From:	Matthew King
To:	Lancellotti, Romina
Cc:	dbeitler@tropical.com
Subject:	Fw: Tropical Shipping Response - Warning Letter #WL20-00056HW50SED
Date:	Tuesday, May 12, 2020 4:58:49 PM
Attachments:	1 - Speed dry -paint - oil drum profile.pdf 1 - Tropical manifest#268154 Oil-Paint 55 gal drum.pdf Tropical Shipping Hazardous Waste Shipping SOP.pdf 2 - Hazardous Waste Importation Contract and Movement Document.pdf 5 - Transfer Facility Site Inspection log.pdf 7 - CAA Inspection log.pdf 7 - CAA log.pdf 8 - COD N-61539 REL#11.pdf 8 - COD N-61539 REL#31.pdf 8 - PHARMACHEM 013517088FLE.PDF 8 - PHARMACHEM 013517088FLE.PDF 8 - PHARMACHEM 013517089FLE.PDF 8 - PHARMACHEM 013517090FLE.PDF

Romina,

Thank you for working with us during this time to further our environmental stewardship. Recapping our conversation yesterday, I have included our responses for each item of inquiry from the warning letter sent to us dated for April 27th 2020. Attached please find documentation supporting our answers. I have also placed a copy of our SPCC in the mail via Fedex for your review. I look forward to working with you and should you have any questions please do not hesitate to reach out to me.

1. **Waste Determination**

   a. Identify oil/paint drum and prove proper disposal

      Complete:

      - We have identified the drum and attached the profile (See Attached)
      - Attached completed Non-HW Manifest from TSDF confirming disposal

   b. Turn over all info on previous sandblast shipments

      Complete: No other shipments identified for previous 3 years. Spent sandblast media takes 3-5 years to generate 1 – 55-gal drum.

2. **Import Requirements**

   Complete:

- Created SOP (See Attached)
- Trained Hazmat Specialist Team on 5/8/20
    - Training consisted of DOT/IMDG training, Hazcom, RCRA Hazwaste,

HW – PPB SOP training, Uniform HW EPA Form review.

- Customer (UNIVAR) has notified the EPA at least 60 Days before the transboundary movements.

    - Created and Implemented HW import contract system (See attached)

3. **Manifest**

Complete:

- Created SOP
- Trained Hazmat Specialist Team on 5/8/20
    - Training consisted of DOT/IMDG training, Hazcom, RCRA Hazwaste,

    HW – PPB SOP training, Uniform HW EPA Form review.

- Will forward the DEP a copy of a correctly completed Uniform HW Manifest EPA Form once available

4. **Transfer Facility**

a. Obtain Transfer Facility Permit

Complete:

- Will submit registration form 8700-12FL concerning the Transfer Facility by COB 5/15/2020.

b. Provide proof on how Tropical will comply going forward as a Transfer Facility.

Complete:

- Created SOP
- Trained Hazmat Specialist Team on 5/8/20
    - Training consisted of DOT/IMDG training, Hazcom, RCRA Hazwaste,

HW – PPB SOP training, Uniform HW EPA Form review.

5. **Hazardous Waste Container Weekly Inspections**

Complete:

- See attached copy of inspection site form

6. **Contingency Plan**

Complete: See attached plan

7. **Register as Transfer Facility and VSQG**

Complete:

- Will submit registration form 8700-12FL concerning the Transfer Facility and VSQG status by COB 5/15/2020.
- See attached VSQG accountability forms to track and inspect monthly waste volumes

8. **Hazwaste Cargo Containers Onsite**

Complete:

- Attached are the completed Uniform Hazardous Waste Manifest per the TSDF for the shipments that were not on the log at the time of review.

Respectfully,

Matthew S. King, CSP, SMS |Health, Safety & Environmental Manager | Tropical Shipping | Mailstop:

MLK 01-12 | 501 Avenue P | Riviera Beach, FL 33404 | Office: (561) 882-2556 | mking@tropical.com

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