

# Florida Department of Environmental Protection

Northeast District  
8800 Baymeadows Way West, Suite 100  
Jacksonville, Florida 32256

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Ryan E. Matthews  
Interim Secretary

May 24, 2017

Mr. Scott Stevens  
Univar USA Inc.  
155 Ellis Road South  
Jacksonville, FL 32254  
[scott.stevens@univar.com](mailto:scott.stevens@univar.com)

**Re: Compliance Assistance Offer  
Univar USA Inc.  
EPA/DEP ID: FL0 000 596 866  
Duval County – Hazardous Waste**

Dear Mr. Stevens:

A compliance inspection was conducted at the above-referenced facility on February 28, 2017, under the authority of Section 403.091, Florida Statutes. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter.

Potential non-compliance with the requirements of Chapter 403, Florida Statutes, and Chapter 62-710, Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the "New Potential Violations and Areas of Concern" and respond within 30 days of receipt of this Compliance Assistance Offer. Your response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a time schedule describing how/when the issue will be addressed; or
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid; or
3. Arrange for the case manager to visit your facility to discuss the Areas of Concern.

It is the Department's desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond appropriately may result in the initiation of formal enforcement proceedings.

Univar USA Inc.  
Facility ID No.: FL0 000 596 866  
Compliance Assistance Offer  
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Please address your response and any questions to Cheryl Mitchell of the Northeast District Office at 904-256-1620 or via e-mail at [cheryl.l.mitchell@dep.state.fl.us](mailto:cheryl.l.mitchell@dep.state.fl.us). We look forward to your cooperation in this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Heather Webber". The signature is fluid and cursive, with the first name "Heather" being more prominent than the last name "Webber".

Heather Webber  
Environmental Manager

Enclosure: Inspection Report

cc: Mr. Michael Hansberry ([michael.hansberry@univar.com](mailto:michael.hansberry@univar.com))  
Mr. Erik Otto ([erik.otto@univar.com](mailto:erik.otto@univar.com))



**Florida Department of  
Environmental Protection  
Hazardous Waste Inspection Report**

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**FACILITY INFORMATION:**

**Facility Name:** Univar USA Inc

**On-Site Inspection Start Date:** 02/28/2017

**On-Site Inspection End Date:** 02/28/2017

**ME ID#:** 50189

**EPA ID#:** FL0000596866

**Facility Street Address:** 155 Ellis Rd S, Jacksonville, FL 32254-3546

**Contact Mailing Address:** 155 Ellis Rd S, Jacksonville, FL 32254-3546

**County Name:** DUVAL

**NOTIFIED AS:**

LQG (>1000 kg/month)

Transporter

Used Oil

**INSPECTION TYPE:**

Routine Inspection for Universal Waste Transporter facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Hazardous Waste Transporter facility

Routine Inspection for Used Oil Transfer Facility facility

Routine Inspection for LQG (>1000 kg/month) facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Cheryl L Mitchell, Inspector

**Other Participants:** Will Simms, Local Manager

**LATITUDE / LONGITUDE:** Lat 30° 19' 24.8286" / Long 81° 44' 32.9217"

**SIC CODE:** 5169 - Wholesale trade - chemicals and allied products, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

Univar USA Inc (Univar) was inspected on February 28, 2017, as an unannounced hazardous waste compliance evaluation inspection. A follow-up visit was made on March 30, 2017, to complete the records review portion of the inspection. Univar was last inspected by the Department's hazardous waste program on May 14, 2013. On March 4, 2016, the facility notified the Department as a Hazardous Waste Transporter and Large Quantity Generator (LQG) of hazardous waste; a Used Oil and Used Oil Filter Transporter and Transfer facility; and a Universal Waste Transporter and Transfer facility. The facility is currently operating as a Hazardous Waste Transporter and LQG of hazardous waste. The facility's Used Oil and Used Oil Filter Transporter and Transfer activities and Universal Waste Transporter and Transfer activities are limited.

Univar is a distributor of chemicals and industrial solvents. The facility has been in operation at this location since 2001, has 30 employees and operates five tractor/trailers and seven box trucks. The facility is connected to city water and sewer. The facility consists of administrative offices, a Warehouse, Storage Yard, Tank Farm, Rail Car Area, and tanker parking lot.

**Process Description:**

The Warehouse, Storage Yard, Tank Farm and Rail Car area are used to store industrial chemicals for distribution, including solvents, corrosives, and, less frequently, pharmaceuticals. The facility receives product from the manufacturer through rail car and tanker truck, and redistributes them to its customers in totes or drums. Hazardous waste is generated at the facility if a product container leaks or breaks, a product

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exceeds its shelf life, is off-specification, or when any tank lines/sumps are flushed.

## Warehouse

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Products such as isopropyl alcohol, caustics, buffers, acids, and pharmaceuticals are stored in the Warehouse. Inside the Warehouse, the facility has a Lab and a <90-day Hazardous Waste Accumulation Area.

## Lab

Univar operates a quality assurance lab to test products upon arrival to the Warehouse. The lab is located outside the administrative offices in a room off the main floor of the Warehouse. The lab performs specific gravity and alcohol content tests to determine whether the raw product is within control parameters. If the facility is not able to recombine the samples with the product, the waste is managed as a D001 hazardous waste in a closed, sealed, and properly labeled satellite accumulation container located immediately outside the lab in the main Warehouse.

## <90-Day Hazardous Waste Accumulation Area

This area is located in the northwest corner of the Warehouse. Mr. Simms stated that the facility typically holds hazardous waste prior to transfer for less than 24 hours. Univar only picks-up waste on Mondays and Wednesdays and off-site transportation occurs on Tuesdays and Thursdays. At the time of the inspection, there were three non-hazardous waste 'Starpack' polyfiber containers in the area (Photo 1). The facility also stores damaged or expired products and pharmaceuticals for reverse distribution in this area. The damaged and expired products are manifested off-site as hazardous waste with U-code designations as appropriate. The majority of the facility's hazardous waste generated is from expired product. At the time of the inspection, there was no hazardous waste expired product being stored in this area.

## Storage Yard

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The Storage Yard is located outside and to the north of the Warehouse. The Storage Yard is an open bay area used to store flammable products and empty containers to be used for products shipped to customers (Photo 2). There were several pallets of drums and totes of product waiting to be shipped to customers. There were also empty drums and totes stored in this area that will be filled with product or sent for reconditioning. No hazardous waste is generated in this area.

## Tank Farm

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Located behind the Storage Yard and to the west of the main Tank Farm warehouse are two 8,000 gallon acid product storage tanks. Both tanks are located inside secondary containment (Photo 3). There was water accumulating in both secondary containments from a recent rain event (Photo 4). The pH of the water within the tank secondary containments was tested using pH paper and was found to be neutral. A truck and container loading area in front of these tanks has secondary containment and a catch basin with no discharge outlet. The catch basin is a low point within the containment where any drips or releases are collected and neutralized as needed prior to discharge to city sewer. There was water in the catch basin. The pH of water was found to be 3 when tested with pH paper (Photo 5). The facility is reminded that any drips or releases within the secondary containment should be cleaned up immediately and neutralized to prevent a release of D002 hazardous waste.

The main Tank Farm is located outside and to the north of the Warehouse within an open bay warehouse. The Tank Farm warehouse holds 35 tanks, separated into two bays, and a truck loading bay (Photos 6 and 7). Flammable products are stored in Bay 1, and corrosive products are stored in Bay 2. Each tank is located within secondary containment. Satellite accumulation areas (SAA) are located within the warehouse for D001 flammable and D002 corrosive wastes that are typically generated during line flushes for the tanks. At the time of the inspection, there were two 55-gallon D002 hazardous waste satellite drums and one 55-gallon D001 hazardous waste satellite drum within the warehouse. The drums were closed and properly labeled and staged at different SAAs within the warehouse. Two 55-gallon drums of non-hazardous propylene glycol and one "Starpack" polyfiber container of used oil spill debris were also located within the warehouse.

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## Rail Car Area

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This area is located to the northeast of the main Warehouse and east of the Tank Farm warehouse. Products arrive on rail cars that are parked in this area until the product is offloaded to tanker trucks. During offload, the operators place 5-gallon buckets underneath the hose connections to collect any drips when the hoses are disconnected. At the time of the inspection, several rail cars were parked in this area after products had been offloaded. No waste was observed in two buckets in the area, and no stained soils or evidence of spills were observed at the time of the inspection.

## Record Review

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Univar generally transports hazardous wastes to Tradebe Treatment and Recycling of Tennessee in Millington (TND 000 772 186). Non-hazardous wastes are generally transported to VLS Recovery Services in Fitzgerald, Georgia (GAD 109 263 467).

A review of the facility's records included used oil and used oil filter annual reports, certificate of liability insurance, disposal manifests, emergency contingency plan, employee training, and waste container inspection logs. All records reviewed appeared to be in order except for the following:

- 1) The facility failed to maintain used oil records on DEP Form 62-710.901(2) or substantially equivalent forms [62-710.510(1), FAC].
  - 2) The facility, when operating in Florida, does not screen the used oil it transports to check for halogens. This is an Area of Concern. The Department's Southwest District office previously accepted Univar's statement for the reason it is not required to screen customers' used oil prior to transportation based on the following Univar procedures:
    - a) Used oil is only transported in individual containers and is not bulked;
    - b) Customers maintain waste profiles that document halogen content of the used oil as required under 40 CFR 279.44(b)(2);
    - c) The customers' waste profiles are provided to the TSDf and all used oil received by the TSDf is screened for halogen content and the TSDf rejects any used oil that does not pass screening; and
    - d) Univar ensures the customer profiles are reviewed / recertified on an annual basis.
- This practice has not been approved by the Department's Northeast District office. In addition, the facility appears to be managing other waste streams as used oil that may be regulated under 40 CFR 279 and may not be including these waste streams in its used oil logs. This is an Area of Concern. The facility should submit documentation with more information about these waste streams and submit a plan to begin screening used oil that is transported by this Univar facility.

## New Potential Violations and Areas of Concern:

### Violations

Type:	Violation
Rule:	62-710.510(1)
Explanation:	The facility failed to maintain used oil and used oil filter records on DEP Form 62-710.901(2) or on substantially equivalent forms.
Corrective Action:	<p>In order to return to compliance, the facility should maintain used oil and used oil filter disposal records on DEP Form 62-710.901(2) or on substantially equivalent forms which contain at least the same information as the DEP form. These records shall include the following information:</p> <ol style="list-style-type: none"><li>(a) The source of the used oil, including the name and street address of each source, the EPA identification number of the source, if applicable;</li><li>(b) The total number of gallons of used oil received from each source, including any oily wastes, which may be an integral part of the used oil shipment;</li><li>(c) The type of used oil received, using the type code designation found in the form instructions;</li><li>(d) The date of receipt; and</li></ol>



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(e) The destination or end use of used oil and oily wastes, including name and street address of each destination or end user, the used oil identification number, if applicable, and the end use code designation found in the form instructions.

The records should be kept at the facility for a minimum of three years and should be available for inspection by DEP during normal business hours.

## PHOTO ATTACHMENTS:

Photo 1 - 90-day waste accumulation area



Photo 2 - Storage Yard



Photo 3 - acid product storage tanks



Photo 4 - acid product tank secondary containment

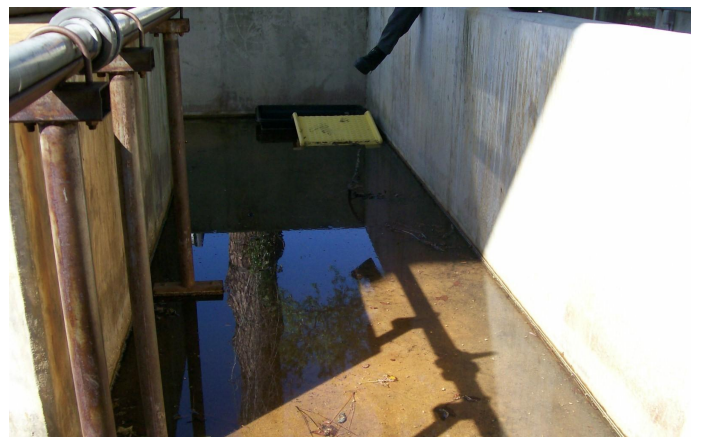


Photo 5 - catch basin within truck loading secondary containment

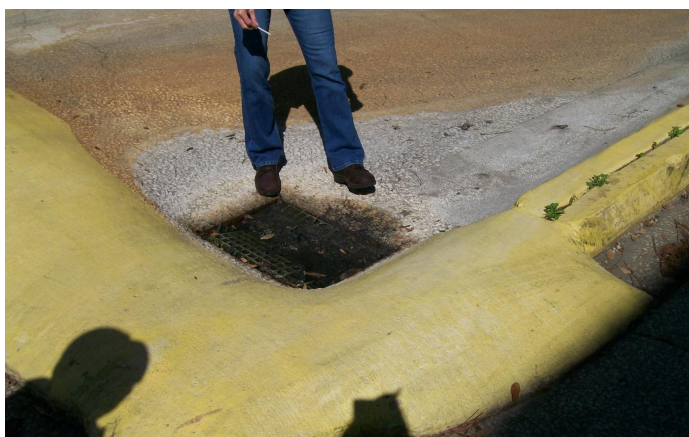


Photo 6 - Tank Farm warehouse



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Photo 7 - Tank Farm warehouse truck loading bay



Photo 8 - Rail Car Area



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**1.0 - Pre-Inspection Checklist**

## Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.12	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		



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**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C.

Cheryl L Mitchell

Inspector

**PRINCIPAL INSPECTOR NAME****PRINCIPAL INSPECTOR TITLE**

DEP

05/12/2017

**PRINCIPAL INSPECTOR SIGNATURE****ORGANIZATION****DATE**

Will Simms

Local Manager

**Representative NAME****Representative TITLE**

Univar USA Inc

**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

**Report Approvers:****Approver:**

Cheryl L Mitchell

**Inspection Approval Date:**

05/12/2017