

Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

September 14, 1993

Walter T. Goossen, Regulatory Manager
Southern Region
Van Waters & Rogers, Inc.
2145 Skyland Court
Norcross, GA 30091-1677

Re: Van Waters & Rogers, Inc. - Transfer Facility
Tampa, Florida
FLD 020 985 727

Dear Mr. Goossen:

This letter acknowledges receipt of your September 2, 1993 letter which listed the revised "List 1" parameters and decontamination limits for the above referenced facility. However, due to recent or forthcoming changes in our guidelines the Department has modified your decontamination limits for all rinsate parameters listed. These new limits presented in Attachment A are either below detectable limits or below the Primary Drinking Water Standards Maximum Contaminate Levels noted in Chapter 17-550, F.A.C., whichever is most stringent. Please incorporate these acceptable limits to your listing. Attached is a copy of the Primary Drinking Water Standards (dated 7/4/93) and a draft copy of Florida Ground Water Guidance Concentration (dated September '93) for your review and files.

Your continued cooperation in our hazardous waste program is appreciated. Should you have any further questions, please contact me at (813) 744-6100, extension 388.

Sincerely,

Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

RE/ab
Attachments

cc: Satish Kastury, Adm., FDEP Tallahassee
Alan Farmer, Chief RCRA, EPA Region IV

Attachment A

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

| WASTE CODE | WASTE PARAMETER | REGULATORY LIMIT -ppm |
|------------|------------------------|-----------------------|
| D001 | STYRENE | 0.1 * |
| D005 | BARIUM | 2.0 * |
| D006 | CADMIUM | 0.005 * |
| D007 | CHROMIUM (HEXAVALENT) | 0.1 * |
| D008 | LEAD | 0.015 * |
| D009 | MERCURY | 0.002 * |
| D010 | SELENIUM | 0.05 * |
| D011 | SILVER | 0.1 * |
| D018 | BENZENE | 0.001* |
| D019 | CARBON TETRACHLORIDE | 0.003 * |
| D022 | CHLOROFORM | 0.006 # |
| D028 | 1, 2 DICHLOROETHANE | 0.003 * |
| D029 | 1, 1 DICHLOROETHYLENE | 0.007 * |
| D035 | METHYL ETHYL KETONE | 0.35 # |
| D039 | TETRACHLOROETHYLENE | 0.003 * |
| D040 | TRICHLOROETHYLENE | 0.003 * |
| F001 | 111 TRICHLOROETHANE | 0.2 * |
| F001 | METHYLENE CHLORIDE | 0.005 * |
| F001 | TETRACHLOROETHYLENE | 0.003 * |
| F001 | TRICHLOROETHYLENE | 0.003 * |
| F002 | 111 TRICHLOROETHANE | 0.2 * |
| F002 | METHYLENE CHLORIDE | 0.005 * |
| F002 | TETRACHLOROETHYLENE | 0.003 * |
| F002 | TRICHLOROETHYLENE | 0.003 * |
| F003 | ACETONE | 0.7 # |
| F003 | ETHYL BENZENE | 0.7 * |
| F003 | METHYL ISOBUTYL KETONE | 0.35 # |
| F003 | XYLENE | 0.32 ^ |
| F005 | ISOBUTANOL | 2.1 # |
| F005 | METHYL ETHYL KETONE | 0.35 # |
| F005 | TOLUENE | 1.0 * |
| F019 | CHROMIUM (HEXAVALENT) | 0.1 * |
| F019 | CYANIDE | 0.2 * |
| K086 | CHROMIUM (HEXAVALENT) | 0.1 * |
| K086 | LEAD | 0.015 * |
| NONE | NICKEL | 0.1 * |
| U002 | ACETONE | 0.7 # |
| U080 | METHYLENE CHLORIDE | 0.005 * |
| U226 | 111 TRICHLOROETHANE | 0.2 * |
| U239 | XYLENE | 0.32 ^ |

* Chapter 17-550 F.A.C.

FDEP Ground Water Guidance Concentrations

^ 40 CFR 268

Van Waters & Rogers Inc.
subsidiary of Univar

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

RECEIVED
SEP 07 1993

Department of Environmental Protection
SOUTHWEST DISTRICT
BY _____

September 2, 1993

Florida Department of
Environmental Regulation
Mr. Roger Evans
Hazardous waste Section
3804 Coconut Palm Drive
Tampa, Florida 33619

VIA CERTIFIED MAIL

Dear Mr. Evans:

With reference to your letter of 7/29/93 and the Van Waters & Rogers Inc. transfer facility, EPA ID No. FLD 020 985 727, enclosed you will find a revised "List 1" for the closure plan.

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: VW&R, Regional Environmental/Operations Manager - Atlanta
VW&R, Area Operations Manager - Atlanta
VW&R, Area Chemcare® Manager - Atlanta
VW&R, Branch Operations Manager - Tampa

LIST 1. 09/02/93

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

page: 1

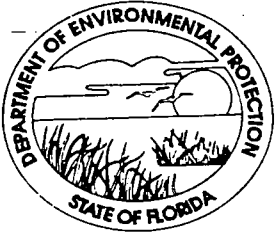
| EPA WASTE CODE | WASTE PARAMETER | REGULATORY LIMIT - ppm |
|----------------|----------------------|------------------------|
| ----- | ----- | ----- |
| D001 | STYRENE | 0.14 |
| D005 | BARIUM | 100 |
| D006 | CADMIUM | 1.0 |
| D007 | CHROMIUM (HEXAVALENT | 5.0 |
| D008 | LEAD | 5.0 |
| D009 | MERCURY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

LIST 1. 09/02/93

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

page: 2

| EPA WASTE CODE | WASTE PARAMETER | REGULATORY LIMIT - ppm |
|----------------|----------------------|------------------------|
| ----- | ----- | ----- |
| F003 | ACETONE | 0.05 |
| F003 | ETHYL BENZENE | 0.057 |
| F003 | METHYL ISOBUT. KETON | 0.05 |
| F003 | XYLENE | 0.32 |
| F005 | ISOBUTANOL | 5.6 |
| F005 | METHYL ETHYL KETONE | 0.05 |
| F005 | TOLUENE | 0.08 |
| F019 | CHROMIUM (HEXAVALENT | 0.32 |
| F019 | CYANIDE | 1.2 |
| K086 | CHROMIUM (HEXAVALENT | 5.0 |
| K086 | LEAD | 0.037 |
| NONE | NICKEL | 0.15 |
| U002 | ACETONE | 0.28 |
| U080 | METHYLENE CHLORIDE | 0.044 |
| U226 | 111 TRICHLOROETHANE | 0.054 |
| U239 | XYLENE | 0.32 |



Florida Department of Environmental Protection

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm Dr.

813-744-6100

Tampa, Florida 33619

Virginia Wetherell, Secretary

July 29, 1993

Walter T. Goosen, Regulatory Manager
Southern Region
Van Waters & Rogers, Inc.
2145 Skyland Court
Norcross, GA 30091-1677

Re: Van Waters & Rogers, Inc. - Transfer Facility
Tampa, Florida
FLD 020 985 727

Dear Mr. Goosen:

The Department has reviewed your revised "List 1" for the closure plan. Most of the parameters listed met acceptable decontamination limits as established in 40 CFR 261 and 268, except:

| <u>Waste Code</u> | <u>Parameter</u> | <u>Revised Limit (ppm)</u> | <u>Acceptable Limit (ppm)</u> |
|-------------------|------------------------|----------------------------|-------------------------------|
| F001 | Methylene Chloride | 0.5 | 0.2 |
| F002 | Methylene Chloride | 0.5 | 0.2 |
| F003 | Acetone | 0.28 | 0.05 |
| F003 | Methyl isobutyl ketone | 0.14 | 0.05 |
| F005 | Methyl ethyl ketone | 200 | 0.05 |
| F019 | Chromium (Hexavalent) | 5.0 | 0.32 |
| K086 | Lead | 5.0 | 0.037 |
| U080 | Methylene Chloride | 0.5 | 0.044 |

Please incorporate these acceptable limits into your "List 1" and provide a new revised listing for our review and records. Should you have any questions, please contact me at (813) 744-6100, extension 388.

Sincerely,

Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

RE/ab

cc: Satish Kastury, Adm., FDEP Tallahassee
Alan Farmer, Chief RCRA, EPA Region IV

Van Waters & Rogers Inc.
subsidiary of Univar

D. E. R.

JUL 16 1993

SOUTHWEST DISTRICT
TAMPA

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

July 14, 1993

Florida Department of Environmental Regulation
Southwest District
Mr. Roger Evans
Division of Waste Management
3804 Coconut Palm
Tampa, Florida 33619

VIA CERTIFIED MAIL

Dear Mr. Evans:

**RE: Van Waters & Rogers Inc. - Transfer Facility
6049 Hiway 41A South
Tampa, Florida 33619
EPA ID No. FLD 02 098 5727**

With reference to my phone conversation of June 17 with you and your supervisor, enclosed is a revised "LIST 1" for inclusion with the above referenced facility's closure plan. Please replace the list dated 5/7/93 which was included with my letter, to you, dated 5/7/93.

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: Satish Kastury, Administrator - FDER Tallahassee
VW&R, Regional Environmental/Operations Manager - Atlanta
VW&R, Branch Operations Manager - Tampa
VW&R, Area Operations Manager - Atlanta

LIST 1. 07/14/93

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

page: 1

| <u>EPA WASTE CODE</u> | <u>WASTE PARAMETER</u> | <u>REGULATORY LIMIT - ppm</u> |
|-----------------------|------------------------|-------------------------------|
| D001 | STYRENE | 0.14 |
| D005 | BARIUM | 100 |
| D006 | CADMIUM | 1.0 |
| D007 | CHROMIUM (HEXAVALENT | 5.0 |
| D008 | LEAD | 5.0 |
| D009 | MERCURY | 0.2 |
| D010 | SELENIUM | 1.0 |
| D011 | SILVER | 5.0 |
| D018 | BENZENE | 0.5 |
| D019 | CARBON TETRACHLORIDE | 0.5 |
| D022 | CHLOROFORM | 6.0 |
| D028 | 1,2 DICHLOROETHANE | 0.5 |
| D029 | 1,1 DICHLOROETHYLENE | 0.7 |
| D035 | METHYL ETHYL KETONE | 200 |
| D039 | TETRACHLOROETHYLENE | 0.7 |
| D040 | TRICHLOROETHYLENE | 0.5 |
| F001 | 111 TRICHLOROETHANE | 0.054 |
| F001 | METHYLENE CHLORIDE | 0.5 — .20 |
| F001 | TETRACHLOROETHYLENE | 0.7 |
| F001 | TRICHLOROETHYLENE | 0.5 |
| F002 | 111, TRICHLOROETHANE | 0.054 |
| F002 | METHYLENE CHLORIDE | 0.5 — .20 |
| F002 | TETRACHLOROETHYLENE | 0.7 |
| F002 | TRICHLOROETHYLENE | 0.5 |

LIST 1. 07/14/93

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

page: 2

| EPA WASTE CODE | WASTE PARAMETER | REGULATORY LIMIT - ppm |
|----------------|----------------------|------------------------|
| ----- | ----- | ----- |
| F003 | ACETONE | 0.28 - .05 |
| F003 | ETHYL BENZENE | 0.057 |
| F003 | METHYL ISOBUT. KETON | 0.14 - .05 |
| F003 | XYLENE | 0.32 - .05 |
| F005 | ISOBUTANOL | 5.6 |
| F005 | METHYL ETHYL KETONE | 200 - .05 |
| F005 | TOLUENE | 0.08 |
| F019 | CHROMIUM (HEXAVALENT | 5.0 - .32 |
| F019 | CYANIDE | 1.2 |
| K086 | CHROMIUM (HEXAVALENT | 5.0 |
| K086 | LEAD | 5.0 - .051 |
| NONE | NICKEL | 0.15 |
| U002 | ACETONE | 0.28 |
| U080 | METHYLENE CHLORIDE | 0.5 - .044 |
| U226 | 111 TRICHLOROETHANE | 0.054 |
| U239 | XYLENE | 0.32 |

Van Waters & Rogers Inc.
subsidiary of **Univar**

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

MAY 10 1993

**SOUTHWEST DISTRICT
TAMPA**

May 7, 1993

Florida Department of Environmental Regulation
Southwest District
Mr. Roger Evans
Division of Waste Management
3804 Coconut Palm
Tampa, Florida 33619

VIA CERTIFIED MAIL

Dear Mr. Evans


**RE: Van Waters & Rogers Inc. - Transfer facility
6049 Hiway 41A South
Tampa, Florida 33619
EPA ID No. FLD 02 098 5727**

With reference to your 3/30/93 letter to me regarding the above noted facility, I have sent you the enclosed additional materials.

In accordance with your requirements, these materials more quantitatively indicate the need for additional decontamination.

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: Satish Kastury, Administrator, FDER Tallahassee
VW&R, Regional Environmental/Operations Manager - Atlanta
VW&R, Branch Operations Manager, Tampa
VW&R, Area Operations Manager, Atlanta

Cleaning

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

Sampling

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

Parameters Indicating Decontamination

The attached, "List 1" contains a column titled Regulatory Limit - ppm. The values in this column were taken variously from 40 CFR 261.24, or from the federal register vol. 55/ Friday, July 27, 1990, pages 30865 - 30867. This list will be reviewed every other year in odd numbered years, prior to March first of that year, and wastes not previously shown on the list, but since handled at the facility will be added to the list. If contamination is indicated, the entire cleaning process will be repeated.

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

LIST 1. 05/07/93

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

page: 2

| EPA WASTE CODE | WASTE PARAMETER | REGULATORY LIMIT - ppm |
|----------------|----------------------|-----------------------------------|
| F003 | ACETONE | 400 - 0.05 |
| F003 | ETHYL BENZENE | 400 - 0.05 |
| F003 | METHYL ISOBUT. KETON | 200 - 0.05 |
| F003 | XYLENE | 7000 - 0.05 |
| F005 | ISOBUTANOL | 1000 - 5.0 - same |
| F005 | METHYL ETHYL KETONE | 200 - 0.05 - same |
| F005 | TOLUENE | 1000 - 1.12 - same |
| F019 | CHROMIUM (HEXAVALENT | 5.0 - 0.32 for total - same |
| F019 | CYANIDE | 70 - 1.2 total - same |
| K086 | CHROMIUM (HEXAVALENT | 5.0 - 0.32 total - same |
| K086 | LEAD | 1.5 - 0.037 same |
| NONE | NICKEL | 70 - 0.150 Randy Merchant memo |
| U002 | ACETONE | 400 - 0.28 same |
| U080 | METHYLENE CHLORIDE | 0.5 - 0.044 same |
| U226 | 111 TRICHLOROETHANE | 300 - 0.05 + same |
| U239 | XYLENE | 7000 - 0.32 same |

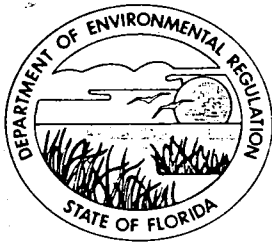
table CCWE
from 268.41

LIST 1. 05/07/93

LIST OF TRANSFER FACILITY WASTES AT VW&R - TAMPA

page: 1

| EPA WASTE CODE | WASTE PARAMETER | REGULATORY LIMIT - ppm |
|----------------|----------------------|--|
| ----- | ----- | ----- |
| D001 | STYRENE | 700 |
| D005 | BARIUM | 100 ✓ |
| D006 | CADMIUM | 1.0 ✓ |
| D007 | CHROMIUM (HEXAVALENT | 5.0 ✓ |
| D008 | LEAD | 5.0 ✓ |
| D009 | MERCURY | 0.2 ✓ |
| D010 | SELENIUM | 1.0 ✓ |
| D011 | SILVER | 5.0 ✓ |
| D018 | BENZENE | 0.5 ✓ |
| D019 | CARBON TETRACHLORIDE | 0.5 ✓ |
| D022 | CHLOROFORM | 6.0 ✓ |
| D028 | 1,2 DICHLOROETHANE | 0.5 ✓ |
| D029 | 1,1 DICHLOROETHYLENE | 0.7 ✓ |
| D035 | METHYL ETHYL KETONE | 200 - |
| D039 | TETRACHLOROETHYLENE | 0.7 ✓ |
| D040 | TRICHLOROETHYLENE | 0.5 ✓ |
| F001 | 111, TRICHLOROETHANE | 300 ² 1.05 same |
| F001 | METHYLENE CHLORIDE | 0.5 ² 0.20 table CCWE 268.41 |
| F001 | TETRACHLOROETHYLENE | 0.7 0.079 same |
| F001 | TRICHLOROETHYLENE | 0.5 0.062 same |
| F002 | 111, TRICHLOROETHANE | 300 - 1.05 same |
| F002 | METHYLENE CHLORIDE | 0.5 - 0.20 same |
| F002 | TETRACHLOROETHYLENE | 0.7 ✓ |
| F002 | TRICHLOROETHYLENE | 0.5 ✓ |



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Virginia B. Wetherell, Secretary

March 29, 1993

Walker T. Goosen, Regulatory Manager
Southern Region
Van Waters & Rogers, Inc.
2145 Skyland Court
Norcross, GA 30091-1677

Re: Van Waters & Rogers, Inc. - Transfer Facility
Tampa, Florida
FLD 020 985 727

Dear Mr. Goosen:

The Florida Department of Environmental Regulation (FDER) has received and reviewed your submittal dated March 8, 1993 which addressed some of our concerns. You are correct in your response to Items 2 and 3 of our letter dated February 4, 1993 in which you indicated that as a transfer facility you are accountable for 40 CFR 265.111, 265.112(c), 265.114 and 265.115. However, in accordance with 265.114, the Department does not have sufficient information to evaluate and approve your decontamination procedures mentioned in the closure plan until the wash/rinse sampling parameters are identified, based on the waste received on-site.

Please submit your response to this office within 30 days. Should you have any questions, please contact me at (813) 744-6100, extension 388.

Sincerely,

Roger Evans
Permitting Engineer
Hazardous Waste Section
Division of Waste Management

RE/ab

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

Van Waters & Rogers Inc.
subsidiary of Univar

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

D. E. R.

MAR 12 1993

SOUTHWEST DISTRICT
TAMPA

March 8, 1993

Florida Department of Environmental Regulation
Southwest District
Mr. Roger Evans
Division of Waste Management
3804 Coconut Palm
Tampa, Florida 33619

VIA CERTIFIED MAIL

Dear Mr.

**RE: Van Waters & Rogers Inc. - Transfer facility
6049 Hiway 41A South
Tampa, Florida 33619
EPA ID No. FLD 02 098 5727**

With reference to your 2/4/93 letter to me regarding the above noted facility, I have sent you the enclosed additional materials.

As per item 1. of your 2/4/93 letter, I have added the language which more precisely defines the collection and storage of wastewater generated from the cleaning operation. As per item 4. of your I have enclosed a facility site plan and a USGS 7.5 minute topographic map illustrate the site features. I thought that you already had these drawings and plans in your files.

I have not included the information from items 2 and 3 of your 2/4/93 letter. You had requested these items as a requirement of 40 CFR, 265.112. (as previously referenced in your 1/11/93 letter to Mr. Wayne Toth). The Florida rules for a transfer facility only require compliance with 265.112(c). All of the written materials sent to you were prepared to comply with 265.111, 265.112(c), 265.114, and 265.115, as required in the text of Florida rule 17-730.171. If I have erred in my reading of the Florida rules, please outline in detail the specific path of reference which would require such detailed information.

PAGE 2. (EPA ID NO. FLD 02 098 5727)

The materials, as presented with this letter and with my letter of 1/22/93, have recently been accepted as satisfactory for the assignment of transfer facility status to another Van Waters & Rogers Inc. facility in Florida.

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

Very truly yours,

A handwritten signature in cursive script, appearing to read "Tom Goossen".

Walter T. Goossen
Regulatory Manager,
Southern Region

CC: Satish Kastury, Administrator, FDER Tallahassee
VW&R, Regional Environmental/Operations Manager - Atlanta

Cleaning

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

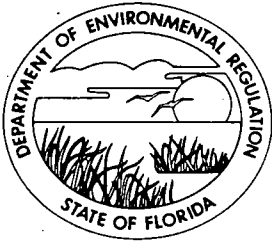
Sampling

Duplicate samples will be collected in septum VOA vials from each of the three wash/rinse cycles, and analyzed for each of the waste species held at one time or another in the proscribed area.

Parameters Indicating Decontamination

The same process will be followed at a second area in the warehouse totally disassociated with hazardous waste in order to provide a "background" value for comparison with the results from the above. Comparison of the two sets of analytical data will demonstrate whether the area used for waste storage has been contaminated by any waste species previously stored. If contamination is indicated, the entire cleaning process will be repeated.

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



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

Tampa, Florida 33619

813-744-6100

XXXXXXXXXX
Carol M. Browner, Secretary
Virginia B. Wetherell

February 4, 1993

Walter T. Goosen, Regulatory Manager
Southern Region
Van Waters & Rogers, Inc.
2145 Skyland Court
Norcross, GA 30091-1677

Re: Van Waters & Rogers, Inc. - Transfer Facility
Tampa, Florida
FLD No. 020 985 727

Dear Mr. Goosen:

The Florida Department of Environmental Regulation (FDER) has received your response to our letter dated January 11, 1993. Review of the plan was an improvement over the previous submittal, however, there are a few items we would like you to elaborate on or include in the plan:

1. On Sheet 4 of the closure plan you mentioned the wash/rinse water would be collected but no reference is made to the disposal if contaminated and type of storage for this water until analysis verified.
2. Response to Item No. 4 of our comments were incomplete. Please identify actual parameters to be monitored for, based on waste received on-site for temporary storage.
3. Indicate right along side the parameters the regulatory level, for example:

| <u>Waste Code</u> | <u>Parameter</u> | <u>Reg. Limit</u> |
|-------------------|------------------|-------------------|
| D043 | Vinyl Chloride | 0.2 ppm |

4. Diagram, of facility layout as requested in Item 5, must be submitted detailing requested items in order for FDER to assess possible impacts to property or adjacent areas.

Review of your plan will continue upon receipt of the above information. Please submit your response to this office within 30 days. Should you have any questions, please contact me at (813) 744-6100, ext. 388.

Sincerely,

Roger Evans
Hazardous Waste Section
Division of Waste Management

RE/ab

cc: Satish Kastury, Administrator, FDER Tallahassee

Van Waters & Rogers Inc.
subsidiary of **Univar**

D.E.R.

JAN 25 1993

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

January 22, 1993

SOUTHWEST DISTRICT TAMP

Florida Department of Environmental Regulation
Southwest District
Mr. Roger Evans
Division of Waste Management
3804 Coconut Palm
Tampa, Florida 33619

VIA CERTIFIED MAIL

Dear Mr.

**RE: Van Waters & Rogers Inc. - Transfer facility
6049 Hiway 41A South
Tampa, Florida 33619
EPA ID No. FLD 02 098 5727**


I am the Regional Regulatory Manager for Van Waters & Rogers Inc. I have elected to respond to your January 11, 1993 letter to Mr. Wayne Toth at the above referenced facility. That facility is in this Southern Region of Van Waters & Rogers Inc.

Attached are the documents which represent the updated closure plan for the above facility. These documents were prepared in full accordance with the Florida Hazardous waste rules, particularly 17-730.171(2)(b) which requires conformance to the requirements of 40 CFR 265.111, 265.112(c), 265.114, and 265.115.

These documents provide for a full acknowledgement of the responsibilities of Van Waters & Rogers Inc. This transfer facility activity is a small part of the operations at the above referenced site. Van Waters & Rogers Inc. is an industrial chemical distributor. Through our hazardous waste collection arrangements we can provide our customers with a reasonable and responsible method of disposing of their used chemicals. Enclosed, for your information, is a copy of this company's annual report. This will help illustrate our business.

If you have any questions, please don't hesitate to contact me.

Very truly yours,



Walter T. Goossen
Regulatory Manager,
Southern Region

D. E. R.

JAN 25 1993

SOUTHWEST DISTRICT
TAMPA

CLOSURE PLAN

Van Waters & Rogers Inc.
6049 Hiway 41A South
Tampa, Florida 33619

EPA ID NO. FLD 02 098 5727

Van Waters & Rogers, Inc.

Closure Plan
Tampa Florida

This section outlines the steps which the subject Van Waters & Rogers Inc. ("VW&R") facility will follow in a closure situation in order to comply with applicable sections of Chapter 17-30.171 of Rules of the Florida Department of Environmental Regulation.

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

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

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

(Response
#6)

(Response
1)

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

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

(Response
1)

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

(Response
1)

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

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

(Response #2) No pretreatment would be required before material would be ready for shipment. Prior to being loaded, all containers would be inspected for leakage, damage, and proper labelling. They would be transported on pallets to a staging area by conventional forklift handling and then placed in trucks for transport. Proper manifest forms would be prepared for each movement.

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

(Response #1 & #7) A schedule of the closure steps is depicted on the appended graph.

(Response #2) After closure, it is expected that the waste holding area will revert to general warehouse usage.

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

(Response #3) The actual physical steps to be followed in closure of this facility are directed toward demonstration that there is not contamination of the waste holding area. The following procedures have been found adequate in the closing of other company facilities:

(Response
#3)

Cleaning

The area in which the wastes were held will be mopped with a strong detergent solution - a 1% solution of a 50/50 mixture of Tergitol R NP-4 and Tergitol R NP-9 has proved satisfactory elsewhere - and then rinsed twice with city tap water. A separate mop and rinse bucket will be used for each mop/rinse cycle. The wash and rinse water will be squeezed from the mop and collected separately from each of the washings.

Sampling

Duplicate samples will be collected in septum VOA vials from each of the three wash/rinse cycles, and analyzed for each of the waste species held at one time or another in the proscribed area.

Parameters Indicating Decontamination

The same process will be followed at a second area in the warehouse totally disassociated with hazardous waste in order to provide a "background" value for comparison with the results from the above. Comparison of the two sets of analytical data will demonstrate whether the area used for waste storage has been contaminated by any waste species previously stored. If contamination is indicated, the entire cleaning process will be repeated.

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

Van Waters & Rogers Inc.

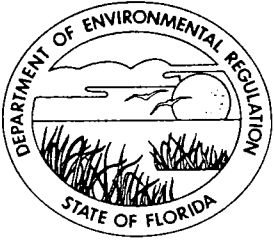
Tampa, Florida
Closure Cost Estimates

| | | | |
|------|---|-------------|-------------|
| I. | <u>Basic Disposal Charge</u> | | |
| | 96 drums @ \$200.00 | | \$19,200.00 |
| II. | <u>Warehouse Labor (Loading)</u> | | |
| | At hourly rate including fringe benefits - 6 hours required | | \$150.00 |
| III. | <u>Transportation</u> | | |
| | To Laidlaw Environmental, Bartow, Florida 250 miles at \$2.50/mile - two loads | | \$1250.00 |
| IV. | <u>Equipment Cost</u> | | |
| | Forklift at \$15.00/hour - 6 hours required | | \$90.00 |
| V. | <u>Decontamination Cost</u> | | |
| | Secondary Containment Area Cleaning 4 hours @ \$60.00/hr. | \$240.00 | |
| | Disposal of Cleanup residue 4 drums @ \$200.00 | \$800.00 | |
| | Laboratory Services (sampling, analyses, report) | \$4,000.00 | \$5,040.00 |
| VI. | <u>Contingencies at 20% of Subtotal of</u> | \$25,730.00 | \$5,146.00 |
| VII. | <u>Engineer Certification</u> | | \$1200.00 |
| | Total Cost of Closure | | \$32,076.00 |

VAN WATERS & ROGERS INC.
Projected Closure Schedule

Tampa, Florida

[illegible]



Florida Department of Environmental Regulation

Southwest District

Lawton Chiles, Governor

3804 Coconut Palm

813-744-6100

Tampa, Florida 33619

Carol M. Browner, Secretary

January 11, 1993

Van Waters & Rogers, Inc.
Attn: Wayne D. Toth
6049 Old 41A Highway
Tampa, Florida 33619-9796

Dear Mr. Toth:

The Florida Department of Environmental Regulation (FDER) acknowledges receipt of your report entitled "Closure Plan", however, this does not fully constitute a closure plan for the facility. Please develop a written plan that is more detailed by utilizing requirements as set forth in 40 CFR Section 265 and incorporated in FAC 17-730.171. Such a plan should include:

- ✓ 1. Steps necessary to perform final closure of the facility at any point during its active life as per §265.112.
- ✓ 2. How the owner/operator will close the facility in a manner that will minimize the need for further maintenance in accordance with §265.111.
- ✓ 3. A detailed description of steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, structures, equipment and soils. This includes, but is not limited to, procedures for cleaning equipment, removing contaminated soils, methods for sampling and testing surrounding soils as per §265.112.
4. Parameters that will be sampled, based on waste received at site as per §265.112.
5. Diagram of facility layout identifying loading and unloading bays, numbers of bays, drainage ditches, ponds, etc.
- ✓ 6. Procedures to be followed to address the amendment of the plan should it require changes once approved as per §265.112.
- ✓ 7. Closure plan indicates time frame (in days) when specified activities would be performed. Please outline these time frames in a detailed report.

Van Waters & Rogers, Inc.
Attn: Wayne D. Toth

January 11, 1993
Page Two

The information submitted is incomplete. Review of this plan will continue upon receipt of the above information. Please submit your response to this office within 45 days. Should you have any questions, please contact me at (813) 744-6100, ext. 388.

Sincerely,



Roger Evans
Permitting Engineer
Hazardous Waste Program
Division of Waste Management

RE/ab

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

Van Waters & Rogers Inc.
subsidiary of **Univar**

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

D.E.R.

November 12, 1992

NOV 13 1992

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

**SOUTHWEST DISTRICT
TAMPA**


To Whom it May concern:

In accordance with FAC 17-730.171(2) (b), enclosed you will find a copy of the closure plan 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

VAN WATERS & ROGERS

CLOSURE PLAN

This section outlines the steps which the subject Van Waters & Rogers branch will follow in a closure situation in order to comply with applicable sections of the Resource Conservation and Recovery Act.

Because this branch functions as only an accumulation and transfer point for containerized waste destined for disposal at an off-site facility, partial closure is not relevant. Because the accumulation and transfer of materials which may be classified as hazardous wastes is but a small portion of the total business at this facility, and due to the fact that this hazardous wastes activity is the sole reason for Van Waters & Rogers being involved in the requirements of this legislation, there exist no partial closure situations. This facility, as it pertains to hazardous waste management activities, is either active or totally inactive as a transfer facility.

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

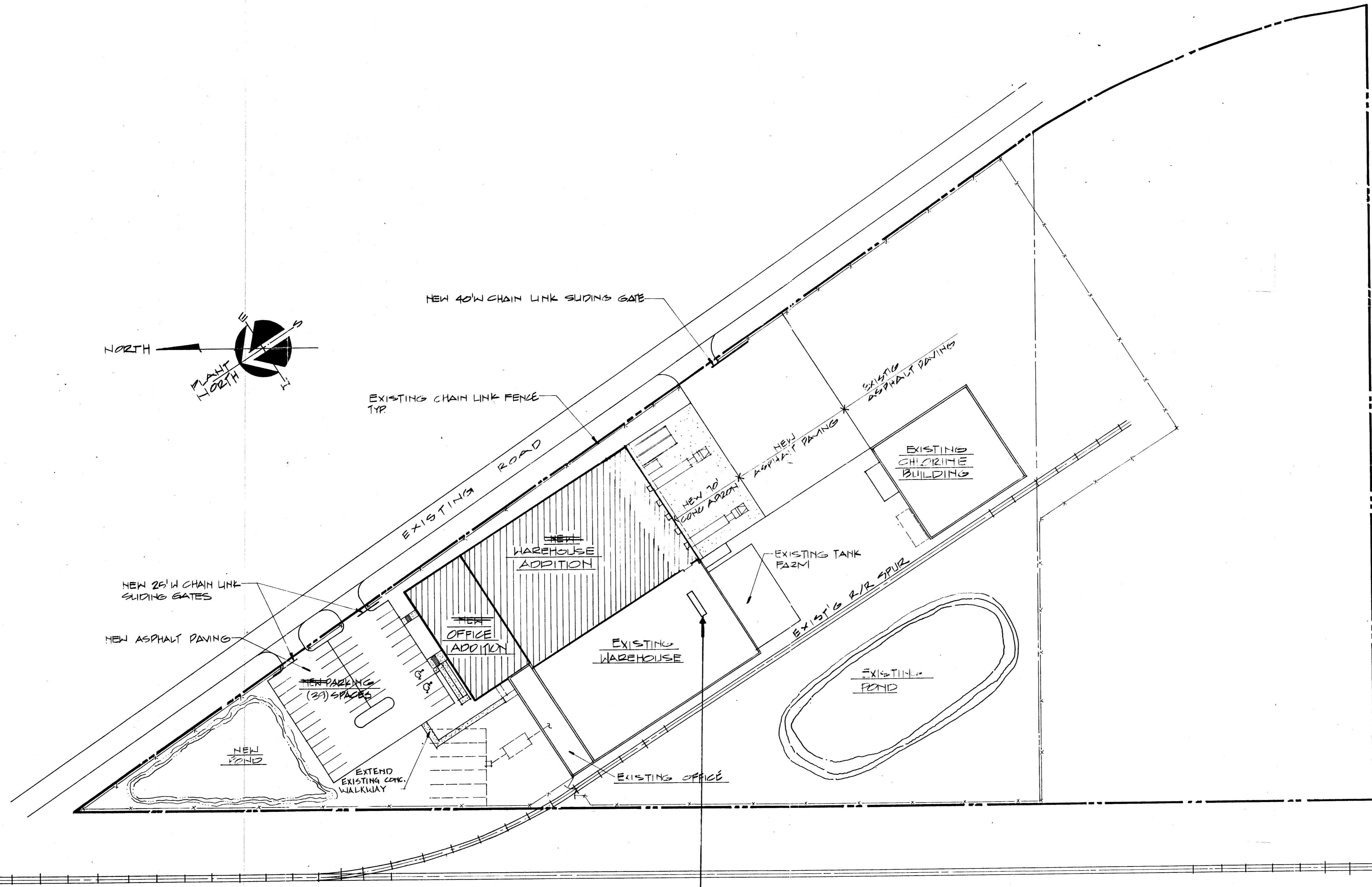
Van Waters & Rogers will maintain a copy of this closure plan at the branch. The company is aware that should this branch contemplate closure of the site, the EPA Regional Administrator and the comparable state agency must be notified at least 180 days prior to the date that the company begins to close the facility.

The maximum number of drums in storage at any one time - the number assumed to be in inventory at the time of closure - will be 96.

Van Waters & Rogers will continue to operate a business at this facility as long as it is deemed economically viable by the company; and "anticipated" date of closure is established as 2020 (in twenty years).

ANTICIPATED CLOSURE SCHEDULE

9. Submittal of certification
to appropriate regulatory
authority



SITE PLAN

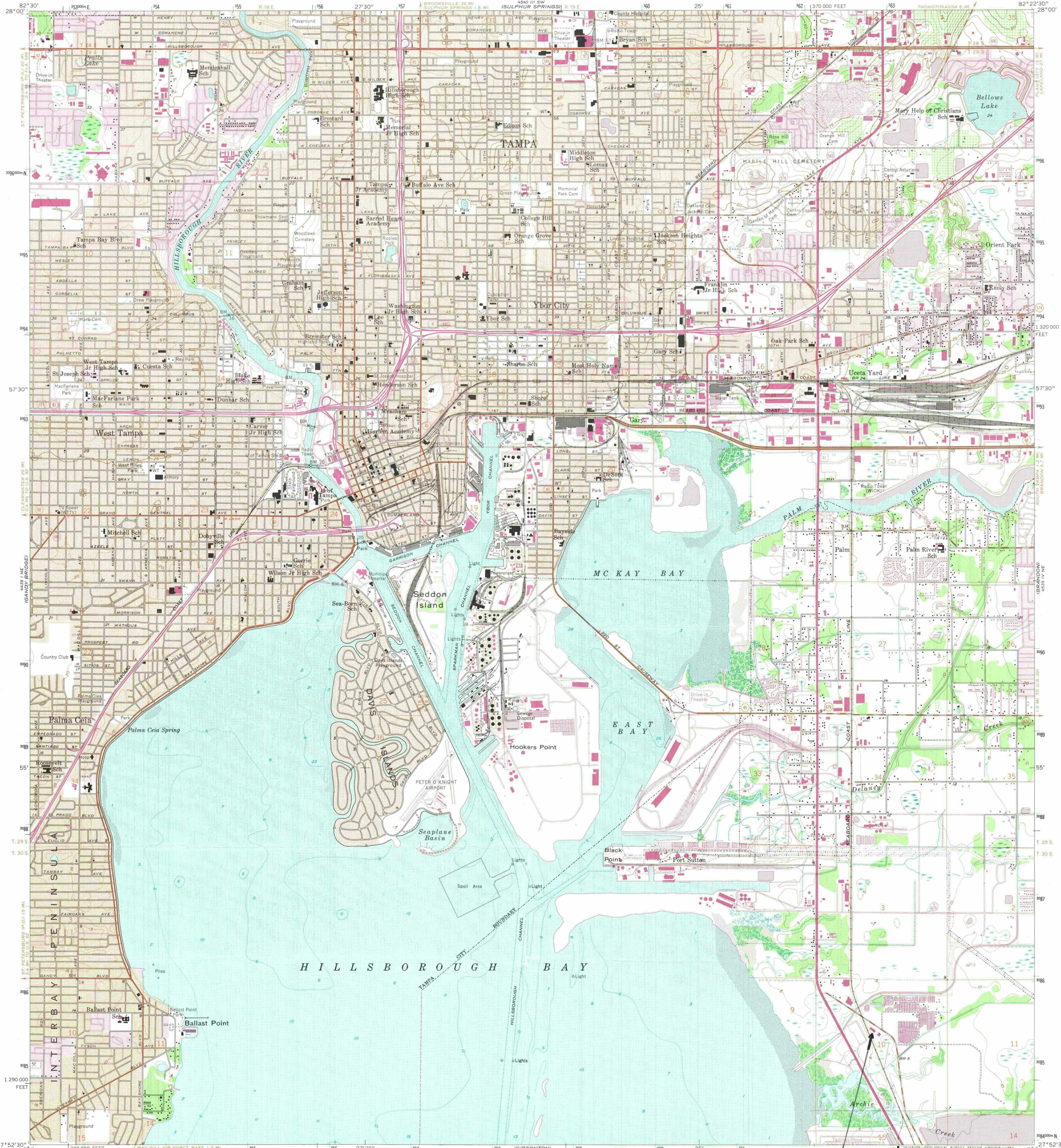
SCALE 1"=50'-0"

Transfer Facility
Waste Holding Area.
Not to scale.

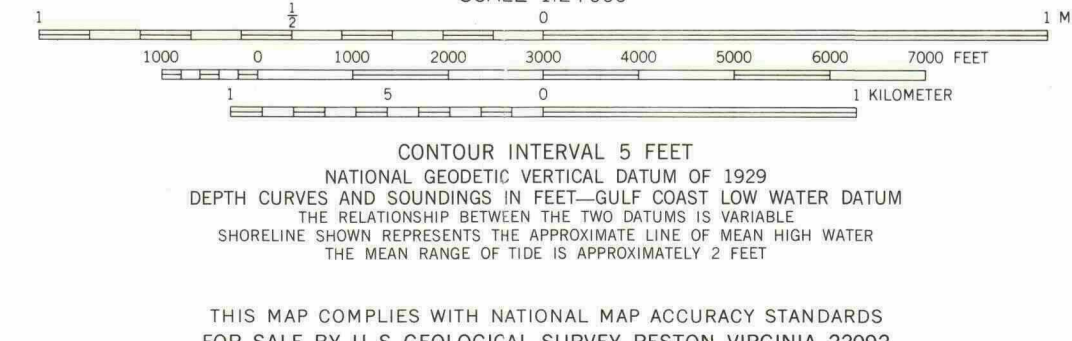
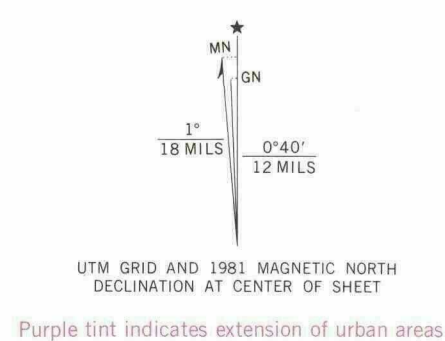
D.E.R.
MAR 12 1993
SOUTHWEST DISTRICT
TAMPA

| | | |
|--|---|---------------------|
| <p>CHRISTMAN & PARSONS CONST. CO. GENERAL CONTRACTORS SPARTANBURG SOUTH CAROLINA</p> | <p>VAN WATERS & ROGERS TAMPA, FLORIDA</p> | <p>C-1 1 OF</p> |
|--|---|---------------------|

PRINTED
AUG 16 1989
Blackwood Associates Inc.



Mapped, edited, and published by the Geological Survey
Control by USGS, NOS/NOAA, and USCE
Culture and drainage in part compiled from aerial photographs
taken 1954. Topography by planetable surveys 1956
Selected hydrographic data compiled from NOS chart 587 (1952)
This information is not intended for navigational purposes
Polyconic projection. 10,000-foot grid ticks based on Florida
coordinate system, west zone. 1000-meter Universal Transverse
Mercator grid ticks, zone 17, shown in blue. 1927 North
American Datum. To place on the predicted North American
Datum 1983 move the projection lines 29 meters south and
17 meters west as shown by dashed corner ticks
Red tint indicates areas in which only landmark buildings are shown
Revisions shown in purple compiled from aerial photographs
taken 1979 and other sources. This information not
field checked. Map edited 1981.



Van Waters & Rogers Inc.
TAMPA

ROAD CLASSIFICATION

| | |
|------------------|-----------------|
| Heavy-duty | Light-duty |
| Medium-duty | Unimproved dirt |
| Interstate Route | U.S. Route |
| | State Route |

QUADRANGLE LOCATION

FLORIDA

TAMPA, FLA.
N2752.5—W8222.5/7.5

1956
PHOTOREVISED 1981
DMA 4539 IV NW—SERIES V847