Special Condition (262.50 - International Shipments)	N/A	
	•	lain		
1.		generator received from, or transported to a sign source any hazardous waste?	NoYes	
	a.	If yes, has he filed a notice with the Regional Administrator?	YesNo	
	ь.	Is this waste manifested and signed by Foreign consignee?	YesNo	
	c.	If generator transported wastes out of the country, has he received confirmation of delivered shipment?	YesNo	

Date		
Inspector	:	
Facility	ID#	

-60-

Appendix A To Generator Checklist

Sec	ion A - Personnel Training (265	.16)		
1.	Do management personnel complete	e hazardous waste training?	Yes _No	
	a. Is training on-the-job?		Yes No	
	b. Is training in the classroom	m?	No	
2.	Do laborers who handle hazardou	a waste complete training?	No	
	a. Is training on—the job?		YesNo	
	b. Is training in the classroom	n?	<u>No</u>	
3.	Does training include:			
	a. Emergency response procedur	es?	Yes No	
	b. Inspection procedures?		Ves No	
	c. Operation of hazardous wast	e handling equipment?	/Yes No	
	Committee () And the committee () And the committee ()	The state of the s	the control of the second of t	
4.	How often is training reviewed?	annuall		•
		· · · · · · · · · · · · · · · · · · ·		3)
5.	Does the facility have personne	I training records including	\sim	2_
14.5	relations to	The same against the sa	_Yes UNO W (3:	- (-
	a Job title and description o	•	YesVNo ln (3)	5 / 5
\$2.52 24.52	b. Description of employee's t	raining?	YesNo	
JE			Man No	-
6.	Are records maintained for thre	e years?	YesNo	
4	:		Section 1	
	C. D. Description and Decum	hinn (265 TO TO)	organisa di Santo de br>Caracterista de Caracterista de Caracterista de Santo de	
26C	tion B - Preparedness and Preven	<u>C1011</u> (285.30-37)	- · · · · · · · · · · · · · · · · · · ·	
1.	Is there evidence of fire, expl	•	,	
2.5.10	environment? (265.31 - Maintena	nce and Operation of Facility))Yes	-
اد خانا		ein inen Troof from the	(4) 据例2016 機能分割(4) 4 4 4 4 4 6 6	
	If yes, use narrative explanati	on a large from the same	इक्का ए कार्यक्रद्रद्राय प्रशासन्ति । जान्य क्राका विकास निर्माण निर्माण । सन् १ वर्ष हर्ना विकास । स्थापन	· *
1		TO BE THE THE LET THE LET	and the formality of the secretary of the secretary of the second of the	•
2.	Is the facility equipped with (265.32 - Required equipment).		
erina a	6K	systan	and the second s	-
erenia.	a. (Internal communications) or	alarm system?	Yes No	
Liee.	Is it essily accessible in	case of emergency?	Yes No	
COUNT	And the second s		e lighter of Fig As he was the control of the co	
-70 - 7 - 10 - 27	b Telephone or two-way radio t	o call emergency	HERMALLY SAME OUR DESCRIPTION OF THE	
ŭ.	response personnel?	Charles and the Cartes of the States	Yesa No regry 1 goods 1 or	
- · ·	and the state of t			,
بتنيور	c. Portable fire extinguishers		N N-	
	white the state of	decontamination equipment?	Yes No	
بازارون در اولین سر کیران	Is this equipment tested to	assure its proper operation?	YesNo	
म्द्राग्द्रा वे ४. =	Markan Ma adda y Solo Solo Anna y da Sana	11.	,	
		H_{1} H_{2} H_{3} H_{4}	• • • • • • • • • • • • • • • • • • • •	

	d. Water of adequate volume for hoses, sprinklers or water spray system? YesNo
	(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)
4.	Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities)
	If N/A, explain
6.	In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements With Local Authorities) If yes, indicate primary authority Is the fire department a city or volunteer fire department? Does the owner/operator have phone numbers 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? Yes No
	ting the contribution of t
	Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements With Local Authorities) Yes No
8.	If no, has the owner/operator attempted to do this? Yes No If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the
	operating record? (265.37 - Arrangements With Local Authorities) Yes No

Section C - Contingency Plan and Emergency Procedures (265.50-56)

(265.51 - Purpose and Implementation of Contingency Plan)	YesNo
Is it maintained at the facility?	
(265.53 - Copies of Contingency Plan.)	YesNo
Is the contingency plan a revised SPCC Plan?	/
(265.52 - Content of Contingency Plan)	YesNo
a. Does the plan include:	
(1) Action personnel will take?	Yes No
(2) Evacuation routes?	Yes No
(3) Emergency equipment?	Yes No
(4) Is the emergency equipment properly	
inspected and maintained?	YesNo
Is there an emergency coordinator on site or within	
short driving distance of the plant at all times?	/
(265.55 - Emergency Coordinator)	YesNo
Who is the emergency coordinator? Gene Rainwals	
Hee the facility sumplied local police and fire	
departments with a copy of the contingency plant	
	(265.53 - Copies of Contingency Plan.) Is the contingency plan a revised SPCC Plan? (265.52 - Content of Contingency Plan) a. Does the plan include: (1) Action personnel will take? (2) Evacuation routes? (3) Emergency equipment? (4) Is the emergency equipment properly inspected and maintained? Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency Coordinator)

Date <u>6-1-88</u>
Inspector <u>6. KNAUSS</u>
Facility ID# <u>FUD 020985</u> 727

TRANSPORTERS CHECKLIST

I. SITE NAME: Van Waters & Roger

			740	CFR	263)
TT.	TRANSPORTER	REQUIREMENTS	740	OLIN	2007

- Do vehicles transporting hazardous waste have the appropriate placards? (263.10)(49 CFR 172.500)
- Does transporter have an EPA identification number? (263.11(a))
- Does transporter comply with 10 day storage limit for transfer facilities? (263.12)
 - a. Is the hazardous waste packaged according to 262.307 (263.12)
- Does the transporter use manifest system as required by 263.20?

Do the manifests contain at least:

- a. Name and address of transporter?
- b. Name, address, identification code of generator?
- c. Name, address, identification code of designated permitted facility?
- d. Corresponding manifest document number?
- e. Description and quantity of each hazardous waste?
- f. Signature of subsequent transporters?
- g. Signatures signifying proper delivery or reasons why delivery could not be certified?

- Yes - No no truchs

- Yes _ No
- Yes __ No

Yes No Verbal

__ Yes __ No

∫ Yes — No Yes No

Yes _ No

Yes _ No

- Yes - NoWA TO (SD

			•
	5.	 International shipments: (263.20(g)) a. Record of date waste left U.S.? b. Presence of one singed copy in records? c. Signed copy of manifest returned to the generator? d. Copy of the manifest given to a U.S. Customs official at the point of departure from the United States? 	Yes No Yes No Yes No Yes No
	6.	Are copies of the manifest retained for 3 years? (262.22)	Yes _ No
	7.	Is there evidence of discharge of hazardous waste? (263.30)	_ Yes No
	8.	Nas transporter demonstrated the financial responsibility required under 17-30.170(2)?	Yes _ No
_		SFER FACILITY REQUIREMENTS (17-30.171)	
•	A. Ge	eneral Facility Standards (265 Subpart B)	
	1	 Security (265.14) a. Is the facility security system adequate to minimize unauthorized entry? b. Are signs posted and legible for 25 feet? 	Yes _ No
	2	. <u>Inspection Requirement</u> (265.15)	

3. Personnel Training (265.16)

facility for 3 years?

Inspection Plan?

a. Do management personnel complete hazardous waste training?

b. Does the facility have completed inspection

c. Were the deficiencies corrected in a timely.

d. Are the inspection logs maintained at the

- · Is training on-the-job?
- Is training in-the-classroom?

a. Does the facility have a copy of the

Tyes _ No

Yes _

Yes _ No

Vyes _ No

Yes _ No

ì	o. Do laborers who handle hazardous waste	Vyes No
	complete training?	<u> </u>
		Vyes No
	· Is training on-the-job?	1 Yes _ No
	· Is training on-the-classroom?	Lies
	13 62 62 62 63 63 63 63 63 63 63 63 63 63 63 63 63	·
	c. Does training include:	
	c. Does training include.	
	procedures?	Yes _ No Yes _ No
	• Emergency response procedures?	Yes _ No
	· Inspection procedures?	•
	Operation of hazardous waste handling	Yes _ No
	equpment?	<u></u>
	0 10 10 1	.11.
	d. Now often is training reviewed? Aunu	411.0
	d. How order as a second secon	V
	e. Does the facility have personnel	Yes _ No Driver
	e. Does the lactify mate read	not!
	training records including:	or 1 mill
	this of position?	Yes No DV
	· Job title and description of position?	Tes No
	· Description of employee's training?	
		_
	f. Is training successfully completed within	Yes _ No
	6 months of hiring/transfer to IIW position?	Yes No
	6 months of hilling, erange	
	thron years	
	g. Are records maintained for three years	Yes No.
	at the facility?	2
	·	•
	Ignitable, Reactive, or Incompatible Waste (265.17)	•
4.	Ignitable, Reactive, of Indone	
	a. Is the waste separated and confined from	_
	courses of ignition or reaction, sparage	Yes _ No
	spontaneous ignition, and radiant heat?	<u> </u>
		Yes No
	b. Are "No Smoking" signs posted in the area?	Yes NO
	D. Ale No Smoking 5-8	
	(act out and C)	
Pre	eparedness and Prevention (265 Subpart C)	
		•
	In there evidence of fire, explosion or	
Ι.	The under dividence of the anxionments (2%5 31 -	
	contamination of the environment? (265.31 -	Yes No
	Maintenance and Operation of Facility)	
	Management A	
	If yes, use narrative explanation.	
	It yes, use natractive out	
_	Is the facility equipped with (265.32 - required	
2.		
	equipment)	
		Van Ma
	a. Internal communications or alarm system?	Yes — No
	Is it easily accessible in case of emergency?	Yes _ No
	Is it easily accessible in case of small	- -

В.

	b. Telephone or two-way radio to call emergency response personnel?	Yes _ No
	c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Is this equipment tested to assure its proper operation?	Yes _ No
	Now frequently?	ins
	d. Water of adequate volume for noses, springers,	Yes _ No
	(1) Describe source of water	Wale
	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, corrossion and proper labeling, etc.) (265.35 - Required Aisle Space)	Yes _ No
4.	llas the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities)	_ N/A _Yes _ No
	N/Λ, explain	
5.	In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with Local Authorities)	_ N/A _ Yes _ No
	If yes, indicate primary authority	partment?
	Does the owner/operator have phone number of and agreements with state emergency response teams contractors and equipment supplements of the contractors and equipment supplements with Local Authorities)	Yes _ No
	Are they readily available to the emergency coordi	nator?Xes No

			15,000	,
	7.	Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements with Local Authorities)	Communi	B
		If no, has the owner/operator attempted to do this?		
	8.	If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operation record? (265.37 - Arrangements with Local Authorities)	μ _ Yes _ No	/A
c.	Coi	ntingency Plan and Emergency Procedures (265 Subpart D)		
	1.	Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)	✓Yes _ No	·
	2.	Is it maintained at the facility? (265.53 - Copies of Contingency Plan)	Yes _ No	
	3.	Is the contingency plan a revised SPCC Plan (265.52 - Content of Contingency Plan)	_ Yes _No	
		a. Does the plan include:		
		(1) Action personnel will take?(2) Evacuation Routes?(3) Emergency Equipment?(4) Is the emergency equipment properly inspected and maintained?	Yes No Yes No Yes No	
		Is there an emergency coordinator on site or within short driving distance of the plant at at all times? (265.55 - Emergency Coordinator)	Yes _ No	
	5.	Who is the emergency coordinator? <u>GeneRainwa</u>	eta-brand	'a
		Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.53(b) - Content of Contingency Plan)	Yes No	

Date 6-1-88 Inspector E. KNAUS Facility ID# FCD020

D. CONTAINERS STORAGE CHECKLIST FOR TRANSPORTERS

					•	Cashainass	265 170)
(Subpart	Ι	– Use	and	Management	of	Containers	203.170)

1. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.)

100 (verbal)

2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container?

3. Is the waste compatible with the containers and/or its liner? (265.172)

4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)

Yes _ No - per drivers pre part transport checklist

If yes, explain using narrative.

5. Are each of the containers inspected at least weekly . (265.174)?

If no, explain using narrative concerning the frequency of inspection.

6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line? (265.176)

If yes, explain using narrative.

7. Are incompatible wastes stored in the same containers?

_ Yes _No - Prior

If yes, explain using narrative.

8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance

If no, explain using narrative.

E. 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? (17-30.171(2)(b))

Yes _ No

F. 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? (17-30.171(2)(d))

Yes _ No

G. Has the facility notified the department on Form 17-30.401(6)
(Transfer facility notification form)? (17-30.171(3))
Yes ___ No

7

[V.	UNREGULA EXEMPT S	ATED WASTES (HOUSEHOLD/CONDITIONALLY SMALL QUANTITY GENERATOR WASTES)	N/A
	1.	Does the transporter have documentation that this waste was generated by an unregulated source?	Yes No
	2.	If no, is the transporter assuming responsibility as the generator of this waste?	Yes No
		a. If yes, complete the applicable Generator or Small Quantity Generator checklist.	
		b. If no, the inspector should inform the transporter that he will be held responsible as the generator of the wastes and will be reinspected to ensure that the applicable requirements are being satisfied. A follow up inspection should be scheduled as follows:	
		 90 days after initial inspection if the quantity of "unregulated" wastes on site exceed 1000 kg. 	
		ii) 180 days after initial inspection if the quantity of "unregulated" wastes on site are less than 1000 kg.	
	3.	Does the transporter mix/consolidate hazardous wastes of different DOT shipping descriptions 263.10(c)(2)?	Yes No
		If yes, complete the Generator checklist.	
٧.	LAND B	AN WASTE	
.*	. 1.	Does the transporter manage restricted (land ban) wastes?	Ves No
		If yes check appropriate box(es) "California list" F list	Yes No



6051 HWY 41A SO. ROUTE 3, BOX 498-A TAMPA, FL 33619 PHONE (813) 677-8414

June 6, 1988

Elizabeth Knauss State of Florida Dept. of Environmental Reg 45200 Oak Fair Blvd. Tampa, FL 33610

Dear Elizabeth,

Attached please find truck driver job description per your request to complete compliance review on June 1, 1988. Please don't hesitate to call if you have any more questions.

Sincerely,

Gary Tonry

Operations Manager

Encl. GT:km

cc: D. Black File

D. E. R.

JUN 0 8 1988

EDUTH WEST DITTECT

POSITION GUIDE

TITLE	<u> </u>	•		
Invole Dad			NAME	
Truck Driver	MPANY		DIVISION	
McKesson Chemic		•		
DEPARTMENT	, , , , , , , , , , , , , , , , , , ,	LOCATION		DATE
· · · · · · ·		"Branch	tt	
B. GENERAL STAT	EMENT OF POSITION	FUNCTION	•	
A McKesson Chem	ical driver is	responsibl	e to the Branch	Operations Manager/Br
Manager for the	safe, efficient	t, and leg	al operation of	his vehicle and the
transporting of	materials to/fi	rom custom	ers and supplie	rs. In carrying out t
responsibilitie	s, he is require	ed to opera	ate and maintair	n his/her vehicle and
transport such	goods in full co	ompliance y	with all applica	able Federal, State and
Local regulation	ns, as well as w	within Comp	pany policy. Ea	ach driver is required
to meet all the	requirements of	f Part 391	of Title 49 D.C	O.T. regulations "Quali
fications of Dr.	ivers", prior to	o and durin	ng his/her emplo	oyment with McKesson
Chemical Company	y. Upon complet	tion of inc	doctrination and	d introductory training
ne will perform	his work in str	rict accord	dance with the r	requirements of Departm
				requirements of Departmon Agency (Title 4N)
of Transportatio	on (Title 49) ar	nd Environm	nental Protectio	
of Transportations, and	on (Title 49) and Company policy	nd Environm	nental Protectio	on Agency (Title 4N)
of Transportations, and both internal ar	on (Title 49) and Company policy	nd Environm	nental Protection I maintain cordi	on Agency (Title 4N)
of Transportations, and both internal ar	on (Title 49) and Company policy	nd Environm	nental Protection I maintain cordi	on Agency (Title 4N)
of Transportations, and both internal ar	on (Title 49) and Company policy	nd Environm	nental Protection I maintain cordi	on Agency (Title 40) ial relationships with of the Company and JUN 0 8 1988
of Transportations, and both internal and perform his work	on (Title 49) and Company policy and external sour	nd Environm	mental Protection in the maintain cordinate best interest and environment.	on Agency (Title 40) ial relationships with of the Company and JUN O E 1988
of Transportation regulations, and both internal arperform his work	on (Title 49) and Company policy and external sour	nd Environm He will ces in the public ar	mental Protection in the maintain cordinate best interest and environment.	on Agency (Title 40) ial relationships with of the Company and JUN 0 8 1988 promotion into position — if u
of Transportations regulations, and both internal and perform his work	on (Title 49) and Company policy and external sour to protect the	nd Environm He will ces in the public ar	mental Protection in the maintain cordinate best interest and environment.	on Agency (Title 40) ial relationships with of the Company and JUN O E 1988
of Transportation regulations, and both internal arperform his work	on (Title 49) and Company policy and external sour to protect the lust be completed price personnel requisition	nd Environm He will ces in the public ar	mental Protection in the maintain cordinate best interest and environment.	on Agency (Title 40) ial relationships with of the Company and JUN 0 8 1988 promotion into position — if u
of Transportations regulations, and both internal arperform his work C. APPROVALS (Massace)	on (Title 49) and Company policy and external sour to protect the lust be completed price personnel requisitions.	nd Environm He will ces in the public an	mental Protection I maintain cordi e best interest and environment. g, hiring, transfer or	on Agency (Title 40) ial relationships with of the Company and JUN O E 1988 promotion into position — if u
of Transportation regulations, and both internal and perform his work. C. APPROVALS (Manager and manager and mana	on (Title 49) and Company policy and external sour to protect the lust be completed price personnel requisitions.	or to recruiting	mental Protection I maintain cordi e best interest and environment. g, hiring, transfer or	on Agency (Title 40) ial relationships with of the Company and JUN 0 8 1988 promotion into position — if u

· -	a un un de la companione de la companion				<u>.</u>		
D. POSITION	SCOPE						
REPORTS TO	HAME; "Supervisor" "				11		
					O, OF EMPLOYEES		
SUPERVISES	TITLE			NC .	O. OF EMPLOYEES		
DIRECTLY	TITLE			NC	O. OF EMPLOYEES		
SUPERVISES IN	DIRECTLY (NUMBER OF EMPLOYEES)	EXEMPT		NON-EX	_		
FINANCIAL					n n		
SALES/BUDGET	TS,'PROFITS \$		ASSETS \$				
RELATION	ISHIPS						
	INTERNAL			EXTERNA	AL.		
Branch Mana	nger	Cus	stomers				
Administrat	ive - Operations Manager	Oti	Other Branch's Employees				
Warehouseme	en .						
E. POSITION S	SPECIFICATIONS (Qualifications for job	5)					
	Min High school gradu	uate or equi	ivalent				
EDUCATION/							
KNOWLEDGE							
l .	Min Minimum 25 years	-					
Recent graduate from truck driving school with no experience							
ı		•					
	Capable of operati	ing assigned	d vehicle.				
	Successful completion of required D.D.T. Drivers Road Test.						
SKILLS	Knowledgeable of all applicable D.O.T. regulations.						
	Complete training requirements of EPA regulations regarding loading, transporting and unloading of hazardous wastes.						

F. MAJOR RESPONSIBILITIES	WEIGHT (Importance)	STANDARDS OF PERFORMANCE (How responsibilities are measured)
Driving	80-90%	Deliveries and pick-ups made on timely basis.
		Logs will be received the follow morning with no deviations from lations, and in a neat manner.
		Adherence to tachograph program the standards of performance exp under that program.
		Responsible for all safety guide as outlined by Company policy ar training (use of safety equipmer proper modes of operation and pr equipment inspections - maintena etc.)
		Full compliance with all D.O.T./ regulations as outlined in train sessions. All incidents of a na requiring management attention t immediately reported to manageme thorough investigation and neces action.
		In addition to H/M and H/W regul adherence; full compliance with traffic laws, speed limits, weig limits, placarding requirements, in effect.
Maintenance and Delivery .	10-20%	Truck will be kept in neat, safe orderly manner. Inspections to made daily on vehicle; maintenan schedule adhered to as outlined management.
		Render any necessary assistance customer or branch location to w housemen, to prepare for loading delivery (i.e. assisting w/unloa cleaning trailers, checking coun
	100 %	

STATE OF FLORIDA

AUTOMOBILE

HAZARDOUS WAS TE TRANSPORTER CERTIFICATE OF LIABILITY INSURANCE

NATIONAL UNION FIRE INSURANCE COMPANY OF FITT	SBURGH, PA,
[Name of Insurer]	
hereby certifies that it has issued liability insurance	covering bodily estoration for
sudden accidental occurrences to	11
1600 NORTON BLDG SEATTLE, WA	98104
in connection with the insured's obligation to demonst	trate financial
responsibility under Florida, Administrative dode Male	L7-30.170. The
coverage applies at:	:
EPA/DIR 1.D. No. 16 ananyan on Manac	Address
notational cuto.	, SOS1 HIGHWAY 41A SOUTH
FLD 020 985727 WATER & ROGERS INC.	PAMPA, FL 33619
outh fudgoent	
FLD 981 014681 VAN WATER & ROGERS INC.	2783 WEST 5TH STREET
	JACKSONVILLE, FL 32205
Princat, ca spair	
(If coverage is for multiple facilities identify each fac	ility insured.)
This insurance is primary and the company shall not	be liable for
amounts in excess of 3,000,000 lot legal defense costs. The coverage is provided under political RMBA154-9186, issued on 3-1-87. The effect	ive date of
[Date]	
said policy is 3-1-87	
[Date]	·
This insurance is excess and the company shall not	be liable for
for each accident a	TI EVECOR OF CITE
for each accident	t, exclusive or
legal defense costs. The coverage is provided under political test on The effect	
[Date]	
said policy is	
[Date]	ý
The Insurer further certifies the following with	respect to the
insurance described in Paragraph 1:	
(a) Bankruptcy or linsolvency of the insured shall	not relieve the
Insurer of its obligations under the policy.	

Transporter Certificate of Liability Insurance
Page 1 of 2 DER FORM 17-30.401(5)(a) EFFECTIVE 10/1/84

TOMOTUA

- (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.
- by the insured for any-such payment made by the Insurer.

 (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Regulation (FDER), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the insured and 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-five (35) days after a copy of such written notice is received by the Secretary of the FDER as evidenced by certified mail return receipt.
- (e) The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify 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]

PUREEN A. ROSETTE

[Type name] [Social Security Number]

India to the second of the sec

SENIOR UNDERWRITER 1993 Mp 0 107

[Title] * main febtyonia a.

in all

Authorized Representative of

NATIONAL UNION FIRE INSURANCE COMPANY

[Name of Insurer]

THREE EMBARCADERO CENTER ESAN FRANCISCO, CA 94111

[Address of Representative]

HAZARDOUS WAS IT INSPECTION EXIT INTERVIEW

Range
MOILITY Van Waters + Rogers 1:00 pm
I.D. NIMEER: FLO 020985727DATE: 6/1/8/TIME: 1:00 pm
INTERVIEW PARTICIPANTS: Gary tonry, Bett Knauss E. Morale
This exil interview is the Department's procedure to advise you take the control of the violations of Florida Administrative Code Chapter 17-30, which adopts Federal Negation 150 40 CFR Parts 260-266 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspection will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental the Department has signed an enforcement and collection of monetary penalties Protection Agency which calls for the assessment and collections may not reduce for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty
liability.
The following violations have been tentatively identified:
2. Hazardous Waste Determination (262.11). 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11). 3. Hazifest Deficiencies or Recordkeeping and Reporting (262 Subpart B and D or 263 Subpart B or 264/263 Subpart E). 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16]. 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or 264 Subpart D). 6. Preparedness and prevention (265 Subpart C or 264 Subpart C). 7. Container Requirements (262.34 or 264/265 Subpart I). 8. Operating a treatment, storage or disposal facility without a permit 1203.722 F.S., F.A.C. 17-30, Section IV). 9. Operating a treatments (264/265.14) 10. Security Requirements (264/265.14) 11. Groundwater Monitoring (264/265 Subpart F). 12. Closure/Post-closure (264/265 Subpart G). 13. Pailure to comply with the provisions of a Department Issued Permit or with the provisions of the Consent Order.
"Diver i de descriptor
COLMERTE: NVIO
DE LAW ABOUTOR SIGNATURE:
PARTICIPANT SIGNATURE:
BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE

onpliance

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY DR. RICHARD D. GARRITY DISTRICT MANAGER

July 24, 1986

Mr. Steven Rudnick McKesson Chemical Company 6051 Highway 41-A, South Route 3 Box 498-A Tampa, Florida 33619

Re: Warning Notice #29-86-07-236

McKesson Chemical Company

Dear Mr. Rudnick:

A review of your correspondence dated July 21, 1986 indicates the violation cited in the referenced Warning Notice has been corrected. This enforcement action is now closed.

Sincerely,

Robin B. Mackley

Environmental Specialist I

Robin B. Mackley

Enforcement Section

RBM/ab

cc: David Thulman, OGC

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610

813-985-7402 SunCom - 570-8000



BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

DR. RICHARD D. GARRITY DISTRICT MANAGER

December 17, 1986

Mr. Ed Kerul McKesson Chemical Company 6051 Highway 41-A South Route 3 Box 498A Tampa, Florida 33619

Dear Mr. Kerul:

Thank you for your assistance during the RCRA compliance inspection conducted on December 16, 1986. Based upon the information gathered from this inspection, McKesson Chemical Company, was found to be in compliance with the regulations governing hazardous waste generators, transporters and transfer facilities as promulgated under CFR Parts 262 and 263, which the State of Florida adopts under Chapter 17-30, Florida Administrative Code.

Enclosed is the inspection report generated from this visit. Please retain this report as a part of your permanent records.

If you have any questions contact me at (813) 985-7402.

Sincerely,

Robin B. Mackley

Environmental Specialist I

Hazardous Waste Section

RBM/br

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610

813-985-7402 SunCom - 570-8000



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

DR. RICHARD D. GARRITY DISTRICT MANAGER

HAZARDOUS WASTE INSPECTION REPORT

1.	INSPECTION REPORTCOMPLAINT_X_ROUT	INEFOLLOW-UPPERMITTING			
	FACILITY NAME Moreland McKesson Chemical	Co.DER/EPA ID FLD 020 985 727			
	ADDRESS 6051 U.S. 41-A, Tampa, FL 33	3619			
	COUNTY Hillsborough Phone(813) 677-	8414 DATE 12-16-86 TIME 10:00 a.m.			
	TYPE OF F	ACILITY:			
Generator Small Quantity Container Tank Land Treatment Waste Pile Transporter Surface Impoundment Landfill Surface Impoundment Waste Pile Surface Impoundment Waste Pile Surface Impoundment Waste Pile Treatment Tank Land Treatment Thermal Chem/Phys/Bio. Incinerator Surface Impoundment Waste Pile					
2.	Applicable Regulations:				
	<u>X_40 CFR 262 _X_40 CFR 26340 CFR</u>	26440 CFR 265			
3.	Responsible Official: (Name & Title)				
	Mr. Stephen Rudnick				
4.	Survey Participants & Principal Inspecto	<u>r</u>			
5.	Steve Rudnick / Ed Kerul, McKesson Chemi Robin Mackley, FDER Paul Luth, FDER Lila Carter, FDER Facility Latitude:	cal Longitude:			
٠.					
6.		82° 23' 05" COUNTY MUNCIPAL <u>PRIVATE</u>			
7.	Permit Number: Date Issued:	Expiration Date:			

Moreland McKesson Chemical Co. FLD 020 985 727

8.	Discrepancies	with	Process	Descri	ption:
----	---------------	------	---------	--------	--------

See attached page

9. List and explain noncompliance items.

None

APPROVED BY

Paul E. Luth

Environmental Supervisor

8) Process Description

McKesson Chemical Company is a nationwide distributor of industrial chemicals and solvents. The Tampa facility maintains a warehouse storage area for the virgin chemicals, a solvent repackaging process and a separate building where chlorine gas is repackaged into cylinders and bleach is produced. There are no hazardous wastes generated at McKesson, however the facility wishes to maintain its generator status in case an accidental spill takes place and requires cleanup and disposal.

As a service to its customers, McKesson Chemical transports spent solvents for recycling at the McKesson Envirosystems plant in New Castle, Kentucky. Typically, McKesson will wait until a full trailer truckload can be compiled before they initiate a pickup. This would entail traveling between several customers and picking up each customers waste solvent. When a full load is collected it is transferred to a common carrier service such as Ryder PIE or Overnight Express for final shipment to the New Castle facility. The turnaround time for transfering the waste to the secondary transporter is generally 3-4 days. During this lapse the spent solvents are kept on the enclosed trailer and it is parked within the fenced-in compound at the McKesson facility.

McKesson Chemical originally intended to operate a hazardous waste storage facility for the spent recylable solvents and had submitted an application for a construction permit (HC29-090463) to build the storage area. However, this application was withdrawn on October 30, 1986. It is the intention of McKesson Chemical to operate only as a transfer facility.

Based upon the information gathered from this inspection, McKesson Chemical was found to be in compliance with the regulations governing hazardous waste generators, transporters and transfer facilities as promulgated under 40 CFR Parts 262 and 263 and Chapter 17-30, Florida Administrative Code.

Date 12/16/86
Inspector Mackley With Corfer
Facility ID# FLA 020985727

Status maintained in case of spill guerated waste

RCRA INSPECTION REPORT GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance. Section A - Site Identification No. 1. Site Name: MEKerson Chemical Company Section B - Hazardous Waste Determination (262.11) 1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? a. If yes, list wastes, EPA numbers & quantities. 2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosovity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste.) ___Yes ____No a. If yes, list wastes, EPA numbers, and quantities. b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge? (1) If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? (2) If equivalent test methods used, attach copy of equivalent methods used. Yes __No 3. Is generator subject to full regulation under Part 262? (If no, check appropriate exemptions) Small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices & checklist) OR Produces non-hazardous waste at this time (261.4 - Exclusions) Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.) Being a farmer disposing of waste pesticides for his own use on his own property (262.51 - Farmers) OR Burns hazardous waste as a fuel for the purpose of recovering usable energy (261.1(c)(2))

			Manifest (262.2023) rator shipped hazardous waste off-aite since Nov. 19,	1980?
			B - The Manifest)	√YesNo
	a.	If	no, do not fill out Section C and D.	
	b.	If Lis	yes, identify primary off-site facilities. McKes of facilities in narrative report.	son Envirosystems Castle, KY
2.	Does	ger	nerator use manifest? (262.20 - General requirements)	YesNo
		tev	yes, inspect manifests at random. Do all manifests iewed include the following information? \$2.21 - Required information) (Check items not on manif	est.)
		a.	Manifest Document No.	✓ YesNo
		b.	Generator's Name, Mailing Address, Tel. No.	✓ YesNo
		c.	Generator EPA I.D. No.	<u> </u>
		d.	Transporter(s) Name and EPA I.D. No.	✓ YesNo
		e.	Facility Name, Address and EPA I.D. No.	Yes No
		f.	DOT description of the waste	✓ YesNo
		g.	(1) Quantity (weight or volume) (2) Containers (type and number)	VYesNo YesNo
		h.	Emergency Information (optional) (special handling instructions, Phone No.)	✓ YesNo
		i.	Is the following certification on each manifest form?	✓ YesNo
			This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.	
		j.	Signatures and dates	
			(1) Generator(2) Transporter(3) Disposer (returned copy)	Yes No Yes No Yes No
		k.	Indicate number of manifests inspected and number of violations. Note type of violation in report.	<u>8</u>

	1. If	copy of	manifest from facility was not returned within did generator file an exception report?		
			Exception reporting)	Yes	No
			id it contain the following information?		
		-	ppy of manifest	Yes _	No
	AN Co		er explaining generators efforts to locate waste.	Yes	_No
	m. Do	es (will	.) generator retain copies for 3 years?	✓ Yes	No
		•			
_	5				NI / A
Sec	tion U	- Pre-Ir	ensport Requirements (262.30-34)		_N/A
1.	Does g	penerator	package waste for transport?	Yes	No
	If no	, skip t	o question 8.		
	If ye	s, compl	ete the following questions.		
_	0	-			
2.			package waste in accordance with 49 CFR 173, DOT requirements)? (262.30 - Packaging)	Yes	No
	170, 0	BIG 177 (201 Todattomortos/. (2021.20 = 1 ackaging/		
3.	Inspec	t contai	ners to be shipped.		
	a. Ar	e contai	ners to be shipped in good condition?		
	(D	escribe	containers and condition; i.e., leaking or		
	c	corroding	or bulging.)	Yes	_No
	h .	. .	oridana of task assessment of form to assessment to the		
			vidence of heat generation from incompatible the containers?	No	Yes
	WG	3,03 III			-, 00
4.	Before	shippin	g, does the generator use DOT labeling requirements		
	in acc	ordance	with 49 CFR 172? (263.31 - Labeling)	Yes	_No
_					
5.			stor mark each package in accordance with	V	N-
	49 LFR	1/2: (262.32 - Marking)	Yes	_No
6.	10 000	h contri	ner of 110 gallons or less marked with the		
0.			1? (262.32 - Marking)	Yes	No
	IOTIOM	ing iane	1: (262.32 - Marking)		
	Label	saying:	HAZARDOUS WASTE - Federal Law Prohibits Improper		
			Disposal. If found, contact the nearest police		
			or public safety authority or the U.S. Environ-		
			mental Protection Agency.		- 1
			Conceptor to Name and Address		- {
			Generator's Name and Address		\
					[
			Manifest Document Number		V

					•	
			ungani May M			
			1 3 and 1			
•		-4q-	and the second			
		79				
				•		
7. I	f there are any vehicles	present on si	te loading or	unloading haza	rdous 🛕	Jore
W	aste, inspect for present	e of placards	. Note this is	nstance on nar	rative C	701
e	xplanation sheet. (262.)	33 - Placardin	ng)			:
a.			late placards	to		
. 1 1 1	offer the initial tran	sporter?			Yes _	No
h	If no, who provides p	lenerde?				
٠,	. In the, with provides p	lacarda:	三 舞台			
8. Ac	ccumulation Time (262.34	- Accumulatio	n Lime)		A State	v
		- Nocumerate				
8.	. Is facility a permitte	d storage fac	ility?		Yes	No
	If yes, skip to questi	·				
	If no, answer rest of	question #8.				
			•			
b.	. Does the facility comp	oly with the 9	O-day accumulat	tion N/A		
	time limit? (262.34(e	1))		7/1	Yes	_No
	If no, has the generat	or been grant	ed a 30-day ext	tention?	•	
	(262.34(b)	•			Yes	No
· ·	If yes, explain the ur	foreseen/unco	ntrollable circ	cumstances		
	in the narrative.	*	**.			
c.	Are containers used to	store wastes	? (262.34(a)(1)	NN/A	Yes _	No
			4.1	, ,		_
	If yes, complete Conta	iners Storage	Checklist for	Generators.		
			7			·
	Is the beginning date		on time clearly	'		
	indicated? (262.34(a)	(2))			Yes _	_No
đ.	Are tanks used to stor	e wastes? (2	62.34(a)(1))	NIA	Yes	<u>_N</u> o
	If was somelake Y-ale	Cha-1/14-4	- 0	DIA		
	If yes, complete Tanks	CUSCKIIST LO	r Generators			
	While being accumulate	d is such as	otainen en tenk			•
٠.	clearly marked "Hazard	•		•	Yes	No
	clourly marked margin	odo madec .	(202,54(0)(5))		'	_,,,,
NO	TE: If generator accumu	lates waste o	n site but is n	ot a storace		
	facility, fill out			-		
	• •	• •	27.			
9. De	scribe storage area. Us	e photos and	narrative.			
				•		
			•			•
Section	n E - Recordkeeping and	Records (262.	40-43) <u> </u> N/A E	xplain		 .
			المائم			
	generator keeping the f				3)	
(N	ate: The following must	be kept for	a minimum of th	ree years.)		•
	Assuration of the	_9.2		. N/A	4.4	N.
a.	Annual reports (not ap	pilcable unti.	r January 1983)	· ~/#	— Үев —	_No
k	Took manulta chans	liophic			. V ==	M-
þ.	Test results where app	TTCANTA.			Yes	_No -

2	!. WI	. Where are records kept (at facility or elsewhere)? On-2142		
3	S., WI	ho is in charge of keeping the records?		
	Na	ame Stew Rudnick Title Ad	ministrative	Manager
4	. Ar	ny additional reporting? (262.43 - Additional Reporting)	Yes <u>~_</u> No	
<u>s</u>	ectio	on F - Special Condition (262.50 - International Shipments)	✓N/A	
	Ex	xplain		
1		as generator received from, or transported to a oreign source any hazardous waste?	NoYes	
	8.	. If yes, has he filed a notice with the Regional Administrator?	YesNo	
	b.	. Is this waste manifested and signed by Foreign consignee?	YesNo	
	c.	If generator transported wastes out of the country, has he received confirmation of delivered shipment?	·YesNo	
			— · · · · · · · · · · · · · · · · · · ·	

. 1

Date/2	1110186	1 Luth / Card	
Inspector _	mackley	. / Luth / Card	er
Facility ID	FU U26	985727	

-6g-

Appendix A To Generator Checklist

Sec	tion A - Personnel Training (265.16)	•
1.	Do management personnel complete hazardous waste training?	YesNo
	a. Is training on-the-job?	YesNo
	b. Is training in the classroom?	Yes No
2.	Do laborers who handle hazardous waste complete training?	YesNo
		V
	a. Is training on—the job?	Yes No
	b. Is training in the classroom?	No
3.	Does training include:	
	- C	Yes No
	a. Emergency response procedures?b. Inspection procedures?	./Yes No
	b. Inspection procedures?c. Operation of hazardous waste handling equipment?	vies No
	C. Operation of Hazardow Mades Handling Squipmone	
4.	How often is training reviewed? At least The	- year
5.	Does the facility have personnel training records including	
	a. Job title and description of position?	yes No
	b. Description of employee's training?	Yes No
6.	Are records maintained for three years?	Yes No
	•	
Sec	tion B - Preparedness and Prevention (265.30-37)	
1.	Is there evidence of fire, explosion or contamination of the	
	environment? (265.31 - Maintenance and Operation of Facility)	YNoYes
	If yes, use narrative explanation.	
_	Is the facility equipped with (265.32 - Required equipment)	
2.	is the facility equipped with (200.02 - Required equipment)	
	a. Internal communications or alarm system?	Yes No
	Is it easily accessible in case of emergency?	√Yes No
	In it egolly accessible in case of amongoney.	
	b Telephone or two-way radio to call emergency	
	response personnel?	Yes No
	 c. Portable fire extinguishers, fire control equipment, 	
	spill control equipment and decontamination equipment?	YesNo
	Is this equipment tested to assure its proper operation?	YesNo
	/	tosted nece/year
	How frequently? Inspected Once Month	The article of the

	d. Water of adequate volume for hoses, sprinklers or water spray system?YesNo
	(1) Describe source of water #1/15.Co Utilities
	(2) Indicate flow rate and/or pressure and storage capacity, if applicable. <u>ハット ドカッル ハ</u>
7	Is there sufficient aisle space to allow unobstructed movement no drums on such
٠.	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) Yes No
4.	Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.)
	(265.37 - Arrangements With Local Authorities)N/AYesNo
	If N/A, explain
5.	In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements With Local Authorities) N/A Yes No
	If yes, indicate primary authority
	Is the fire department a city or volunteer fire department?
6.	Does the owner/operator have phone numbers 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?
7.	Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements With Local Authorities) Yes No
	If no, has the owner/operator attempted to do this?YesNo
8.	If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the DA operating record? (265.37 - Arrangements With Local Authorities) Yes No

Section C - Contingency Plan and Emergency Procedures (265.50-56)

1.	Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)	Yes No
2.	Is it maintained at the facility?	/
	(265.53 - Copies of Contingency Plan.)	YesNo
3.	Is the contingency plan a revised SPCC Plan?	/
	(265.52 - Content of Contingency Plan)	Yes _1/No
	a. Does the plan include:	
	(1) Action personnel will take?	Yes No
	(2) Evacuation routes?	Yes No
	(3) Emergency equipment?	Yes No
	(4) Is the emergency equipment properly	
	inspected and maintained?	YesNo
4.	Is there an emergency coordinator on site or within	
	short driving distance of the plant at all times?	
	(265.55 - Emergency Coordinator)	V YesNo
5.	Who is the emergency coordinator? <u>Gene Rainus</u>	4er
6.	Has the facility supplied local police and fire	,
	departments with a copy of the contingency plan?	•/
	(265.52 - Content of Contingency Plan.)	™°Yea No

Date 12/16/86
Inspector MacKley Leuth Carder
Facility ID# FLA 020 985727

TRANSPORTERS CHECKLIST (40 CFR 263)

ı.	License number and current date on tag SC TL17264	
	(tractor and trailer, if separate units) FL N46717	
2.	Maintenance of records for the specified	
	three year time limit? (263.72)	YesNo
3.	Copy of manifest or delivery document available?(263.20)	¥ YesNo
	Manifest containing at least: (263.21)	
	a. Name and address of transporter?	No
	b. Name, address, identification code of generator?	✓ Yes No
	c. Name, address, identification code of designated permitted facility?	VYesNo
	d. Corresponding manifest document number?	√YesNo
	e. Description and quantity of each hazardous waste?	Vyes No
	f. Signature of subsequent transporters?	Yes No
	g. Signatures signifying proper delivery or reasons why delivery could not be certified?	✓ YesNo
4.	Containers properly labeled and marked? (262.3132)	YesNo
5.	International shipments: (262.50) \mathcal{U}/\mathcal{A}	•
	a. Record of date waste left U.S.?	YesNo
	b. Presence of one signed copy in records?	Yes No
6.	Evidence of leaking or damaged containers? (Note appearance of truck also) (263.30 - Hazardous Waste Discharges) \mathcal{N}/\mathcal{A}	NoYes
7.	Vehicles containing hazardous waste placarded properly? (49 CFR 172.500) verbacly confurmed	YesNo
8.	If it is required of vehicle or if vehicle contains more than 1,000 lbs of hazardous waste, check to see that markings:	,
	a. Appear on both sides of vehicle?	Yes No
	b. Are in letters contrasting in color with background?	YesNo
	c. Are legible during daylight from 50 feet away?	YesNo
9.	Does the operator have a copy of the financial assurance required by 17-30.17(2)?	YesNo

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION SOUTHWEST DISTRICT

CONVERSATION RECORD

Date <u>8/18/86</u>	Subject McKesson Chem - Spill
Time 3:00 pm	Permit No.
1	County Hillsborough
Mr. Wade Dehhee	Telephone No. 813-689-6757
Representing Hillsborough	Co. Fire Dept.
[X Telephoned Me [] Was Called	[] Scheduled Meeting [] Unscheduled Meeting
Other Individuals Involved in	Conversation/Meeting Ed Kerol (McKesson)
677-8414	
Summary of Conversation/Meetir	Tanker being washed out over flowed
_ into diked area (dr.	ainage to neutralization basin) containing
approx. 1% caustic soc	da. Guard summoned Fire Dept. who
shut off water (water	r left on by employee accidentally). Liquid
which overflowed enter	red McKesson's neutralization system
and deposited into C	ity of Tampa System.
	11 M CA.
(continue on another	Signature K. McClain
sheet, if necessary)	Title <u>£57</u>

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STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610

813-985-7402 SunCom - 570-8000

CERTIFIED MAIL
RETURN RECEIPT REQUESTED



BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

DR. RICHARD D. GARRITY DISTRICT MANAGER

July 9, 1986

Mr. Gene Rainwater McKesson Chemical Company 6051 Highway 41-A South Rt. 3 Box 498 A Tampa, Florida 33619

> WARNING NOTICE #29-86-07-236 FLD # 020985727

Dear Mr. Rainwater:

RE: RCRA Hazardous Waste Compliance Inspection Conducted June 10, 1986

A hazardous waste compliance inspection was conducted at your facility on June 10, 1986. A copy of the inspection report is attached to this Notice. This inspection was conducted under the authority of Section 403.061, Florida Statutes and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance statuts of your facility with 40 CFR 260-266, adopted as Florida Administrative Code Rule 17-30.

During the inspection the following violations of 40 CFR 260-266, as adopted by Florida Administrative Code Rule 17-30 were noted:

40 CFR 263.20(a)

Facility accepted improperly filled out manifest from generator.

You are advised to immediately cease all operations contributing to violations of the cited statutes and regulations. You are further advised that you may be held liable for any damages occuring to the resources of the State and for the restoration to original condition of those resources.

Mr. Gene Rainwater WN #29-86-07-236

The violations set forth in this Warning Notice may be resolved by the execution of a mutually acceptable Consent Order or, in some cases by the provision by you of an acceptable Time Schedule within which the violations will be corrected. This Consent Order and/or Time Table will set forth the specific requirements for compliance and the time periods within which compliance must be achieved. If a Consent Order is required it will set forth a settlement figure payable to the State in compensation for your violations of State statutes.

Please be advised that we must be notified in writing within ten (10) calendar days of the receipt date of this Notice of your desire to resolve these issues and your plans for complying with the cited statutes. Please address your response to Ms. Robin Mackley of the District Office. Failure to respond in writing by the tenth day may result in one of the following actions:

- 1. The issuance of an Administrative Order against you pursuant to the authority of Chapter 403.121, Florida Statutes within thirty (30) days of date of receipt of this Notice.
- 2. The filing of civil complaint in circuit against you pursuant to the authority of Chapter 403.131, 403.141, 403.161, and 403.727, Florida Statutes.

Please be advised that should Consent Order negotiations be initiated, they must result in complete signed Order within ninety (90) days of the receipt of this Notice.

Sincerely,

Craig McArthur

Environmental Supervisor

RM/msb

cc: Richard D. Garrity, Ph.D

David Thulman, OGC

Paul Luth

REFERRAL	NO	PRO	OGRAM:	HW
	ENFORCEME	NT REFERRAL FORM		
SOURCE:	McKesson Chemical Co	RESPONSIBLE	PARTY:	<u>Gene Rainwater-M</u> g
ADDRESS:	6051 Highway 41A South	ADDRESS:		·
	(Rt 3 Box 498A)	. · · ·		
	Tampa, Fl. 33619			
TELEPHONE	(813) 677-8414			· · · · · · · · · · · · · · · · · · ·
EPA ID NO	FLD 020985727	TYPE:	COUN	ry: Hillsborough
	·			
ENGINEER:		ATTORNEY: _		
		ADDRESS:		· · · · · · · · · · · · · · · · · · ·
	•	_		
		_		
TELEPHONE	:	TELEPHONE:		
RECEIVING	WATERS:	CLASSIFI	CATION	<u> </u>
DOMINANT	PLANT COMMUNITY:		`	
I.	VI	OLATION SUMMARY		
	R STATUTE	DESCRIPT	ION OF	VIOLATION

40 CFR Part 263 Subpart B-263.20(a)

Facility accepted improperly filled out

manifest from generator.

: :		
TI.	DESCRIPTION OF INTERACTION WITH VIOLATOR:	•
	WRITTEN:DATE:	
:	TELEPHONE: DATE:	
	MEETINGS: DATE:	
•	INSPECTIONS: X DATE: 6-10-86	
III.	OTHER AGENCIES INVOLVED? None	
IV.	ATTACH ALL CURRENT FILES WHICH PERTAIN TO THE VIOLATION:	
	(In-house referrals must be accompanied by all current permitting files. Outside referrals must be accompanied copies of all relevant files.)	
v.	COMMENTS: Warning letter suggested. (McKesson Chemical has	
	demonstrated effort to correct manifest error.)	
vI.	DESCRIPTION OF CORRECTIVE ACTION NEEDED: (Attach map of restoration lines, jurisdictional lines, etc.).	
VII.	REFERRED BY: K. McClain DATE: 6-10-86	_
	SECTION SUPERVISOR: Q-23-80	<u>ر</u>
	RITY: HIGH MODERATE LOW	

BEST AVAILABLE COPY

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* CODES

8a. AGENCY RESPONSIBLE FOR EVALUATION:

E = EPA

S = State

J = Joint

C = Contractor/EPA

0 = 0ther

B = Contractor/State

X = Oversight

86. TYPE OF EVALUATION COVERED BY THIS REPORT:

1 = Evaluation Inspection

2 = Case Development (Sampling)

3 = Record Review

4 = Ground Water Monitoring Evaluation

5 = Follow Up

6 = Other - Citizen Complaint

7 = Other - Part B Call-In

8 = Other - Withdrawal Candidate

9 = Other - Closure/Post-Closure

0 = 0ther - General

11. CODES FOR TYPES OF ENFORCEMENT ACTIONS:

02 = 3007 Letter

03 = Warning Letter

04 = N.0.V.

05 = CO (Administrative Order)

ll = Filed Civil Action

12 = Filed Criminal Action

15 = 3008(H) Corrective Action Order

18 = CERCLA 106 Order

(See instruction for additional codes)

CODES FOR RESPONSIBLE AGENCY:

E = EPA

S = State

X = EPA Oversight

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA J2301-8241



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT ROUTINE X FOLLOW-UP PERMITTING
FACILITY NAME McKesson Chemical Company DER/EPA ID FL D020985727
ADDRESS 6051 Highway 41A South (Rt. 3 Box 498A) Tampa, Fl. 33619
COUNTY <u>Hillsborough</u> Phone (813 677-8414 DATE 6/10/86TIME 9:30 a.m.
TYPE OF FACILITY:
THE GO PRESENT.
Generator Storage Treatment
Small Quantity Container Tank
Generator Tank Land Treatment
Waste Pile Thermal Transporter Surface Impoundment Chem/Phys/Bio.
Y Transporter Incinerator
DisposalSurface Impoundment
Landfill
Surface Impoundment
Waste Pile
2. Applicable Pagulations
2. Applicable Regulations:
40 CFR 262 X 40 CFR 263 40 CFR 264 40 CFR 265
3. Responsible Official: (Name & Title)
Gene Rainwater - Manager
,
4. Survey Participants & Principal Inspector
Steven Rudnick - McKesson
Ed Kerul - McKesson
Kim McClain - FDER
5. Facility Latitude: Longitude:
02 20 00 H
6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL -PRIVATE
7. Permit Number: HC29-90463 Date Issued: pending Expiration Date: pending

8.	Discrepancies with Process	Description;	if	different	from	previews	report.
----	----------------------------	--------------	----	-----------	------	----------	---------

See attached page

9. List and explain noncompliance items.

 $\frac{\text{40 CFR Part 263 Subpart B}}{\text{accepted improperly}} - \frac{\text{263.20(a)}}{\text{filled out manifest from generator.}}$

APPROVED BY

Dale J. Stivik

Permitting Engineer IV

8) Process Description

McKesson Chemical Company is a nationwide firm and is a distributor of industrial chemicals and solvents.

The process description at McKesson Chemical Company's Tampa facility has remained unchanged since the last RCRA compliance inspection on 12–19–85.

McKesson Chemical's Tampa plant presently consists of a large warehouse for storing virgin chemicals, a solvent repackaging area, and the repackaging of chlorine gas into cylinders.

The facility is a transporter of hazardous wastes (solvents) primarily as a service to its customers. The facility transports its wastes via second transporter to the McKesson Envirosystems recycling plant located in New Castle, Kentucky.

McKesson Chemical is still maintaining generator status although the facility does not produce any hazardous wastes. The generator status is maintained in case of any spill occurrences where clean up and disposal would be necessary.

PIE International, (previously known as Ryder-PIE) is still utilized as McKesson's secondary transporter for final shipment of the waste solvents to the Envirosystems plant in Kentucky.

Construction of McKesson Chemical's hazardous waste storage area has not begun as of this inspection date. The facility is waiting on further proceedings from the Department of Environmental Regulation on this matter before construction is to commence. The storage area, when complete, will consist of a diked area $19' \times 25'$, with 31/2 inch high berms. The storage area will be constructed inside the main building where the virgin chemicals are stored, and will be designed to hold a maximum of 96-55 gallon waste drums.

Date <u>6/10/86</u>
Inspector <u>K. Mc Crain</u>
Facility ID# <u>FLD 020 985</u> 727

TRANSPORTERS CHECKLIST (40 CFR 263)

	Ctrailer)	C tracker) S.C., FL 45845D
l.	License number and current date on tag TL172-11	
2	(tractor and trailer, if separate units) No tractors on Factorial Maintenance of records for the specified	cility's property at this time.
۷.	three year time limit? (263.72)	YesNo
	,,	
3.	Copy of manifest or delivery document available?(263.20)	YesNo
	Marifest containing at least, (2/7 21)	
	Manifest containing at least: (263.21)	
	a. Name and address of transporter?	Yes _No
		Tenerator signed is
	b. Name, address, identification code of generator?	Yes No wrong place on one manifest. Transport
	c. Name, address, identification code of designated	
	permitted facility?	VYES NO I signed an incom
		line also
	d. Corresponding manifest document number?	Yes No
		Yes No
	e. Description and quantity of each hazardous waste?	Z_TesNo
	f. Signature of subsequent transporters?	Yes No
	g. Signatures signifying proper delivery or	
	reasons why delivery could not be certified?	YesNo
	Containing annually labeled and probable (200 3) 30)	Yes No No Containers on site
4.	Containers properly labeled and marked? (262.3132)	Yes No No containers on site at time of this inspertion fruck load left on 6/6/86
5.	International shipments: (262.50)	truck load left on 6/6/86
	N/A	, . ,
	a. Record of date waste left U.S.?	YesNo
	b. Presence of one signed copy in records?	YesNo
6.	Evidence of leaking or damaged containers? (Note appearance of	Alaxentainers on site -
	truck also) (263.30 - Hazardous Waate Discharges)	No Yes Noncontainers on site-
7.	Vehicles containing hazardous waste placarded properly?	
	(49 CFR 172.500)	YesNo
8.	If it is required of vehicle or if vehicle contains more than	
	1,000 lbs of hazardous waste, check to see that markings:	
	a. Appear on both sides of vehicle?	Yes No
	b. Are in letters contrasting in color with background?	Yes No
	c. Are legible during daylight from 50 feet away?	V YesNo
٥	Does the operator have a copy of the financial assurance	
9.	required by 17 30 17(2)?	Yes No

Date	6	120	186		
Inspector	7	K	MC	A in	_
acility	ID#	FU	2020	985	721

RCRA INSPECTION REPORT GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance.
Section A - Site Identification No.
1. Site Name: McKesson Chemical Company
Section 8 - Hazardous Waste Determination (262.11) 1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? Yes No
a. If yes, list wastes, EPA numbers & quantities.
 Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosovity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste.)Yes.
a. If yes, list wastes, EPA numbers, and quantities.
b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge?NA
(1) If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)?YesNo
(2) If equivalent test methods used, attach copy of equivalent methods used.
3. Is generator subject to full regulation under Part 262? (If no, check appropriate exemptions)
Small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices & checklist) OR
Produces non-hazardous waste at this time (261.4 - Exclusions) OR Facility is a transporter of hazardous waste and
Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.) OR Wishes to maintain general
Being a farmer disposing of waste pesticides for his own use on his own property (262.51 - Farmers) OR OR ON
Burns hazardous waste as a fuel for the purpose of recovering
usable energy (261.1(c)(2))

Sect	ion C -	- Manifest (262.2023)	
1.	Has ger	nerator shipped hazardous waste off-site since Nov. 19, 1980	12
	(Subpai	t B - The Manifest)	Yes No
	a. If	no, do not fill out Section C and D.	
			·
	b. If	yes, identify primary off-site facilities.	
	Ļ	st facilities in narrative report.	•
2. [ിറലെ ന	merator use monifort? (2/2 an a	
'	ocs ge	nerator use manifest? (262.20 - General requirements)	YesNo
	If	yes, inspect manifests at random. Do all manifests	
	re	viewed include the following information?	
	(2	62.21 - Required information) (Check items not on manifest.)
			•
	a.	Manifest Document No.	Yes No
		·	
	ь.	Generator's Name, Mailing Address, Tel. No.	YesNo
	_		
	c.	Generator EPA I.D. No.	YesNo
	d	Transporter(-) N	
	u.	Transporter(s) Name and EPA I.D. No.	YesNo
	ρ.	Facility Name Address and FDA 1.0. A	
	•	Facility Name, Address and EPA I.D. No.	YesNo
	f.	DOT description of the waste	W - W
			YesNo
	g.	(I) Quantity (weight or volume)	Voo No
		(2) Containers (type and number)	YesNo Yes No
			YesNo
	h.	Emergency Information (optional)	
		(special handling instructions, Phone No.)	Yes No
	i.	Is the following certification on each manifest form?	Yes No
	•	**	
		This is to certify that the above named	
		materials are properly classified, described,	
		packaged, marked and labeled and are in proper	
		condition for transportation according to the	
		applicable regulations of the Department of	
		Transportation and the EPA.	
	j.	Signatures and dates	
		(1) 0	
		(1) Generator	YesNo
		(2) Transporter	Yes No
		(3) Disposer (returned copy)	YesNo
	k.	Indicate number of manifests	
	~•	Indicate number of manifests inspected and number of violations.	
		Note type of violation in report.	
		report.	

	45 days	of manifest from facility was not returned within , did generator file an exception report? - Exception reporting)	YesNo
	Legible <u>AND</u>	did it contain the following information? copy of manifest etter explaining generators efforts to locate waste.	YesNo Yes No
		ll) generator retain copies for 3 years?	YesNo
Sec	ction D - Pre-	Transport Requirements (262.30-34)	
1.	Does generat	or package waste for transport?	YesNo
		to question 8. plete the following questions.	
2.	Does generat 178, and 179	or package waste in accordance with 49 CFR 173, (DOT requirements)? (262.30 - Packaging)	YesNo
3.	Inspect cont	ainers to be shipped.	
	(Describe	ainers to be shipped in good condition? e containers and condition; i.e., leaking or ng or bulging.)	YesNo
	b. Is there wastes in	evidence of heat generation from incompatible the containers?	NoYes
4.	Before shipp: in accordance	ing, does the generator use DOT labeling requirements with 49 CFR 172? (263.31 - Labeling)	YesNo
5.	Does the gene 49 CFR 172?	erator mark each package in accordance with (262.32 – Marking)	YesNo
6.	Is each conta	iner of 110 gallons or less marked with the	
	following lab	el? (262.32 - Marking)	YesNo
	Label saying:	HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	
		Generator's Name and Address	
		Manifest Document Number	

7.	WE	f there are any vehicles present on site loading or unloading has aste, inspect for presence of placards. Note this instance on na oplanation sheet. (262.33 - Placarding)	zardous arrative	
	a.	Does the generator have the appropriate placards to offer the initial transporter?	YesNo	
	ь.	If no, who provides placards?		
8.	Ac	cumulation Time (262.34 - Accumulation Time)		
	а.	Is facility a permitted storage facility? If yes, skip to question #9.	YesNo	
		If no, answer rest of question #8.		
	b.	Does the facility comply with the 90-day accumulation time limit? (262.34(a))	YesNo	
,		If no, has the generator been granted a 30-day extention? (262.34(b) If yes, explain the unforeseen/uncontrollable circumstances	YesNo	
		in the marrative.		
	c.	Are containers used to store wastes? $(262.34(a)(1))$	YesNo	
		If yes, complete Containers Storage Checklist for Generators.		
		Is the beginning date of accumulation time clearly indicated? (262.34(a)(2))	YesNo	
	d.	Are tanks used to store wastes? (262.34(a)(1))	YesNo	
		If yes, complete Tanks Checklist for Generators		
	e.	While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3))	YesNo	
	NOT	E: If generator accumulates waste on site but is not a storage		
		facility, fill out Appendix A to Generators Checklist.		
9.	0es	cribe storage area. Use photos and narrative.		
Sect	ion	E - Recordkeeping and Records (262.40-43) N/A Explain		
1	Is (Not	generator keeping the following reports? (262.40 - Record keepinge: The following must be kept for a minimum of three years.)	g)	
1	a.	Annual reports (not applicable until January 1983).	√Yea _No	
ı	b.	Test results where applicable.	YesNo	

2.	Where are records kept (at facility or elsewhere)?FACIL	iry
3.	Who is in charge of keeping the records?	•
	Name Ed Kerol Title Operat	Lions Manager
4.	Any additional reporting? (262.43 - Additional Reporting)	YesNo
Sec	tion F - Special Condition (262.50 - International Shipments)	N/A
	Explain	
1.	Has generator received from, or transported to a foreign source any hazardous waste?	✓No _Yes
	a. If yes, has he filed a notice with the Regional Administrator?	YesNo
	b. Is this waste manifested and signed by Foreign consignee?	YesNo
	c. If generator transported wastes out of the country, has he received confirmation of	
	delivered shipment?	Vog 11-

-6g-

Appendix A To Generator Checklist

<u>Se</u>	ction A - Personnel Training (265.16)		
1.	Do management personnel complete hazardous waste training?	YesNo	
	a. Is training on-the-job?	· · · · · · · · · · · · · · · · · · ·	
	b. Is training in the classroom? .	Yes No	
2.	Do laborers who handle hazardous waste complete training?	Yes No	
	a. Is training on-the job?		
	b. Is training in the classroom?	Yes No	
3.	Does training include:		
	a. Emergency response procedures?	. /.	
	b. Inspection procedures?	YesNo	
	c. Operation of hazardous waste handling equipment?	Yes No Yes No Yes No	
4.	How often is training reviewed?once/yr minimu	m	
	Does the facility have personnel training records including		
	a. Job title and description of position?		
	b. Description of employee's training?	YesNo	/ Dd Kerd began at
	or owersperson of employee's training:	Yes _No /	McKesson in 84.
6.	Are records maintained for three years?	Yes _No.	Ed Kerol began at MCKesson in 84. No records were mo tained previous to to concerning person mesign off for train
			sign off for train
Sec	tion B - Preparedness and Prevention (265.30-37)		received.
1.	Is there evidence of fire, explosion or contamination of the		
	environment? (265.31 - Maintenance and Operation of Facility)	No Yes	
	If yes, use narrative explanation.		
2.	Is the facility equipped with (265.32 - Required equipment)		
	a. Internal communications or alarm system?	✓Yes No	
·	Is it easily accessible in case of emergency?	Yes No	
	b Telephone or two-way radio to call emergency		
	response personnel?	Yes No	
	c. Portable fire extinguishers, fire control equipment,		
	spill control equipment and decontamination equipment?	Yes No	
	Is this equipment tested to assure its proper operation?	i/Yan Na	

co. fire dept - every 6 months

How frequently?

	d. Water of adequate volume for hoses, sprinklers or water spray system? Yes No	
	(1) Describe source of water	
	(2) Indicate flow rate and/or pressure and storage capacity, if applicable	
3.	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) YesNo	N/A (no storage of hazardo waste exis
4.	4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities) N/A Yes No	waste exis
	If N/A, explain	
5.	In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements With Local Authorities) N/A Yes No	
	If yes, indicate primary authority	
	Is the fire department a city or volunteer fire department?County_n	on-volunteer
6.	_	
	Are they readily available to the emergency coordinator? Yes No	
7.	Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements With Local Authorities)	
	If no, has the owner/operator attempted to do this? YesNo	
3	If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operating record? (265.37 - Arrangements With Local Authorities) Yes No	·····································

Section C - Contingency Plan and Emergency Procedures (265.50-56)

1.	Does the facility have a contingency plan? (265.51 - Purpose and Implementation of Contingency Plan)	YesNo
2.	Is it maintained at the facility?	
	(265.53 - Copies of Contingency Plan.)	Yes _No
3.	Is the contingency plan a revised SPCC Plan?	
	(265.52 - Content of Contingency Plan)	YesNo
	a. Does the plan include:	
	(1) Action personnel will take?	Veg No
	(2) Evacuation routes?	Yes -No
	(3) Emergency equipment?	Yes No Yes No Yes No
	(4) Is the emergency equipment properly	
	inspected and maintained?	Yes _No
4.	Is there an emergency coordinator on site or within	
	short driving distance of the plant at all times?	_
	(265.55 - Emergency Coordinator)	Yes _No
5.	Who is the emergency coordinator? Gene Rainwater -	Brandon
6.	Has the facility supplied local police and fire	
	departments with a copy of the contingency plan?	
	(265.5% - Content of Contingency Plan.)	Yes No
	53	

compliance

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610

813-985-7402 SunCom - 570-8000



BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

DR. RICHARD D. GARRITY DISTRICT MANAGER

July 1, 1986

Robert I. Alvarez, M.D. 8611 Alaska Street Tampa, Florida 33604

Dear Mr. Alvarez:

I have received your letter concerning the discharge of chlorine gas from McKesson Chemical Company. In the process of investigating your letter, I contacted Chief Wade DeHate of the Hazardous Incidence Team of Hillsborough County. He confirmed the occurance of the discharge and their response to the incidence.

Chlorine gas, when liberated into the environment, may cause severe irritation of the eyes and respiratory tract. When a spill occurs, the appropriate emergency response is to evacuate the area and allow the vapors or fumes to dissipate.

The role of the Department of Environmental Regulation in these situations is to evaluate the damage to the environment and take appropriate measures to assure restoration in the event of contamination. Due to the time that has elapsed and the nature of the spill, an effective action from this Department has been mitigated:

much (es) seule

Other rights you may wish to pursue in this matter should be through your own legal counsel.

Sincerely,

Robin B. Mackley

Robin B. Mackley

Environmental Specialist I

Enforcement Section

RBM/ab

cc: Clabe Polk

Tom Maurer, OGC

Dale Stitik

PCKH Compliance

DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32301 8241



BOB GRAHAM GOVERNOR

VICTORIA J. TSCHINKEL SECRETARY

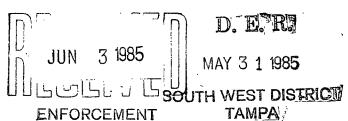
May 28, 1985

CERTIFIED MAIL

Mr. Donald M. Black Regulatory Compliance Manager McKesson Chemical Company Post Office Box 266

North Haven, Connecticut 06473 RE: FLD 020 985 727, Tampa, Florida

Dear Mr. Black:



The Department has completed its review of the documents submitted to comply with the financial requirements of 40 CFR Part 264, Subpart H, as adopted by reference in Florida Administrative Code Rule 17-30.18. From the documents submitted, we are unable to verify the figure of \$1,646,047 for the sum of the current closure and post-closure cost estimates.

The total of the cost estimates in Exhibit "C" equals \$2,690,048. All cost estimates in Exhibit "D" are duplicates of estimates in Exhibit "C", which should not be the case if questions 3 and 4 are answered accurately. Although McKesson Corporation still passes the financial test with the higher cost estimate, it is necessary for us to have an accurate listing of facilities and cost estimates as part of our records.

A special report from your independent certified public accountant to you as described in 264.143(f)(3)(iii) was not submitted to the department. This report must be submitted for McKesson Chemical Company to satisfy the financial requirements of 40 CFR Part 264. Please note, since McKesson Chemical Company's Tampa facility is a new facility, 264.143(f)(4) applies. This says that financial documents must be submitted to the department at least 60 days before the date on which hazardous waste is first received for treatment, storage or disposal. I presume that since the construction permit has not been issued that the 60 day deadline has not been exceeded and therefore there is no compliance issue at this time. However, keep this deadline in mind in forwarding the CPA's special report and accurate Exhibits "C" & "D" to complete this submittal and financial test updates.

Please send financial responsibility information to me at the letterhead address. Call me at 904/488-0300 if you have any questions.

Diane C. Hunt

Environmental Specialist

Solid and Hazardous Waste Section

DCH/1s

Rich Landi - DER/SWD (for Permit File)

√Clabe Polk - DER/SWD

Protecting Florida and Your Quality of Life

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610

813-985-7402 SunCom - 570-8000



BOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY DR. RICHARD D. GARRITY DISTRICT MANAGER

December 20,1985

Mr. Gene Rainwater McKesson Chemical Company Route 3 Box 498A Tampa, FL 33619

Dear Mr. Rainwater:

Thank you for all of the assistance that your colleagues afforded me during the RCRA inspection conducted on December 19, 1985. Based upon the information gathered during this inspection, McKesson Chemical Company was found to be in compliance with the regulations governing hazardous waste transporters as promulgated under 40 CFR Part 263 which the State of Florida adopts under Chapter 17-30 of the Florida Administrative Code.

Enclosed you will find the inspection report and associated checklist that was generated from this inspection. If you have any questions or if I may be of any assistance please contact me at (813) 985-7402.

Sincerely,

Steve Curry

Environmental Specialist Hazardous Waste Section

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING 2600 BLAIR STONE ROAD TALLAHASSEE, FLORIDA 32301-8241



SOB GRAHAM GOVERNOR VICTORIA J. TSCHINKEL SECRETARY

HAZARDOUS WASTE INSPECTION REPORT

1.	INSPECTION REPORT COMPLAINT X ROUTINE FOLLOW-UP PERMITTING
	FACILITY NAME McKesson Chemical Company DER/EPA ID FL D 020_985_727
	ADDRESS 6051 Highway 41A South (Route 3 Box 498A) Tampa, FL 33619
	COUNTY Hillsborough Phone 813) 677-8414 DATE 12/19/85TIME 10:00 AM
	TYPE OF FACILITY:
_	Storage Treatment Small Quantity Container Tank Generator Tank Land Treatment
	TransporterSurface ImpoundmentChem/Phys/Bio.
	Disposal Surface Impoundment Landfill Surface Impoundment Waste Pile
2.	Applicable Regulations:
•	40 CFR 262 <u>X</u> 40 CFR 263 <u>40 CFR 264</u> <u>40 CFR 265</u>
3. !	Responsible Official: (Name & Title)
	Gene Rainwater - Manager
4. 5	Survey Participants & Principal Inspector
	Howard Brown — McKesson Steve Curry — FDER Ed Kerul — McKesson Steven Rudnick — McKesson
5. <u>F</u>	acility Latitude: Longitude:
27	⁰ 52' 32" N 82 ⁰ 23' 05" W
6. <u>I</u>	voe of Gwneranio: FEDERAL STATE COUNTY MUNICIPAL PRIVATE
7. <u>P</u>	ermit Number: HC29-0904630ate Issued: Pending Expiration Date: Pending

8.	Di <u>screp</u>	ancies with Pr	oceaa Dead	ription:	: if di	fferent	from	previous	report.	
		tached page								
				-		:				
										•
9.	Summary o	of Violations;	list and	explain	noncom	pliance	items	•		
Requ	lation	Description	<u> </u>			·				
		NONE								

APPROVED: Jaul E. Jull Environmental Specialist II

8). Process Description - Mr son Chemical Company

McKesson Chemical Company is a nationwide distributor of industrial chemicals and solvents. The Tampa facility maintains a warehouse storage area for the virgin chemicals, a solvent repackaging process and a separate building where chlorine gas is repackaged into cylinders and bleach is produced. There are no hazardous wastes generated at McKesson, however the facility wishes to maintain its generator status in case an accidental spill takes place and requires cleanup and disposal.

As a service to its customers, McKesson Chemical transports spent solvents for recycling at the McKesson Envirosystems plant in New Castle, Kentucky. Typically, McKesson will wait until a full trailer truckload can be compiled before they initiate a pickup. This would entail traveling between several customers and picking up each customers waste solvent. When a full load is collected it is transferred to a common carrier service such as Ryder PIE or Overnight Express for final shipment to the New Castle facility. The turnaround time for transfer—ing the waste to the secondary transporter is generally 3-4 days. During this lapse the spent solvents are kept on the enclosed trailer and it is parked within the fenced in compound at the McKesson facility.

McKesson Chemical is planning to construct and operate a hazardous waste storage facility for the spent recyclable solvents. As of this inspection they have submitted an application for a construction permit (HC29-090463) in order to build the storage area. This application is currently under review and has not been issued to date.

Date	12	19	85
Inspector		$\sum_{i} U_i x_i$	ry
Facility I	D#	FUD	020-485-727

TRANSPORTERS CHECKLIST (40 CFR 263)

ı.	License number and current date on tag 80 8569	1285
	(tractor and trailer, if separate units)	·
2.	Maintenance of records for the specified	
	three year time limit? (263.72)	YesNo
3.	Copy of manifest or delivery document available?(263.20)	Yes No
	Manifest containing at least: (263.21)	
	a. Name and address of transporter?	Yes No
	b. Name, address, identification code of generator?	Yes No
	c. Name, address, identification code of designated permitted facility?	✓Yes′No
	d. Corresponding manifest document number?	√YesNa
	e. Description and quantity of each hazardous waste?	Yes No
	f. Signature of subsequent transporters?	Yes No
•	g. Signatures signifying proper delivery or reasons why delivery could not be certified?	YesNo
4.	Containers properly labeled and marked? (262.3132)	_Yes _No None on Site
5.	International shipments: (262.50) NM	
	a. Record of date waste left U.S.?	YesNo
	b. Presence of one signed copy in records?	YesNo
6.	Evidence of leaking or damaged containers? (Note appearance of truck also) (263.30 - Hazardous Wæste Discharges)	_No_Yes None on site
7.	Vehicles containing hazardous waste placarded properly? (49 CFR 172.500)	YesNo
8.	If it is required of vehicle or if vehicle contains more than 1,000 lbs of hazardous waste, check to see that markings:	
	a. Appear on both sides of vehicle?	Yes No
	b. Are in letters contrasting in color with background?	Yes No
	c. Are legible during daylight from 50 feet away?	✓YesNa
9.	Does the operator have a copy of the financial assurance required by 17-30.17(2)?	✓YesNo

```
4/17/1954
CHARTER
            339699 AMEND TO NAME, FOR PROFIT LOC CA-OD
FEI 94-2432849 REG 12/21/1977 LST 3/02/1978
            MORELAND-MCKESSON CHEMICAL COMPANY, INC. (A CALI CHANGED 3/02/1978
NAME
            F CORP)
ADDRESS
            ONE POST STREET
            SAN FRANCISCO, CALIFORNIA
VANE SHS 885, 1 NO DIAG NO DIAG
OFFICERS/DIRECTORS:
 V/P STARACI, VINCENT
                                ONE POST ST
                                                         SAN FRANCISCO, CA
 A/S PEETZ, LORRAINE E
                                ONE POST ST
                                                         SAN FRANCISCO, CA
                                                                           0000
 A/T SEELENFREUND, ALAN
                                ONE POST ST
                                                         SAN FRANCISCO, CA
                                                                           0000
 A/S/D MILLER, N A
                                ONE POST ST
                                                         SAN FRANCISCO, CA
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ANNUAL REPORTS FILED: (1982) 3/01/1982 (1983) 3/14/1983 (1984) 2/29/1984



M-Kesson

December 6, 1983



DEC 9 1983

SOUTHWEST DISTRICT

Richard J. Powell Environmental Permitting State of Florida Department of Environmental Regulation 7601 Highway 301 North Tampa, Florida 33610

Re: FLD 020 985 727

Dear Dick:

Attached are revised Form 1/Form 3 for our Part A application. These will give you a more accurate and current view of our business. I have also attached, for your information, a flow chart of our "closed-loop" solvent distribution system. This chart shows the following features:

Our position in the industry and financial mass— With 65 distribution branches and numerous other warehouse locations, McKesson Chemical is the largest private national distributor of solvents and other chemicals. [Note: McKesson Corporation, our parent corporation, is a \$4.25 billion in annual sales distribution giant and one of the top 200 corporations in the United States.]

Our vertical integration— We are the only national chemical distribution company that owns and operates its own (three) reclamation refineries. As such we can sell into our own established markets all the reclaimed solvent we can process.

No speculative accumulation-- We can market all the product we can process.

Material is never discarded-- Once a stream is selected, we control its movement from the off-site generator through the reclamation process and on to its ultimate customer. [Note: McKesson is the only recycling company that offers complete idemnification to its raw material (approved waste stream) suppliers from point of pick-up to completion of the reclamation process.]

Double-check sample and approval process-- Candidate raw materials must be sampled, analyzed and approved before entering the refinery side of the loop; further these same raw materials must again be sampled, analyzed and approved for conformation with the original sample before entering the refinery process itself.



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Richard J. Powell State of Florida Page 2 December 6, 1983

Not shown on this chart are three additional important factors that should be known:

Each and every transaction with our "hazardous waste" customers is actually a batch-tolling arrangement— That is, we contract for a specified quantity of a raw material stream whose composition is predetermined and commercial value agreed upon, a purchase order is tendered and the goods move through our system as a separate and discrete entity whose integrity and uniqueness is preserved up to and through the refinery process. In many cases the reclaimed solvent is sold right back to the off-site generator who initially produced the raw material stream; in all cases the reclaimed solvent remains under our control until resold.

We are <u>not</u> in fact in the hazardous waste business at all—— Since the definition of hazardous waste in 40 CFR 261 is more a matter of function than chemistry, we have elected to remain out of both the treatment and disposal functions. Our "storage" function at the distribution branches is <u>not</u> that normally associated with hazardous waste management. We, the distribution branches, serve merely as staging points for the consolidation of economically attractive full trailer loads of containers of preselected waste streams for transshipment from the off-site generators to our reclamation facilities. [Note: Only at the reclamation facilities do we conduct those hazardous waste management functions normally associated with "storage"; that is, sampling, secondary containment, contingency planning, personnel training, etc.] You can see, then, that we actually function under the guidelines established in 40 CFR 261.6 (a)(1) as beneficially using or reusing "hazardous waste" by legitimately recycling or reclaiming "hazardous waste".

Recent correspondence (attached as I received it) from the Federal EPA indicates that the "hazardous wastes" we handle are not "listed wastes" such as F001, F002, U226, U228, etc.), but rather unregulated "solvent blends".

This is the best definition of our current "hazardous waste" business I can provide. I have recently discussed all of these issues with both Region IV and the Federal EPA. The persons with whom I have been speaking are encouraging us to continue our discussions at the Federal EPA to press for the exemption of our distribution branches from further regulation (including permitting) under RCRA.

If there ever was a cogent case for regulatory relief and the encouragement of legitimate solvent recovery, it is ours. We hope you can also see our position in this light and either exempt us from further regulation in Florida, or agree to an abbreviated application process so that we may be fully permitted as soon as possible. I fervently believe that we are part of the solution to the hazardous waste problem.

We are eager to proceed in Florida with your program as it best suits both organizations. Please let me know how else I can be of service to you in this regard-particularly if you have any questions.

Richard J. Powell State of Florida Page 3 December 6, 1983

Most sincerely,

MCKESSON CHEMICAL COMPANY

Hal Brown

Regional Warehousing Manager

Prove

HB/jc

Attachments -Rev. Part A
Flow Chart
EPA Corresp.

cc: D. Eisner-HOC

D. Black-ERO

W. Gabbard-Enviro

D. Simpson

J. Foster

D. Pike

S. Block

SOUTH WEST DISTRICT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460 OFFICE OF SOLID WASTE

DEC 2 | 1981

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Tom Cook, Chief
Hazardous Waste Section
Solid Waste Management Division
Office of Land Programs
Department of Ecology
Mail Stop PV-11
Olympia, Washington 98504

Dear Mr. Cook:

In your letter of October 16, 1981, you questioned EPA's interpretation of the spent solvent listings as they pertain to solvent mixtures. We recognize that this is a problem area, and we are working to rectify it. We have already begun to study the solvents used in Safety-Kleen's mixture and other commonly used solvents. The Agency expects to refine the solvent listings and to attempt to resolve the mixture problem as it relates to solvents. However, at the present time, the solvent listings FDO1-FOO5 apply only to

mixture problem as it relates to solvents. However, at the present time, the solvent listings F001-F005 apply only to pure or technical grade solvents, when spent or discarded. An analogous situation exists for commercial chemical products listed in §261.33 (e) and (f).

The Agency realized that this approach would create a major problem in that mixtures of solvents would not be covered by the spent solvent listings and, therefore, not within the scope of Subtitle C regulation, unless the waste exhibited any of the characteristics defined in Subpart C of 40 CFR Part 261. However, at the time that the Agency promulgated the solvent listings and prepared the background document to support them, we felt it inappropriate to define "spent solvents" in quantitative terms because insufficient data precluded the Agency from establishing a threshold level for toxic constituents other than those regulated by the National Interim Primary Drinking Water Standards. Without establishing a threshold concentration level at which a solvent would be considered hazardous waste, when spent or discarded, the Agency was unable to define at what concentrations mixtures of these solvents would constitute a hazard, when spent or Surely all materials containing these solvents in any concentration do not meet the statutory definition of hazardous waste. Thus, the Agency concluded that the spent solvent listings would apply only to technical grade solvents, notwithstanding the fact that lesser concentrations of these chemicals may be toxic.

JUNITED STA JENVIRONMENTAL PROTECTION

OFFICE OF SOLID WASTE

EUBLEST Safety-Kleen Corporation Spent Solvents

FEST John P. Lehman, Director Hazardous and Industrial Waste Division

^{⊤o} See Below

I recently had an inquiry from one of the Regional Offices. pertaining to solvents distributed on a lease basis by Safety-Kleen Corporation. Since Safety-Kleen distributes its products and services on a nation-wide basis I thought I_should share this with you. Safety-Kleen has been informing its customers that their spent solvent being returned to their service centers is not regulated by EPA under RCRA.

As noted in the attached letter, Safety-Kleen had petitioned the Agency for a clarification or modification of the RCRA regulations to exempt their spent product from RCRA control due to their particular "closed loop" type of leasing operation. Upon review of their petition we determined that their spent product was not the specific spent solvents listed in §261.31 of our regulations. Therefore the waste would only be hazardous if it exhibited one of the characteristics of hazardous waste. As such it would not be subject to RCRA control if it were being beneficially used or re-used, or legitimately recycled or reclaimed (§261.6(a)).

Thus, Safety-Kleen's information to their customers is correct and within the decision as made in response to their petition to the Agency. This information should serve your needs if you receive similar inquiries within your area. Please call Matt Straus of my staff (755-9187) should you want a copy of Safety-Kleen's petition or if you have any questions on this decision.

Attachment

Addressees:

Directors, Air and Hazardous Materials Divisions, Regions I and III-X Director, Water Division, Region II Douglas MacMillan, Acting Director, Office of Water Programs Enforcement



The Agency agrees with your statement that EPA's "sometimes discarded" provision in the definition of solid waste has created problems as it relates to Safety-Kleen's solvent mixture and other materials that are recycled. For example, a sludge being used as a feedstock material in a production process (for instance, fly ash being used as an ingredient in concrete) is still considered to be a solid waste. The Agency is currently working on revising the definition of solid waste (40 CFR 261.2) to clearly distinguish wastes from non-wastes and to devise an appropriate regulatory scheme that will selectively regulate recycling activities known to be the most hazardous or thought to have that potential. EPA expects that selectively regulating these activities will lighten the regulatory burden of many small businesses and also promote resource recovery.

At the present time, the Agency intends to adhere to its present interpretation of the solvent listings. However, as mentioned, we plan to revise these listings upon completion of our solvents study. Should you have further questions concerning the Agency's position on this issue or any information that would assist us, please feel free to contact Matthew Straus, of my staff, at (202) 755-9187.

Sincerely yours,

John P. Lehman

Director

Hazardous & Industrial Waste Division (WH-565)

OEC O GOS SOUTHWEST DISTRICT TAMPA

D. L. Eisner, Home Office

Date

November 17, 1983

Copies to

Donald M. Black

Location

From

Subject

Eastern Region

SOLVENT BLENDS AS LISTED WASTES

D. A. Davis, HO H. E. Brown, SERO M. Kirkland, SRO

T. E. Nisler, CRO

D. L. Wettstead, WRO

G. N. Butter, MEC

W. D. Gabbard, MEC

I picked up an interesting bit of information during my recent visit to Region III of the USEPA in Philadelphia: it has been established and accepted by the legal authorities of the EPA that a blend of materials that individually would be hazardous wastes is not a listed waste if the blend was sold originally as a blend. In other words, a blend per se is not a listed waste if sold originally as a blend, regardless of the nature of the basic components.

A copy of the supporting documentation from Washington is attached. reading has caused some consternation within the EPA, but no immediate change is expected.

Donald M. Black

DMB:dc

Attachments





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

NOV 2 1983

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

RE: WCBLG2518

Dr. Donald Black McKeffen Chemical Company 136 Summit Avenue Montvale, NJ 07645

Dear Dr. Black:

At the request of Sam Rotenburg, of our Region III office, I have enclosed several letters related to Safety-Kleen (product) and its coverage by regulations under the Resource Conservation and Recovery Act (RCRA). As you will note, for most areas of possible concern, this product (and its recovery) are not subject to RCRA regulations. However, we are contemplating regulatory amendments both to add additional solvents to our listed group and to cover mixtures of solvents. If you need further information, please call me or Jacqui Sales, of my staff; we may be reached at (202) 382-4770.

Sincerely yours,

Alan S. Corson

Chief

Waste Characterization Branch

Enclosures

because the materials in such a system are never discarded. Clarification was requested because Safety-Kleen believes that EPA's definition of "solid waste" can be interpreted as including some materials that are not discarded in a given industrial operation but that are discarded in others. Alternatively, Safety-Kleen requested that the regulation defining solid waste be modified to include only materials that are in fact discarded in the industrial operation in which thay are created.

We have decided that the agency need not act on Safety-Kleen's petition at this time. Based on the facts contained in the petition, and additional information presented at the meeting, we have determined that neither of the solvents distributed by Safety-Kleen is presently listed as hazardous waste in 40 CFR §261, Subpart D. At the May 27 meeting, we pointed out that the spent mineral spirits solvent is not a listed waste, but sought further information on the chlorinated solvent distributed by Safety-Kleen. We recently advised you, and hereby confirm, that the spent chlorinated solvent is also not a listed waste. Although the solvent contains materials that are contained in wastes listed in 40 CFR 261.31, it is our interpretation that the regulations are intended to apply to spent solvents identifiable as any technical grades of the chemical that is produced or marketed and not to mixtures otherwise containing the chemical. Safety-Kleen's chlorinated solvent is a mixture of cresylic acid, methylene chloride, o-dichlorobenzene and water. company's spent solvent thus does not constitute a waste listed in Subpart D of Part 261 and is not considered a listed waste.

Thus, Safety-Kleen's spent solvents would only be hazardous because they exhibit any of the four characteristics identified in 40 CFR §261, Subpart C. Because non-listed hazardous wastes are not subject to regulation at this time if they are being beneficially recycled or stored for that purpose, (see 40 CFR §261.6(a))///) the regulations already provide the relief sought in your petition. Thus, we plan no further actions on your request. Please contact Matt Straus of my staff if you have any further questions. Mr. Straus can be reached at (202) 755-9187.

Very truly yours,

John P. Lehman

pirector

Hazardous & Industrial Waste Division (WH-565)



UNITED STATE INVIRONMENTAL PROTECTION / INCY

WASHINGTON, D.C. 20460 OFFICE OF SOLID WASTE

JUL 2 1 1981

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE

Mr. Theodore H. Mueller Safety-Kleen Corporation 655 Big Timber Road Elgin, Illinois 60120

Dear Mr. Mueller:

This letter responds to the concerns raised in Safety-Kleen's "Petition for Clarification or Modification of Regulation," which you submitted to the Environmental Protection Agency on April 6, 1981.

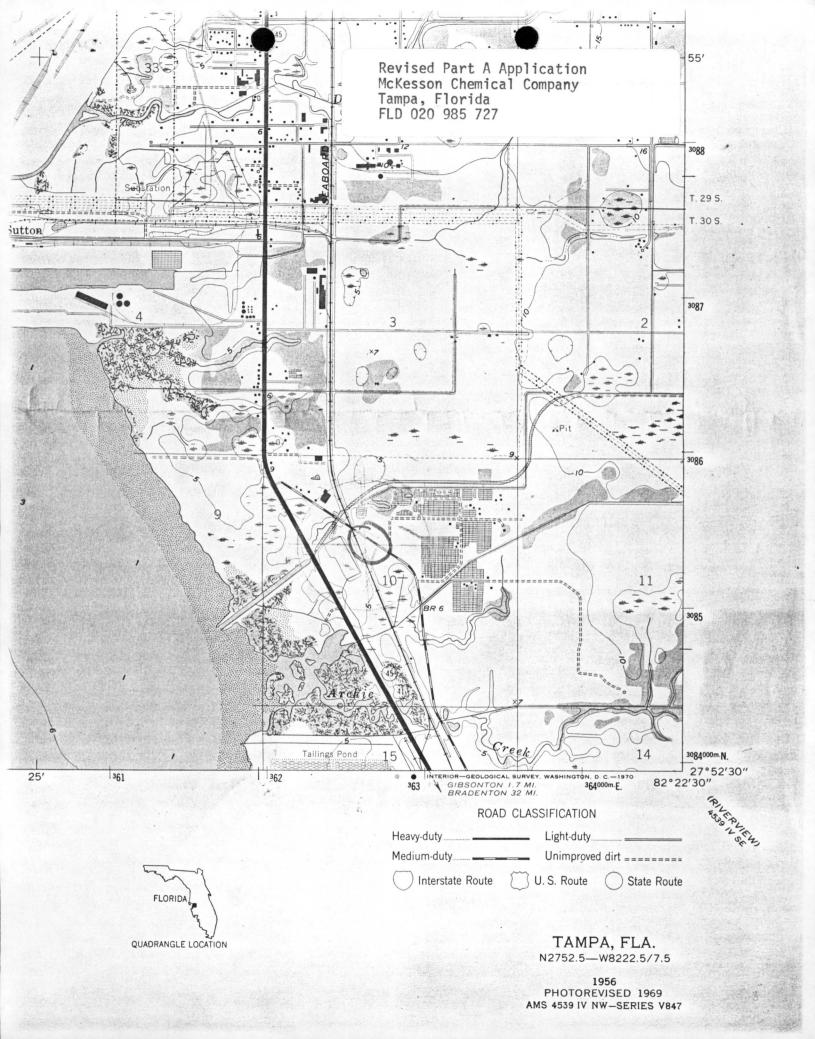
According to the facts stated in the petition and at the May 27 meeting, Safety-Kleen distributes two types of small parts cleaning solvents to its customers. The solvents are a mineral spirits solvent and a chlorinated, water-phase solvent containing approximately 14% cresylic acid, 29% methylene chloride, 29% o-dichlorobenzene, and 28% water with a The solvents are distributed through a closedsurfactant. loop system in which solvent from the company's reprocessing facilities is delivered in company-owned trucks to regional service centers where it is stored for subsequent delivery to the company's customers. This solvent is then delivered under a lease arrangement to the customer in cleaning equipment supplied by Safety-Kleen or other companies. Delivery is performed by Safety-Kleen service representatives. The representatives replace drums of spent solvent with drums of clean solvent and return the spent solvent to the service The mineral spirits solvent is usually transferred to bulk storage tanks; the chlorinated solvent remains in drums, which are generally kept in storage sheds. The spent solvent is then transported to the reprocessing facilities for recycling.

The petition submitted by Safety-Kleen requests EPA to issue a statement clarifying the meaning of the term "solid waste" in 40 CFR §261.2. The petition stated that the definition of "solid waste" in the Resource Conservation and Recovery Act was not intended to include materials recycled in a closed-loop system of the sort used by Safety-Kleen

Program McKesson "Closed Loop" Solvent Distribution System Prepared by H.E.C. Brown Date 12/2/83 MASTERS OF DISTRIBUTION Solvent Suppliers Virgin Solvent Various DuPont Drum Staging Distribution Facili-Dow Virgin Solvent Carbide RC Drums Shell Others Albany Reclaimed Solvent
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Dolton, IL
Newark, NJ forms to Sample? Sample) Yes Regulated Disposal (By Others) HQs Envirosys-Suitability?/ tems Yes Ft. Wayne, IN Staging Re-Drums Approved Stream Bu1k Approved Stream

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XI. MAP	
Attach to this application a topographic map of the area extending to the outline of the facility, the location of each of its existing and pr	at least one mile beyond property bounderies. The map must show opposed intake and discharge structures, each of its hazardous waste
treatment, storage, or disposal facilities, and each well where it injec	ets fluids underground. Include all springs, rivers and other surface
water bodies in the map area. See instructions for precise requirements	De
XII. NATURE OF BUSINESS (provide a brief description)	
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their initial use by our customers, may qualify	y, after rigorous sampling and screening, as raw
materials for beneficial recycling by our recla	amation refinery. This reclamation facility,
	n of the same parent corporation, is located at
point for these selected waste streams produced	ed at Tampa, FL, would serve only as a transfer
consolidate full trailer-loads of containers for	
No intentional, purposeful generation of hazard	dous wastes occurs at the Tampa distribution fa-
cility. Neither are processing operations of a	any kind performed here.
	Constitution of the second
I cartify under penalty of law that I have personally examined and are attachments and that, based on my inquiry of those persons imme	n tamiliar with the information submitted in this application and all
application, I believe that the information is true, accurate and com	plete. I am aware that there are significant penalties for submitting
false information, including the possibility of fine and imprisonment. A. NAME & OFFICIAL TITLE (type or print) B. SIGNATU	And the second s
Darwin H. Simpson	C. DATE SIGNED
Southeast Region, Vice-President	December 5, 1983
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HAZAHOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

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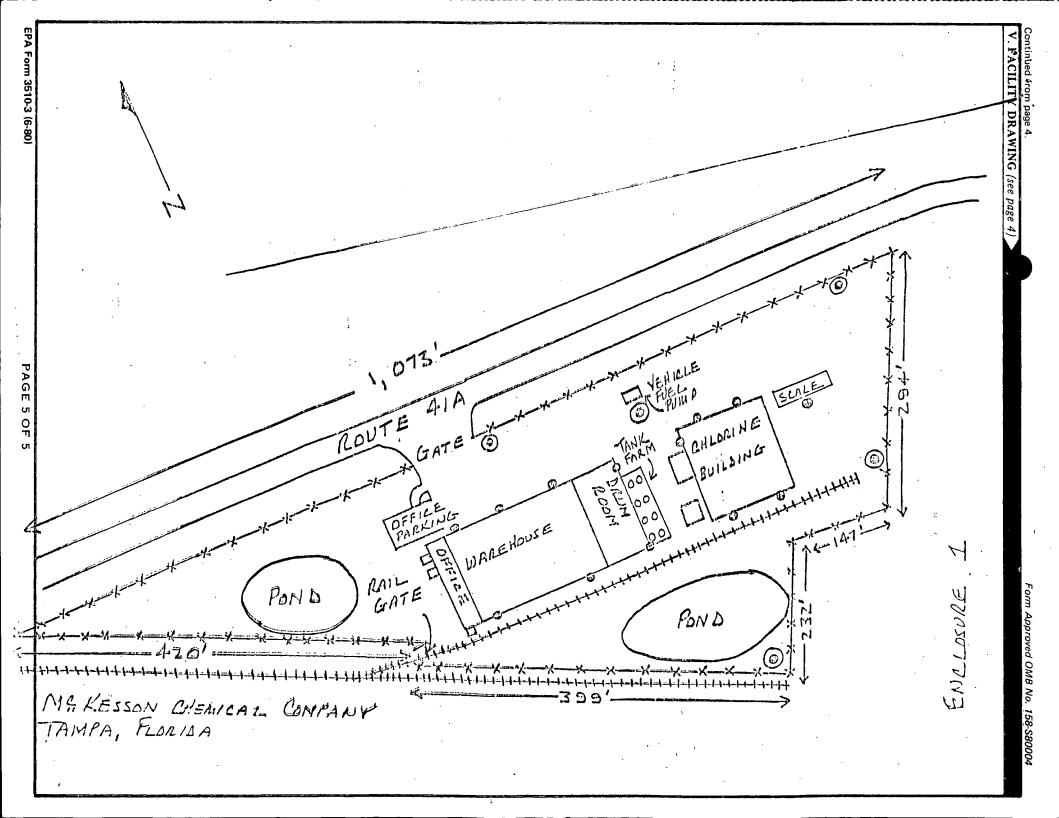
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			ZARDOUS WASTE		lair number from	A AEB Subnart D	Unted hazardous	waste you will handle. If you
	handle hazar	rdous wastes which	ich are not listed in 4 inants of those hazard	40 CFR, Sul	ubpart D, enter the	four—digit number(s)	from 40 CFR, Subpart C	that describes the characteris-
· ·	basis. For ea	ach characteristic	ANTITY — For each or toxic contaminant stic or contaminant.	listed wast it entered in	e entered in colun column A estimat	nn A estimate the quate the total annual qua	antity of that waste that antity of all the non-listed	will be handled on an annual d waste(s) that will be handled
	UNIT OF M codes are:	EASURE - For	each quantity entere	ed in colum	in B enter the uni	t of measure code. Ur	nits of measure which mu	st be used and the appropriate
	ver a sy	ENGLISH UNI	T OF MEASURE		CODE	METRIC UNIT	OF MEASURE	CODE
ı		POUNDS			P	KILOGRAMS.		K
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D.	PROCESSES	S	-		-		$\label{eq:continuous} \phi_{ij} = \phi_{ij} = \phi_{ij} = \phi_{ij}$. 300
	1. PROCES For listed	S CODES: d hazardous waste					de <i>ls)</i> from the list of proce	ess codes contained in Item III
	to indicat	te how the waste —listed hazardous	will be stored, treated s wastes: For each cl	ed, and/or di characteristic	lisposed of at the fa ic or toxic contami	acility. Dinant entered in colun	mn A. select the code(s) 1	from the list of process codes
	contained	d in Item III to acteristic or toxic	indicate all the proce	esses that v	will be used to sto	re, treat, and/or dispo	ose of all the non-listed	hazardous wastes that possess
	Note: F	our spaces are p	provided for entering	process co	odes. If more are roace provided on p	needed: (1) Enter the age 4, the line number	e first three as described a r and the additional code(s	bove; (2) Enter "000" in the
		* 1 * * * * * * * * * * * * * * * * * *		. *		Eller Holler (Fr. 1947)	cess in the space provided o	
NO	TE: HAZA	RDOUS WASTE!	S DESCRIBED BY N	MORE THA	N ONE EPA HAZ	ZARDOUS WASTE N	UMBER — Hazardous wa	stes that can be described by
			Vaste Number shall be ezardous Waste Numbe	•			olete columns B.C, and D	by estimating the total annual
	quantity	of the waste and	describing all the pro-	ocesses to be	e used to treat, stor	re, and/or dispose of the	he waste.	column D(2) on that line enter
٠	"included	d with above" and	d make no other entri	ries on that I	line.	to describe the hazard		Olumn D(2) on and and once
	ودر معارش ای او							se of an estimated 900 pounds
per are	year of chro corrosive on	ome shavings from ally and there will	m leather tanning and I be an estimated 200	nd finishing c	operation. In addit	tion, the facility will tr	reat and dispose of three n is corrosive and ignitable a	on-listed wastes. Two wastes
			Treatment will be .	in an incine.				
	A. EP	<u> </u>		C. UNIT		will be in a landfill.	D. PROCESSES	

	A. EPA					C. UNIT													
HAZARD. WASTENO (enter code)		10	QUANTITY OF WASTE		SURE (enter code)		E 1. PROCESS CODES							DES			2. PROCESS DESCRIPTION (if a code is not entered in D(1))		
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X-4	D	0	0	2					T	1		T	1		Γ		T	T	included with above

Continued from page 2. NOTE: Photocopy this page before completing if , Form Approved OMB No. 158-S80004 have more than 26 wastes to list. FOR OFFICIAL USE ONLY EPA I.D. NUMBER (enter from page 1) W DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) D. PROCESSES C. UNIT A. EPA HAZARD. WASTENO B. ESTIMATED ANNUAL QUANTITY OF WASTE SURE (enter code) 1. PROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) 29 27 29 27 - 29 27 - 29 a 0 s 0 1 1100 G 1 2 0 2 0 1100 S 0 1 3 0 0 S 0 1 1100 0 0 5 G 1100 S 0 1 5 0 G S 0 1 0 550 6 550 G 0 0 2 S 0 1 7 0 7 550 S 0 1 8 8 G 550 S 0 1 0 9 S 0 4 550 10 5 S 0 1 1 1100 11 5 G S 0 1 1100 12 1 550 S 0 1 13 550 G S 0 14 S 0 1 2 1100 15 2 2 1100 G S 0 16 G 550 SQ1 17 18 19 20 21 22 23 24 25 26

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EPA I.D. NO. (enter from page 1)		
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V. FACILITY DRAWING		
All existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instruct	tions for more detail).
VI. PHOTOGRAPHS		
All existing facilities must include photographs (aer treatment and disposal areas; and sites of future sto	ial or ground—level) that clearly delineate a rage, treatment or disposal areas (see instruc	Il existing structures; existing storage, sections for more detail).
VII. FACILITY GEOGRAPHIC LOCATION		
LATITUDE (degrees, minutes, & second	s) LONGIT	UDE (degrees, minutes, & seconds)
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VIII. FACILITY OWNER		
A. If the facility owner is also the facility operator as skip to Section IX below.	listed in Section VIII on Form 1, "General Inform	nation", place an "X" in the box to the left and
B. If the facility owner is not the facility operator as	listed in Section VIII on Form 1, complete the fo	llowing items:
The state of the s	LITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E.		
15 116 3. STREET OR P.O. BOX	4. CITY OR TOWN	55 56 - 50 59 - 61 62 - 6 5. ST. 6. ZIP CODE
F	Ğ	
IX. OWNER CERTIFICATION	45 115 116	40 41 42 47 51
I certify under penalty of law that I have personally		
documents, and that based on my inquiry of those is submitted information is true, accurate, and comple	ndividuals.immediately responsible for obta ete. I am aware that there are significant per	nalties for submitting false information,
including the possibility of fine and imprisonment.		
A. NAME (print or type) Darwin H. Simpson	B/SIGNATURE 1	C. DATE SIGNED
Regional Vice-President, Southeas	Perwin H. Vim	December 5, 1983
X. OPERATOR CERTIFICATION		
I certify under penalty of law that I have personally documents, and that based on my inquiry of those i submitted information is true, accurate, and comple including the possibility of fine and imprisonment.	individuals immediately responsible for obta	nining the information, I believe that the
A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
EPA Form 3510-3 (6-80)	PACE ACE 5	CONTINUE ON PAGE
	PAGE 4 OF 5	



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R. MAP Attach to this application a topographic map of the	17 19 27 19 27 27 27 27 27 27 27 27 27 27 27 27 27	1 (3)	pecify)	
I. MAP Attach to this application a topographic map of the he outline of the facility, the location of each of i reatment, storage, or disposal facilities, and each water bodies in the map area. See instructions for pre	area extending to at least ts existing and proposed well where it injects fluids ecise requirements.	one mile beyond p	roperty bounderies.	The map must show."
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SEPA .	U.S. ENVIRONMENTAL PROTECTION AGENC NOTIFICATION OF HAZARDOUS WASTE A		INSTRUCTIONS: If you received a preprinted
INSTALLA- TION'S EPA I.D. NO.			label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is
I. STALLATION			complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted
INSTALLA- TION II. MAILING			label, complete all items. "Installation" means a single site where hazardous waste is generated,
ADDRESS	PLEASE PLACE LABEL IN THIS SPACE	CE	treated, stored and/or disposed of, or a trans- porter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFI-
LOCATION III OF INSTAL- LATION			CATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
FOR OFFICIAL			
c	COMMENTS		
15 16	ON'S EPA I.D. NUMBER APPROVED DATE RECEIVE (yr., mo., & day)	2	35
F	1) 1/A C 17 16 17 17 17 17 17 17 17 17 17 17 17 17 17	22	·
I. NAME OF INS	・ 高いではないとう 不知のがらい 正正を主要はなか。 またことの言というできれていっている いっこうかんまかん Tay かっこうか はあれば Tay かけだける	en eter	
Morela	nd McKesson Company		671
II. INSTALLATIO	ON MAILING ADDRESS	energy in	是是非常是可能的一种。
3 Route	3 B O x 4 9 8 A		
	CITY OR TOWN	ST. ZII	PCODE
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5 6 0 5 1	Highway 41A South		45
	CITY OR TOWN	ST. ZIF	CODE
6 Tampa		FL33	619
IV. INSTALLATI		制矿料	學學的學術,可以可以完成了多數的學學學
2 T h o m a	NAME AND TITLE (last, first, & job title) S E m o r y Manager		PHONE NO. (area code & no.) 8 1 3 - 6 7 7 - 8 4 1 4
V. OWNERSHIP	ASSESSOR AND		45 45 - 41 49 - 51 52 - 55
	A. NAME OF INSTALLATION'S LEGAL	OWNER	
8 Morel	 	1	mpany Inc.
B. TYPE OF C (enter the approprie	OWNERSHIP box) VI. TYPE OF HAZARDOUS WASTE	-	TRANSPORTATION (complete item VII)
F = FEDERAL M = NON-FE	. 57	38	UNDERGROUND INJECTION
VII. MODE OF T	RANSPORTATION (transporters only – enter "X" in the	60	· · · · · · · · · · · · · · · · · · ·
A. AIR	B. RAIL SC. HIGHWAY GD. WATER		R (specify):
	SUBSEQUENT NOTIFICATION		为4000000000000000000000000000000000000
Mark "X" in the app If this is not your fir	ropriate box to indicate whether this is your installation's first no st notification, enter your Installation's EPA I.D. Number in the s	tification of ha space provided t	below.
X A. FIRST	NOTIFICATION	n (complete ite	m C)
	N OF HAZARDOUS WASTES	(1) 10 10 10 10 10 10 10 10 10 10 10 10 10	
Please go to the reve	rse of this form and provide the requested information,		

				I.D FOR O	FICIAL USE ONLY
				w	T/A
IX. DESCRIPTION OF HA	ZARDOUS WASTES	(continued from f	ront)		13 14 1
A. HAZARDOUS WASTES FRO waste from non—specific sou	OM NON-SPECIFIC SO	NIBCEC E-+- + C		40 CFR Part 261.31 fc	r each listed hazardous
	2	3	4	5	6
23 26					
7	8	9	10	23 - 26	23 - 26
					12
B. HAZARDOUS WASTES FRO	M SPECIFIC SOURCE	23 - 26	23 25	23 - 26	23 - 26
B. HAZARDOUS WASTES FRO specific industrial sources you	T	Jse additional sheets i	of number from 40 CFF f necessary.	Part 261.32 for each I	isted hazardous waste from
	- 14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 . 26		
19	20	21	22	23 - 26	23 - 26
23 - 26	23 - 26	23 - 25	23 - 26	23 - 26	23 - 26
			28	29	30
23 - 26	23 26	23 - 26	23 - 26		
C. COMMERCIAL CHEMICAL F stance your installation handle	'RODUCT HAZARDOU s which may be a hazard	JS WASTES. Enter ti dous waste. Use addi	an form of the control of	om 40 CFR Part 261.3 See attachm	3 for each chemical sub-
31	32	33	34	35	36
0002	U 2 2 6	U 2 1 0	U 2 2 8	0031	0057
37	23 - 26 38	23 - 26	23 - 26	23 - 26	23 - 26
		39	40	41	42
<u>U 0 6 9 </u>	U 1 1 2	U 1 2 2	U 1 5 4	U 1 5 9	U161
43	44	45	46	23 - 25	23 - 26
U 2 2 0	U 2 3 9				48
D LISTED INEECTIOUS WAST	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
D. LISTED INFECTIOUS WAST hospitals, medical and research	70011115011	t number from 40 CF lation handles. Use a	R Part 261.34 for each dditional sheets if neces	listed hazardous waste sary.	from hospitals, veterinary
49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 26		
E. CHARACTERISTICS OF NON hazardous wastes your installat	I—LISTED HAZARDOU ion handles. (See 40 CF	IS WASTES. Mark " R Parts 261.21 - 26	X" in the boxes corresponded.	onding to the character	istics of non—listed
1. IGNITABLE	∑2. c (D002)	ORROSIVE	☐3. REACTI		□ 4. TOXIC
X. CERTIFICATION			(5003)	l) The state of the state of th	D000)
I certify under penalty of lattached documents, and the	aw that I have perso	nally examined a	d am familia-		The second second
attached documents, and the I believe that the submitted	at based on my inqu	iry of those indivi	duals immediately re	ne injormation subj esponsible for obtain	nitted in this and all ing the information
I believe that the submitted mitting false information, inc	injormation is true, is luding the possibility	accurate, and com of fine and impris	plete. I am aware the conment.	at there are signific	ant penalties for sub-
SIGNATURE		NAME & OFFICE	AL TITLE (type or prin	it)	DATE SIGNED
Midute	Te or	G. N. But	ter, Technical	Director	8-14-80
EPA Form 8700-12 (6-80) REVE	<u> </u>	Mckesson	Chemical Compa	ny	0 11 00

Foremost-McKesson Chemical Group One Post Street San Francisco, CA 94104 415 983 8300



To Whom It May Concern:

McKesson Chemical Company, which is an operating division of Foremost-McKesson, Inc., is a distributor of various chemical products for various suppliers of chemicals. It operates a large number of distribution facilities throughout the country, of which this is one. We stock an average of five-hundred (500) packaged chemical products at these locations. The products carried will vary from location to location and from time to time. It is anticipated that some or all of the products could at one time or another result in the generation of a hazardous waste and the amount generated could in one or more instances exceed the quantity limit for a small generator. Since ours is a distributing function it is impossible for us to be more specific at this time.

In addition, this particular unit is a repackager of certain chemical products which is expected to result in the generation of hazardous wastes. This is more particularly spelled out in the Notification submitted herewith.

NOV 14 1983

SOUTHWEST DISTRICE

. N. Butter

Technical Director

McKesson Chemical Company

GNB:ks attachment (Form GSA No. 0246-EPA-OT)

No. Here



ACKNOWLEDGEMENT OF No FIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle of RCRA.

MORELAND AND RESS.

#1D020985727

MORELAND MCMESSON COMPANY ROUTE 3 BOX 4988 TRAPA

FL 336 19

6051 HIGHNAY 418

FL 336 19

EPA Form 8700-12A (4-80)

Taylea



ACKNOWLEDGEMENT OF APPLICATION FOR A HAZARDOUS WASTE PERMIT

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility with the EPA Identification Number shown on the front of this postcard; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

EPA Form 3510-3A (12-80)

PULL RELIVERHAM, DOLT STYL pringl or type in the unshaded areas only -in areas are spaced for elite type, i.e., 12 acters/inch). Form Approved OMB No. 158-S80004 ORM ENVIRONMENTAL PROTECTION AGENCY I. EPA I.D. NUMBER 1 HAZARDOUS WASTE PERMIT APPLICATION Consolidated Permits Program (This information is required under Section 3005 of RCRA.) RCRA FOR OFFICIAL USE ONLY APPLICATION DATE RECEIVED APPROVED (yr., mo., & day) COMMENTS (yr., mo., & day) II. FIRST OR REVISED APPLICATION Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above. A. FIRST APPLICATION (place an "X" below and provide the appropriate date) 1. EXISTING FACILITY (See instructions for definition of "existing" facility. 2.NEW FACILITY (Complete item below.) Complete item below.) FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day)
OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left) EXPECTED TO BEGIN 73 74 75 76 77 78 REVISED APPLICATION (place an "X" below and complete Item I above) 1. FACILITY HAS INTERIM STATUS 2. FACILITY HAS A RCRA PERMIT III. PROCESSES – CODES AND DESIGN CAPACITIES A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C). B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount. 2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used. PRO- APPROPRIATE UNITS OF CESS MEASURE FOR PROCESS PRO- APPROPRIATE UNITS OF CESS MEASURE FOR PROCESS MEASURE FOR PROCESS MEASURE FOR PROCESS PROCESS PROCESS CODE CODE DESIGN CAPACITY DESIGN CAPACITY T01 GALLONS PER DAY OR
LITERS PER DAY
T02 GALLONS PER DAY OR Storage: Treatment: CONTAINER (barrel, drum, etc.) S01 GALLONS OR LITERS
GALLONS OR LITERS
CUBIC YARDS OR
CUBIC METERS للوطاء ومحارب المارية WASTE PILE GALLONS PER DAY OR LITERS PER DAY TONS PER HOUR OR \$03 SURFACE IMPOUNDMENT SURFACE IMPOUNDMENT T02
INCINERATOR T03 SURFACE IMPOUNDMENT 504 GALLONS OR LITERS METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR 111 Disposal: INJECTION WELL **GALLONS OR LITERS** OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in LANDFILL ACRE-FEET (the volume that would cover one acre to a GALLONS PER DAY OR depth of one foot) OR The second secon HECTARE-METER AND APPLICATION ACRES OR HECTARES
GALLONS PER DAY OR
LITERS PER DAY OCEAN DISPOSAL the space provided; Item III-C.) UNIT OF
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UNIT OF MEASURE
CODE SURFACE IMPOUNDMENT D83 GALLONS OR LITERS MEASURE manager of the second of the s UNIT OF MEASURE UNIT OF MEASURE UNIT OF MEASURE CODE LITERS PER DAY.

V ACRE-FEET.

A TONS PER HOUR.

W ACRES.

B GALLONS PER HOUR.

E HECTARES.

Q LITERS PER HOUR.

H GALLONS, G LITERS L CUBIC YARDS Y CUBIC METERS GALLONS PER DAY EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour. ii. 345a ... DUP 1 B. PROCESS DESIGN CAPACITY A. PRO **B. PROCESS DESIGN CAPACITY** A. PRO CESS FOR FOR 2. UNIT OF MEA SURE CESS 2. UNIT OF MEA-SURE (enter OFFICIAL OFFICIAL USE AMOUNT (specify) (from list ಕೃಷ್ಣಾಕ್ರಕ್ಕ್ 1. AMOUNT ONLY above) (enter ONLY ျှမည်းမြောက် မြောက်သည်။ above) code code 28 X-1|S|02 600 G 5 T0 3 X-2 -20 E 6 1 2 0 7 200 8 3 9

EPA Form 3510-3 (6-80)

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Continued from the front.	•	. \
III. PROCESSES (continued)		
C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTH INCLUDE DESIGN CAPACITY.	IER PROCESSES (code "T04	"). FOR EACH PROCESS E
		•

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- 9. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDSP	KILOGRAMS	K
TONST	METRIC TONS	

METRIC TONS. If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into If facility records use any other unit of measure for quantity, the units of measure must be conscited in account the appropriate density or specific gravity of the waste.

PROCESSES

- - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
 - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
 - Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the Note: Four spaces are provided for entering process codes. If more are needed, (1) Enter the fine number and the additional code(s).

 extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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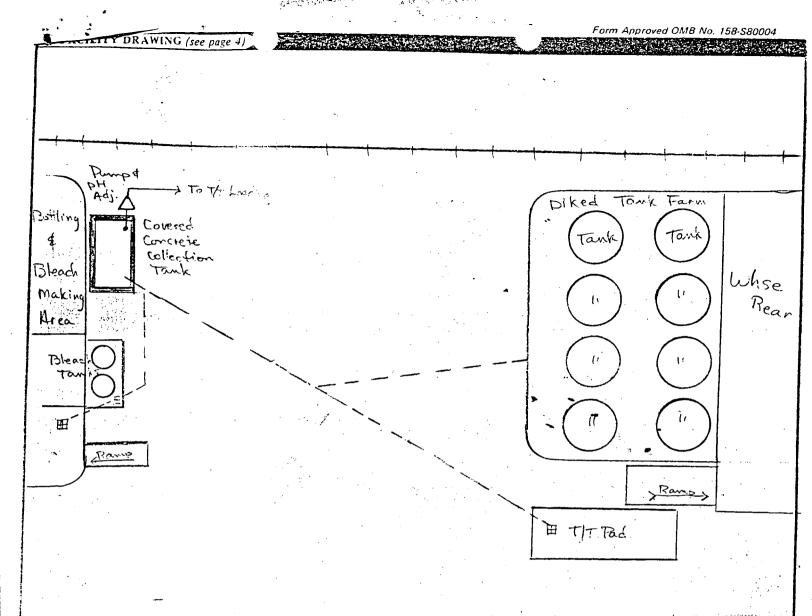
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PAGE 4 OF 5

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Continued from the front.

EPA Form 3510-3 (6-80)



Surface Water & Wash water Collection & PH. Adjustment System.

VI PHOTOGRAPHS

Tampa, Fla.

[not received in time to include in 1st mailing deadline]

M-Kesson

November 11, 1983



Richard J. Powell Environmental Permitting State of Florida Department of Environmental Regulation 7601 Highway 301 North Tampa, Florida 33610

SOUTHWEST DISTRICT

NOV 14 1983

Dear Dick:

I have attached the various items from our Tampa file that would be of interest to you. You can see the sequence--Notification, Form 1, Form 3, Inspection--leading to our assumption of interim status. Unfortunately very little busines developed in 1980-1982 because of the general business malaise, the distance from Tampa to our T/S/D/R facility in New Castle, Ky., and the fact that we only reclaim solvents and do not offer disposal services.

Where the confusion arose is our request to withdraw from the treatment category (6/10/81 Ltr.) only. This function was excluded from regulation by amendment and our simple pH adjustment and neutralization system became exempt.

We have consistently sought to retain our interim status as a "storer", both to complement our transporter permits and also to support our recycling division, even though we would merely act as a transfer agent for off-site generators of containerized, reclaimable solvent streams.

Now that business is improving and my management is aware of our need to "get something going" concerning Tampa, we would certainly appreciate your understanding of our situation and help in this regard.

Sincerely,

Hal Brown

HB/jc

Attachments

cc: DMB CCH
DLE DEP

JHF DHS

Fran

Serving the Nation Since 1833

M-Kesson

November 7, 1983

Mr. Lloyd Woosley, P.E. U. S. Environmental Protection Agency Region IV, 345 Courtland Street Atlanta, Georgia 30365

Dear Lloyd:

Thank you for your note of 11/2/83. The Federal Register NPR (4/4/83) you sent was interesting, but, unfortunately, will not impact us significantly. We are still looking and hoping for proposed legislation that will:

- 1. Recognize, define and legitimize our function as third party transfer/staging agents between off-site generators of recyclable solvents (as raw materials) and our T/S/D/R facilities that reclaim these high-quality wastes.
- 2. In recognition of our legitimate and valuable recovery function, grant some substantial relief from the onerous, time-consuming, and duplicative requirements of full compliance with the Part B application requirements.

In fact what you will see from us, if there is no legislative relief, is the same Part B (in various revisions), with only the names, places and dates changed.

Once we submit our revised Kingspört application, later this month, perhaps we can get the Regional Administrator involved in the review process. Once you understand the similarity of function, management, stability, fiscal responsibility, and internal operating rules and procedures involved in our facility/regional/national hazardous waste management programs, it may then be possible for Region IV to grant us some administrative relief on future Part B applications. We would be eager to continue to supply that information unique to any individual facility, (primarily Sec. B), such as maps, location layout, management, emergency response, and hazard prevention equipment/contacts, etc. However, the text of Sections C, D, F, G, H, & I will remain essentially unchanged except for local and special information in all our future applications.



Mr. Lloyd Woosley, 1 Page 2 November 7, 1983

On a related subject, I have attached a copy of my 6/14/83 letter to Mr. Scarbrough which remains unanswered. The copy of the notification you sent me was for our former location in Jacksonville, Fl., and not the Part A sent with my 14 June letter. You may have us listed as "Moreland-McKesson" Company as went through a name change in 1981.

I hope this information will be helpful to you.

Sincerely,

MCKESSON CHEMICAL COMPANY

Hal Brown

HB/jc

Attachment

cc: D. Black

D. Eisner

J. Foster

D. Simpson

r

)

D. L. Eisner - HOC/27

Date

October 14, 1983

M-Kesson

From

Hal Brown

Location/Tel.

Intra Company

Southeast Regional Office (803) 583-8481

Correspondence

Subject

Status of RCRA Part B Permitting TD 84097 Copies To

D. M. Black

J. H. Foster

D. H. Simpson

Two points of interest to Southeast Region:

1. Kingsport was ommitted. This application should be listed either under paragraph 5--Applications Submitted and Branches Visited, or paragraph 6--Application Submitted and No Further Activity.

We have not heard from EPA Region IV in more than a year, nor from Tennessee DWSM in more than ten months on our application, so I can understand your ommission of our "Forgotten Application".

2. Tampa's due date is not established, yet, because it is a voluntary application. If we do not set a date soon, it may never be processed. I understand that Don will be real busy for the next four months on the existing list, but may I suggest an April 1, 1984 date?

Hal Brown

HECB: tw

e gra

September 30, 1983

ACTIVITY REPORT - SEPTEMBER, 1983 Page two.

II. Other Permitting Activity

- A. New Jersey Pollutant Discharge Elimination System permit application filed for Woodbridge. Securing this permit is a requisite for Woodbridge's HW storage permit.
- B. Application for kosher labelling of sorbitol solution at Woodbridge filed.
- C. Hazardous waste and hazardous material transport permit filing for Boston and Albany.
- D. New Jersey has issued a permit for storage of toluene in bulk at Woodbridge.

III. Miscellaneous

- A. Bids for incineration of distress Triton X-202 at Woodbridge received from SCA and Ross Incineration and submitted to Region.
- B. Facility of marketer of distress chemicals visited and working arrangement established for ER.

Donald M. Black

DMB:dc

.-

D. L. Eisner, Home Office

September 30, 1983

From

Donald M. Black

Location

Eastern Region Subject

ACTIVITY REPORT - SEPTEMBER, 1983

Copies to

Date

D. A. Davis

R. R. Powell

W. R. Landry

5. Omaha, called for Dec 9

I. Part B Applications

A. Region V of the USEPA has notified us that permits for Cincinnati, Columbus, and Cleveland will issue today.

B. On the other hand, the Ohio EPA has notified us informally that the office of Ohio's Attorney General has requested additional information on the applications of these branches. The OEPA is somewhat stunned, particularly in light of the Federal permits. and considers the request "totally irrelevant". Some delay will ensue.

C. New Jersey has issued the Woodbridge draft permit with the public hearing scheduled for October 31.

D. Part B's filed for Altoona with both state and USEPA (new facility - not called).

E. Part B for Pittsburgh filed with USEPA in order to provide for expanded storage capacity (had been called by Pennsylvania).

F. Other applications in process:

1. Portland, called for November 14.

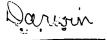
2. Philadelphia, called for December 1.

3. Albuquerque, called for February 1.

4. Chattanooga, called for February 29.

G. Turmoil at Hummelstown continues. The PADER is taking it in stride and has tentatively scheduled standard public hearing during period of November 16-23.

Ill curiulati Dr. Done



Joromose dollesson Ulternoci Graso

Takkesson Chemical Company Post Office Brawer 2169 Spartanburg, South Carotina 29304 P03-583-8461

June 14, 1983



James A. Scarbrough, Chief
Residuals Management Branch
U. S. Environmental Protection Agency
Region IV, 345 Courtland Street
Atlanta, Georgia 30365

Re: Applications for Interim Status Approval

as a Hazardous Waste Storer

Dear Mr. Scarbrough:

We are requesting interim status approval for hazardous waste storage for our branch locations in Region IV as follows:

Atlanta, Ga. GAD072472707
Augusta, Ga. GAD000828269
Charlotte, N. C. NCD024481848
Greensboro, N. C. NCD089903983
Mobile, Al. ALD000737478
Spartanburg, S.C. SCD008941619
Tampa, Fl. FLD020985727

Our branches in Chattanooga, Kingsport, & Nashville, Tennessee will be subject to an independent series of actions since Tennessee is operating under Phase II and we have already achieved interim status at Kingsport.

Please note that our Jacksonville, Fl. facility (FLD000737429) should be included in the group of branches above, but since we have moved its location we will be required to submit a corrected Part A application. (attached) Also, we have closed our Birmingham, Al. facility (ALD095697447).

As you may already know, our Company is the largest private distributor of chemicals in the U.S.A. We purchased a multi-plant waste recycling company two years ago, so we can now provide complete distribution services for virgin and recycled fluorinated, chlorinated, oxygenated and petroleum solvents from the generic groups F001, F002, F003, and F005.



Our operating rules for the profitable servicing of hazardous waste accounts restricts us to handling only containerized, high-grade waste streams. We solicit only solvents from the four main solvent groups mentioned above and have invested heavily in analytical lab equipment to pre-screen and qualify prospective waste streams to eliminate those with difficult, toxic impurities which would not be profitable for us to handle. This includes all constituents listed on the D, K and P Groups listed in Part 261.

As a matter of practical consequence we are acting strictly as a transfer agent for these hazardous waste transactions and need interim status authorization only because:

- (1) The overwhelming majority of waste streams we regularly handle involve chemicals which are <u>unregulated</u> in their virgin state and only become subject to regulation when thy are lightly contaminated with cutting oils, grease, paint solids, etc. which do not significantly alter their original chemical properties. If this were not so, they would be of no commercial value or interest to us.
- (2) Point (1) notwithstanding, we still would not need interim status authorization if it were not for the fact that we (our branches and the regional office) cannot in all cases directly control the trucking operations involved in these hazardous waste transactions. These are handled by and large by our independent recycling operation and occasionally they would not be able to move the drums to our recycling facilities within the prescribed storage time limits dictated by our transporter permits.

I will also be applying to the individual states concerned to petition their participation in and approval of our interim status authorizations. Since we have filed Part A applications for the facilities mentioned above in August of 1980, you and the state agencies concerned already have the factual information needed for our current requests.

If I can provide you with any additional information required for the completion of this process, please contact me at your earliest convenience.

Sincerely,

MCKESSON CHEMICAL COMPANY

Hal Brown

Regional Warehousing Manager

·HB/jc

Attachment

(Rev. Part A-Jacksonville, Fl.)

bcc: DLE

JHF DHS

}	
1	
!	
3-25-83	MCKESSON CHEM. (HAL BROWN) - STORAGE FACILITY
1	DRUMMED WASTES
,	HALOGENATED SOLVENTS
-	
	Small Amounts OF Flammade Solvents
	EPA (SCARBOROUGH LETTER) - OPINION FROM TALLA,
	PART A+B
	WITHDREW INTERIN STATUS
	BUIGHT INLAND CHEMICAL- BECAME FUTORESTED
	IN STORAGE FACILITY.
	· · · · · · · · · · · · · · · · · · ·
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<u> </u>	

TO: Mr. Don Moores, Southwest District

FROM: R. H. Patton, Administrator, Chemistry Section

DATE: December 10, 1982

SUBJECT: McKesson Chemical Co., Tampa, Hillsborough County *
Effluent Sample * Volatile Organics Analyses * File

Reference: T.13.B.37.

Plese find attached the laboratory results for volatile organics analyses of subject effluent samples.

If you have any questions or need additional information, please let us know.

RHP:ac

Attachments

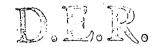
cc: Dr. G. J. Thabaraj

/Mr. Bill Hennessey

Mr. Matt McCann

Mr. Doug Jones

File Reference: T.13.B.37



DEC 18 📳



SOUTHWEST DISTRICE TAMPA

INTEROFFICE MEMORANDUM

TO:

Dr. R. H. Patton

FROM:

Joe Bricker 🎾

DATE:

December 9, 1982

SUBJECT:

McKesson Chemical Co., Tampa, Hillsborough County

Water Samples For Volatile Organic Analysis

Sample I .D. #17857 Through #17860.

File Reference: T. 13.B. 37.

Two samples (one water sample and a field blank) were received from Tampa, Hillsborough County, (McKesson Chem. Co.) for volatile organic analysis. Sample analyses were performed by purge and trap GC/FID techniques for component screening. Component identification and quantification is performed by purge and trap GC/MS techniques.

The field blank (#17857) was found to be relatively free of volatile components. The sample (#17860) was found to contain chloroform and tetrachloroethene. The concentrations of these components are listed on the attached data sheet.

attachment:



Volatile Organic Analysis

SPAN # 17860 Date Collected: 11/29/82 Date Analyzed: 12/02/82

Effluent, McKesson Chemical Co.

Location: Tampa, Hillsborough County.

Location: Tampa, Hillsborough County.							
Component:	Concentration	(ug/L):					
Acrolein	25U 5u 5U 5U 5U 5U 5U 5U 5U 5U						
1,2-Dichloroethane 1,1-Dichloroethene 1,2-Dichloroethene 1,2-Dichloropropane cis-1,3-Dichloropropene	5U 5U 5U 5U						
trans-1,3-Dichloroproper Ethylbenzene	5U 35U ne5U 11.4 ug/L 5U	-					
Trichloroethene Trichlorofluoromethane Toluene Vinyl chloride Xylene	5U 5U NA 5U						
Styrene	5U 5U 5U						

U = Material was analyzed for but not detected. The value given is the minimum quantification limit.

 $[\]boldsymbol{<}$ means component was detected but was not quantified, and is known to be less than the value given.

> means component was detected but was not quantified, and is known to be greater than the value given.

J = Estimated Value.

NA = Component Not Analyzed for by this technique.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA. GEORGIA 30365

JUL 0 1 1982

4AW-RM

Mr. Julian H. Foster Regional Operations Manager Foremost-McKesson Chemical Group McKesson Chemical Company Post Office Drawer 2169 Spartanburg, South Carolina 29304

Re: Moreland-McKesson, EPA I.D. #FLD020985727

Where for

Dear Mr. Foster:

In response to your letter dated June 3, 1982, this is to confirm that the referenced facility is still carried in our records as a potential generator and transporter of hazardous waste under the same I.D. #FLD020985727.

If there are any questions pertaining to this, please contact this office.

Singerely yours,

James H. Scarbrough, Chief Residuals Management Branch June 3, 1982

U. S. Environmental Protection Agency Region IV 345 Courtland Street Atlanta, Georgia 30365

Attention: James H. Scarbrough, Chief Residuals Management Branch

> Re: EPA ID# FLD 020 985 727 Your letter of May 11, 1982 - 4AW-RM

Dear Mr. Scarbrough:

In reply to the above letter, we wish to emphasize that we are to retain our EPA Registration #FLD 020 985 727 as a potential generator and transporter of hazardous waste. Please acknowledge this status.

1 1

Yours truly,

MCKESSON CHEMICAL COMPANY

Julian H. Foster Regional Operations Manager

JHF/jc



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

MAY 1 1 1982

4AW-RM

Mr. Julian H. Foster Regional Operations Manager Foremost-Mckesson Chemical Group McKesson Chemical Company P. O. Drawer 2169 Spartanburg, SC 29304

Re: EPA I. D. Number FLD 020 985 727

Dear Mr. Foster:

This letter acknowledges receipt of your request to be removed from our hazardous waste activity list. Based on the information furnished by you, EPA agrees that the hazardous waste regulations apparently do not apply to your facility, therefore, you will be classified as a non-handler of hazardous waste.

EPA intends to retain your notification file within our data management system, so that, in the future, should the need arise, an EPA identification number will be available to you.

You should be aware that the state in which your facility is located has its own rules and regulations concerning hazardous waste. You should contact that office to insure that you are in compliance with their regulations.

If you require further information, please contact Nell Keever of my staff at (404)881-3446.

Sincerely yours,

James H. Scarbrough, Chief Residuals Management Branch

cc: Florida Department of Environmental Regulations

relievy for

April 19, 1982

D. P. R.

U. S. Environmental Protection Agency Region IV 345 Courtland Street Atlanta, Georgia 30365

NOV 14 1983

SCUTHWEST DISTRICT
TAMPA

Attention: James H. Scarbrough, Chief Residuals Management Branch

Dear Mr. Scarbrough:

Re: McKesson Chemical Co., Tampa, Fla. -EPA #FLD020985727

We wish to emphasize that we are to retain our EPA Registration #FLD 020985727, as a potential generator of hazardous waste. Please acknowledge this status.

Yours truly,

MCKESSON CHEMICAL COMPANY

Julian H. Foster Regional Operations Manager

JHF/jc



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

APR 1 2 1982

REF: 4AW-RM

Mr. J. H. Foster Regional Operations Manager Moreland McKesson Chemical Company Chemical Group Drawer 2169 Spartanburg, SC 29304

Re: McKesson Chemical Co., Tampa, FL - EPA #FLD 020 985 727

Gentlemen:

This letter is to acknowledge receipt of your request for withdrawal of your application for a permit under the Resource Conservation and Recovery Act (RCRA), as amended. Your letter indicated that you nowlonger treat, store, or dispose of hazardous wastes. Therefore, your application is considered withdrawn, and your file has been inactivated.

This letter should \underline{not} be construed as concurrence with your determination that the Federal regulations are not applicable to your facility.

However, based on your voluntary request for removal from our list of permit applicants, your interim status under §3005(e) of the Act has been terminated. Consequently, if we determine upon subsequent inspection that your facility is treating, storing, or disposing of hazardous waste without a permit (or interim status), you will be subject to enforcement action under §3008 of the Act.

If you wish to reconsider your request for withdrawal, please advise us within the next ten days.

Sincerely yours,

James H. Scarbrough, Chief Residuals Management Branch

CC: FL Department of Environmental Regulations

Reply - We wish to emphasize that we are to retain our EPA
Registration #_____, as a potential generator
of hazardous waste, Please acknowledge this status.



UNITED STATES ENVIRONMENTAL PROTEIN HOW AGENCY

REGION IV

345 COURTLAND STREET ATLANTA GEORGIA 10365

APR 1 1 1982

REF: 4AW-RM

Mr. J. H. Foster Regional Operations Manager Moreland McKesson Chemical Company Chemical Group Drawer 2169 Spartanburg, SC 29304

Re: McKesson Chemical Co., Tampa, FL - EPA #FLD 020 985 727

Gentlemen:

This letter is to acknowledge receipt of your request for withdrawal of your application for a permit under the Resource Conservation and Recovery Act (RCRA), as amended. Your letter indicated that you no longer treat, store, or dispose of hazardous wastes. Therefore, your application is considered withdrawn, and your file has been inactivated.

This letter should $\underline{\text{not}}$ be construed as concurrence with your determination that the Federal regulations are not applicable to your facility.

However, based on your voluntary request for removal from our list of permit applicants, your interim status under $\S3005(e)$ of the Act has been terminated. Consequently, if we determine upon subsequent inspection that your facility is treating, storing, or disposing of hazardous waste without a permit (or interim status), you will be subject to enforcement action under $\S3008$ of the Act.

If you wish to reconsider your request for withdrawal, please advise us within the next ten days.

Sincerely yours,

James H. Scarbrough, Chief Residuals Management Branch

CC: FL Department of Environmental Regulations

BEST AVAILABLE COPY

Moreland McKesson Chemical Company

Foremost-McKesson -Chemical Group Drawer 2169 Spartanburg, SC 29304 803 583 8481

FLO 020 985 727 FLD020 985727



Delek IIC Mr. Paul Keith Withdraw Port A EPA Region IV RCRA Activities 345 Courtland Street, N. E.

Dear Mr. Keith:

Atlanta, Georgia

30365

June 10, 1981

Tampa, FL Facility

Per our conversation, please withdraw our application for our location in Tampa, Florida as submitted on EPA Form 3. (face copy attached) The original application was for treatment facility which is simple pH adjustment and neutralization system that we have to adjust wastewater before discharge to POTW.

As subject facility was exempt from necessity of registration by an amendment in the Federal Register on or about November 19, 1980, we should like to remove this simple pH adjustment facility from registration and withdraw our application from same.

Yours very truly,

MCKESSON CHEMICAL COMPANY

J./H. Foster

Regional Operations Manager

JHF/jc Attachment

Moreland McKesson Chemical Company

Foremost-McKesson Chemical Group Drawer 2169 Spartanburg, SC 29304 803 583 8481

FLD 020 985 727



Delele IIC Withdraw Part A F Merse

June 10, 1981

Mr. Paul Keith
EPA Region IV
RCRA Activities
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Dear Mr. Keith:

Tampa, FL Facility

Per our conversation, please withdraw our application for our location in Tampa, Florida as submitted on EPA Form 3. (face copy attached) The original application was for treatment facility which is simple pH adjustment and neutralization system that we have to adjust wastewater before discharge to POTW.

As subject facility was exempt from necessity of registration by an amendment in the Federal Register on or about November 19, 1980, we should like to remove this simple pH adjustment facility from registration and withdraw our application from same.

Yours very truly,

MCKESSON CHEMICAL COMPANY

J./H. Foster

Regional Operations Manager

JHF/jc Attachment



November 23, 1981

Mr. Paul C. Keith
United States Environmental Protection Agency
Region IV
345 Courtland Street
Atlanta, Georgia 30365

Dear Mr. Keith:

As we discussed previously, we should like to request the addition of transporter registration for our various branches listed below that are now permitted as potential generators of hazardous waste.

We have various customers who are asking us to pick up solvents from them for recycling, and we should like to be registered as transporters of hazardous waste so that we might perform this service. Please advise if there is anything further that we need to do to effect this registration. The locations and I. D. numbers are:

Richmond, Va.	VAT000619973
Greensboro, N. C.	NCD089903983
Charlotte, N. C.	NCD024481848
Spartanburg, S.C.	SCD008941619
Kingsport, Tenn.	TND000822973
Chattanooga, Tenn.	TND000737445
Nashville, Tenn.	TND000737437
Atlanta, Ga.	GAD072472707
Augusta, Ga.	GAD000828269
Mobile, Ala.	ALD000737478
Tampa, Fla.	FLD020985727

Yours very truly,

Julian H. Foster Regional Operations Manager

EFF. 10/1/81

17-1.122(84)

STATE OF FLORIDA

DEPARTMENT OF ENVIRONMENTAL REGULATION

APPLICATION FOR DETERMINATION OF HAZARDOUS WASTE GENERATOR

STATUS UNDER CHAPTER 208, FLORIDA STATUTES

Please complete only the \underline{ONE} of the three sections below which applies to your status as a hazardous waste generator in Florida:

I. I hereby certify that the waste generated by the following facility does not meet the definition of a hazardous waste as defined in Chapter 17-30, Florida Administrative Code, and is therefore not subject to the tax levied on generators of hazardous waste in Florida. I am aware that if at any time the waste generated at the referenced facility meets the criteria for a hazardous waste, the generator will be subject to the hazardous waste tax as mandated in Chapter 208, Florida Statutes, and must notify the Department of such a change.

McKesson Chemical Company
Facility Name

Foremost -McKesson Inc.

Owner's Name

Box 498A, Tampa, Fla. 33619

Dox 37242, Jacksonville, Fla. 32205

Business Address

Hwy 41A -Route 3, Tampa, Fla. 33619

924 Lane Avenue, Jacksonville, Fla. 32205

Mailing Address

Owner's Signature or
Authorized Representative

We registered with the EPA as potential generators only. Our business is chemical distribution, and there is occasionally a possibility of an accidental spill, drum breakage, etc. which might result in some hazardous waste, and which might require an EPA no. for proper disposal. Thus we elected to apply for "stand-by" type of registration as potential generators.



7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610





BOB GRAHAM GOVERNOR

JACOBD. VARN SECRETARY

WILLIAM K. HENNESSEY DISTRICT MANAGER



June 8, 1981

Mr. Emory N. Thomas Tampa Branch Manager Moreland McKesson Co. 6051 Highway 41 A South Tampa, FL 33619

Dear Mr. Thomas:

Thank you for your helpfulness in touring the Moreland McKesson plant. Attached for your information is a copy of the appropriate checklist that will be forwarded to Tallahassee for their consideration.

If you have any further questions, please do not hesitate to call me at 813/985-7402.

Sincerely,

Phyllis Jones

Phyllis Jones

PJ/bc

CC. Ed Julian

EPA I.D. F FLD 020985727

GENERATORS CHECKLIST

1.	Checl	c manifest	Moreland McKessoni (6051 Nay 41 A South
	a. •	identification (I.D. code, name, address, date)	
	b.	waste information (shipping description, hazard class, quantity and unit)	after neutralization, goes to city ormer
	c.	emergency information (immediate response information, special handling instructions, phone no.)	ues
	d.	certification: This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA."	1e)/A
2.	Chec	k containers	
	a.	improper construction -	No
	b.	leaks or corrosion	νο.
	- c.	heat generation from incompatible wastes	No
3.	Labe	eling practices	
	a.	DOT shipping description	<u>~/A</u>
• • .	b.	Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.	
		Generator's Name and Address	110
		Manifest Document Number	NIFI.
4.	Pla	icards for transport	NIA

5.	Chec	k accumulation time of wastes:	ı
	a.	check records and dates	<u> </u>
	b.	check containers	ok
6.	Chec	k contingency plan	ok_
7.	Reco	rdkeeping practices:	•
	a.	manifests	N/12
	, b.	annual reports	
•	c.	exception reports	
	d.	test results	<u> yes</u>
8.	Inte	ernational shipments	<u> </u>
9.	Pėri	nit information: ADAIE	•
	a.	List all applicable permits held by the generator	r:
•	•	NPDES Permit SPCC Plan State Permit (Spec	cify)
		Air Permits Local Permit RCRA Disposer	* .
	•	RCRA Storer RCRA Treater Other (Specify) DER THAT No IO39 - 9	5818 NO 11 1957 3
	ь.	In Compliance Yes No Unknown with respect	
10.	. Pas	t regulatory actions:	eri Nese i
	Nor	ne	
	Yes	If yes, summarize:	
		<u> </u>	

checklist.

EPA I.D. F FLD 020985727

FIGURE 11

GENERAL SITE INSPECTION CHECKLIST

. Site	Identification:		. 4
a.	site name	Moreland Mc	Kesson Compr
b.	street (or other identifier)	6051 Highwa	4 41A South
c.	city, state, zip	TAMPA F1.	33619
d.	county name	Hills horough	
e.	owner/operator	Emosy Thor	MAS
f.	telephone <u>677-84</u> (if known)		tate // County ivate // Unknown
g.	site description		<u> </u>
2. Cha a. STORER	racterization of si check off the app	ropriate activities below: TREATER Activities below:	DISPOSER
Pile	Inmpoundment	Filtration Incineration Thermal Treatment	Landfill Land Treatment Surface Impoundment Incineration
Tank. Al	ove Ground	Volume Reduction	
Tank, Al Tank, Bo	pove Ground	Recycling/RecoveryChem/Phys/Bio TreatmentWaste OilReprocessing	Other Swen
Tank, Al Tank, Bo	elow Ground	Recycling/Recovery	

Note: This form is undergoing Agency review. A final form will be distributed at a later date, accompanied by a separate transmittal notice.

VII-76

RCRA INSPECTION MANUAL

Act1	ons Taken or Pla	nned					
3.	Permit informat	ion:					
	a. List all a	pplicable perm	nits held l	by the	site:		
	NPDES Permit	SPCC. Plan	State Po	ermit ((Specify)	·	· · · · ·
	Air Permits	Local Permit	RCRA Di	sposer		·	
		RCRA Treater		5.0	E.		ر مردی
	Other (Specify)	NER YORM	1 Diponer	No	T029	-5818	יטע '
	In Compliance	Yes No			respect		
4.	Past regulatory	actions:				+ + - 4	•
	None						
	Yes If ye	es, summarize:	·····			•	<u> </u>
				· ·		•	
				٠		•	
5.	Inspection acti	vity (past or	on-going)	:		•	•
	_	Date of Past Action	Performe by EPA/Stat		Describe	· · ·	
None			•	··		•	
Yes	Specify:						
				 .			
6.	Remedial activ	ity (past or o	n-going):				
(None	•					
	Yes Specify:	:	A				
						·	

General Facility Standards

(K.	
×	`
•	1
No	
9)
4)
d;)

9. Adequate security:

- a. 24 hour surveillance systemb. artificial or natural barrier around facility
- c. means to control entry
- d. danger sign(s) at entrance(s)

June septem at right

$365 \cdot 15$ 10. Inspection requirements must include:

- _a. malfunction
- b. operator error
- c. discharges
- (d.) inspection schedule
- e. safety, emergency equipment
- f. security devices
- g. operating and structural equipment
- (h.) inspection log

11. Personnel training records:

a. job titles

<u> yes - e</u>	taily
SOFA	U1(
<u>Les</u>	
No	
462	
_ Yes	٠. ١
<i>ν</i> છ	

•			•	
General	Site	Inspection	-	Continued

				* •
	b.	description of training		<u>ok</u>
÷	c.	records of training		<u>4.65</u>
12.		irements for ignitable, reactive or mpatible wastes:		
	a.	handling		NIA
	b.	no smoking signs		yes
	c. .	separation and confinement		NA
	d.	check waste containers		<u>oþ</u>
Prep	aredn	ess and Prevention	r r f	
L3.	Main	tenance and operation of facility:		
	a.	evidence of fire, explosion or contamination of the environment		No.
L4.	Requ	ired equipment:	·	
	a.	alarm system	•	WES
	b. <u>S</u>	telephone òr 2-way radio	:	talophone
	c.	portable fire extinguishers, fire control, spill control equipment and decontamination equipment	:	<u> </u>
. ,	d.	water of adequate volume for hoses, sprinklers or water spray system		<u> 195</u>
	~			\mathcal{J}
L5.		ing and maintenance of equipment:	•	
	a.	testing and maintenance procedures		<u> </u>
•	b. .	condition of equipment		- C.C.
l6.	Requ	ired aisle space		. ok
L7.		ngements with local authorities rating record)		Ghiston Hol.
				File Dept,



Contir	gency Plan and Emergency Procedures	-6
	Content of contingency plan —	ues
		NOS
19.	Copies of contingency plan —	0
20.	Emergency coordinator:	ing Bespensi
	coordinator	Froy. all -
	N CONTRACTOR OF THE PROPERTY O	conegois and techno
	b. ensure qualifications of coordinator	Sh.
		Ol.
21.	Emergency procedures —	CIU.
	Fest System, Recordkeeping, and Reporting	to companies
- Mani		at tornes
22.	Use of manifest system:	the city sever.
كوري	a. procedures for processing each manifest	
	b. records of past shipments	
		•
23.	Manifest discrepancies (methods of detection)	V 1
24.	Operating record:	
	a. presence	-
	b. maintenance	
25.	Availability, retention and disposition	
	of records	
26.	Annual report	
27.	Unmanifested waste report:	
	a. procedures for filling out	A) (1)

compliance file for reports

				~~		\
Gene	ral S	Site Inspection - Continued				
28.	Addi	tional reports:				
	a.	releases, fires and explosions				No
٠.	b.	groundwater contamination			_	NÍA
	c.	facility closure			_	Or Fixe Play
Grou	ndwat	er Monitoring N/A				•
29.	Appl	icability:				
	a.	check applicability			_	
	b.	operation and maintenance of a system	,	··	-	
•	c.	waiver of requirement	•		_	
30.	Grou	undwater monitoring system:				
	a.	presence	•		-	•
	b.	number and placement of wells		•		
	c.	maintenance of wells			_	
	d.	well integrity			_	
31.	Samp	oling and analysis:	÷			
	a.	sampling and analysis plan				
	b.	records of sampling and analysis			-	
32.	Prep	paration, evaluation and response:		· .		
•	a.	outline of water quality assessment program		•		
*	Ь.	adequacy of outline				

33. Recordkeeping and reporting:

- groundwater analysis records
- reports of groundwater monitoring information to Regional Administrator b.
- annual groundwater quality reports

General Site Inspection - Continued

34.	Closure and post closure:	
_	a. closure plan	yes
265.111	b. adequacy of plan	plan in june clasa
265.113 (35.	Time for closure:	oscape procedents
	 a. 90 day closure requirements 	
	b. six month closure requirements	
36.	Disposal or decontamination of equipment	12 (25tp)
37.	Certification of closure	wo (TD)
38.	Post closure care and use of property:	•
•	a. post closure plan	<u> </u>
	b. period of post closure plan	
<u> </u>	c. plan and amendments approved	
39.	Notice to local land authority:	•
	a. survey plat including records of all waste types and quantities of waste	M)//
	b. submitted to proper authorities	10/11
40.	Notice in deed to property:	

proper notification to potential purchasers

FIGURE 12 TANKS CHECKLIST The ph is Adjusted to

8, then shipped by

Company truck to

Hooker's Point Sewage

TREATMENT Plant

Rainy Season - tank is pumped

every 2 wks. Dry season - twice

1. General operating requirements:

 compatibility of waste type and tank (ruptures, leaks, corrosion, etc.)

b. uncovered tanks: at least 60 cm(2 feet) freeboard or

containment structure (e.g. dike or trench) or

drainage control system or

diversion structure (standby tank)

c. Volume of tanks: volume of containment

Waste analysis and trial test procedures for and records of waste analysis and trial tests

3. Inspections: maintenance and inspection of:

a. discharge control equipment

 b. monitoring equipment (pressure and temperature guages)

c. level of waste in tank

d. tank construction materials

e. area immediately surrounding confinement structures

4. Closure plan present at site

Ignitable or reactive waste properly stored

6. Incompatible wastes properly stored

 Evidence of corrosion, leakage at seams, wet spots, dead vegetation N/A

Concreto tank

NO

NO

30,000

Thornton yes Lings PH 8-8:2

NO

Visual

<u>2'alove pipe</u>

Concrete

No

yes

LONG

Note: This form is undergoing Agency review. A final form will be distributed at a later date, accompanied by a separate transmittal notice.

7/8/80

VII-83

RCRA INSPECTION MANUAL

June 10, 1981

Mr. Paul Keith
EPA Region IV
RCRA Activities
345 Courtland Street, N. E.
Atlanta, Georgia 30365

Dear Mr. Keith:

Per our conversation, please withdraw our application for our location in Tampa, Florida as submitted on EPA Form 3. (face copy attached) The original application was for treatment facility which is simple pH adjustment and neutralization system that we have to adjust wastewater before discharge to POTW.

As subject facility was exempt from necessity of registration by an amendment in the Federal Register on or about November 19, 1980, we should like to remove this simple pH adjustment facility from registration and withdraw our application from same.

Yours very truly,

MCKESSON CHEMICAL COMPANY

J. H. Foster Regional Operations Manager

JHF/jc Attachment State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

touting To District Offices And or To Other Than The Addressee				
	Loctn.:			
	Loctn.:			
To:	Loctn.:			
From:	Date:			
Reply Optional []	Reply Required []	Info. Only []		
Date Due:	Date Due:			

Southwest District, Tampa

TO:

Mike Redig

THRU:

Pat Lewis

FROM:

Phyllis Jones \mathcal{R}

DATE:

June 8, 1981

SUBJECT:

Hillsborough County-HW

Moreland McKesson Co.

Inspection

General Information:

Moreland McKesson Co.

6051 Highway 41 A South

Tampa, FL 33619 Phone: 813/677-8414

Treator

Contact Person: Emory Thomas, Branch Manager

Inspected by: P. Jones, J. Meekin

Date of Inspection: June 4, 1981

Applicable Regulations: 40 CFR 265 and generator, TSD.

Purpose of Inspection: RCRA Compliance

Description of Operation: Moreland McKesson receives chemicals by rail, packages the chemicals in drums, and sells the product.

Hazardous Waste: Moreland McKesson is a wholesaler of chemicals. The chemicals are shipped in by rail. Some of the chemicals are reduced in volume for sale by putting the chemical in 55 gallon drums. The waste at this facility comes from the washing out of the drums. This washwater is put into a tank then it goes to a neutrilization tank where the washwater is neutralized with Muratic acid. Next, the facilities own truck pumps the neutralized water out and the wastewater goes to Hookers Point city sewer.

This facility also makes bleach. Chlorine that is left in a cylinder is vacuumed out then this is mixed with water and caustic soda which makes a 10% bleach product.

Memorandum Mike Redig June 8, 1981 Page Two

In review of this facility, the following discrepancies were found:

Section 265.15 General Inspection Requirements

- (1) No inpsection schedule
- (2) No inspection log

Section 265.111 Closure Performance Standard Section 265.113 Time allowed for closure

The closure plan for this facility is incorporated with the fire plan. Basically, the closure plan explains how to escape the building and shut down the tanks. The closure plan is not for a permanent shut-down of the facility, it is only what would happen in the event of a fire.

Section 265.197 Closure

The closure plan only includes a temporary shut down, not a permanent closure plan for the tank.

PJ/bc

This checklist covers injection

EPA I.D. # FLD 020985727

FIGURE 11

GENERAL SITE INSPECTION CHECKLIST

		•	•	
1.	Site	Identification:		. 4
	a.	site name	Moreland Mc	Kesson Company
	b.	street (or other identifier)	6051 Highway	1 41A South
. ` `	c.	city, state, zip	TAMPA Fl.	33619
	d.	county name	Hills borough	•
	e.	owner/operator	Emory Thor	nas
	f.	telephone <u>677-841</u> (if known)	<u>y/</u> // Federal // St /_7 Municipal <i>∑</i> // Pri	ate // County vate <u>/</u> / Unknown
	g.	site description		
2.	Char	acterization of sit	e activity:	
	a.	check off the appr	opriate activities below:	
ST0	RER	(TREATER Adjust	DISPOSER
Dru Tan	face I ms_ k, Abo	Inmpoundment ove Ground low Ground	Filtration Incineration Thermal Treatment Volume Reduction Recycling/Recovery Chem/Phys/Bio Treatment	LandfillLand TreatmentSurface ImpoundmentIncinerationOtherOwen
			Waste Oil Reprocessing Solvent Recovery Other	
•	b.	specify details o	f site activities as needed:	

Note: This form is undergoing Agency review. A final form will be distributed at a later date, accompanied by a separate transmittal notice.

7/8/80

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RCRA INSPECTION MANUAL

Actions Taken or Planned

3	Permit informat	ion:					
	a. List all a	applicable perm	its held	by the	site:		
	NPDES Permit	SPCC. Plan	State P	ermit ((Specify)		
	Air Permits	Local Permit	RCRA Di	sposer		•	
	RCRA Storer	RCRA Treater	كاعتما	So Jak	E.		بإنىق
	Other (Specify	DER GERMI	· · · · · · · · · · · · · · · · · · ·	No.	T029-	- 5818	NOU
	In Compliance	Yes No		with	respect to	Regulation	Name
4.	Past regulator	y actions:					
•	None				•	••	
-	Yes If y	es, summarize:					<u> </u>
	•	_	·				
				•		•	
5.	Inspection act	ivity (past or	on-going):		. ,	
		Date of Past Action	Performo by EPA/Sta		Describe:		
Non							
	Specify:						· . · .
6.	Remedial activ	vity (past or o	n-going):				
(None						
	Yes Specify	y:					•
					t .		

VII-77

General Facility Standards		•
Regional notices to RA present:	Yes	<u>No</u>
a. foreign shipments	()	(()
b. new owner/operator	()	\otimes
(8.) General Waste Analysis Plan must include:	<u>Yes</u>	<u>No</u>
a. test methods	(%)	
b. sampling method	(×)	\$ }
c. review or repeat of analysis	Ø.	CH)
9. Adequate security:		/
a. 24 hour surveillance system	a Ti	maid septem at righ
 b. artificial or natural barrier around facility 	-	Jenes
c. means to control entry	-	<u> </u>
<pre>d. danger sign(s) at entrance(s)</pre>	-	yes yes
5 10. Inspection requirements must include:		• • •
a. malfunction		yes - daily
b. operator error		NA
c. discharges		<u>yes</u>
(d.) inspection schedule		
e. safety, emergency equipment	,	<u>yes</u>
f. security devices		yes
g. operating and structural equipment		
(h.) inspection log		<u> </u>
11. Personnel training records:		
a. job titles		yas
. ·		

	b. description of training	<u>ok</u>
	c. records of training	<u> 485</u>
12.	Requirements for ignitable, reactive or incompatible wastes:	
	a. handling	NIA
٠	b. no smoking signs	yes
	c. separation and confinement	N/A
	d. check waste containers	ok
Prep	aredness and Prevention	
13.	Maintenance and operation of facility:	
	 evidence of fire, explosion or contamination of the environment 	No
14.	Required equipment:	
-	a. alarm system	<u>ves</u>
	b. telephone or 2-way radio	_tolophone
	 portable fire extinguishers, fire control, spill control equipment and decontamination equipment 	<u> 1es</u>
٠.	 d. water of adequate volume for hoses, sprinklers or water spray system 	yes J
15.	Testing and maintenance of equipment:	•
	a. testing and maintenance procedures	yes
	b. condition of equipment	sh.
16.	Required aisle space	OR
17.	Arrangements with local authorities (operating record)	Gikinton Vol

Cont	ingency Plan and Emergency Procedures	•
18.	Content of contingency plan	<u>yes</u>
19.	Copies of contingency plan	yes
20.	- (T) /J /	Enoug Response
·	a. identify emergency coordinator b. ensure qualifications of coordinator	nanagers on trees
21.	Emergency procedures	ok
Man	ifest System, Recordkeeping, and Reporting	The companies
22.	Use of manifest system:	the city serve
. کمر	 a. procedures for processing each manifest 	
	b. records of past shipments	:
23.	Manifest discrepancies (methods of detection)	
24.	Operating record:	
	a. presence	
	b. maintenance	
25.	Availability, retention and disposition of records	
26.	Annual report	
27.	Unmanifested waste report:	
	a. procedures for filling out report	1/1/
	b. compliance file for reports	

		· ·			•
28.	Addi	tional reports:		' / /)	
	a.	releases, fires and explosions	•	100	
	b.	groundwater contamination		NA	IIN OF
	c.	facility closure		90	FILE PIN
Grou	ndwat	er Monitoring \mathcal{N}/\mathcal{A}		•	
29.	. App1	icability:			
•	a.	check applicability			·
	b.	operation and maintenance of a system			
•	c.	waiver of requirement		•	
30.	Grou	indwater monitoring system:			
	a.	presence			·
	b.	number and placement of wells			
	c.	maintenance of wells			
	d.	well integrity			
31.	Samp	oling and analysis:			
,	a.	sampling and analysis plan	·		
	b.	records of sampling and analysis			
32.	Pre	paration, evaluation and response:			•
• •	a.	outline of water quality assessment program	• .		
	b.	adequacy of outline			
33.	Rec	ordkeeping and reporting:			
	a.	groundwater analysis records	•		
	b.	reports of groundwater monitoring information to Regional Administrator			
	c.	annual groundwater quality reports			

34.	Closure and post closure:	
$\overline{}$	a. closure plan	yes
265.111	b. adequacy of plan	plan is justice some
265.113 (35)	Time for closure:	oscape procedures
	a. 90 day closure requirements	470
	b. six month closure requirements	
36.	Disposal or decontamination of equipment	12 (A)
37.	Certification of closure	No (M)
38.	Post closure care and use of property:	•
	a. post closure plan	11/0
	b. period of post closure plan	
<u> </u>	c. plan and amendments approved	
39.	Notice to local land authority:	* *
. •	 a. survey plat including records of all waste types and quantities of waste 	M)//
	b. submitted to proper authorities	10/11
<u> </u>	Notice in deed to property:	

proper notification to potential purchasers

methanol





CAUSTIC 50% con

Coustice 25%

Rugen Coustic 50 % consta Consta Consta Rayon Grude
Coustie
509
Consorior

EPA I.D. # FLD 020985727

GENERATORS CHECKLIST

1.	Chec	k manifest	Moreland 11 Chess 6051 Nmy 41 A So
	a.	identification (I.D. code, name, address, date)	TAMOR F1, 33619
	þ.	<pre>waste information (shipping description, hazard class, quantity and unit)</pre>	after neutralization
	c.	emergency information (immediate response information, special handling instructions, phone no.)	yes
	d.	certification: This is to certify that the above named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA."	N/A
2.	Chec	ck containers	
	a.	improper construction .	No
	b.	leaks or corrosion	NO:
	c.	heat generation from incompatible wastes	
3.	Lab	eling practices	
	a.	DOT shipping description	
• .	b.	Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Pro- tection Agency.	
		Generator's Name and Address	, IIn
		Manifest Document Number	WIH .
4.	Pla	cards for transport	NIA

5.	Chaal		.f		
э.	Checi	c accumulation time			~ 1
	a.	check records and	dates	•	
	b.	check containers		,	<u>Ok</u>
6.	Chec	k contingency plan	•		ok
7.	Reco	rdkeeping practices	::		
	a.	manifests			N/A
	b.	annual reports			
	c.	exception reports			
		•		And the second	yes .
	d.	test results			- 963
8.	Inte	ernational shipment	 S		<u>No</u>
9.	Pėri	mit information: A	iope É		•
	a.	List all applicab	le permits he	ld by the generator	•
-		NPDES Permit S	PCC Plan	State Permit (Spec	ify)
		Air Permits L	ocal Permit	RCRA Disposer	w .
•	•	RCRA Storer R	CRA Treater		
		Other (Specify)			
	b.	In Compliance Ye	es No Unkno	own with respect t R	o: egulation Name/#
10.	Pas	t regulatory action	ns:		
(Nor				•
	Yes	If yes, summ	marize:		
		•	·		

Ne Valization TANK - 30,000 ga
The pH is Adjusted to
8 , then shipped by
Company truct to

FIGURE 12 TANKS CHECKLIST

General operating requirements:

a.	compatibility of waste type and tank (ruptures, leaks, corrosion,
	etc.)

 uncovered tanks: at least 60 cm (2 feet) freeboard or
 containment structure (e.g. dike or trench) or

drainage control system or
diversion structure (standby tank)

c. Volume of tanks: volume of containment

Waste analysis and trial test procedures for and records of waste analysis and trial tests

3. Inspections: maintenance and inspection of:

a. discharge control equipment

 monitoring equipment (pressure and temperature guages)

c. level of waste in tank

d. tank construction materials

e. area immediately surrounding confinement structures

4. Closure plan present at site

Ignitable or reactive waste properly stored

6. Incompatible wastes properly stored

Evidence of corrosion, leakage at seams, wet spots, dead vegetation Hooker's Point Sewage
TREATMENT PLANT
RAINY SEASON - tANK is pumped
every 2 wks. Dry season - twice a
every 2 wks. Dry season - twice a

~/A

conceto tank

NO

30,000

Thornton yes LABS PH 8-8.2

Visual

2'alove pipe

Concrete

NO ...

es No

<u>yes</u>

yes

NONE

Note: This form is undergoing Agency review. A final form will be distributed at a later date, accompanied by a separate transmittal notice.

VII-83

RCRA INSPECTION MANUAL

7/8/80

8 TANKS - MORELAND McKesson Co.

Methanol

methanol

CAUSTIC

CAUSTIC 50% Corrosive

CAUSTIC 25% Rayon Grade Caustic 50% Corrosive

Commercial Caustic 50% Corrosive PAYUN Grade Caustic 5090 Corrosive

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610



BOB GRAHAM GOVERNOR JACOB D. VARN SECRETARY

WILLIAM K. HENNESSEY DISTRICT MANAGER

June 8, 1981

Mr. Emory N. Thomas Tampa Branch Manager Moreland McKesson Co. 6051 Highway 41 A South Tampa, FL 33619

Dear Mr. Thomas:

Thank you for your helpfulness in touring the Moreland McKesson plant. Attached for your information is a copy of the appropriate checklist that will be forwarded to Tallahassee for their consideration.

If you have any further questions, please do not hesitate to call me at 813/985-7402.

Sincerely,

Phyllis Jones

Phyllis Jones

PJ/bc

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

SOUTHWEST DISTRICT

7601 HIGHWAY 301 NORTH TAMPA, FLORIDA 33610



BOB GRAHAM GOVERNOR JACOBD. VARN SECRETARY WILLIAM K. HENNESSEY DISTRICT MANAGER

April 29, 1981

Mr. Emory Thomas Moreland McKesson Company Route 3, Box 498A Tampa, Florida 33619

Dear Mr. Thomas:

The Florida Department of Environmental Regulation is working under contract with the U.S. Environmental Protection Agency to implement the hazardous waste management program under the Resource Conservation and Recovery Act (PL94-580), and the State requirements of Part IV, Chapter 403, Florida Statutes. Our records indicate your operation engages in hazardous waste activity as a (generator, transporter, or facility).

During the next 15 days, you will be contacted by a representative of this Department to arrange for a mutually agreeable time for our inspection of your facility to determine compliance with the federal hazardous waste regulations. This inspection will be made within 30 days of this date. You are requested to have a person knowledgeable about your facility operations available at the time of inspection.

The inspector will be looking at the appropriate items identified on the enclosed inspection checklist. Your cooperation in this matter will be appreciated. Please call Phyllis Jones, or James Meekin, at (813)985-7402, ext 241, should you have any questions.

Sincerely,

William K. Hennessey

District Manager Southwest District

PL/ftb Enclosure

cc: Solid Waste Section (Tallahassee)

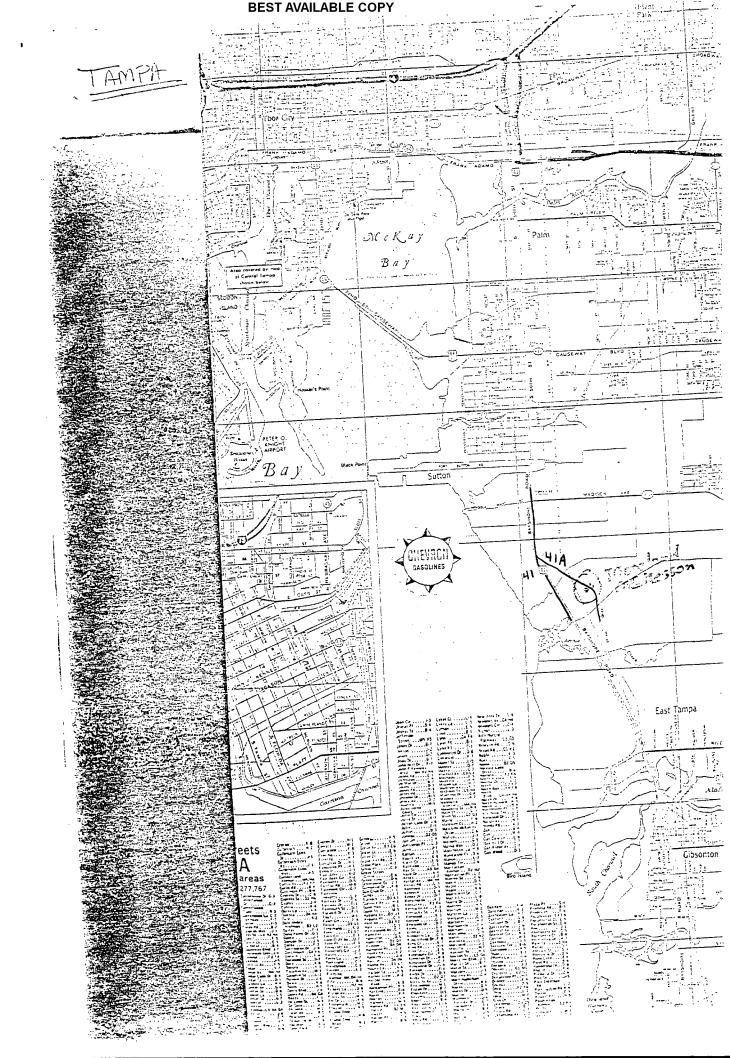
Part A, Permit Process --- Internal Checklist

ID Number _	FLDs 20795 727 Inst Name MinRECORD	Hetessod Co
	PHASE ONE	Indicate by Valid
Refer to Form No:	Interim Regulatory Requirements	your initials: Prmlg <u>Yes-</u> <u>No</u> <u>Qate?</u>
1	T/S/D'Facility? (If No, return to respondent.)	<u> </u>
3	Form 1 received?	
1	Form 3 received?	
1 & 3	Postmarked on or before November 19, 1980?	
3	Date of operation entered?	
3	Date of operation on or before November 19, 1980?	W
Notif.	Notifier?	W
record	Notified on or before August 18, 1980?	
1	Form 1, XIII B signed?	<u> </u>
3	Form 3, IX B Signed?	
	items above are initialed in the Yes column, general ment and indicate the trigger date here:	nte Interim Status) / {で)
	PHASE TWO	<u>-</u>
1	Unsure if regulated or non-regulated?	
3	New facility?	
1 & 3	Core items missing? If Yes, indicate which items:	
	Facility name; location; mail address; ope	rator info ;
•	certification ; process info ; waste info ; o	
	PHASE THREE	
1 & 3	Non-core items missing? If Yes, indicate which ite	ms:
	<pre>Maps; photos; drawings; lat/long</pre>	
·	Other observations and comments:	
		Received Date Stamp
``.		
Log out/Log	in	
on reverse s	side.	(Stann forms also)

CONTINUED FROM THE FRONT			
VII. SIC CODES (4-digit, in order of priority)			
理解 TENNES TO THE TENNES TO TH		SHOUTH B. SECOND 4	्य वटार्ड हेया है है है है जिस कर के है स्पूर्त है है से हैं।
5 1 6 1 (specify)	7 (specify	·)	
THE PROPERTY OF THE PROPERTY O		D. FOURTH	· · · · · · · · · · · · · · · · · · ·
(specify)	c (specif)	·)	
13 14 - 19	12 13		fluen and the second se
VIII. OPERATOR INFORMATION			
			8. Is the name listed Item VIII-A also Owner?
8 Moreland McKesson Company	The second second second second second		YES ON
C STATUS OF OPERATOR (Enter the appropriate letter into the)	NE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE	(specify)	A 803	583 8481
ASSESSMENT OF P.O. BOX	1779 25 1999 Sept 17 17 17 17 18 18 18 18 18 18 18 18 18 18 18 18 18		
РФВо'x 2169			
A CONTRACTOR OF TOWN	SANCE HE G.STATE H. ZIP	CODE IX. INDIAN LA	VD West Art and a second
<u>च्या विकास का ताल</u>		I la sha facility la	cated on Indian lands?
B Spartanburg	SC 293	T YES	- ○□ NO
18 16 THE CONTRACTOR OF THE PROPERTY OF THE PR	A 42 47 10 41 42 47 10 40		1965年1966年1961年1
X. EXISTING ENVIRONMENTAL PERMITS			
A. NPDES (Discharges to Surface Water) A. NPDES (Air Er	nissions from Proposed Sources)		TRANSPER TO THE
9 N 9 P 7			
15 16 17 18 20 18 16 17 18 950 B. UIC (Underground Injection of Fluids)	OTHER (specify)		
CITE I I I I I I I I CITI		(specify)	
	9 - 5 8 1 8	DER, Florid	á
	OTHER (specify)		
		(specify)	
9 R 9 9 10 10 10 10 10 10	3	. \	•
XI. MAP			STATE OF ASSESSED
Attach to this application a topographic map of the area exten the outline of the facility, the location of each of its existing treatment, storage, or disposal facilities, and each well where water bodies in the map area. See instructions for precise require	and proposed intake and discit injects fluids underground.	harge structures, each Include all springs, ri	of its hazardous waste wers and other surface
XII. NATURE OF BUSINESS (provide a brief description)			
Surface water at this location is trapped i	: n underground conta	inment tanks w	here the pH is
adjusted, if necessary, before the water i	s carried to the sew	er system. To	anticipate the
possibility of an accidental spill which mi	ght result in trace q	uantities of a h	azardous
material being present in the containment	~ , 1		
	system, we have or	ceted to tist till	.s iocation as a
treatment facility.	• •	•	·
$A_{ij}^{(i)} = A_{ij}^{(i)} = A_{i$			
XIII. CERTIFICATION (see instructions)			Water and the same
I certify under penalty of law that I have personally examined attachments and that, based on my inquiry of those personapplication, I believe that the information is true, accurate an false information, including the possibility of fine and imprison	s immediately responsible for d complete. I am aware that	obtaining the informa	ation contained in the
A. NAME & OFFICIAL TITLE (type or print) 8. SI	GNATURE /	A CONTRACTOR OF THE STATE OF TH	C DATE SIGNED
			C. DATE STOTE
W.D. Bain, Jr.	173		
W.D. Bain, Jr. Regional Vice President	Be		11/13/80
	B		11/13/80

REVERSE

fill—in areas are sourced for elite type, i.e., 12 char vinct	ارح.	•	Form Approved OMB No. 158	8-R0175
	ERAL INFORM		I. EPA I.D. NUMBER JAN	
C C	onsolidated Permits P General Instructions'	Program	FFLD02098	5 7 2 7 D
CASEC ITEMS	1-1-1-1-1		GENERAL INSTRU	and the same of th
T. EPA I.D. NUMBER			If a preprinted label has bee it in the designated space. Re	eview the inform-
III. FACILITY NAME			ation carefully; if any of it in through it and enter the co	rrect data in the
			appropriate fill—in area below the preprinted data is absent	(the area to the
V FACILITY PLEASE PL	ACE LABEL IN	THIS SPACE	left of the label space lists that should appearl, please	provide it in the
			proper fill—in area(s) below complete and correct, you no	ed not complete
FACILITY			Items I, III, V, and VI (ex must be completed regardles	ss). Complete ali
VI LOCATION			items if no label has been po the instructions for detaile	d item descrip-
			tions and for the legal auth which this data is collected, in	
II. POLLUTANT CHARACTERISTICS				
SINSTRUCTIONS: Complete A through J to determine w				
guestions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no"				
is excluded from permit requirements; see Section C of the		o, Section D of the instructions	for definitions of bold-faced to	
SPECIFIC QUESTIONS	VES NO FORM	SPECIFIC Q	UESTIONS STORY	MARK X
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.?		B. Does or will this facility include a concentrated a	either existing or proposed) nimal feeding operation or	χ ~.
(FORM 2A)	X 12 14	🚊 aquatic animal production	n facility which results in a	19 20 21
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in	x	D. Is this a proposed facility in A or B above) which	(other than those described	x x
A or 3 above? (FORM 2C)	22 23 24	waters of the U.S.? (FORM	4.2D)	25 25 27
É. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)			the lowermost stretum con-	\mathbf{x}
である おおなる 不安から かんかん かんかん かんかん かんかんしょう	X 24 29 30	taining, within one quains underground sources of dr	inking water? (FORM 4)	31 32 33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface		H. Do you or will you inject	at this facility fluids for spe-	
This in connection with conventional oil or natural gas pro-	x	process, solution mining	ning of sulfur by the Frasch of minerals, in situ combus-	\mathbf{x}
oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	34 30 34	(FORM 4)	overy of geothermal energy?	37 28 39
I. is this facility a proposed stationary source which is one of the 28 industrial categories listed in the in-	7 7 7	J. Is this facility a proposed	stationary source which is strial categories listed in the	**
structions and which will potentially emit 100 tons per year of any air pollutant regulated under the	x	. Instructions and which wi	ill potentially emit 250 tons	x
Clean Air Act and may affect or be located in an attainment area? (FORM 5)		Air Act and may affect or	nt regulated under the Clean be located in an attainment	
III. NAME OF FACILITY	10 11 12	erea? (FORM 5)		
1 SKIP Moreland McKesson Co	ompany			
IV. FACILITY CONTACT				
A. NAME & TITLE (lost, first	st, & title)	8.	PHONE (area code & no.)	
2 Thomas, Emory Manage	TTTTT	8 1	3 6 7 7 8 4 1 4	
15 16		45 14 -	41 44 - 51 42 - 55	THAT SATE OF SAME
V. FACILITY MAILING ADDRESS				
A. STREET OR P.O. E	BOX .			
3 Route 3 Box 498A				
B. CITY OR TOWN	-	C.STATE D. ZIP CODE		
4 Tampa		Fi 33619		
VI. FACILITY LOCATION				
A. STREET, ROUTE NO. OR OTHER SE	PECIFIC IDENTIFIE	R		Water Sales Sales
5 6051 Highway 41A South		- Address		
10 July 10 Jul		The second secon	al la company transport de la company de La company de la company d La company de la company d	
Hillsborough				
C. CITY OR TOWN		O.STATE E. ZIP CODE	F. COUNTY CODE	
6 Tâmpa			(((known)	4-1
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EPA Form 3510-1 (6-80)			CONTRAD	E ON REVERSE



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IV. D	ES	C R	PΊ	'IO	N OF HAZARDOUS WASTE	S					ben					4	nast D iv	or each listed hazardous waste you will handle. If you
har	idle	haz	arc	lou:	s wastes which are not listed in 4 pxic contaminants of those hazarde	0 C	FR,:	Sui	g, c i	t D	, er	nter	r th	e fo	our-dig	it nu	imber(s)	from 40 CFR, Subpart C that describes the characteris-
bas "wh	is. f ich	For poss	eac iess	h c tha	haracteristic or toxic contaminant at characteristic or contaminant.	teni	ered	in	colu	ımı	ηA	est	tim	ate	the tota	il an	nual qua	intity of that waste that will be handled on an annual ntity of all the non—listed waste(s) that will be handled
	IIT des a		ME	AS	SURE - For each quantity entere	d in	colu	um	ი გ	en	ter	the	uı	nit	of meas	ure	code. Ur	its of measure which must be used and the appropriate
				PO	GLISH UNIT OF MEASURE										KIL	.c.G	RAMS.	OF MEASURE CODE.
16	facil	ity	rec	ord	NS	for	quan	tity	/, th			s 0	fα	neas				ed into one of the required units of measure taking into
D. PR	our	it th	e a	ppr	opriate density or specific gravity	of t	he w	ast	e.							٠		·.
	For	OCI	SS ted	ha	and the contract will be stored treated	A 7.	3d/01	- ~1	COOL	od.	Λŧ	at t	ha	fac	ditv			e(s) from the list of process codes contained in Item (II
÷.	For	r no rtair	n- ned	liste in	ed hazardous wastes: For each call the proc	harr	CTOF	rti.	- 0-	to	vic	COL	et o	min	ant ent	ered and	l in colur /or dispo	nn A, select the code(s) from the list of process codes use of all the non-listed hazardous wastes that possess
	No	٠.	Ε,		ristic or toxic contaminant, spaces are provided for entering box of Item IV-D(1); and (3) Ent	pro ter i	cess n the	co sp	des ace	. (f	mo vid	ore led	are	e ne pag	eded: (je 4, the	1) E	inter the number	first three as described above; (2) Enter "000" in the and the additional code/s).
•																		ess in the space provided on the form.
more.	than	on	a =	PΔ	Hazardous Waste Number shall be	des	cribe	ed i	on t	he 1	farr	n a	s fo	ollo	ws:			UMBER — Hazardous wastes that can be described by biete columns B,C, and D by estimating the total annual
1 .	0111	nei		of +1	he waste and describing all the are	CASS	es to	n ibe	HISE	d t	o ti	reat	5.	tore	and/or	r dis	pose of t	he waste. o describe the waste, in column D(2) on that line enter
3.	"io	clu	ted	wi	th above" and make no other entr 2 for each other EPA Hazardous W	ies d	on th	at	line.									
per ye	ar (of c	hro Oni	me lv a		d fii O co	nishii nund	ng sp	opei er v	atı. ear	on.	in eac	ace ch	was	on, the i	oth	er waste	cility will treat and dispose of an estimated 900 pounds reat and dispose of three non-listed wastes. Two wastes is corrosive and ignitable and there will be an estimated
Ш	A	1. E	PA			c.	UNI	7										D. PROCESSES
Z O	W A (en	ST	E١	10		10	unter ode)				1	. P1	RO	CE:	ss coo	ES		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K	0	5	4	900		P		T	0	3	D [']	S	0				
X-2	D	0	0	2	400		Р		$T^{'}$	o'	3	$D^{'}$	S	0				
X-3	D	0	0	1	100		P		T^{-1}	0	3	D	8	0	- 1			
X-4	D	0	0	2					. 1	1		1	1	1			; 1	included with above
EPA F	orm	1 35	10-	3 (1	6-80)	1	<u> </u>				P/	٩G	E	2 (OF 5			CONTINUE ON PAGE 3
													-					· · · · · · · · · · · · · · · · · ·

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "TO4"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

BEST AVAILABLE COPY I. EPAI.D. NUMBER 01020985727 PROTICTION ASENCY
U.S. ENVIRONMENTAL PROTICTION ASENCY
HAZARDOUS WASTE PERVET APPLICATION Please print or type in the district larges only fields print of vision in the distribute Laritas unity

(fill-in areas are a supplied for elite type, i.e., 12 characters/it (This information is required under Section 3003 of RCRA. 3274 FORM COMMENTS Place an "X" in the appropriate box in A or B below finark one box only) to indicate vinetner this is a revised application, enter your facility's revised application. If this is your first application and you already know your facility's EPA I.D. Number, or it this is a revised application. u FOR OFFICIAL USE ONLY APPLICATION DATE RECEIVED Place an "X" in the appropriate box in A or B below (mark one box only) to indicate vinetner this is the first application you are submitting for your facility's revised application, and a or B below (mark one box only) to indicate vinetner this is the first application you are submitting for your facility's revised application, and a or B below (mark one box only) to indicate vinetner this is the first application you are submitting for your facility's revised application and you already know your facility's EPA 1.D. Number, or it this is a revised application, and you already know your facility's EPA 1.D. Number in Item 1 above. II. FIRST OR REVISED APPLICATION PROVIDE THE DATE
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PROVID A. FIRST APPLICATION (place an "X" below and provide the appropriate date; X1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item octobe.)

Solve the Date Information Commence of the Date Information Commence of the Date Construction Commence of the Date Con EPA I.D. Number in Item I above. 2. FACILITY HAS A RCRA PERMIT A PROCESS CODE — Enter the code from the list of process codes below that best describes each process will be used that is not included in the list of codes below, then entering codes. If more lines are needed, enter the code(s) in the space provided on the form (Item III-C).

A process CODE — Enter the code from the list of process codes below that best describes each process will be used that is not included in the list of codes below, then entering codes. If more lines are needed, enter the code(s) in the space provided on the form (Item III-C). III. PROCESSES – CODES AND DESIGN CAPACITIES entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will entering codes. If more lines are needed, enter the code(s) in the space provided on the form (Item III-C). describe the process (including its design capacity) in the space provided on the form (Item III-C). AMOUNT — Enter the amount.
 UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used. B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process. MEASURE FOR PROCESS UNIT OF MEASURE — For each amount entered in column b(1), enter the GALLONS PER DAY OR
LITERS PER DAY
LITERS PER DAY
LITERS PER DAY
LITERS PER HOUR
TONS PER HOUR
GALLONS PER HOUR
GALLONS PER HOUR
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LITERS PER HOUR DESIGN CAPACITY Treatment: T02 CESS SURFACE IMPOUNDMENT CODE GALLONS OR LITERS
GALLONS OR LITERS
CUBIC YARDS OR
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CUBIC METERS
GALLONS OR LITERS -- 703 J -PROCESS_ GALLONS PERIONY OR
USTERS PER DAY
USTERS PER DAY INCINERATOR 501 502 503 CONTAINER (barrel, drum, etc.) OTHER (Use for physical, chemical, thermal or biological treatment thermal or biological treatment thermal or occurring in tanks, processes not occurring in tanks, surface intponuments or incinerators. Describe the processes in ators. Describe the processes in the space provided; Item III-C.) Storage: 704 WASTE PILE GALLONS OR LITERS

ACRE-FEET (the volume that

ACRE-FEET (the volume that

would cover one acre to a

depth of one foot) OR

depth of one foot) OR

HECTARE-METER

ACRES OR HECTARES

ACRES OR PER DAY OR

GALLONS OR LITERS

GALLONS OR LITERS 504 SURFACE IMPOUNDMENT UNIT Disposal: INJECTION WELL D80 MEAS! COL UNIT OF UNIT OF MEASURE D81 D82 LAND APPLICATION OCEAN DISPOSAL MEASURE CODE ACRE-FEET. HECTARE-METER. . . SURFACE IMPOUNDMENT UNIT OF UNIT OF MEASURE CALLONS PER DAY

LITERS PER HOUR... A facility has two storage tanks, one tank can hold 200 gallons and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the facility also has an incinerator that can burn up to 20 gallons per hour.

The facility also has an incinerator that can burn up to 20 gallons are hold 400 gallons. ACRES. HECTARES MEASURE LITERS PER DAY EXAMPLE FUH CUMPLETING ITEM III is nown in line numbers X-1 and X-2 below): A facility has to other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour. SURE TA. PRO (enter 1. AMOUNT 13 14 15 CESS codel DUP B. PROCESS DESIGN CAPACITY المنا FOR CODE OFFICIAL \mathfrak{D} 28 UNIT F MEA SURE (cn(er code) LINE (from list) above) ONLY A.PRO 1. AMOUNT CESS HE 5 . . . UN (from list G above) Z 600 6 E x-1/5/0 2 7 20 X-210/3 IJ Š 200 21 0 1 ß 9 CONTINL 2

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PAGE 1 OF 5

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Continued from the from V. DESCRIPTION OF HAZARDOUS WASTES THIS SPACE TO LIST ADDITIONAL P	Continued A TARCH TEN DITTO
ontinued from the front	ROCESS COULS
V. DESCRIPTION OF TO LIST ADDITION	
USE THIS SPA	
	•
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Seam District	
EPA I.D. NO. (enter from page 1)	6
1 T T n n 2 0 9 8 5 1	one 5 a scale drawing of the facility (see
V. FACILITY DRAWING V. FACILITY DRAWING All existing facilities must include in the spanning facilities must include in the	acquided on page 5 a scale of
V. FACILITY DRAWING V. Facilities must include in the Spa	ace programmed level) that clearly define
All existing facilities	paraghs (aerial or ground or disposal alegan
VI. PHOTO Wiries must include pro	es of future stories
All existing facilities and site treatment and disposal areas; and site treatment are treatment and disposal areas; and site treatment are treatment and disposal areas; and site treatment are t	ATION
treatment and dispose RAPHIC LOC	ninuins, & seconds)
VII. FACILIA	TaTTo 3 4
[2 7] [5]	General
62	Section VIII on Form 1.
VIII. FACILITY OWNER	facility operator as listed
VIII. I she facility owner is also the	facility operator as listed in Section VIII on Form 1, "General facility operator as listed in Section VIII on Form 1, complete facility operator as listed in Section VIII on Form 1, complete facility operator as listed in Section VIII on Form 1, complete facility is LEGAL OWNER.
skip to Section IX	a facility operator as listed in a
to the facility owner is not the	TE OF FACILITY'S LEGAL OF
B. If the	I. NAME
	4. CITY OR
E 3. STREET OR	P.O. BOX
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F	that I have personally examined and am familiar with that I have personally examined and am familiar with may inquiry of those individuals immediately responsion my inquiry of those individuals immediately responsion my inquiry of the are signary accurate, and complete. I am aware that there are signary accurate, and complete. I am aware that there are signary accurate, and complete. I am aware that there are signary accurate, and complete.
IX. OWNER CERTIFICATION	that I have personally examined and am that I have are signally inquiry of those individuals immediately responsing any inquiry of those individuals immediately responsing any inquiry of the personal including any inquiry of the personal individuals in a support of the personal individuals in any inquiry of the personal individuals immediately responsing that I have personally examined and am terminal individuals immediately responsing that I have personally examined and am terminal individuals immediately responsing that I have personally examined and am terminal individuals immediately responsing that I have personally examined and am terminal individuals immediately responsing that I have personally examined and am terminal individuals immediately responsing that I have a signal individuals immediately responsing the personal individuals individu
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W. D. Bain, Jr, Regional Vice-Pre	ATION ATTOM Is immediately respo
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A. NAME (print or type)	PAGE : OF 5
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Continued from the front			
IV. DESCRIPTION OF HAZARDOUS WASTES 1602	ntimiest	فسنطقة الطائسات	
E. USE THIS SPACE TO LIST ADDITIONAL PRO	CESS CODES FROM ITEM D(I) ON PAGE 3.		
EPA I.O. NO. (enter from page 1)			
F F L D 0 2 0 9 8 5 7 2 7 6			
N FIGURE PRINCE			
V. FACILITY DRAWING All existing facilities must include in the space provided on	page 5 a scale drawing of the facility (see instructions for	or inore detail)	
VI. PHOTOGRAPHS			
Att initial facilities must include chotographs (20)	rial or cround—level) that clearly delineate all exis	sting structur	es; existing storage,
treatment and disposal areas; and sites of future sto	prage, treatment or disposal areas (see instructions	s for more de	tail).
VII. FACILITY GEOGRAPHIC LOCATION			
LATITUDE (degrees, minutes, & second	(e) LONGITUDE	(davreas, minu	tes, & seconds;
2 7 5 2 0 3 4	0.2	2 2 3	0 0 5
65 36 57 48 20 - 21	172		77 70
VIII. FACILITY OWNER			
A. If the facility owner is also the facility operator as	s listed in Section VIII on Form 1, "General Information	i", place an "X	" in the box to the left and
skip to Section IX below.			
8. If the facility owner is not the facility operator as	listed in Section VIII on Form 1, complete the following	ng items:	
	ILITY'S LEGAL OWNER		. PHONE NO. (crea code & no.)
	TETT 5 LEGAL OWITCH		
E .			- 54 59 - 61 62 - 61
15 16	4. CITY OR TOWN	5.57	S. ZIP CODE
3. STREET OR P.O. BOX	4. CITY OR TOWN		
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13 / 16	15 16	10 11 11 11 11 11 11 11 11 11 11 11 11 1	
IV OWNER CERTIFICATION		And the second state of	
to the standard boung paragraphi	y examined and am familiar with the information	n submittea ir n the informa	n this and all attached Ition. I believe that the
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W. D. Bain, Jr,	1 Sal Sam	\leq - $\frac{1}{2}$	1 10-00
Regional Vice-President		7	
X, OPERATOR CERTIFICATION			
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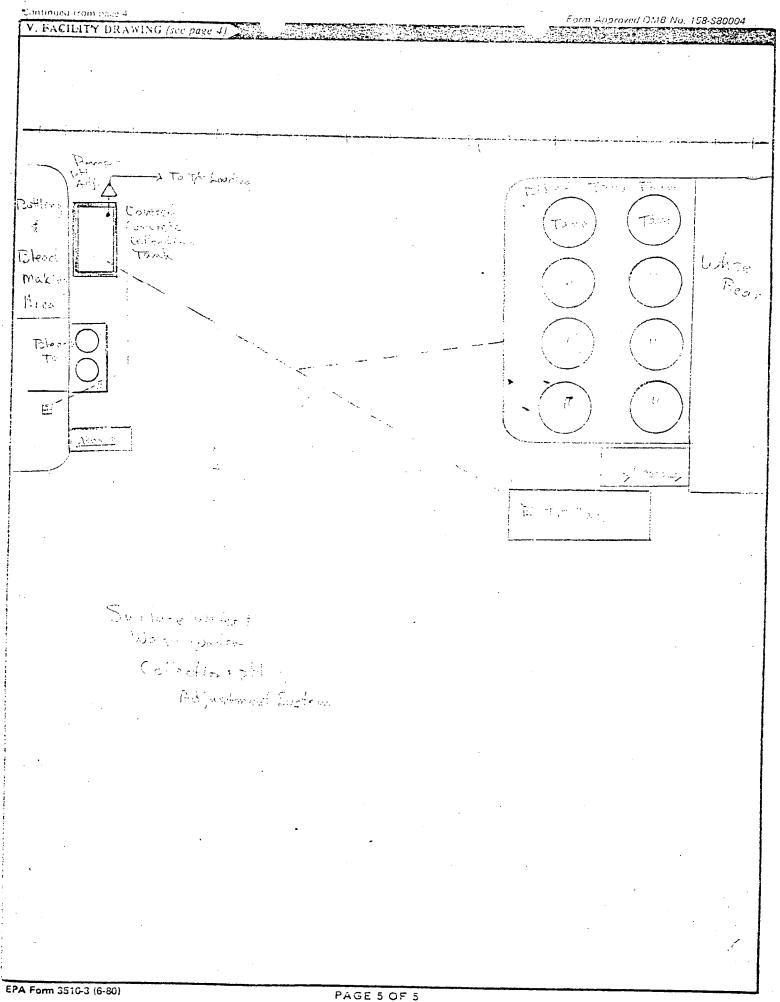
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VI: PMOTOGRAPHS

Tamper, Fla.

[not received in time to include in 1st mailing deadline]

Van Waters & Rogers Inc. subsidiary of **Univa**r

GARY TONRY OPERATIONS MANAGER

ROUTE 3, BOX 498-A TAMPA, FL 33619

(813) 677-8414