FECC. Inc.

June 17, 2019
John White
Hazardous Waste Section
Florida Dept. of Environmental Protection
3319 Maguire Blvd.
Orlando, FL 32803
RE: Hazardous Waste Transporter Non-Compliance;
FECC, Inc., 3652 Old Winter Garden Road, Orlando, FL 32805;
EPA ID Number FLD981748015
Dear Mr. White:
As discussed last Friday, June 14, 2019, this is to submit a report of non-compliance that occurred at the above referenced facility.

## Description of Non-Compliance:

FECC, Inc. parked hazardous waste at the above referenced Orlando facility location for approximately 10.7 days, from Monday, April 29, 2019 starting at approximately 8:30PM until approximately 1:00PM on Friday, May 10, 2019. FECC, Inc. (FECC) is a registered hazardous waste transporter in Florida. The above referenced facility is not a registered 10 day hazardous waste transfer facility.

## Background Information:

On Monday, April 29, 2019, FECC picked up and transported hazardous and non-hazardous wastes from Sears Logistics, EPA ID No. FLD982148652, located at 1 Imerson Blvd., Jacksonville, Florida 32218. Monday, April 29 was the last day of operation of the Sears facility and the facility was to be shut down and the gates closed the next day, April 30.

The FECC truck departed the Jacksonville location at approximately 4:30PM on April 29 and headed towards Orlando. Triumvirate Environmental Services, Inc. (TEI), the designated facility shown on the manifest, located at 10100 Rocket Blvd., Orlando was already closed when the FECC truck arrived in Orlando at approximately 8:30 PM. The truck and the load was parked at FECC-Orlando overnight.

On Tuesday morning, April 30, the manifest and truck load was inspected by FECC Orlando personnel. It was determined that the manifest was poorly written and was unacceptable. Enclosed as Attachment A is a copy of the manifest and attachments.

It was also discovered the same morning that the waste profiles for the truck load have not yet been approved by TEI-Orlando. FECC personnel started working with TEI personnel towards getting the waste profiles approved so that the wastes will be accepted by TEI.

FECC attempted to deliver the load to TEI on Wednesday, May 8 using the April 29 manifest. The delivery was rejected by TEI because the manifest was unacceptable.

A letter of authorization authorizing FECC to sign waste documents was obtained from the generator on May 9 to expedite the signing of original manifests and to prevent time lost from having to fedex manifests to the generator for signature and then fedex back to the transporter. The hazardous waste profiles were approved by TEI on Thursday, May 9. New hazardous waste manifests were printed and signed on Friday, May 10. The truckload was delivered to TEI on Friday, May 10, at approximately 1:30PM. TEI accepted the delivery. The letter of authorization and corrected manifests are enclosed as Attachment B.

Other non-hazardous wastes from the April 29 truckload were still present at FECC-Orlando after May 10. These non-hazardous wastes were transported to US Ecology in Tampa on June 6, 2019 and to TEI-Orlando on June 17, 2019. These manifests are enclosed as Attachment C.

## Steps Taken to Prevent Recurrence of Non Compliance

Effective immediately, all FECC drivers and FECC supervisors have been instructed not to pick up hazardous and non-hazardous wastes from any generator site without a waste profile approval number or without an approved waste profile issued by the waste disposal facility. If a truck load of waste must sit at FECC-Orlando, the waste must sit at FECC-Orlando less than 24 hours.

The above procedure also applies to emergency response (ER) cleanups. Wastes and wastewaters generated from the ER work will have to sit at the generator site until the waste profile is approved by the designated disposal facility on the manifest.

If you have any questions or need additional information, please call me at 813-842-5520 or send an email to vsanagustin@feccorporation.com.

Sincerely,


Health and Safety Director

## Attachment A

## Incorrect Manifest

FECC, Inc.
3652 Old Winter Garden Rd
Orlando, FL 32805

No.: 00023
Drum Run Daily
Date: 04/30/2019
Manifest 1


FECC, Inc.
3652 Old Winter Garden Rd Orlando, FL 32805

No.: 00023

## Drum Run Daily

Manifest 2


Manifest 3


Departure Time from Disposal Location 21:02

## SUMMARY

## TRIUMVIRATE

ENVIRONMENTAL
Waste Profile Sheet
Triumvirate Environmental of Florida. Inc 10100 Rocket Blvd.
Orlando, FL 32824
Phone (800) 345-6393 Fax (407) 855-2812
A. Generator Information:

Approval Number:

Shipment Method Drum (size 35 fifo)
Bulk Quant y Customer Information:

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(For Triumvirate Environmental Use Only)

| Authorized Signature |  | Printed Name: | Date: | Title: |
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| Off Site Codes: |  | Disposal Restrictions |  |  |

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Land Disposal
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P5N

## NON Hazardous Non Requiated material



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## Attachment B

## Letter of Authorization

and
Corrected Manifests

## Sears Logistics

## 73 East Mount Zion Rd, <br> Griffin, GA 30223 <br> Tel. 404-391-2278

May 9, 2019
To Whom It May Concern

## RE: Letter of Authorization

## Dear Sir/Madam:

Please consider this letter as a letter of authorization from Sears Logistics authorizing Victor L. San Agustin of FECC, Inc. to sign as an agent for waste generator, Sears Logistics, located at 1 Imerson Park Blvd., Jacksonville, FL 32218.

Mr. San Agustin is authorized to sign on waste profiles, waste manifests, and other environmental documents needed to properly dispose of wastes generated at our Imerson Park Blvd. facility located in Jacksonville, Florida.

If you have any questions or need additional information, please call me at 404-391-2278 or send an email to Harold.leath@searshc.com.

Sincerely,

## Sears Logistics



Harold Death
Maintenance Manager
Sears Logistics
73 East Mount Zion Rd, Griffin, GA 30223
Tel. 404-391-2278

ERIP Triumpirite Environmental
Please print or type.

14. Special Handilingelnstructions and Additional Information

seaier $4 .(1 \times 55)$ Tos3571 Filter aboks
Waste was picked up from generaton site 4-29.19.
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby deflare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable intemational and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27 (a) (if I am a large quantity generator) or (b) (ifl am a small quantity generator) is true.



## WASTE PROFILE SHEET

Triumvirate Environmental Services, Inc. 10100 Rocket Boulevard
Orlando, FL 32824

Phone: (407) 859-4441 Fax: (407) 218-6703

| A. Generator Information: |  |
| :---: | :---: |
| Generator Name: Sears Logistic |  |
| Mail Address: 1 Imerson Blvd. |  |
| City: Jacksonville | State: FL $\quad$ Zip: 32218 |
| Contact: Victor San Agustin | Titte: Senior Engineer |
| Site Phone: | EPA ID: FLD982148652 |
| Site Address: 1 Imerson Blvd | cksonville, FL 32218 |

Site Address: 1 Imerson Blvd. Jacksonville, FL 32218
B. COMMON NAME OF WASTE: Aerosol (rubber tire repair prep)
Process generating waste: surplus materia

## Approval \#: TO53599


/mo. $\square$ qr. $\square \mathrm{yr}$. $\square$ one time $\square$
C. Physical Propertles: Color: Total Halogens (\%p Odor: none $\square$ mild $\mathbb{K}$ strong $\square$
Liquids (\%) Solids (\%) Sludge (\%) Powder (\%) Debris: Specific Gravity: 0.90

PH: : BTU/Lb: $\square<5000$ 区 $<10,000 \square>10,000$ Flash Point ( 0 ): 区 $<100 \square<140 \square<200 \square>200$

| D. Waste Composition (list all haz \% non-haz components) |  |  |  |  | G. Hetals: None [8TCLP $\square$ TOTAL $\square$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| PROPRIERTARY INGREDIENTS | 50 | - | 70 | \% | D004 Arsenic 5mgl: 0 | D005 Barium 100mgl:0 |
| PROPANE | 15 |  | 25 | \% | D006 Cadmium 1migl: 0 | D007 Chromium $5 \mathrm{mg} / \mathrm{l}: 0$ |
| TOLUENE | 15 | - | 25 | \% | D008 Lead 5mg/: 0 | D009 Mercury 0.2 mgyl 0 |
|  |  | - |  | \% | D010 Selenium 1mg/i:0 | D011 Silver 5mg/: 0 |
|  |  | - |  | \% | Copper: 0 | Nickel: 0 |
|  |  | - |  | \% | Zinc: 0 |  |

Does this waste contain any UHCs? N[.] Y|X (Attach UHC Appendix or LDR if Yes


Generator Certification: I hereby centify that the waste identified or described on this waste profile conforms with the identifications or descriptions provided, and with analytical data or other specifications provided to the TSDF. To the extent the waste does not conform, the Generator agrees to indemnify Triumvirate Environmental Services, Inc. from all liability and damages arising therefrom. No deliberate or wilful omissions of composition or properties exist and that all known or suspected hazards have been disclosed. I also certify that the obtained sample is representative of the waste material described above anc give this TSDF permission and consent to make amendments and corrections.

| Name: Harold Leath | Thite: Maintenance Mgr |
| :--- | :--- | :--- |
| Sigaature: Hesold Leath | Date: $5 / 7 / 19$ |

## Facility Certification:

As required by 40 CFR 264.12 (b) of US EPA Hazardous Waste Regulations, Triumvirate Environmental Services, Inc. certifies that they possess the proper current licenses required by the US Environmental Protection Agency and the Florida Department of Environmental Protection to accept and store the waste listed above. The generator will be notified in writing within seven days of any changes in license status affecting the ability of Triumvirate Environmental Services, Inc. to accept the above waste.

## (For Triumvirate Environmental Use Only)



## TRIUMVIRATE ENVIRONMENTAL



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## Triunyirate ENVBONMENTAL

Waste Profile Sheet

Triumvirate Environmental of Florida, inc. 10100 Rocket Blvd.
Orlando, FL 32824
Phone (800) 345-6393 Fax (407) 218-6703

| Generator infomation: | Approval Number: <br> Custamer information: |  |
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(For Triumvirate Emvironmenta! Use Only)

## Waste Profile Sheet

Triumvirate Environmental of Florida, Inc.
10100 Rocket Blvd.










Mainsrande $\quad$ Manongex

## Facility Certification:





(For Triumvirate Environmental Use Only)


## Triungirate

## ENVIROFMENTAL

## Waste Profile Sheet








## Facillty Certification:



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(For Triurnvirate Enwironmertial Use Only)


## TriuMvirate

## Waste Profile Sheet

Triumvirate Environmental of Florida, Inc. 10100 Rocket Blvd.

Orlando. FL 32824
Phone (800) $345-6393$ Fax (407) 218-6703
A. Generator Information:
Serwalor Erne: Saszelogisias

Approval Number:
 Customer information:


Address
 State:

Cuatmernex Fink.
B. COMMON NAME OF WASTE: Mingral Spirits


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## 















(For Triumvirate Environmental Use Only)


## TRIUMVIRATE

 ENVIRONMENTAL
## Waste Profile Sheet

Triumvirate Environmental of Florida. Inc. 10100 Rocket Blvd.
Orlando, FL 32824
Phone ( 800 ) 345-6393 Fax (407) 218-6703



B. COMMON NA LE OF WASTE: SUP

## 




D. Waste Composition (list all hate 8 non-haz components) Sodium Hydroxide $\quad$ o roc Arabic 5mge o bens baum 100mgtio 0 ethylenediamine tetraacetate Di-propyleacglycolethirs.







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## TRIUMVIRATE <br> Environirental

## Waste Protile Sheet






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14. Special Handling Instructions and Additional Information


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4- (1 x55)TOE3595LF PLC#B321E5
WASTE WAS PICKED UP AT GENERATOR SITE ON 4-29-19
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15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CR 262.27 (a) (if I am a large quantity generator) or (b) (fl am a small quantity generator) is true.
Generator's/Offeror's Printed/Typed Name Signature
VICTOR L. SAN AGUSTIN for Generator 1 16. Intemational Shipments Export from U.S.
 Transporter signature (for exports only): Port of entrylexit:
 Date leaving U.S.:
16. Transporter Acknowledgment of Receipt of Materials
Transporter 2 Printed/Typed Name 17 18. Discrepancy Quantity $\square_{\text {Type }}$
$\square$
Partial Rejection
$\square$ Full Rejection

Manifest Reference Number:
18b. Alternate Facility (or Generator)
U.S. EPA ID Number

Facility's Phone:
18c. Signature of Alternate Facility (or Generator)
19. Hazardous Waste Report Management Method $\operatorname{Codes}$ (ie, codes for hazardous waste treatment, disposal, and recycling systems)

3. $\mathrm{H} / \mathrm{Cl}$
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as need in item 18a

Printed/Typed Name



Date: $5 / 9 / 19$ Drum\#: $2 \quad$ Drum Size/Type:55/BM.
Generator: Sears Logistics 1 Imeson Park Blvd Jacksonville, Fit 322,18
EPAID\#:
Approval Code: TO53595LP
Shipping Name:
UN1993, Waste Flammable Liquid, n.o.s. 3 PG\| (Petroleum Distills:


Packed By. Blake Cabreche

Date: $5 / 9 / 19$ Drum\#: ${ }^{3}$ Drum Size/Type:55/DM
Generator: Śears Logistićs i.Imeson Park Bivd Jacksonville, FL 32218
EPAID\#:
Approval Code: TO53595L户
Shipping Name:


Packed By Blake Labreche

Date: $5 / 9 / 19$ Drum\#: $4 \quad$ Drum Size/Type: $45 / \mathrm{DM}$
Generator: Sears Logistics 1 Imeson Park Blvd Jacksonville, FL 32218
EPA ID\#: FLD982148652 Approval Code: TO53595LP
Shipping Name: UN1760, Waste Corrisve Liquid, n.o.s, (Lab Pack) 8 PGIII (Sodium Hydroxide Solution


Packed By Blatie Cabreche


Date: $5 / 9 / 19$ Drum\#: 5 Drum Size/Type: 55/DM Generator: Sears Logistics 1 Imeson Park Bind Jacksonville, FL 32218 EPA ID\#: FLD982148652 . Approval COde: TO53595LP Shipping Name: UN1760, Waste Corrisve Liquid; n.0.s. (Lab Pack) 8 PGIII (Sodium Hydroxide Solution)


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Date: $5 / 9 / 19$ Drum\#: 6
Drunk Size/Type: $55 / D M$
Generator: Sears Logistics 1 Imeson Park Blvd Jacksonville, FL 32218
EPA ID\#: FLD 982148652 Approval Code: TO53595LP Shipping Name: UN 1760, Waste Corinisve Liquid, n.o.s. (Lab Pack) 8 PGIII
(Sodium Hydroxide Solution)


Packed By. Blake Labreche

Date: $5 / 9 / 19$ Drum\#: $\frac{9}{}$
Drum Size/Type:55/DM
Generator: Sears Logistics 1 Imeson Park Blvd Jacksonville, FL 32218.
EPAID\#: FLD982148652 Approval Code: TO53595LP
Shipping Name:
Non Hazardous Non Regulated Material


Packed B.- Blake Labreche

Generator: Sears Logistlcs 1 Imoson Park Blvd Jacksonville, FL 32218
EPA ID\#: FLDD982148652
Approval Code: TO53595LP
Shipping Name:
Non Hażardous Non Regulated Material

| Quantity | Cont. <br> Size | $\begin{gathered} \text { State } \\ (\mathbf{L}, G, S) \end{gathered}$ | Cont. Type ( $G, \mathrm{P}_{1}$ M) | Chemical Name/ Compound/ Constituents | Waste Code(s) |
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| 3 | 5 Gal | L |  | 1 Shine High Sollds Floor Finish | N/A |
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Packed By. Blake Labreche

## Attachment C

## Sears Logistics Wastes

Transported After May 10, 2019




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    ## Facility Cortificstion:

    
    
    
    
    [For Triumvirata Environmental Use Only)
    

