CHRONOLOGICAL ENTRY FORM FOR FOLDERS

EQ of FLORIDA

(fka US Liquids of Florida, Inc., USL City Environmental Services)

FLD 981 932 494 34875-HO-007

Permit Correspondence File 8d Page 1

NO	DATED	RECVD	ТО	FROM	REFERENCE
1/04	5-24-04	6-1-04	DIV OF WASTE MANAGEMENT	C. STALLWORTH	Rejected WASTES - INDBILITY TO CONFIRM PLB
104	10-12-04	10-20-04	J. GAFFIN	S.RESEHOEZ	PAYMENT OF PERMIT MOD Fee FOR AEROSOL CAN CRUSHER
64	10-15-04	~	S.RESENDEZ	B.BAKER	FOEP APPROVAL OF FINANCIAL ASSURANCE DEMONSTRATION
04	11-19-04		B. Mulhollaurs		Summary OF HISTORIC INVESTIGHTIONS AT THE SITE
705	1-7-05				EQ FLORIDA COMMENTS ON DEP 1+19-04 LETTER Rei INVESTIBATION
05	1-25-05				APPHAL WASTE MODIMIZATION LERTIFICATION
65	1-25-05			10 V V V	EQ FINANCIAL ASSURANCE DEMONSTRATION
105	1-26-05		B. KOTHUR		EQ SAMPLIAGO DATA - STORMWATER RETENTION POND
0/	2-21-05		S. RESENDEZ		FOEP DISAPPROVAL OF ED FINANCIAL ASSURANCE DEMONSTRA
0/05	3-2-05	34-05	B. KOTHUR		EQ SAMPLINK DATA - STORMWATER RETENTION POPO
1/	3-8-05		B. KOTHUR	8	EQ SAMPLE LOCATION MAP FOR Above DOC. 8/05 AND 19/05
-/	3-11-05			D. OUTLAW	DEP RECLASSIFIES SWMM-3 AS NFA
3/05	4-1-05	4-14-05	J. GRIFFIN	S.RESENDEZ	EQ FLORIDA CLOSURE COST ESTIMATE
4/05	7-15-05		J. BRIFFIN		LETTER APPLICATION FOR PERMIT RENEWAL
5/05	8-5-05		S.PELZ		Request TO BEDIN SOLIO WASSIE FACILITY CONSTRUCTION AT THEIR OWN RIS
6/	10-15-05		70	B. BAKER	FORP APPROVAL OF FINANCIAL ASSURANCE DEMONSTRATION
			MUSCHULL	V. WIII CI	THE MILE OF PERMITTER HOSPING DEMONSTRATION
		E III			
				7	

EAV		

Date 2/16/06 Number of pages including cover sheet

TO:

WILLIAM HALL

RESOURCE **MANAGEMENT CONCEPTS**

Phone

301-862-7501

Fax #

301-862-5759

FROM:

AL GEPHART

FLORIDA DEPARTMENT OF ENVIRONMENTAL

PROTECTION

13051 NORTH TELECOM

PARKWAY

TEMPLE TERRACE, FL

33637-0926

Phone

(813) 632-7600, EXT. 372

Fax Phone

(813) 632-7664

CC:	
00:	

REMARKS: Urgent

☐ Reply ASAP

☐ Please Comment

ATTACHED IS THE INFORMATION I CAN PROVIDE ON EQ FLORIDA, TAMPA, FL FACILITY

AL GEPHART



March 2, 2006

Mr. Albert Gephart, Engineer South West District Florida Department of Environmental Protection 13051 North Telcom Parkway Temple Terrace, FL 33637



RE: Compliance Review of EQ Florida, Inc., located in Tampa, Florida.

Dear Sir:

Resource Management Concepts, Inc. (RMC) is assisting the Transportation Security Administration (TSA) in developing their environmental program. As part of this effort and TSA's ongoing quality control effort, RMC has been asked to confirm a report produced by SAIC, Inc. (SAIC) in January 2005. The SAIC report contained information on the business and operational status of treatment storage disposal facilities (TSDFs). Because the TSDF facility located in your jurisdiction has been the recipient of TSA waste, the information contained in SAIC's report must be verified and updated. Responses to the questionnaire that accompanies this letter will provide the necessary information for RMC to complete this tasking for TSA.

The TSD facility that we are reviewing is EQ Florida, Inc., located in Tampa, FL.

An RMC representative will be contacting you within two weeks to discuss your responses to the questionnaire. If you would like to schedule the interview, please contact Mr. William Hall at 301-862-7501 or via e-mail at bhall@rmcweb.com.

Your cooperation in this matter will be greatly appreciated.

Sincerely

William T. Hall, P.E.

Senior Engineer

RMC

TSA TSDF Pre-audit REGULATOR INTERVIEW

This questionnaire is intended to collect background information from the inspectors of the TSDF facility pertaining to its environmental management activities. Accurate and timely information is requested. An RMC representative will follow up this questionnaire. To schedule a follow-up phone interview, please contact Bill Hall at 301-862-7501, or send an e-mail to bhall@rmcweb.com or ehoschar@rmcweb.com. Completed questionnaires can be faxed to 301-862-5759 or sent to:

RMC, Inc.

Attn: William Hall

If yes, please describe briefly:

46970 Bradley Blvd, Suite B Lexington Park, MD 20653

GENERAL

Facility Name:	EQ FLORIDA INC.	SIC:	9511,5093,4226,8734
Street Address:	2002 NORTH ORIENT ROA		
City:	MAILING ADDRESS: 7202 E TAMPA	State:	FLORIDA
County:	HillsboroutH	Zip Code:	33619
Inspector Name:	AL GERHART	Email:	albertigephartedop, st. fl.
Phone #:	813-632-7600 × 372	Fax #:	813-632-7664
Inspector Name:		Email:	
Phone #:		Fax #:	
Date Completed:	MARCH 9, 2006	Completed by:	AL GERHART
			Yes No Unknown
	y penalties either for an inves esult of a spill or release in 2		×

AIR EMISSIONS Is the facility required to register sources? Not TO MY KHOW		Yes	No ×	Unknown
If yes, provide a brief descript sources:	ion of major air permits, includ	ing "gr	andfat	thered"
WASTEWATER		Yes	No	Unknown
Does the site have an NPDES	permit? NOT TO MY KNOWLEDGE			
Have there been any fines or of wastewater/storm-water discha			X	
If yes, please describe briefly:	THEY DO SAMPLE THE STORM WATER DETENTION			
	IF/WHEN THERE IS A DISC	N SONS HAREE	·	
GROUNDWATER		Yes	No	Unknown
Does the facility monitor groun			X	
Is there groundwater contamin Are there any abatement, reme			×	***************************************
treatment operations underway	/?		×	
If yes, please describe briefly:	HISTORICALLY THE SITE DID INVESTIBATION , NO FURTHER , MONITORING REQUIRED AT	A 60 ASSESS	200 WD 6NEH7 081WT	WATER
OIL AND HAZARDOUS SUBS	STANCE STORAGE	Vac	No	Unknown
Has the facility been cited for a	ny SPCC or other spill		\/	OTIKITOWIT
deficiencies by a regulatory ag	ency within the past year?			
If yes, please describe briefly:				
CERCLA		Yes	No	Unknown
Did any release or spill report if from a regulatory agency?	n the past year initiate a visit		X	

If yes, describe each incident and its status:

WASTE

Does the facility have permits for hazardous waste:

- a. Treatment?
- b. Storage?

FLD 981 932 494

c. Disposal?

Are there corrective action programs (RCRA, state, or voluntary) underway at the site?

Has the facility received any regulatory notices or citations for hazardous or solid waste management deficiencies during the past two years?

×	<u> </u>	
X		
	*	27
	×	

Unknown

Yes No

If yes, please describe briefly: THE LAST CITATION BENALTY WAS 5/5/03

FAILURE TO ENSURE TOTAL HAZOTEN CONTENT OF USED OIL WHICH LED TO UNAUTHORIZED DISPOSAL OF A LISTED HAZARDOUB WASTE, ENTERCEMENT CASE CLOSED ON 1/8/04

6 SOLID WASTE MANAGEMENT UNITS (SWMU)
UNDER HSWA. ALL HAVE NFA STATUS.

SEE ATTACHED LISTING OF PERMITS REGISTRATIONS
THIS IS AN OLD LIST BUT I'M PRETTY SURE THEY
STILL MAINTAIN THESE,

EQ FLORIDA, INC

(FRA US LIQUIDS OF FLORIDA, INC. (USLF)

-		the same and the s			. the same near of the same	
TEM	PERMIT	FERMIT	AGENCY	PERMIT	PERMIT	EXFIR
	\ <u>\</u>	NUMBER		LIFE (YRS)	DATE	DATE
1	TAMPA - SPECIAL USE PETITION	#V99-68	сот	N/A	N/A	N/A
2	EPA ID #	FLD 981 932 494	EPA, DEP	N/A	N/A	N/A
3	SWFWMD STORMWATER EXEMPTION	E07840	SWFWMD	N/A	14-May-97	N/A
4	CERCLA APPROVAL LETTER	FLD 981 932 494	EPA	N/A	21-Feb-95	N/A
ıs	EPA STORMWATER NOI MULTI-SECTOR	FLR05E179	DEP	5	20-Sep-96	17-Mar-06
9	DOT HAZ MAT REGISTRATION	062801 003 047 J	DOT		03-Oct-02	30-Jun-04
7	SOLID WASTE PERMIT	34757-001-SO	DEP	3	20-Jun-02	15-Dec-07
8	MERCURY STORAGE & TRANSPORTER	FLD 981 932 494	DEP	+	09-May-01	01-Mar-04
6	HAZ. WASTE TRANSPORTER (FL)	FLD 981 932 494	DEP	-	04-Sep-02	01-Mar-04
10	HAZ. WASTE 10-DAY TRANSFER (FL)	FLD 981 932 494	DEP	-	19-Aug-02	pending
1	INSURANCE W- COMP/ AUTO/ LIABILITY	see ACCORD	LIBERTY MUT.	-	04-Sep-02	04-Sep-03
12	TAMPA PORT AUTH. WASTE OIL	N/A	TPA	_	01-Oct-02	30-Sep-03
13	WASTE TIRE COLLECTOR	Receipt # 348158	DEP	-	28-Mar-03	01-Apr-04
14	EPCRA REPORTING	N/A	USLF File		17-Feb-03	17-Feb-04
15	HAZARDOUS WASTE EXPORT REPORT	N/A	EPA	~	15-Apr-03	01-Mar-04
16	LIQUID WASTE TRANSPORTER (Miami)	LW-000277-2001/2002 (HW	DERM	-	01-Apr-03	31-Mar-04
17	USED OIL COLLECTION & TRANSP.	FLD 981 932 494	DEP	-	30-Jun-02	pending
18	LABORATORY QAP	980194	FDOH	-	16-Dec-99	N/A
19	COT SOLID WASTE	01-004009-PH	TAMPA	-	01-Jul-02	pending
20	WASTE TRANSPORTER (Broward)	HMT-98-11991	DNRP	2	15-Aug-02	31-Aug-04
21	SOLID WASTE FINANCIAL ASSURANCE	34757-001-SO	DEP	-	01-Jan-03	01-Mar-04
22	HAZ WASTE FINANCIAL ASSURANCE	FLD 981 932 494	DEP	-	01~Jun-03	01-Jun-04
23	HAZARDOUS WASTE PERMIT (TSDF)	34875-HO01-002	DEP	5	22-Jan-01	22-Jan-06
24	HAZARDOUS WASTE (HSWA) PERMIT	FLD 981 932 494	EPA	10	96-voN-90	90-voN-90
25	Lab Pack Cyanie w/ Lab Pack acids	DOT-E 9723	DOT	-	03-May-02	31-Dec-03
26	Paint Related Material Cu. Yd. Boxes	DOT-E 11624	DOT	-	08~Jun-03	30-Sep-04
27		DOT-E 9769	DOT		25-Apr-02	31-Mar-04
28	Lab Pack Mixed Classes 4.2, 6.1, 8	DOT-E 11294	DOT	-	21-Apr-03	30-Sep-04
29	6.1 Cynaide Salts w/ Class 8 acids	DOT-E 10441	DOT		10-Apr-02	31-Mar-04
30	Division 2.1 Aerosols > 220 lbs	DOT-E 11396	DOT	-	30-Apr-03	31-Oct-04
34	D. Dana Dackers Facility	Permit No: 53:00007	HOO	2	25~Jul-03	31-11-05



Department of Environmental Protection

Jeb Bush Governor Southwest District 3804 Coconut Palm Drive Tampa, Florida 33619

Colleen M. Castille Secretary

PERMITTEE

EQ Florida, Inc. Mr. Scott Maris, Vice President 36255 Michigan Ave. Wayne, Mi. 48184

PERMIT/CERTIFICATION

GMS ID No: SWD/29/44633
Permit No: 34757-003-SO
Date of Issue: 12/16/2002
Expiration Date: 12/15/2007

County: Hillsborough Lat/Long: 27°57'50"N 81°22'26"W

Sec/Town/Rge: 14/29S/19E

Project: Solid Waste Processing

Facility

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rule(s) 62-4, 62-330, 62-522, 62-550, 62-701, 62-730, 62-770 and 62-775. The above named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To construct building improvements and operate a materials processing and transfer facility, referred to as the EQ Florida, Inc. Solid Waste Materials Processing and Transfer Facility, for the processing, consolidation, bulking, and solidification of solid waste materials, subject to the specific and general conditions attached, located at 2002 N. Orient Road (at the north corner of Orient Road and 8th Avenue) and at 7202 East 8th Avenue, Tampa, Hillsborough County, Florida. The specific conditions attached are for the operation of:

Amended 08/29/2005 •

1. Materials Processing and Transfer Facility

Replaces Permit Number: 34757-001-SO

Includes Modifications #: 34757-004-SO, dated 6/24/2004

#: 34757-005-so, dated 08/29/2005

This permit contains compliance items summarized in **Attachment 1** that shall be complied with and submitted to the Department by the dates noted. If compliance dates are not met and submittals are not received by the Department on or before the dates noted, enforcement action may be initiated to assure compliance with this permit.





Department of Environmental Protection

Jeb Bush Governor Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Colleen M. Castille Secretary

Southwest District Tampa

October 15, 2005

Mr. Steve Reséndez EQ of Florida, Inc. 7202 East 8th Avenue Tampa, Florida 33619-3380

Re: FLD 981 932 494
EQ of Florida, Inc.
7202 East 8th Avenue
Tampa, Florida 33619-3380

Subject: Financial Responsibility Compliance for 2005

Dear Mr. Reséndez:

The department has reviewed the documentation submitted to demonstrate financial responsibility. Comerica Bank letter of credit number 588011-02 effective March 22, 2004 indicates an amount of \$240,000 to cover the inflation adjusted closure cost. The corresponding standby trust fund agreement has been established on December 18, 2003 between EQ of Florida, the Grantor, and US Bank National Association, the Trustee. In addition, the American International Specialty Lines Insurance Company certificate of liability insurance policy number PLS2673560 effective August 1, 2002 shows the required coverage for sudden and nonsudden accidental occurrences.

Therefore, EQ of Florida is in compliance with the financial responsibility requirements of 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180 of the Florida Administrative Code.

If you have any questions, please contact Mr. Edgar Echevarría of my staff at 850-245-8793.

Sincerely,

Bryan Baker

Professional Geologist III

Hazardous Waste Regulation Section

BB/ee

Copy: Ms. Elizabeth Sawyer, USEPA/Region 4

Mr. William Kutash, FDEP/Southwest District Office

FDEP File

"More Protection, Less Process"

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FILE: 8-d

70/12

 $813-744-6100 \times 386$ susan.pelz@dep.state.fl.us

----Original Message----

From: Steve Resendez [mailto:Steve.Resendez@eqonline.com]

Sent: Friday, August 05, 2005 9:34 AM

To: Pelz, Susan

Cc: Bob Mulholland; Scott Maris

Subject: EQ Permit

Susan,

I had submitted our application to Steve Morgan for our Solid Waste Modification. I spoke with him early last week and he was confident that he would meet the deadline to issue the draft permit to me before Aug, 4th. This is also the date that by Chapter 62-4 F.A.C. the department must take action on the pending permit modification (letter June 3, 2005). At this time EQ has requested a construction permit from the City of Tampa in order to begin this project. Upon receiving this permit EQ will begin it's construction. I requested in July for Steve M. to send me the Public Notice information so I can put it in the newspaper as soon as I receive the draft. At this time I request on behalf of EQ that the Department authorize construction (at own risk) without the public comment. Upon receiving the draft permit FO will continue the permit process and issue the public notification. By the taking this step EQ construct this building at their own risk. EQ is requesting to begin this but construction in order to complete this project and begin operations in a timely manner, lete this If you have any questions you can contact me at office ph: 813-623+5302 eext.235 toricellar can 813-417-2907.

Steve Resendez Compliance Coordinator EQ Florida, Inc.

Phone: (813) 623-5302 ext.235

Fax: (813)626-7451

Fife: 8-d



7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

Department of Environmental Protection Hazardous Waste Management Section 2600 Blair Stone Road, MS 4560 Twin Towers Building Tallahassee, Florida 32399-2400

Attention: John E. Griffin

Re: Permit Renewal

Ferrill Reflewar

EPA I.D. No.: FLD 981 932 494

Permit No.: 34875-HO-007 Hillsborough County

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

JUL 1 8 2005

SOUTHWEST DISTRICT

TAMPA

July 15, 2005

Mr. Griffin,

This letter and information attached is for the Hazardous Waste Operations located at 2002 N. Orient Road, Tampa Florida. EQ Florida, Inc. has completed DEP Form 62-730.900(2)(d) as per Hazardous Waste Facility Permit Application Instructions Guidance dated 5/15/1996. EQ requests that the department complete a renewal permit for the existing Hazardous Waste Facility at 2002 N. Orient Road. At this time EQ certifies that there has not been any regulatory or facility changes and that we have operated according to all Federal, State, and Local Permits. The facility has not had any releases to the environment that may have the potential to harm human health and the environment. EQ requests that the department accept a new attachment for the original application to reflect the adjacent (contiguous) property. The new attachment would be 8.3 and named Site Survey for the 7202 East 8th Avenue property. This additional attachment is for information purposes for the department to acknowledge that the two (2) properties are considered contiguous and does not reflect changes to the facility. The total acreage would be 4.46 acre (MOL) when both properties are considered contiguous. EQ has enclosed a check payable to the Department in the amount of \$10,000 as per F.S. 62-4.050.

Please call me at (813) 623-5302 ext. 235 if you require further information or have any questions.

Sincerely.

Steve Resendez

Compliance & Safety Manager

Cc: Bob Mulholland (EQFL)
Al Gephart (SWDEP)
Ron Cope (HEPC)
Bob Fox (SCS)
Scott Maris (EQ Corporate)

MATERIALS INSERTED INTO APPLICATION NOTEBOOK ON BOOK SHELF

FILE: 8-d





7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

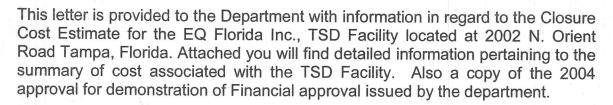
April 1, 2005

Department of Environmental Protection Twin Towers Office Building 2600 Blair Stone Road MS 4560 Tallahassee, Florida 32399

Attn: John Griffin

Re: Cost Estimates for 2005

I.D. No.: FLD 981 932 494



Please contact me at (813) 623-5302 extension 235 if additional information is needed.

Steve Resendez Compliance Manager

ınager

COST ESTIMATE FILES
IN PERMIT APPLICATION
NOTE BOOK ON SHELF

FILE: 8-d





Jeb Bush Governor

Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

October 15, 2004

Colleen M. Castille Secretary

Mr. Steve Reséndez EQ of Florida, Inc. 7202 East 8th Avenue Tampa, Florida 33619-3380

Re: FLD 981 932 494 EQ of Florida, Inc. 7202 East 8th Avenue Tampa, Florida 33619-3380

Subject: Financial Responsibility Compliance for 2004

Dear Mr. Reséndez:

The department has received the documentation submitted to demonstrate financial responsibility. The amendment number 1 to Comerica Bank letter of credit number 588011-02 effective March 22, 2004 indicates an amount of \$240,000 to cover the inflation adjusted closure cost. The corresponding standby trust fund agreement has been established on December 18, 2003 between EQ of Florida, the Grantor, and US Bank National Association, the Trustee. In addition, the American International Specialty Lines Insurance Company certificate of liability insurance policy number PLS2673560 effective August 1, 2002 shows the required coverage for sudden and nonsudden accidental occurrences.

Therefore, EQ of Florida is in compliance with the financial responsibility requirements of 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180 of the Florida Administrative Code.

If you have any questions, please contact Mr. Edgar Echevarría of my staff at 850-245-8793.

Sincerely,

Bryan Baker

Professional Geologist III

Hazardous Waste Regulation Section

BB/ee

cc: Ms. Elizabeth Sawyer, USEPA/Region 4
Mr. William Kutash, FDEP/Southwest District Office
FDEP File

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Jeb Bush Governor

Department of **Environmental Protection**

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

March 11, 2005

Colleen M. Castille Secretary

Bob Mulholland Technical Services Manager EQ Florida, Inc. 7202 East 8th Avenue Tampa, Florida 33619

SUBJECT: EQ Florida, Inc. (f.k.a US Liquids Southeast)

EPA I.D. Number: FLD 981 932 494 Operating Permit 34875-005-HO

Confirmatory Sampling Results for SWMU #3, Storm Water Retention

Pond

Hillsborough County

Dear Mr. Mulholland:

The Florida Department of Environmental Protection (FDEP) has completed its review of the submittals dated January 26, 2005 and March 2, 2005 regarding the Confirmatory Sampling of SWMU-3. Based on analysis of soil and groundwater samples taken on July 19, 2004 and January 28, 2005 SWMU-3 meets the residential soil clean up criteria. Therefore, SWMU-3 is unlikely to be contaminated. Therefore, this SWMU has been reclassified to No Further Action (NFA) at this time.

If you should have any questions, please contact Bheem Kothur at (850) 245-8781.

Sincerely,

Douglas G. Outlaw, P.E. III Hazardous Waste Regulation

DGO/bk

cc: Jon Johnston, EPA/Region 4
Rebecca Hoffman, EPA/Region 4
Al Gephart, DEP/Southeast District
Steve Resendez, EQ Florida, Inc. /Tampa
Judie Kean, DEP/Tallahassee

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FILE: 8-8

2



7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

March 8, 2005

MAR 0 9 2005

Department of Environmental Protection Hazardous Waste Management Section 2600 Blair Stone Road, MS 4555 Twin Towers Building Tallahassee, Florida 32399-2400

Attention: Bheem Kothur

Re: EQ Florida (Comments to November 9, 2004 Letter)

I.D. No.: FLD 981 932 494; Operating Permit No. 34875-005-HO

Mr. Kothur,

Attached you will find a map with the locations of the samples that were taken at the EQ Florida facility. This map will correspond with the samples identified in the letters dated 1/26/05 and 3/5/05.

Please call me at (813) 623-5302 ext. 235 if you require further information or have any questions.

Sincerely,

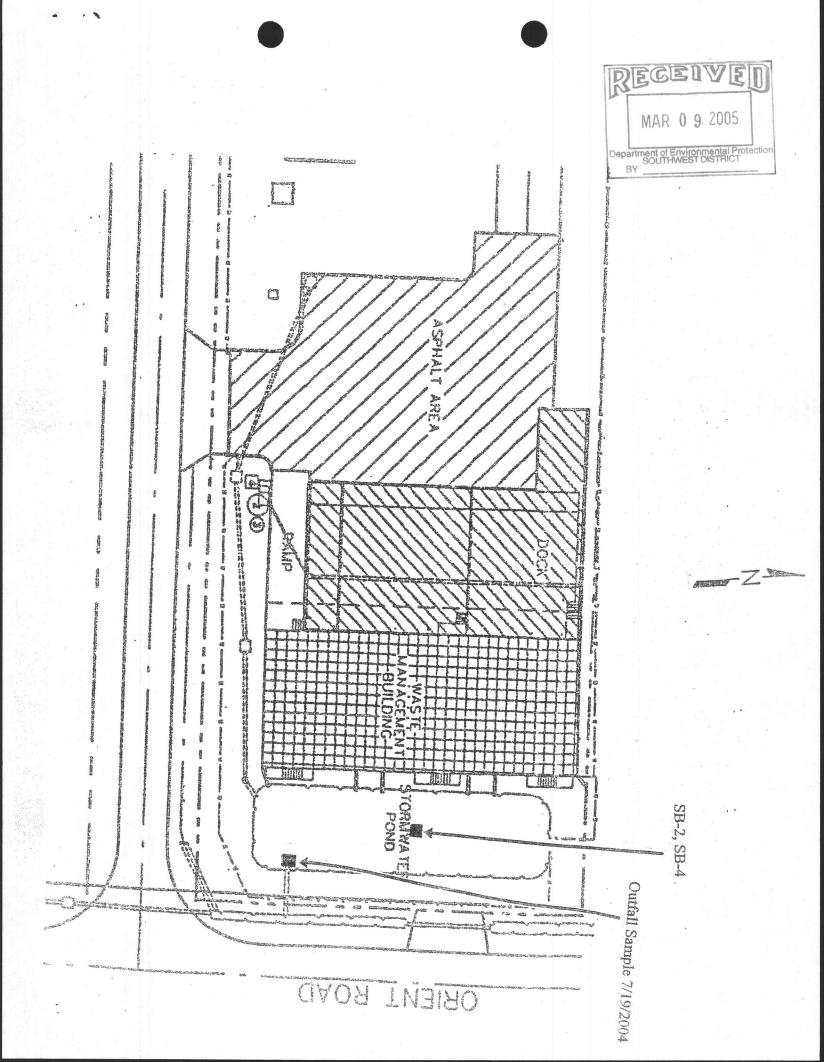
Steve Resendez

Compliance & Safety Manager

Cc: Bob Mulholland (EQFL)
Al Gephart (SWDEP)
Terry Griffin (HEPC)

Fik: 8-d









March 2, 2005

7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

Department of Environmental Protection Hazardous Waste Management Section 2600 Blair Stone Road, MS 4555 Twin Towers Building Tallahassee, Florida 32399-2400

Attention: Bheem Kothur

Re:

EQ Florida (Comments to November 9, 2004 Letter)

Southwest District Tampa I.D. No.: FLD 981 932 494; Operating Permit No. 34875-005-HO

Mr. Kothur,

This letter and information attached is a response to the letter dated November 9, 2004 and per our conversation during the month of January 2005. Attached you will find analytical data from the Storm water retention pond at the TSD facility located at 2002 Orient Road Tampa, Florida. The soil samples were taken at 2 feet below ground surface (bgs) and 4 feet bgs. Upon reviewing the data you will find that the COC (metals) were all below threshold limits. Samples are represented as SB-2 and SB-4, these samples were taken at the same location within the retention pond. As you will review the data, all samples are under threshold values set for commercial/industrial properties set forth in Chapter 62-777 Table 2 Soil Cleanup Target Levels. In conclusion EQ Florida request that the Department file No Further Action in the investigation on the 2002 Orient Road property.

Please call me at (813) 623-5302 ext. 235 if you require further information or have any questions.

Sincerely,

Steve Resendez

Compliance & Safety Manager

Cc: Bob Mulholland (EQFL) Al Gephart (SWDEP) Terry Griffin (HEPC)





February 11, 2005

Tim Dean EQ Florida, Inc. 2002 N. Orient Road Tampa, FL 33619

Re:

SunLabs Project Number:

050128.05

Client Project Description:

Drainage Ditch

Dear Mr. Dean:

Enclosed is the report of laboratory analysis for the following samples:

Sample Number	Sample Description	Date Collected
25772	SB-2	1/28/05
25773	SB-4	1/28/05

If you have any questions or comments concerning this report, please do not hesitate to contact us.

Sincerely,

Michael W. Palmer

Vice President, Laboratory Operations

Mudal W. Palmer

Enclosures

SunLabs, Inc. PO Box 350 Tampa, FL 33601 Cover Page 1 of 1

Unless Otherwise Noted and Where Applicable:

These samples were received at the proper temperature and were analyzed as received. The results here relate only to the items tested or to the samples as received by the laboratory. This report shall not be reproduced except in full, without the written approval of the laboratory. Results for all solid martices are reported on a dry weight basis. All samples will be disposed of within 45 days of the date of receipt of it samples. All results in the Dody of the report are environmental samples. All results in the Quality Con (CC) section are islaveled appropriately. All results meet the requirements of the NELAC standards. Foot are given at the end of the report. Uncertainty values are available upon request.

Phone: (813) 881-9401

Email: Info@SunLabsInc.com
Website: www.SunLabsInc.com



Report of Laboratory Analysis

SunLabs Project Number

050128.05

EQ Florida, Inc.

Project Description

Drainage Ditch

February 11, 2005

SunLabs Sample Number

25772

Matrix

Soil

Sample Designation

SB-2

Date/Time Collected

1/28/05 11:13

Date/Time Received 01/28/05 13:16

Parameters	Method	Units	Results	Date/Time Analyzed	Date/Time Prepped
Percent Moisture		***************************************			
% Moisture	160.3M	%	14	01/31/05	
Mercury					
Date Digested	7471		2/8/05	02/08/05 15:57	02/08/05 11:30
Date Analyzed	7471		2/8/05	02/08/05 15:57	02/08/05 11:30
Mercury	7471	mg/kg	0.10 U	02/08/05 15:57	02/08/05 11:30
Nickel					
Date Digested			2/2/05	02/11/05 14:20	02/02/05 14:20
Nickel	6010	ma/ka	1.0 U	02/11/05 14:20	02/02/05 14:20
RCRA Metals					
Date Digested	3050		02/02/2005		02/02/05 11:15
Date Analyzed	6010		2/8/05	02/08/05 14:33	02/02/05 11:15
Arsenic	6010	mg/kg	0.8 U	02/08/05 14:33	02/02/05 11:15
Barium	6010	mg/kg	62	02/08/05 14:33	02/02/05 11:15
Cadmium	6010	mg/kg	1.0 U	02/08/05 14:33	02/02/05 11:15
Chromium	6010	mg/kg	1.9	02/08/05 14:33	02/02/05 11:15
Lead	6010	mg/kg	1.3	02/08/05 14:33	02/02/05 11:15
Selenium	6010	mg/kg	1.0 U	02/08/05 14:33	02/02/05 11:15
Silver	6010	mg/kg	1.0 U	02/08/05 14:33	02/02/05 11:15



Report of Laboratory Analysis

SunLabs Project Number EQ Florida, Inc.

050128.05

Project Description

Drainage Ditch

February 11, 2005

SunLabs Sample Number

25773

Matrix

Soil

Sample Designation

Date/Time Collected

SB-4 1/28/05 11:15 Date/Time Received 01/28/05 13:17

······································					
Parameters	Method	Units	Results	Date/Time Analyzed	Date/Time Prepped
Percent Moisture					
% Moisture	160.3M	%	21	01/31/05	
Mercury					
Date Digested	7471		2/8/05	00/00/05 45.50	00/00/05 44 00
Date Analyzed	7471		2/8/05	02/08/05 15:58 02/08/05 15:58	02/08/05 11:30
Mercury	7471	mg/kg	0.10 U		02/08/05 11:30
	7771	mg/kg	0.10 0	02/08/05 15:58	02/08/05 11:30
Nickel					
Date Digested			2/2/05	02/11/05 14:22	02/02/05 14:20
Vickel	6010	ma/ka	2.1	02/11/05 14:22	02/02/05 14:20
RCRA Metals					
Date Digested	3050		02/02/2005		02/02/05 11:15
Date Analyzed	6010		2/8/05	02/08/05 14:37	02/02/05 11:15
Arsenic	6010	ma/ka	0.8 U	02/08/05 14:37	02/02/05 11:15
Barium	6010	mg/kg	22	02/08/05 14:37	02/02/05 11:15
Cadmium	6010	mg/kg	1.0 U	02/08/05 14:37	02/02/05 11:15
Chromium	6010	mg/kg	23	02/08/05 14:37	02/02/05 11:15
ead	6010	mg/kg	7.0	02/08/05 14:37	02/02/05 11:15
Selenium	6010	mg/kg	1.0 U	02/08/05 14:37	02/02/05 11:15
Silver	6010	mg/kg	1.0 U	02/08/05 14:37	02/02/05 11:15



Report of Laboratory Analysis

SunLabs Project Number

050128.05

EQ Florida, Inc.

Project Description

Drainage Ditch

February 11, 2005

Footnotes

LCS Laboratory Control Sample

LCSD Laboratory Control Sample Duplicate

MB Method Blank
MS Matrix Spike

MSD Matrix Spike Duplicate
RPD Relative Percent Difference

The analyte was not detected at or above the reported sample quantitation limit.

SunLabs, Inc. Chain of Custody

1/20/05/11:45 Project Name: Drawwag Ditch SUNLABS, INC. RESERVES THE RIGHT TO BILL FOR UNUSED/ Time: Time: Due Date Requested: Remarks / Comments: Date: Date: Date: Project #: PO#: Alt Bill To: Relinquished To: Relinquished To: Relinquished To: Prinklame / Affiliation: Print Name / Affiliation: Print Name / Affiliation: Print Name / Affiliation: Religguished By: 1 Relinquished By: Relinquished By: Relinquished By: 050128.0 KINZ 8 Y (N. 9NA 4 S SunLabs Project # Y / N / NA Y / N / NA Y / N / NA AN / N. / . Y John T. Shimes/Sunlabs Bottles VS = MeOH, OFW, + Ice # of Analysis / Method H = Hydrochloric Acid + Ice S = Sulfuric Acid + Ice Requested O = Other (Specify) Preservative Bottle Type Sample Time 11:13 1:15 Matrix Printed Name / Affiliation: Sample Condition Upon Recei 1295 Sample Date sample containers intact? Shipping Bills attached? Custody Seals present? N = Nitric Acid + Ice Preservative Codes: Internal Use Only I = Ice only Sample Description GVS = Low Level Volatile Kit Spec large 5B-3 つか-4 SW = Surface Water W = Water (Blanks) O = Other (Specify) T = Tedlar Bag 0 = Other SOL = Solid SO = Soil Client Name: CA Sampler Signature / Date: eived on Ice? Phone / Fax: E-Mail: Address: Confact: DW = Drinking Water GW = Ground Water SunLabs Bottle Tybe Codes; GA = Glass Amber Sample# Į. GV ≈ Glass Vial SE = Sediment Matrix Codes: P = Plastic S = Soil Jar A = Air



Jeb Bush Governor

Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

February 21, 2005

Colleen M. Castille Secretary

Mr. Steve Resendez, Compliance Manger EQFlorida, Inc. 7202 East 8th Avenue Tampa, Florida 33619

RE: Cost Estimates for 2005 Financial Assurance

EQFlorida, Inc. FLD 981 932 494

Dear Mr. Resendez:

The Department is in receipt of the estimated cost to complete closure at the EQFlorida, Inc. dated January 25, 2005. The Department has reviewed the cost estimates. The Department has concluded that the table summaries do not provide the level of detail necessary to review and verify the costs.

The cost estimate for a closure requires a detailed written cost estimate in undiscounted current dollars and shall equal the estimated cost of completing closure at the facility [Rule 62-730.180(7)(a)].

A detailed cost estimate submitted to the Department must include both capital costs and closure costs. The capital costs shall include but not be limited to costs for engineering, site preparation, materials, labor, sampling/analysis, waste management/disposal, permitting, health and safety measures, etc. The closure costs shall include labor, training, sampling and analysis, maintenance materials, utilities, waste disposal and /or treatment, etc. Costs shall be calculated as the total net present value of the capital costs and closure costs. The cost estimate shall include a specific itemization for all aspects of the closure plan, and any contingency plan, including the following: man hours, equipment, volume of material used or removed, mobilization and demobilization, number of hours to perform each task, sampling and analysis, inspections, deed notation, attorney fees, engineering cost, certification cost, and contingency allowance.

"More Protection, Less Process"

Printed on recycled paper.

File: 8-d 9/05 Mr. Steve Resendez Page 2 of 2 February 21, 2005

Please submit a detailed cost estimate based on the 2005 cost estimate summary table and these requirements to the Department within 45 days. If you should have any further questions, please contact John E. Griffin at (850) 245-8785.

Sincerely,

Doug Outlaw, P. E. III

Hazardous Waste Regulation

DO/jeg

Cc: Bill Kutash, DEP/Tampa



7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

January 26, 2005

Department of Environmental Protection Hazardous Waste Management Section 2600 Blair Stone Road, MS 4555 Twin Towers Building Tallahassee, Florida 32399-2400

Attention: Bheem Kothur

Re: EQ Florida (Comments to November 9, 2004 Letter)

I.D. No.: FLD 981 932 494; Operating Permit No. 34875-005-HO

Mr. Kothur,

This letter and information attached is a response to the letter dated November 9, 2004 and per our conversation during the month of January 2005. Attached you will find analytical data from the Storm water retention pond at the TSD facility located at 2002 Orient Road Tampa, Florida. Upon reviewing the data you will find that the COC (metals) were all below threshold limits. At this time EQ has retained services to conduct soil sampling within the retention pond and to analyze the samples for Total metals. Upon receiving and reviewing the data provided by the Certified Laboratory, EQ will provide further comments and data to the Department.

Please call me at (813) 623-5302 ext. 235 if you require further information or have any questions.

Sincerely.

Steve Resendez

Compliance & Safety Manager

Cc: Bob Mulholland (EQFL)
Al Gephart (SWDEP)
Terry Griffin (HEPC)

File: 8-2 8/05



6712 Benjamin Road, Suite 100 - Tampa FL 33634 Telephone:(813) 885-7427 Fax:(813) 885-7049

Analytical Report

For: Dr. Bruce Nocita

HSW Environmental Consultants 3820 Northdale Blvd., Suite 210B

Tampa, FL 33624

Order Number: B423580

Client Project ID: 1AQ200302

Project: EQ Florida Report Date: 07/29/2004

Sampled By: Client

Sample Received Date: 07/19/2004

Requisition Number: Purchase Order:

SDG Number:

Nancy Robertson, Project Manager nrobertson@stl-inc.com

The test results in this report meet all NELAP requirements for parameters for which accreditation is required or available. Any exceptions to NELAP requirements are noted in this report. Pursuant to NELAP, this report may not be reproduced, except in full, without the written approval of the laboratory.



6712 Benjamin Road, Suite 100 - Tampa FL 33634 Telephone: (813) 885-7427 Fax: (813) 885-7049

Sample Summary

Order: B423580

Date Received: 07/19/2004

Client: HSW Environmental Consultants

Project: EQ Florida

Client Sample ID
OUTFALL 001

Lab Sample ID B423580*1 **Matrix** Liquid Date Sampled 07/19/2004 12:05



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Lab Sample ID Description	n		Matrix	Date Received	Date Sampled SDG#
23580-1 OUTFALL 00	1		Liquid	07/19/04	07/19/04 12:05
		Lab Sam	ole IDs		
Parameter	Units	23580-1			
ICP Metals (6010)					
Arsenic	mg/l	0.0038U			
Cadmium	mg/l	0.00071U			
Lead	mg/1	0.0058			
Magnesium	mg/1	0.43I			
Selenium	mg/1	0.0048U			
Silver	mg/l	0.0019U			
Dilution Factor	mg/ r	1			
Prep Date		07/20/04			
Analysis Date		07/27/04			
Batch ID		40720I			
Mercury (7470)					
Mercury	mg/1	0.000072U			
Dilution Factor	mg/ t	1			
Prep Date		07/27/04			
Analysis Date		07/27/04			
Batch ID		40727T	*		
Hardness as CaCO3 (2	340B)				
Hardness as CaCO3	mg/7	38			
Prep Date	a/ ·	07/20/04			
Analysis Date		07/27/04		•	
Batch ID		40720I			



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Lab Sample ID	Description			Matrix	Date Received	Date Sampled	SDG#
23580-1	OUTFALL 001			Liquid	07/19/04	07/19/04 12:05	
			Lab Sample	n IDs			
Parameter		Units	23580-1				
Ammonia-	N (350.3)						75
Ammonia-N		mg/l	0.061				
Dilution Fact	or	mg/ i	1				
Analysis Date			07/26/04				
Batch ID			0726Y				
Chemi cal	Oxygen Demand	(SM5220C)					
Chemical Oxyg	en Demand	mg/1	200				
Dilution Fact	or		1				
Prep Date			07/21/04				
Analysis Date			07/23/04				
Batch ID			0721E	8			
Cyanide	(335.2)						
Cyanide		mg/l	0.0050U				
Dilution Fact	or		1				
Analysis Date			07/27/04				
Batch ID			0727FF				



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Lab Sample I	D Description			Matrix	Date Received Da	ate Sampled	SDG#
23580-2	Method Blan	k	:	Liquid	07/19/04		
			Lab Sample	e IDs			
Parameter		Units	23580-2				
ICP Met	als (6010)						
Arsenic		mg/1	0.0038U				
Cadmium Lead		mg/l	0.00071U				
		mg/l	0.0015U				
Magnesium Selenium		mg/l	0.110				
Silver		mg/l	0.0048U				
Dilution Fac	ton	mg/l	0.00190				
Prep Date	rol.		1				
Analysis Date	•		07/20/04				
Batch ID	C		07/27/04				
baccii 1D			407201				
Mercury	(7470)						
Mercury		mg/l	0.000072U				
Dilution Fact	tor	3.	1				
Prep Date			07/27/04				
Analysis Date	e		07/27/04				
Batch ID			40727T				
Ammonia-	-N (350.3)						
Ammonia-N		mg/I	0.040U				
Dilution Fact	tor		1				
Analysis Date	9		07/26/04				
Batch ID			0726Y				
			37601				



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Lab Sample ID Description	1		Matrix Date Received Date Sampled St	DG#
23580-2 Method Blar	nk	Lab Sample IDs	Liquid 07/19/04	
Parameter	Units	23580-2		
Chemical Oxygen Demar	nd (SM5220C)		RECEIVE	
Chemical Oxygen Demand Dilution Factor	mg/l	200	JAN	
Prep Date		07/21/04	By South Environ	/
Analysis Date Batch ID		07/23/04 0721E	Department of Environmental Projection	/
Cyanide (335.2)				
Cyanide	mg/l	0.0050U		
Dilution Factor		1		
Analysis Date		07/27/04		
Batch ID		0727FF		



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Lab Sample ID	Description				Matrix Date	Received Date Sa	supled SDG#		
23580-3	Lab Control	Standard % Rec	overy		Liquid 07/19/04				
23580-4	Lab Control	Standard Dupli	cate % Recovery		Liquid 07/19/04				
23580-5	Precision (%	RPD) of LCS/LC	SD		Liquid 07/19/04 Liquid 07/19/04				
23580-6	LCS Accuracy	Control Limit	(%R)						
23580-7	LCS Precisio	n Control Limi	t (Advisory) %RPD		Liquid 07/19				
				Sample IDs					
Parameter		Units	23580-3	23580-4	23580-5	23580-6	23580-7		
ICP Metal	ls (6010)								
Arsenic		%	102 %	99 %	3.0 %	75-125 %	<20 %		
Cadmium		%	105 %	100 %	4.5 %	75-125 %	<20 %		
Lead		%	108 %	103 %	4.5 %	75-125 %	<20 %		
Magnesium		%	103 %	99 %	3.7 %	75-125 %	<20 %		
Selenium		%	100 %	98 %	3.0 %	75-125 %	<20 %		
Silver		%	94 %	92 %	2.8 %	75-125 %	<20 %		
Dilution Facto	or		1	1	200 //	.5 115 %	20 %		
Prep Date			07/20/04	07/20/04					
Analysis Date			07/27/04	07/27/04					
Batch ID			407201	40720I	40 7 20I				
Mercury ((7470)								
Mercury		%	98 %	100 %	2.4 %	80-120 %	<20 %		
Dilution Facto	or		1	1					
Prep Date			07/27/04	07/27/04					
Analysis Date			07/27/04	07/27/04					
Batch ID			40727T	40727T	40727T				
Ammonia-N	(350.3)								
Ammonia-N		%	99 %	98 %	1.0 %	85-115 %	<30 %		
Dilution Facto	r		1	1					
Analysis Date			07/26/04	07/26/04					
Batch ID			0726Y	0726Y	0726Y				



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Lab Sample ID	Description		ä		Matrix [Date Rece	ived Date Si	ampled SDG#
23580-3	Lab Control S	tandard % Rec	covery		Liquid (07/19/04		
23580-4	Lab Control S	tandard Dupli	cate % Recovery			07/19/04		
23580-5	Precision (%R)	PD) of LCS/LC	CSD		* CO 10 10 10	07/19/04		
23580-6	LCS Accuracy	Control Limit	: (%R)			07/19/04		
23580-7	LCS Precision	Control Limi	t (Advisory) %RPD			07/19/04		
				Sample IDs				
Parameter		Units	23580-3	23580-4	23580-5	5	23580-6	23580-7
Dilution Facto Prep Date Analysis Date Batch ID	r		1 07/21/04 07/23/04 0721E	97 % 1 07/21/04 07/23/04 0721E	1.4 % 0721E		80-120 %	<40 %
Cyanide (335.2)							
Cyanide Dilution Facto Analysis Date	•	%	88 % 1 07/27/04	88 % 1 07/27/04	0 %		80-120 %	~25 %
Batch ID			0727FF	0727FF	0727FF			



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Lab Sample ID	Description				Matrix Date I	leceived Date Sa	mpled SDG#		
23580-8	Matrix Spike	_			Liquid 07/19/	′04			
23580-9	Matrix Spike	Duplicate % R	ecovery		Liquid 07/19/	04			
23580-10	Precision (%				Liquid 07/19/04				
23580-11	MS Accuracy A	Advisory Limit	(%R)		Liquid 07/19/	′04			
23580-12	MS Precision	Advisory Limi	t (%RPD)		Liquid 07/19/	′04			
			Lab S	Sample IDs					
Parameter		Units	23580-8	23580-9	23580-10	23580-11	23580-12		
ICP Metal:	s (6010)								
Arsenic		%	103 %	102 %	0.60 %	75–125 %	<20 %		
Cadmium		%	105 %	103 %	1.6 %	75-125 % 75-125 %	<20 %		
Lead		%	108 %	107 %	1.2 %	75-125 % 75-125 %			
Magnesium		%	102 %	102 %	0.13 %	75-125 % 75-125 %	<20 % <20 %		
Selenium		%	101 %	101 %	0.06 %	75-125 % 75-125 %	<20 % <20 %		
Silver		%	95 %	95 %	0.11 %	75-125 %	<20 %		
Dilution Factor	r	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	1	1	V.II //		<20 %		
Prep Date			07/20/04	07/20/04		At the last			
Analysis Date			07/27/04	07/27/04		k ias			
Batch ID			40720I	407201	407201	K 12.5			
Mercury (7470)								
Mercury		%	97 %	98 %	1.1 %	80-120 %	<20 %		
Dilution Factor	r		1	1			20 /0		
Prep Date			07/27/04	07/27/04					
Analysis Date			07/27/04	07/27/04					
Batch ID			40727T	40727T	40727T				
Ammonia-N	(350.3)								
Ammonia-N		%	99 %	100 %	1.0 %	85-115 %	<30 %		
Dilution Factor	•		1	1					
Analysis Date			07/26/04	07/26/04					
Batch ID			0726Y	0726Y	0726Y				



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ran sample m	Description				Matrix	Date Rece	rived Date	Sampled SDG#
23580-8	Matrix Spike S	% Recovery			Liquid	07/19/04		
23580-9	Matrix Spike I	Duplicate % Re	ecovery		Liquid	07/19/04		
23580-10	Precision (%R)	PD) MS/MSD			Liquid	07/19/04		
23580-11	MS Accuracy A	dvisory Limit	(%R)		Liquid	07/19/04		
23580-12	MS Precision	Advisory Limit	: (%RPD)		Liquid	07/19/04		
			Lab S	Sample IDs				
Parameter		Units	23580-8	23580-9	23580	-10	23580-11	23580-12
Chemical Oxyge	en Demand	%	109 %	105 %	3.79	4	80-120 %	<40 %
Chemical Oxyge Dilution Facto Prep Date Analysis Date		%	109 % 1 07/21/04 07/23/04	105 % 1 07/21/04 07/23/04	3.7 %		80-120 %	<40 %
Dilution Facto Prep Date Analysis Date Batch ID	or	%	1 07/21/04	1 07/21/04	3.7 9 0721E		80-120 %	<40 %
Dilution Facto Prep Date Analysis Date Batch ID Cyanide (or		1 07/21/04 07/23/04	1 07/21/04 07/23/04			80-120 %	<40 %
Dilution Facto Prep Date Analysis Date Batch ID Cyanide (Cyanide	or (335.2)	%	1 07/21/04 07/23/04	1 07/21/04 07/23/04			80-120 % 80-120 %	<40 % <25 %
Dilution Facto Prep Date Analysis Date Batch ID	or (335.2)		1 07/21/04 07/23/04 0721E	1 07/21/04 07/23/04 0721E	0721E			



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Lab Sample ID Desc	ription			Matrix	Date Received	Date Sampled	SDG#
	e Amount Added, MS	1		Liquid	07/19/04		
	e Amount Added, MSD			Liquid	07/19/04		
23580-15 MS/M	ISD Sample ID			Liquid	07/19/04		
		Lab S	Sample IDs				
Parameter	Units	23580-13	23580-14	2358	0-15		
ICP Metals (60	10)			,			
Arsenic	mg/l	1.0	1.0	42358	30-1		
Cadmium	mg/l	1.0	1.0	42358			
Lead	mg/l	1.0	1.0	42358			
/agnesium	mg/l	1.0	1.0	42358			
Selenium	mg/1	1.0	1.0	42358			
Silver	mg/l	1.0	1.0	42358	30-1		
Batch ID		40720I	40720I	40720			
Mercury (7470)							
Mercury	mg/∏	0.00100	0.00100	23580)_1		
Batch ID		40727T	40727T	40727	_		
Ammonia-N (350	.3)						
mmonia-N	mg/l	1.0	1.0	23580	L-1		
Batch ID		0726Y	0726Y	0726Y	_		
Chemical Oxygen	n Demand (SM5220C)						
Chemical Oxygen Dema	and mg/1	150	150	23494	-1		
Batch ID		0721E	0721E	0721E	_		



STL Tampa

6712 Benjamin Road, Suite 100 - Tampa FL 33634 Telephone: (813) 885-7427 Fax: (813) 885-7049

Analytical Data Report

Lab Sample ID	Description			Matrix	Date Received	Date Sampled	SDG#
23580-13	Spike Amount Added, MS			Liquid	07/19/04	(D)	
23580-14	Spike Amount Added, MSD			Liquid	07/19/04	NEG	
23580-15	MS/MSD Sample ID			Liquid	07/19/04	1	FIVE
		Lab S	Sample IDs	•			15/16
Parameter	Units	23580-13	23580-14	2358	/	Department 2	7 200
Cyanide ((335.2)			A A Marine in a constitution of the second		BY SOUTH ENVIRON	2005 Strict of ection
Cyanide Batch ID	mg/l	0.050 0727FF	0.050 0727FF	2371 0727			ollon



STL Tampa

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Analytical Data Report

Lab Sample ID	Description				Matrix	Date Received	Date Sampled	SDG#
23580-16 23580-17		uantitation Limi			Liquid Liquid	07/19/04 07/19/04		
				Sample IDs				
Parameter		Units	23580-16	23580-17				
ICP Meta	īls (6010)				1			
Arsenic		mg/l	0.010	0.0038				
Cadmium		mg/1	0.0050	0.00074				
Lead		mg/T	0.0050	0.0015				
Magnesium		mg/l	0.50	0.11				
Selenium		mg/1	0.0048	0.0048				
Silver		mg/1	0.0019	0.0019				
Mercury	(7470)							
Mercury		mg/l	0.00020	0.000072				
Ammonia-	N (350.3)							
Ammonia-N		mg/l	0.050	0.040				
Chemical	Oxygen Demand	(SM5220C)						
Chemical Oxyg	en Demand	mg/I	20	20				
Cyanide	(335.2)							
Cyanide		mg/1	0.010	0.0050				



STL Tampa

6712 Benjamin Road, Suite 100 - Tampa FL 33634 Telephone: (813) 885-7427 Fax: (813) 885-7049

Order Number: B423580

Methods: EPA SW-846, FDEP DOH Certification #E84282

U = Indicates that the compound was analyzed for but not detected.

 ${\bf I}$ = The reported value is between the laboratory method detection limit and the laboratory practical quantitation limit.

These test results meet all the requirements of NELAC. All questions regarding this test report should be directed to the STL project manager who signed this test report.

The estimated uncertainty associated with these reported results is available upon request.

Website: www.stl-inc.com Phone: (813) 885-7427 Fax: (813) 885-7049		PAGE OF	STANDARD REPORT DELIVERY	DATE DUE	EXPEDITED REPORT DELIVERY (SURCHARGE)	DATE DUE	NUMBER OF COOLERS SUBMITTED PER SHIPMENT:	REMARKS	als = As	Cd, Pb, Hs, Se, Ag						DATE TIME	DATE TIME			CONTROL CONTRO
	cation Phone: Fax:	REQUIRED ANALYSIS						NUMBER OF CONTAINERS SUBMITTED								RELINQUISHED BY: (SIGNATURE)	RECEIVED BY: (SIGNATURE)	ならら	REMARKS	
STL Tampa 6712 Benjamin Road, Suite 100 Tampa, FL 33634	Alternate Laboratory Name/Location	REQUIRE	(,Th	HENDING OF COLNER	mon mon (en)	Am Charles Cha	ENZY WON BZ SONEONS		Longo							DATE TIME	38 7-19-04 1312	USE BNIY FELD 16Pd down	STL TAMPA LABORATORY LOG NO. 647358	
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DAILY LOG

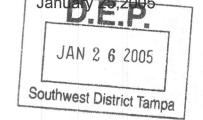
Project No:	AQ 200302	Page of								
Location:	. Q Florida	Date: 7 19 04								
Borehole(s):		Prepared By: BWN	*** (*** **** /***							
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1/20	Pick up fresh co	oler from lab, head to								
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7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

Department of Environmental Protection Hazardous Waste Regulation Section 2600 Blaristone Road, MS-4560 Tallahassee, Florida 32399-2401

Attn: Edgar Echevarria



Re:

Financial Assurance

I.D. No.:FLD 981 932 494

This letter is provided to the Department with information in regard to the demonstration financial assurance for EQ Florida Inc. TSDF facility located at 2002 N. Orient Road Tampa, Florida.

Current cost for closure is \$234,883.57 (for TSDF operations only) with inflationary increases to date. The current Letter of Credit (on file) of \$240,000 exceeds this cost and provides for the July, 2004 increase of 1.016% which will bring the estimated closure cost to \$238,641.70

Please contact me at (800) 624-5302 extension 235 if additional information is needed.

Steve Resendez

Compliance Manager

Cc: Al Gephart (FDEP)

File: 8-d



7202 EAST 8TH AVENUE • TAMPA, FLORIDA 33619 • TEL 800 624 5302 • FAX 813 628 0842 • www.eqonline.com

January 25,2005

Department of Environmental Protection Southwest District 3804 Coconut Paml Drive Tampa, Florida 33619

Attn: Albert Gephart

Re: Waste Minimization 2005

I.D. No.: FLD 981 932 494

This letter is provided to the Department with information in regard to the concern of Waste Minimization for EQ Florida Inc., TSD facility located at 2002 N. Orient Road Tampa, Florida.

Although Waste Minimization at our facility is on a small-scale effort, as we generate little to no waste in addition to that received. As required, EQ Florida continues to reduce the volume and toxicity of waste generated to the degree determined to be economically practicable.

The operations at EQFL consist of waste consolidation and offsite shipping for disposal. These operations generate less than 1% of waste (PPE) from our facility. Due to the insignificant volume that EQFL generates this practice does not leave any opportunity in waste reduction. PPE and clean-up absorbents and materials are utilized on an as needed basis to protect personnel from exposure and threat to the environment.

EQ Florida certifies that the use of PPE and absorbent clean-up materials are limited to minimum quantities to conduct daily operations at the facility. EQ Florida continues to comply with the requirements of the waste minimization program set by the Department and will continue to research for ways that it can assist in reducing harm to human health and the environment.

Please contact me at (813) 623-5302 extension 235 if additional information is needed.

Steve Resendez

Compliance Manager

Fife: 8-d 6/05







FLORIDA, Inc.

7202 EAST 8TH AVENUE - TAMPA, FLORIDA 33619 - TEL 800 624 5302 - FAX 813 628 0842 - www.eqonline.com

To:Doug Outlaw

Department of Environmental Quality

2600 Blair Stone Road

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Tallahassee, Florida 32399-2400

Sub: Summary of Information for Historic Investigations Conducted at EQ Florida

EPA I.D. No. FLD 981 932 494

From: Steve Resendez

Compliance & Safety Manager

Dear Mr. Outlaw:

I have reviewed the letter that was sent on November 19th, 2004 relating to the EQ Florida historic investigations. Upon review of the comments in Attachment II it appears that comment 7 relates to the approval of Confirmation Sampling Report 4/22/1998. At this time comment 7 from Attachment II does not supply sufficient information of any action to be conducted. If their is any editorial errors in the letter please contact me upon reviewing the data. If further information is required or if you have any questions please contact me at (813) 623-5302 ext. 235.

Steve Resendez

Compliance Coordinator

EQ Florida, Inc.

RECEIVED RCRA DEC 2 1 2004

Hazardous Waste Regulation

Post-it* Fax Note	7671	Date 1	17/05	# of pages	5_
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Phone * 813-744	-6101 Bei	Phone #	850-	215-8	781
Fax #913 - 744	6125	Fax #	818-	245-8	810.

FILE: 8-d



Jeb Bush Governor

Department of Environmental Protection

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400 November 19, 2004

Colleen M. Castille Secretary

Mr. Bob Mulholland Technical Services Manager U.S. Liquids Southeast 7202 East 8th Avenue Tampa, Florida 33619

Subject: Summary of Information For Historic Investigations Conducted at the EQ Florida f.k.a. (U.S. Liquids Southeast (USL) site), EPA I.D. No. FLD 981 932 494; Operating Permit No. 34875-005-HO

Dear Mr. Mulholland:

The Florida Department of Environmental Protection (FDEP) and U.S. Environmental Protection Agency (EPA) have received and reviewed "Historic Investigations Conducted at U.S. Liquids Southeast Site". The facility has conducted, completed and documented the requirements in HSWA Part II-Confirmatory Sampling (CS), Appendix A, and A.3 Solid Waste Management Unit Summary, in accordance with the permit issued in March 26, 2002. The facility must respond to Comment No. 7 in Attachment II within 30 days upon receipt of this letter. Otherwise, the Department will require appropriate action to complete assessment and remediate the unit.

Please contact Bheem Kothur at (850) 245-8781 if you have any questions.

Sincerely,

Doug Outlaw, P.E. III

Hazardous Waste Regulation Section

DO/bk

Enclosures

cc: Jon Johnston, EPA/Region 4
Al Gephart, DEP/Southeast District
Terry W. Griffin, HSW/Tampa

Elizabeth Foeller, SCS Engineering/Tampa Judie Kean, DEP/Tallahassee 850-921-

ATTACHMENT I

Enclosed are EPA's Comments and FDEPs responses on Summary of Information For Historic Investigations Conducted at the U.S. Liquids Southeast (USL) Site, dated June 19, 2002.

1. Sampling was performed at this site before the current facility was even constructed. This information is very important. The fact that the sampling took place, along with the results, should be discussed in this document. The results of this earlier sampling should also be compared to sampling results obtained from assessments. Please review the data and revise the report.

FDEP Response:

Facility was submitting the sampling data to the Department and EPA prior to their facility construction in 1990 and also in 1994 to evaluate the current conditions at the time of construction. Department reviewed and compared the results of this earlier sampling to sampling results obtained from assessments. It appears that the site conditions are very similar. Initial groundwater monitoring data collected on November 1989, May 1992, June 1994, and June 1996 indicates that the monitoring wells MW-1 and MW-3 appear to be background wells. (See Table 1; reference report item 2 and Attachment II).

2. Page 1: Site Background

This paragraph identifies the location of Helena Chemical as Northwest of USL. Helena, according to the figures presented, appears to be located North of one portion of the site and Northeast of the other. Please vertify and revise as appropriate.

FDEP Response:

Please note that Helena Chemical Plant is to North of USL but continues to Northwest. This is just a clarification from these maps (see reference report item 3 and Attachment II).

3. Page 3: Phase I ESA with Limited Phase II Sampling and Testing

Paragraph 3 states that the USL site has been remediated and a finding of no further action has been obtained from FDEP. It is not clear from this description when remediation was performed and what remediation was performed. Is there a dated letter from FDEP stating that no further action was necessary? This should be mentioned along with the date of the letter. Please revise the report as appropriate.

850-921

In January 1996, three Underground Petroleum Storage Tanks were removed from the USL site. The Site Assessment Report for Underground Petroleum Storage Tanks was prepared dated September 15, 1999, and a Site Rehabilitation Completion Order was issued on December 22, 2000. A Site Assessment Rreport Addendum for Underground Petroleum Storage Tank was prepared on August 4, 2000. No further action was recommended. (See reference report item 5 and Attachment II).

EPA issued a letter dated April 22, 1998 stating that NFA at this time at SWMU #3, Stormwater Retention Pond.

A figure should be included that clearly identifies the site and labels all solid waste management units.

FDEP Response:

A figure was included in the Confirmatory Sampling Workplan Report dated March 1997 and submitted in January 22, 2002 by USL. (See reference report item 2 Attachment II).

5. One of the items requested by EPA was the latest groundwater sampling results. These results should be included with this report or their absence should be explained.

FDEP Response:

Technical memorandum prepared by ENSAFE, Inc. for HCC dated August 22, 2001 includes groundwater monitoring results indicating that the offsite contamination is controlled by HCC. MW-28, 29, 30 and 31 were installed in March 2001. Sampling results indicate BDL for Total Pesticides at all wells except MW-28 where it was detected 6.87 mg/l.

Attachment A is full of figures representing a remedial investigation of soil and groundwater at Helena Chemical, apparently in 1994. A summary should be included with these figures explaining why they were included, what they represent and how this correlates with USL and the contamination found at the USL site. Please revise the report as appropriate.

FDEP Response:

In 1996, HSW prepared a Groundwater Monitoring Update for the USL site. The purpose of this report was to continue observation of contaminants found in the surficial aquifer at MW-1 through MW-4 and to determine the potential source of these contaminants, if any. On June 5, 1996, surficial aquifer groundwater samples from MW-1 through MW-4 were collected and analyzed for VOCs, Semi-Volatile Organic Compounds (SVOCs) chlorinated herbicides, chlorinated pesticides, and organophosphous. Results from these samples showed concentrations of arsenic, cadmium, chromium, lead, and nickel above regulatory thresholds.

Other contaminants observed at these monitoring wells included aldrin, alpha-BHC, gamma-BHC, 2,4-D, benzene, 1,4-dichlorobenzene, and 2,4-dichlorophenol detected in concentrations above regulatory thresholds.

Based on the type of contaminants found at MW-1 through MW-4, information provided through various reports, review of groundwater data, flow maps, and regulatory files, FDEP identifies HCC as the primary potential contributor of the pesticides, PAHs, VOCs and metals observed in the groundwater at the USL site. However, HCC is not a primary potential contributor of metals. Therefore, USL must provide the source of the metals contamination.

7. Page 9: Conclusions

850-921

A number of conclusions were drawn but no reports, documents, letters or footnotes were given to support the conclusions. Please provide the appropriate information.

FDEP Response:

Upon review of additional information, reports, data, and letters of correspondence between USL, FDEP and EPA, FDEP concludes that the studies of the extent of contamination at the HCC site indicates that contamination has extended south of the property boundary, generally following the surficial aquifer hydraulically upgradient of the USL facility; thus, chemicals released from the HCC facility generally flow south, southeast, and southwest toward the USL site.

Based on these facts, FDEP concludes that the releases documented from the HCC site can reasonably be expected to be the source of the low concentrations of PAHs observed in the soil at SWMU #3 at the USL site. According to the HCC report by ENSAFE dated August 2001, the contamination has migrated off-site and towards the USL facility and beyond, and at present it is under control and showing below detection limits in monitoring wells 25, 26, 27, 28, 29, 30, and 31.

Based on all of these information and documentation FDEP recommends that the SWMU #3 Stormwater Retention Pond is recommended for to provide the data and documentation of metals contamination to justify NFA at the site.

850-921

<u> ATTACHMENT – II</u>

- 1. Summary of Information For Historic Investigations conducted at the USL site, dated June 19, 2002.
- 2. Confirmatory Sampling Work Plan, City Environmental Services Facility, prepared by HSWA Environmental consultants, Inc. dated March 1997 and submitted to the Department on January 22, 2002.
- 3. Technical Memorandum, Helena Chemical Company (HCC) prepared by ENSAFE Inc. Report dated August 22, 2001.
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- RCRA/HSWA Permit, I need dated March 26, 2002.
- 13. RCRA Facility Assessment (RFA) Report dated March 30, 1995.

November 19, 2004

Mr. Bob Mulholland Technical Services Manager U.S. Liquids Southeast 7202 East 8th Avenue Tampa, Florida 33619

Subject: Summary of Information For Historic Investigations Conducted at the EQ Florida f.k.a. (U.S. Liquids Southeast (USL) site), EPA I.D. No. FLD 981 932 494; Operating Permit No. 34875-005-HO

Dear Mr. Mulholland:

The Florida Department of Environmental Protection (FDEP) and U.S. Environmental Protection Agency (EPA) have received and reviewed "Historic Investigations Conducted at U.S. Liquids Southeast Site". The facility has conducted, completed and documented the requirements in HSWA Part II-Confirmatory Sampling (CS), Appendix A, and A.3 Solid Waste Management Unit Summary, in accordance with the permit issued in March 26, 2002. In recommending further action for SWMU 3, Retention pond, the attached documents and the responses are addressed:

Please contact Bheem Kothur at (850) 245-8781 if you have any questions.

Sincerely,

Doug Outlaw, P.E. III Hazardous Waste Regulation Section

DO/bk

Enclosures

cc: Jon Johnston, EPA/Region 4
Al Gephart, DEP/Southeast District
Terry W. Griffin, HSW/Tampa

Elizabeth Foeller, SCS Engineering/Tampa Judie Kean, DEP/Tallahassee

> File: 8-d 4/04

ATTACHMENT I

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FDEP Response:

Facility was submitting the sampling data to the Department and EPA prior to their facility construction in 1990 and also in 1994 to evaluate the current conditions at the time of construction. Department reviewed and compared the results of this earlier sampling to sampling results obtained from assessments. It appears that the site conditions are very similar. Initial groundwater monitoring data collected on November 1989, May 19, 92, June 19, 94, and June 19, 96 indicates that the monitoring wells MW-1 and MW-3 appear to be background wells. (See Table 1; reference report item 2 and Attachment II).

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- 13. RCRA Facility Assessment (RFA) Report dated March 30, 1995.

Contaminant	MCL			th high				ith high	HCMW with Concen		
	GWCTLs	Concentration, mg/l				Concentration, mg/l					
			M	W-1			M	W-3			
		11/89	5/92	6/94	6/96	11/89	5/92	6/94	6/96	MW-25 31	MW-26
A-BHC (608-Organochlorine Pesticides and PCBs)	0.02			20	23	350		300	530	0.37	0.05
Naphthalene	20	36		27				5.3			
Arsenic	50		130	112	149	70	220	75	57		
Cadmium							21	10	5		
Chromium	100					110	350	238	52		a ² , a
Lead	15			14.6	9.5	1.8		35	61		
Benzene	1					17	3.7	11	6.9		, F - c
Chlorobenzene	100		9								
1,2-Dichlorobenzine	600			Si		43		**************************************			
1,4-Dichlorobenzene	75				***************************************	110	22	100	76		lead of the second seco
1,2-Dichloropropane	5						34	5			



Jeb Bush Governor OCT 2 5 2004

Poartment of Environmental Protection
By

Twin Towers Office Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400

October 15, 2004

Colleen M. Castille Secretary

Mr. Steve Reséndez EQ of Florida, Inc. 7202 East 8th Avenue Tampa, Florida 33619-3380

Re: FLD 981 932 494 EQ of Florida, Inc. 7202 East 8th Avenue Tampa, Florida 33619-3380

Subject: Financial Responsibility Compliance for 2004

Dear Mr. Reséndez:

The department has received the documentation submitted to demonstrate financial responsibility. The amendment number 1 to Comerica Bank letter of credit number 588011-02 effective March 22, 2004 indicates an amount of \$240,000 to cover the inflation adjusted closure cost. The corresponding standby trust fund agreement has been established on December 18, 2003 between EQ of Florida, the Grantor, and US Bank National Association, the Trustee. In addition, the American International Specialty Lines Insurance Company certificate of liability insurance policy number PLS2673560 effective August 1, 2002 shows the required coverage for sudden and nonsudden accidental occurrences.

Therefore, EQ of Florida is in compliance with the financial responsibility requirements of 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180 of the Florida Administrative Code.

If you have any questions, please contact Mr. Edgar Echevarría of my staff at 850-245-8793.

Sincerely,

Bryan Baker

Professional Geologist III

Hazardous Waste Regulation Section

BB/ee

cc: Ms. Elizabeth Sawyer, USEPA/Region 4

Mr. William Kutash, FDEP/Southwest District Office

FDEP File

"More Protection, Less Process"

Printed on recycled paper.

File: 8-d 3/04



7202 EAST 8TH AVENUE * TAMPA, FLORIDA 33619 * TEL 800 624 5302 * FAX 813 628 0842 * www.eqonline.com

Department of Environmental Protection Hazardous Waste Management Section 2600 Blair Stone Road, MS 4560 Twin Towers Building Tallahassee, Florida 32399-2400



Attention: John Griffin

Re:

Aerosol Can Operations I.D. No.: FLD 981 932 494

Permit No.: 34875-HO-007

Hillsborough County

October 12, 2004

Mr. Griffin,

Attached is a check in the amount of \$50.00 for the Aerosol operation replacement. As per our conversation on September 22, 2004, this fee will satisfy the required amount applicable for the modification.

Please call me at (813) 623-5302 ext. 235 if you require further information or have any questions.

Sincerely,

Steve Resendez

Compliance & Safety Manager

Cc: Bob Mulholland (EQFL)
Al Gephart (SWDEP)
Jeffrey Sims (HEPC)

File: 8-2

ADEM

May 24, 2004



POST OFFICE BOX 301463 36130-1463 • 1400 COLISEUM BLVD. 36110-2059 MONTGOMERY, ALABAMA

WWW.ADEM.STATE.AL.US (334) 271-7700

BOB RILEY GOVERNOR

Facsimiles: (334)

Administration: 271-7950 General Counsel: 394-4332

Air: 279-3044 Land: 279-3050 Water: 279-3051 Groundwater: 270-5631

Field Operations: 272-8131 Laboratory: 277-6718 Mining: 394-4326 Education/Outreach: 394-4383

DIRECTOR

JAMES W. WARR

Florida Department of Environmental Protection Division of Waste Management 3900 Commonwealth Blvd. Tallahassee, FL 32399

Re:

EQ Florida, Inc. FLD 981 932 494

2002 N. Orient Road Tampa, FL 33619

Dear Mr. Welch:

The attached documents describe hazardous wastes generated by EQ Florida, Inc., Tampa, FL, which were shipped to M&M Chemical Company (M&M) in Attalla, AL. M&M rejected the wastes to inability to confirm PCB analysis.

This matter is being provided for your information and/or action. If you need any further assistance, please give Mr. Brad Curvin, Industrial Compliance Unit, a call at (334) 271-7744.

Sincerely,

Clethes Stallworth, Chief

Compliance and Enforcement Section

Land Division

Attachments

M&M Chemical Company, May 12, 2004 (w/atch)

File Name: M&M Chemical Company (Etowah Co.) ID#: ALD 070 513 767

File Type: Hazardous Waste

File: 8-d

RECEIVED

JUN 01 2004 DIVISION OF WASTE MANAGEMENT



M & M Chemical Company an affiliate of Giant Resource Recovery Company



1229 Valley Drive, Attalla, AL 35954 • Ph. (256) 538-3800 Fax (256) 538-1836

May 12, 2004

Chief Land Division
Alabama Department of Environmental Management
Post Office Box 301463
Montgomery AL 36130-1463

Re: Waste Rejection Report ALD 070 513 767

Dear Chief of the Land Division,

In accordance with Section II.S of M & M Chemical Co., Inc. RCRA Permit, please accept this as our waste rejection report.

On May 4, 2004, M & M Chemical Co., rejected 8 drums consisting of Waste Stream No.27024, Waste Flammable Liquid, N.O.S., 3, UN1993, from EQ Florida, Inc., EPA ID # FLD 981 932 494. The transporter was Freehold Cartage, EPA ID # NJD 054 126 164. The material was rejected unable to confirm PCB analysis.

If there are any questions, please contact me @ 256/538/3800.

Sincerely,

Andrew Jackson Plant Manager

andrew

AJ/pl

Cc: Lane Smith

	24 hour Emergency # 800-62	4-5302			
UNIFORM HAZARDOUS WASTE MANIFEST	Generator's US EPA ID No. FL0981932494	Manifest Occupant No.	2. Page 1 of		in the shaded areas is 5 by Federal law
13. Generator's Mame and Mailing Address	EO EL OPIDA INC	3		milest Docume	
	EQ FLORIDA, INC. 2002 N. ORIENT ROAD				I-6/73990
4. Generator's Phone ()	TAMPA FL	33619	B. State Ge	nerator's ID	
8. Transponer : Company Name	(213) 523 5302 S. US EPA ID 11	near		ansporter's ID	40705
FREEHOLD CARTAGE, INC.	NJD85412	6164	D. Transoc	ter's Phone	863-533-4599
7. Transponer 2 Company Name	S US EPAIC N		E State Tra	insporter's ID	
	1		F. Transpor	ters-Phone	
9. Designated Facility Name and Site Address	ic. US EPA ID N	umcer	G. State Fa	cility's.1D	
GRRI MAM CHEMICAL COMPANY, INC.					
1229 VALLEY DRIVE			H. Facilityis	Phone	256/538-3800
ATTALLA AL 35954	1 ALD07051	3767			2303330-3800
11. US DCT Description (Including Proper Shicping		:2. Con	ainers :	13.	14.
i-ni		No.	Tyoe !	Total Guantity	Unit I. Wt//of Waste No.
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15. Special Handling Instructions and Additional Into	mation				
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