Florida Department of Environmental Protection

Southwest District Office
13051 North Telecom Parkway, Suite 101
Temple Terrace, Florida 33637-0926

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Noah Valenstein
Secretary

July 10, 2017

Univar USA, Inc.
6049 Old Highway 41A
Tampa, Florida 33619
Attn: Mr. Freddie Franks, Branch Operations Manager
Freddie.Franks@univarusa.com

Re: Univar USA, Inc.
FLD020985727
Hillsborough County

Dear Mr. Franks,

Department personnel conducted a compliance inspection of the above-referenced facility on June 29, 2017. Based on the information provided during, the facility was determined to be in compliance. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact Elizabeth Knauss at (813) 470-5902, or via e-mail at: Elizabeth.Knauss@dep.state.fl.us.

Sincerely,

Richard Vaughn
Environmental Manager
Compliance Assurance Program
Southwest District
Florida Department of Environmental Protection

ec: Gerry Javier, HEPC (javier@epchc.org)

Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Univar USA Inc

On-Site Inspection Start Date: 06/29/2017 **On-Site Inspection End Date:** 06/29/2017

ME ID#: 52299 **EPA ID#:** FLD020985727

Facility Street Address: 6049 Old 41A Hwy, Tampa, FL 33619-8786

Contact Mailing Address: 6049 Old 41A Hwy, Tampa, FL 33619

County Name: HILLSBOROUGH

NOTIFIED AS:

LQG (>1000 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Transfer Facility facility

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

INSPECTION PARTICIPANTS:

Principal Inspector:	Elizabeth Knauss, Environmental Consultant
Other Participants:	Damon Blue, Branch Operations Manager; Scarlett Russell, ChemCare Sales Coordinator

LATITUDE / LONGITUDE: Lat 27° 53' 16.6618" / Long 82° 23' 40.6392"

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

TYPE OF OWNERSHIP: Private

Introduction:

Univar USA, Inc. operates a chemical packaging and distribution warehouse at this location, and also offers hazardous waste transportation services to the company's customers. The facility is a large quantity generator of hazardous waste and has notified that it is operating a 10 day transfer facility. Used oil, universal waste and other non-hazardous chemical wastes are also handled by the facility. Damon Blue, the Branch Operations Supervisor and Scarlett Russell provided information and access to records during this inspection. The facility operates two shifts, five days per week, and is provided with municipal water. Plant sewage is disposed of in a septic system.

Process Description:

Univar receives chemicals by truck transport, and also receives some bulk corrosive and flammable liquids by rail. Bulk liquids are stored in a tank farm on site. At the time of this inspection, Cliff Berry, Inc. was in the process of using a sodium hydroxide solution to pickel a steel tank at the facility. Mr. Blue was not initially sure how the used solution would be managed. He was told by Cliff Berry staff that the used liquid would be directly re-used in another process. The material would be excluded from regulation under 40 CFR 261.2(e)(ii).

The tank farm is located next to the warehouse building. This building includes offices, a storage area for food grade materials, storage for other chemicals, a chemical packaging area for loading drums and intermediate bulk containers (IBCs) and the designated hazardous waste transfer area. A second building at the facility was formerly occupied by DPC Enterprises, which manufactured bleach. The building was not inspected, and currently is used to store extra racks, supplies like packaging materials, and as a cooling area for plant staff.

No chemicals are stored in the building, according to Mr. Blue.

Inside the warehouse and next to the tank farm is a fill station for loading drums and IBCs. The facility has three satellite accumulation drums for hazardous waste generated from container loading, one for flammable line flush, a second for corrosive line flush and a third for spill cleanup materials and used protective gear. A fourth container is used for non-RCRA regulated corrosive solids. Emergency equipment and a contact call list was located in the area. Equipment included a telephone, eye washes, safety showers, fire extinguishers and the manual pull for the fire alarm. Spill cleanup equipment is located at stations throughout the warehouse. The facility does not have an automatic alarm or fire control system. Equipment inspections were up to date.

When satellite accumulation containers are full, they are moved to the facility's 90 day accumulation area, which is located adjacent to the 10 day transfer facility area. The areas are designated by aisles painted on the warehouse floor, and each aisle is five pallets long. Mr. Blue said that if material is spilled or damaged in the other product handling areas, the material is immediately packaged, labeled, dated and placed in the 90 day area. At the time of this inspection, only one 55 gallon drum had accumulated. A few containers were found in a separate holding area for off specification materials. These were being held for either customer release or for evaluation. One universal waste lamp container, properly closed and labeled, was stored near this area. The container had an accumulation start date of 1/30/17.

A charging station for battery operated pallet jacks was in the northeast corner of the warehouse. A door was open in this area, and it appeared that some rain water had blown in onto the floor. The puddled liquid had a pH of less than 2 when tested by pH paper, and it was recommended that a spill kit containing a neutralizing agent be placed in this area. The puddle was cleaned up during the inspection. The floor did not otherwise show evidence of battery acid spills.

The transfer facility consists of six aisles, and therefore has a total capacity of the equivalent of 240 55-gallon drums. Waste is accepted in cubic yard containers and smaller packages. Univar does not transport hazardous waste in bulk. Univar does not open or repackage any waste, unless a container is found to be leaking or damaged. Overpack containers were available. All waste is transported using either a hazardous waste or non-hazardous waste manifest that lists the waste profile/waste approval number issued by the designated facility. Because of this, the District has not required the facility to open and screen used oil shipments for halogen content. The waste profile and approval meet the 40 CFR 279.44(d) recordkeeping requirement. Univar handles only a limited amount of material designated as used oil.

On occasion, waste may be stored in a truck over the weekend, if the warehouse closes before the driver arrives. The trucks are parked inside the facility gates until they can be unloaded. Occasionally Univar will transport waste directly to EQ Florida. Most often, waste is picked up at Univar by Dupree Logistics, LAR000045963, for transport to Tradebe in Millington, TN. Non-hazardous waste is transported to VLS Recovery in Fitzgerald, Ga.

Compliance with the 10 day transfer facility limit is generally tracked by the manifests, copies of which are retained on site. While containers are on site, a copy of the manifest is stamped with a blank form so that the date the waste was received, the date it was pulled for loading and the date that the load was checked can be filled in. These sheets are kept until the shipment is billed and taxes calculated. One manifest was found that indicated an 11 day lapse between receipt as transporter and disposal to EQ Florida. Absent a transfer facility log, it was not clear if the waste had been received at the transfer facility the same day it was received from the generator, which was a Friday. This was the only potential discrepancy noted with the 10 day limit.

Facility records were on site and available for inspection. The facility contingency plan is a modified SPCC plan, last updated in 2011. The plan was reviewed in May of 2017, and no updates were needed as operations and facility staff had not changed. The facility has distributed the plan, and maintains emergency response arrangements with SWS and with ACT. The closure plan was on site. Inspection records are maintained as required for both the central accumulation area and transfer facility, and records include a count of the number of containers in each area. Univar maintains records for satellite container inspections as well. Personnel training was reviewed for plant staff in November 2016, and for Ms. Russell in April 2017. Job titles and position descriptions are maintained.

Conclusion:

At the time of the inspection, Univar was operating in compliance with hazardous waste management regulations applicable to large quantity generators and Florida transfer facilities.

6.0 - Transporters Checklist

Requirements:

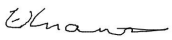
The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more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

Item No.	Transporter Requirements (62-730.170 & 40 CFR 263)	Yes	No	N/A
6.1	Has the transporter notified the Department as a transporter and received an EPA identification number? 62-730.150(2)(a), 263.11(a)	✓		
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) ☐ Exemption Type - Tolling Agreement ☐ Exemption Type - CESQG Bill-of-Lading	✓		
6.8	Does the transporter sign and date the manifest upon acceptance? 263.20(b)	✓		
6.9	Does the transporter leave a signed copy of the manifest acknowledging acceptance of the waste? 263.20(b)	✓		
6.10	Does the transporter ensure the manifest and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(c)	✓		
6.11	Does the transporter obtain the signature and date of delivery of the receiving (designated) facility or other transporter upon transferring custody of the waste? 263.20(d)(1)	✓		
6.12	Does the transporter retain one copy of the manifest signed and dated by the designated facility or other transporter? 263.20(d)(2)	✓		
6.13	Does the transporter give the remaining copies of the manifest to the designated facility or accepting transporter? 263.20(d)(3)	✓		
6.14	If the entire quantity of hazardous waste cannot be delivered, does the transporter contact the generator for further direction and revise the manifest in accordance with the generator's instructions? 263.21(b)(1)	✓		
6.15	For a partial load rejection, while the transporter is on the facility's premises, does the transporter obtain a new manifest for the rejected material, accompanied by a copy of the original manifest that includes the manifest tracking number of the new manifest? 263.21(b)(2)	✓		
6.16	Does the transporter retain a copy of the manifest signed by the generator, himself, and the next designated transporter or designated facility for a period of three years from the date the hazardous waste was accepted by the initial transporter? 263.22(a)	✓		
Item No.	**Rail Transporters**	**Yes**	**No**	**N/A**
6.17	If initial rail transporter, when accepting hazardous waste from a non-rail transporter does the rail transporter sign and date the manifest acknowledging receipt of the hazardous waste? 263.20(f)(1)(i)			✓
6.18	If initial rail transporter, does the rail transporter return a signed copy of the manifest to the non-rail transporter? 263.20(f)(1)(ii)			✓
6.19	If initial rail transporter, does the rail transporter forward at least three copies of the manifest to the next designated non-rail transporter or facility? 263.20(f)(1)(iii)			✓
6.20	If initial rail transporter, does the rail transporter retain one copy of the manifest and rail shipping paper? 263.20(f)(1)(iv)			✓
6.21	Does the rail transporter ensure the shipping paper and, in the case of exports the Acknowledgment of Consent, accompany the waste during transport? 263.20(f)(2)			✓
6.22	Does the final rail transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(f)(3)(i)			✓
6.23	Does the final rail transporter retain a copy of the manifest or signed shipping paper? 263.20(f)(3)(ii)			✓
6.24	When delivering hazardous waste to a non-rail transporter, does the rail transporter obtain the date of delivery and handwritten signature of the next non-rail transporter on the manifest and retain one copy of the manifest? 263.20(f)(4)			✓
Item No.	**Water (Bulk) Transporters**	**Yes**	**No**	**N/A**
6.25	Does the water (bulk) transporter obtain the date of delivery and handwritten signature of the designated facility on the manifest or shipping paper? 263.20(e)(3)			✓
6.26	Does the water (bulk) transporter retain a copy of the manifest or signed shipping paper? 263.20(e)(5)			✓

Item No.	SQG Waste	Yes	No	N/A
6.27	For SQG waste, if a manifest is not used is the waste being transported pursuant to a recalmation (tolling) agreement per 262.20(e)? 263.20(h)(1)			✓
6.28	Is the following information recorded on a log or shipping paper for each shipment? (Check items below that are NOT in compliance): 263.20(h)(2) ☐ Name, address, and EPA identification number of the generator of the waste ☐ Quantity of waste accepted ☐ All DOT-required shipping information ☐ The date the waste is accepted			✓
6.29	Does the transporter carry the shipping paper/log when transporting waste to the reclamation facility? 263.20(h)(3)			✓
6.30	Does the transporter retain shipping papers/logs for a period of at least three years after termination or expiration of the tolling agreement? 263.20(h)(4)			✓
6.31	If hazardous waste was discharged during transport, did the transporter give notice, if required by 49 CFR 171.15, to the National Response Center (800-424-8802)? 263.30(c)(1)			✓
6.32	If hazardous waste was discharged during transport, did the transporter report in writing as required by 49 CFR 171.16 to the Director, Office of Hazardous Materials Regulations, Materials Transportation Bureau, Department of Transportation, Washington, DC 20590? 263.30(c)(2)			✓
6.33	If hazardous waste was discharged during transport, did the transporter clean up the discharge so that it no longer presents a hazard to human health or the environment? 263.31			✓
6.34	Has the transporter demonstrated the financial responsibility required under 62-730.150(2)? 62-730.150(2)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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.

Elizabeth Knauss	Environmental Consultant	
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**	
	FDEP - SWD	07/05/2017
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**	**DATE**

Damon Blue	Branch Operations Manager
Representative NAME	**Representative TITLE**
	Univar
	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.

Scarlett Russell	ChemCare Sales Coordinator
Representative NAME	**Representative TITLE**
	Univar
	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: Elizabeth Knauss **Inspection Approval Date:** 07/05/2017