

FLD - 980 - 559 - 728

InterOffice Memorandum

CENTRAL DISTRICT

TO: Chemical Conservation Corporation File - Orange County

FROM: John White *JW*
Environmental Specialist

DATE: December 1, 1999

SUBJECT: November 30, 1999 Drum Incident at Chemical Conservation Corporation

On November 30, 1999, I visited Chemical Conservation Corporation (CCC) in response to notification from DEP's Emergency Response Bureau that some type of release had occurred earlier in the day.

I met with Patrick Sullivan, head of operations for CCC, the plant manager, and the two chemists that perform waste consolidation for CCC. On November 29, 1999, two 75 pound bags of nonregulated Hydroxylamine Sulfate were consolidated into a 55-gallon drum labeled "corrosive solids". On the morning of November 30, 1999, 13 pounds of a chemical labeled Sodium Hydroxide were added to the drum along with 5-gallon of solid Sodium Metasilicate soap powder.

At 12:45, while the chemists were on a lunch break, they were notified by plant personnel that a drum was on fire. In the waste consolidation area they found the drum of corrosive solids was emitting a heavy black smoke and making popping noises; however, it was not on fire. The reaction was brought under control by the use of dry extinguishers.

Upon review of the manifests accompanying the wastes, it was noted that the 13 pounds of Sodium Hydroxide was actually Calcium Hypochlorite. The container had been mislabeled at the generator location.

I asked Armando Gonzalez to provide a short letter indicating there was an incident to meet the permitting requirement.

Attached are copies of the hazardous waste manifests for the wastes involved in the incident and pictures of the container.



Figure 1. Drum of "Caustic Solid" that reacted on November 30, 1999

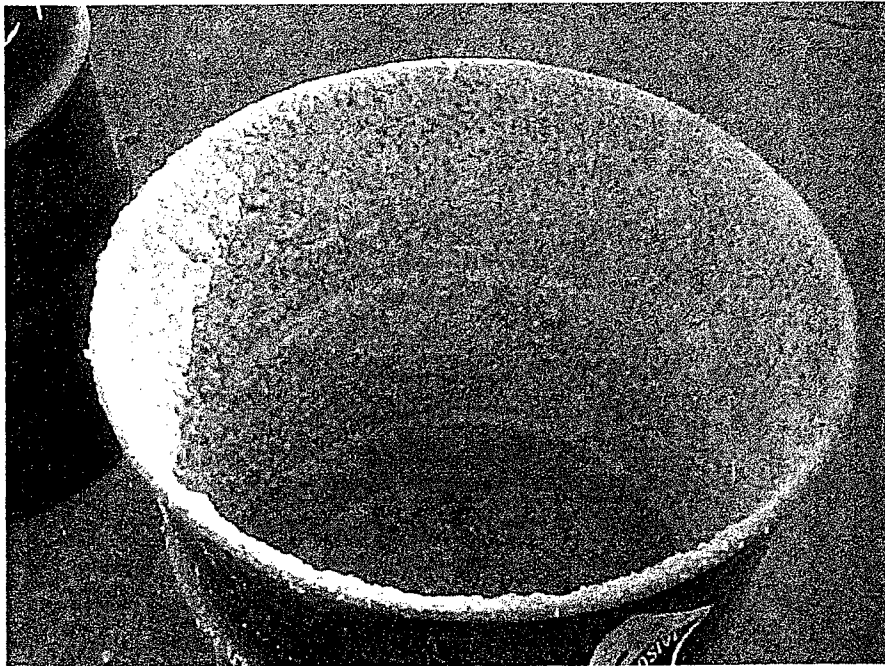


Figure 2. Type of waste involved in incident on November 30, 1999

4112

UNIFORM HAZARDOUS WASTE MANIFEST Generator's USEPA ID No. Manifest Document No. Page 1 Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: DRMO FORT SILL, BLDG. 3323, FORT SILL, OK 73503-6900. 4. Generator's Phone: 580/442-4703. 5. Transporter 1 Company Name: DART TRUCKING COMPANY, INC. 6. US EPA ID Number: LOHD009865825. 7. Transporter 2 Company Name: [Blank]. 8. US EPA ID Number: [Blank]. 9. Designated Facility Name and Site Address: CHEMICAL CONSERVATION CORP., 10100 ROCKET BLVD., ORLANDO, FL 32824. 10. US EPA ID Number: FLFD980559728. 11. US DOT Description: WASTE LITHIUM BATTERY, SOLID CATHODE, UN3090, PGII II. WASTE CORROSIVE LIQUIDS, N.O.S., UN1780, PGI (SULFURIC ACID, HYDROCHLORIC ACID). WASTE BATTERIES, DRY, CONTAINING POTASSIUM HYDROXIDE SOLID, UN3028, PGII. WASTE BATTERIES, WET, NON-SPILLABLE, UN2800, PGII.

Table with 5 columns: Container No., Type, Total Quantity, Unit, Waste No. Rows include: 001 DE 00022 P 0003; 001 DE 00083 P 0002; 001 DE 00208 P 0009; 001 DE 00007 P 0001.

J. Additional Descriptions for Materials Listed Above: 11A DRMO858, 11B DRMO1856, 11C DRMO991, 11D DRMO1187. K. Handling Codes for Wastes Listed Above: 11A 138, 11B 154, 11C 154, 11D 154.

15. Special Handling Instructions and Additional Information: 24 HOUR RESPONSE: 1-888-873-2860 ER CODE 06 SP4400-98-D0001 0122. 1996 ERG GUIDE #: 11A 138, 11B 154, 11C 154, 11D 154. SEND PHOTOCOPY OF MANIFEST TO: CHEM-NET SERVICES, 19145 ALLEN ROAD, BROWNSTOWN, MI 48192.

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

Printed/Typed Name: Charles N. Co. Signature: Charles N. Co. Month Day Year: 11/6/98

17. Transporter 1 Acknowledgement of Receipt of Materials. Printed/Typed Name: Gary E. Coil. Signature: Gary E. Coil. Month Day Year: 11/6/98

18. Transporter 2 Acknowledgement of Receipt of Materials. Printed/Typed Name: [Blank]. Signature: [Blank]. Month Day Year: [Blank]

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name: Janice. Signature: Janice. Month Day Year: 11/6/98



TRANSPORTER #2

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator's US EPA ID No.

Manifest Document No.

Page

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

OK 4213720846

99045

2 of 2

23. Generator's Name

DRMO FORT SILL

BLDG. 3323
FORT SILL, OK 73503-8900

580 442-4703

SP4400-99-D0001

0122

24. Transporter Company Name

25. US EPA ID Number

26. Transporter Company Name

27. US EPA ID Number

State Manifest Document Number

1000122

M. State Generator's ID

N. State Transporter's ID

O. Transporter's Phone

P. State Transporter's ID

Q. Transporter's Phone

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

29. Containers
No Type

30. Total Quantity

31. Unit Wt/Vol

HM	US DOT Description	No	Type	Total Quantity	Unit Wt/Vol
a.	RQ. WASTE BATTERIES, WET, FILLED WITH ACID, 8, UN2794, PGII (D002, D008)	003	DF	01437	P
b.	RQ. WASTE BATTERIES, WET, FILLED WITH ACID, 8, UN2794, PGII (D002, D008)	001	CW	00739	P
c.	WASTE CALCIUM HYPOCHLORITE MIXTURES, DRY, 5.1, UN2208, PGIII UN1748 P6II	001	MC		
d.	WASTE AEROSOLS, FLAMMABLE, N.O.S., 2.1, UN1850 (PAINT, ADHESIVE)	002	DF	00013	P
e.		004	DM	00100	P
f.					
g.					
h.					
i.					

Handling Codes for Wastes Listed Above

001	050
002	050
003	050
004	050
005	050

32. Special Handling Instructions and Additional Information

EMERGENCY RESPONSE GUIDE #

28e)
28f)
28g)
28h)
28i)

28a) 154
28b) 154
28c) 140
28d) 128
28e)

GENERATOR
TRANSPORTER
FACILITY

33. Transporter Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Signature

Month Date Year

33. Transporter Acknowledgement of Receipt of Materials

Date

Printed/Typed Name

Signature

Month Date Year

35. Discrepancy Indication Space



WASTE MANAGEMENT DIVISION
MICHIGAN DEPARTMENT OF
ENVIRONMENTAL QUALITY

DO NOT WRITE IN THIS SPACE

ATT. DIS. REJ. PR.

Required under authority of Part 111 and
Part 121 of Act 451, 1994, as amended.

Failure to file may subject you to
criminal and/or civil penalties under
Sections 324.11151 or 324.12116 MCL.

Please print or type.

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MI D 9 8 0 7 9 3 7 5 6		Manifest Document No. 2	2. Page 1 of 1	3. Information in the shaded areas is not required by Federal law.				
3. Generator's Name and Mailing Address CLINTON VALLEY CENTER 140 ELIZABETH LAKE ROAD PONTIAC, MI 48341					A. State Manifest Document Number MI 7401812					
4. Generator's Phone (248) 452-8848					B. State Generator's ID					
5. Transporter 1 Company Name CHEMICAL CONSERVATION CORP.					6. US EPA ID Number FL D 9 8 0 5 5 9 7 2 8		C. State Transporter's ID			
7. Transporter 2 Company Name <i>Chemical Conservation</i>					8. US EPA ID Number <i>FL D 9 8 0 5 5 9 7 2 8</i>		D. Transporter's Phone 407-859-4441			
9. Designated Facility Name and Site Address CHEMICAL CONSERVATION CORP. 10100 ROCKET BLVD. Orlando, FL 32824					10. US EPA ID Number FL D 9 8 0 5 5 9 7 2 8		E. State Transporter's ID			
							F. Transporter's Phone 407-859-4441			
							G. State Facility's ID			
							H. Facility's Phone 407-859-4441			
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).					12. Containers		13. Total Quantity	14. Unit	15. Waste No.	
a. RQ, Waste Pesticides, liquid, toxic, flammable, n.o.s. (CARBYL, PETROLEUM DISTILLATES), 6.1, UN2903, II					1. No. 1		55		G D001	
b. RQ, Waste Corrosive liquid, acidic, inorganic, n.o.s. (SULFURIC ACID), 8, UN3264, II					1. No. 1		55		G D002	
c. RQ, Waste Corrosive liquid, acidic, inorganic, n.o.s., (PHOSPHORIC ACID, SULFURIC ACID), 8, UN3264, II					1. No. 1		55		G D002	
d. RQ, Waste Corrosive liquid, basic, inorganic, n.o.s., (SODIUM METASILICATE, POTASSIUM HYDROXIDE), 8, UN3266, II					1. No. 1		55		G D002	
J. Additional Descriptions for Materials Listed Above								K. Handling Codes		
(a) CL12023E D014, ERG 131								a. M141		
(b) CL12023F ERG # 154								b. ↓		
(c) CL12023G ERG # 154								c. ↓		
(d) CL12023H ERG # 154								d. ↓		
15. Special Handling Instructions and Additional Information 24 HR. EMERGENCY #: (734) 282-9250.										
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.										
Printed/Typed Name <i>Kimberly [unclear]</i>					Signature <i>Kimberly [unclear]</i>			Date 11/02/99		
17. Transporter 1 Acknowledgement of Receipt of Materials										
Printed/Typed Name <i>William Woods</i>					Signature <i>William Woods</i>			Date 10/29/99		
18. Transporter 2 Acknowledgement of Receipt of Materials										
Printed/Typed Name <i>Steven Spedding</i>					Signature <i>Steven Spedding</i>			Date 11/02/99		
19. Discrepancy Indication Space										
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.										
Printed/Typed Name <i>James Joseph</i>					Signature <i>James Joseph</i>			Date 11/02/99		

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-282-4706 OR OUT OF STATE AT 617-573-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-9802 24 HOURS PER DAY.

Chemical Conservation Corporation
LAB PACK - DRUM INVENTORY

Generator Name: Valley City Center

OCC Profile No.: CL1202H

DOT Shipping Name: Corrosive Liquid, Basic Inorganic

Generator Drum No.: H Sheet 1 of 1 per drum H

Hazard Class: 8 UNNA ID No. UN3246 PG II

Out: 6991510

NOTE: Only one DOT hazard class/division materials in every lab pack contain

Line Item No.	Quantity and Unit (5 x 10 ml)	Materials/Chemical Name or Description	EPA Hazard Waste Codes				
1	1x5gal	S-722 Foaming Detergent	D002	L	P	Mixed Alkaline	CR 652246
2	1x2.5g	Chem Surfo 10150		L	P	Sodium Metasilicate	
3-6	3x1QT	Cronex Detergent		L	P	Potassium Hydroxide	
7-9	3x1QT	AMONIA		L	P		432575
10	1x2.5gal	UNITED Duo Zyme		L	P	Mixed Alkaline	CR 652246
→ 11	1x5gal	Flow Adjuvant A		S	P	Corrosive Solid	CR 652253
12	1x16	CAKISOLV		L	P		CR 652246

APPROVED
DATE: 10-27 BY: J. Cannon
J. CANNON, CHEMIST

: Line Item numbers on this sheet must be entered on labels affixed to inner containers holding materials/chemicals identified on the corresponding line. Materials that appear in the "U" or "P" hazardous waste list must have the EPA hazardous waste code; otherwise, enter "used", "spent" or "more than five ingredient", if it applies, to explain why the code is not assigned. INFORMATION: The listing above is an accurate and complete description of the contents of this drum, and they are packed in accordance to 49 CFR 173.12.

Generator Name: Randy Ramsey and SIGNATURE: Randy Ramsey PACKED BY: J. Cannon

Material State: S=Solid; L=Liquid; R=Residue (sludge); A=Aerosol; G=Gas
Container Type: G=Glass; M=Metal; P=Plastic; F=Fiber; A=Assembled Container



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

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. AR.R.0.0.0.0.0.4.0.7.7.	Manifest Document No. 65246	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address 2415 Commercial Lane Little Rock, AR 72206			AMERICAN FREIGHTWAYS, INC.		A. State Manifest Document Number AR-1085246	
4. Generator's Phone 800-603-3828			6. US EPA ID Number F.L.D.9.8.2.1.0.5.8.8.4.		C. State Transporter's ID H-325	
5. Transporter 1 Company Name R. PAQUETTE			8. US EPA ID Number		D. Transporter's Phone 904-736-1978	
7. Transporter 2 Company Name			10. US EPA ID Number		F. Transporter's Phone	
9. Designated Facility Name and Site Address CHEMICAL CONSERVATION CORP. 10100 Rocket Boulevard Orlando, FL 32824			10. US EPA ID Number F.L.D.9.8.0.5.5.9.7.2.8.		G. State Facility's ID 407-859-4441	
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)			12. Containers	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. Waste Phenoxyacetic Acid Derivative Pesticide, Liquid, Toxic, Flammable 6.1, UN3067, PG II			No. 7	Type DM85	G	0001
b. RQ, Waste Phosphoric acid 8, UN1805, PG III			No. 001	Type DM85	G	0002
c. RQ, Waste Oxidizing, solid, n.e.s. (Sodium Chlorate, Sodium Metaborate) 5.1, UN1479, PG II			No. 1	Type DM88	G	0003
d. RQ, Waste Hydroxylamine sulfate 8, UN2865, PG III			No. 001	Type DM85	G	0000
16. Additional Description for Materials Listed Above			17. Emergency Response Information			
a) AME1833 (G00F014) (PEST) (Phenoxy herbicide)			M14			
b) AME1836 (BQ8679) (HAZ 8) 090						
c) AME1837 (G00F014) (PEST) (Phenoxy herbicide)						
d) no alternate TSD return to generator						
15. Special Handling Instructions and Additional Information EMERGENCY RESPONSE: Chem-Trec 1-800-424-9300 EMERGENCY CONTACT: Denise Neal 8006033828						
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packaged, marked, and labeled/placarded, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name Denise M Neal			Signature <i>Denise M Neal</i>		Month Day Year 11.03.99	
17. Transporter 1 Acknowledgement of Receipt of Materials						
Printed/Typed Name W.H. Freelard			Signature <i>W.H. Freelard</i>		Month Day Year 11.03.99	
18. Transporter 2 Acknowledgement of Receipt of Materials						
Printed/Typed Name			Signature		Month Day Year	
19. Discrepancy Indication Space						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.						
Printed/Typed Name Janice Joseph			Signature <i>Janice Joseph</i>		Month Day Year 11.03.99	