



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

July 24, 2020

Freddie Franks, Branch Operations Manager II
Univar Solutions USA, Inc.
6049 Old 41A
Tampa, FL 33619-8786
Freddie.franks@univarsolutions.com

Re: Univar Solutions USA, Inc.
Facility ID Number FLD020985727
Hillsborough County

Dear Mrs. Franks:

Department personnel conducted a Hazardous Waste compliance inspection of the above-referenced facility on June 24, 2020. Based on the information provided during the inspection, 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 Leslie Pedigo at (813) 470-5870 or via e-mail at: Leslie.Pedigo@FloridaDEP.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "S. Kennedy".

Shannon Kennedy
Compliance Assurance Program
Southwest District

Enclosures: Inspection Report

cc: Gerry Javier, SQG Program, Hillsborough EPC; javier@epchc.org
Shannon Kennedy, FDEP/SWD; Shannon.Kennedy@FloridaDEP.gov
Sarah Brownlee, FDEP/SWD; Sarah.Brownlee@FloridaDEP.gov
Ileana Hernandez, FDEP/SWD; Ileana.Hernandez@FloridaDEP.gov
Leslie. Pedigo, FDEP/SWD; Leslie.Pedigo@FloridaDEP.gov



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Univar Solutions USA Inc
On-Site Inspection Start Date: 06/24/2020 **On-Site Inspection End Date:** 06/24/2020
ME ID#: 52299 **EPA ID#:** FLD020985727
Facility Street Address: 6049 Old 41A Hwy, Tampa, Florida 33619-8786
Contact Mailing Address: 6049 Old 41A Hwy, Tampa, Florida 33619
County Name: Hillsborough **Contact Phone:** (813) 336-0771

NOTIFIED AS:

LQG (>1000 kg/month), Pharmaceuticals Healthcare, Transfer Facility, Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Transporter:** Own Waste, Commercial Waste, Transfer Facility **Used Oil:** On-Spec, Off-Spec, Used Oil, Oil Filters, Utility Boiler, Industrial Boiler, Industrial Furnace, Collection Center (Commercial) **HW Fuel:** Smelter Deferral **Recycler:** Commercial, Does Not Store Prior to Recycling **Other:** Both, UIC, Person Authorized to Manage Very Small Quantity Waste Generated at Other Facilities, Tax Default, Bankrupt, Recognized Trader Importer, Recognized Trader Exporter, SLAB Importer, SLAB Exporter **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH) **Destination Facility for UW Mercury Recovery and/or Reclamation Reverse Distributor of UW:** Devices, Lamps
Hazardous Waste Pharmaceuticals:
Pharmaceutical Activities: Healthcare Facility

INSPECTION TYPE:

Routine Inspection for LQG (>1000 kg/month) Facility
Routine Inspection for Transfer Facility Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector
Ileana Hernandez, Environmental Specialist II; Sarah Brownlee, Environmental
Other Participants: Specialist II; Freddie Franks, Branch Operations Manager II

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

NAIC: 424690 - Other Chemical and Allied Products Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

Univar Solutions USA, Inc. (Univar) was inspected on June 24, 2020, by the Florida Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility initially notified as a generator of hazardous waste on November 11, 1980. The facility is a large quantity generator of hazardous waste and has notified as a transporter and transfer facility of hazardous waste, universal waste, used oil and used oil filters. The facility's current hazardous waste, used oil, and used oil filter Transporter and Transfer Facility registration expires on June 30, 2020. The facility's current universal waste Transporter and Transfer Facility registration expires on March 1, 2021. The facility has been inspected numerous times by the Department, most recently on June 29, 2017. Freddie Franks, Branch

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Operations Manager II, accompanied the inspectors during the inspection and Scarlett Russell provided records.

Process Description:

Univar has eighty facilities across the US, three of which are located in Florida. At this location, Univar operates a chemical packaging and distribution warehouse at this location. The facility receives bulk chemicals by truck transport and some bulk corrosive and flammable liquids by rail. Bulk liquids are stored in a tank farm on site and packaged as needed. The facility also offers hazardous waste transportation services to their customers. Used oil, universal waste and other non-hazardous chemical wastes are also handled by the facility.

The facility is located on 10.31 acres and two buildings (the 42,226 square foot main building and the 11,953 square foot former DPC building) and a tank farm. The facility has approximately 20 employees. The office is open from 8 am to 5 pm, Monday through Friday, while the warehouse hours are 7 am to 5 pm, Monday to Friday. The City of Tampa provides municipal water. Plant sewage is disposed of in a septic system.

The facility is in the process of changing the lighting from fluorescent lighting to LED; the main building warehouse has already been converted. An off-site electrician is used to replace spent fluorescent bulbs and spent bulbs are removed from the facility for proper disposal. There were no spent fluorescent bulbs present on site at the time of the inspection.

Main Building/Warehouse

The main building houses the facility's offices space and the main warehouse used for the storage of food grade materials and other chemicals, a chemical packaging area for loading drums and intermediate bulk containers (IBCs), the 90-day central accumulation area (CAA) and the designated 10-day hazardous waste transfer area. Eye wash and showers stations are located throughout the warehouse are checked for proper operation prior to each shift by warehouse personnel and are checked monthly by facility management. 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.

The facility operates four propane powered forklifts and three battery powered pallet jacks. Pallet jacks use a 110-volt outlet to recharge their batteries; the charging station is located in the northeast corner of the warehouse. The facility contracts with Crown Equipment Corporation for the maintenance of their warehouse equipment.

Chemical Packing Area

A fill station for loading drums and IBCs is located inside the warehouse and next to the tank farm where. There are three separate designated satellite accumulation areas (SAAs) for hazardous waste generated from container loading operations; each SAA contains a single drum. The flammable line flush SAA contains a metal 55-gallon drum; the corrosive line flush SAA contains a polypropylene 55-gallon drum; and spill cleanup materials and used protective gear SAA contains a metal 55-gallon drum. All three SAA drums contained a hazardous waste label and label with an indication of the hazard (flammable, corrosive and flammable solid, respectively). A fourth non-RCRA regulated corrosive solids (empty sample bottles) SAA contains a metal 55-gallon drum. 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. When satellite accumulation drums are full, they are replaced with a properly labeled empty drum and the full drum is moved to the facility's 90-day central accumulation area.

90-Day Central Accumulation Area

The 90-day central accumulation area 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. Spilled or damaged in the other product handling areas are immediately packaged, labeled, dated and placed in the 90-day area. At the time of this inspection, there was no waste being stored area.

Transfer Facility Area

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, drums and smaller packages. Univar does not transport

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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. At the time of the inspection, six 55-gallon polypropylene drums and one 35-gallon polypropylene drum were located in this area.

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, Tennessee. Non-hazardous waste is transported to VLS Recovery in Fitzgerald, Georgia.

Storage Tank Farm

The storage tank farm is located adjacent to the main building. A fill station for loading drums and IBCs is also located adjacent to the tank farm. The flammable line flush SAA contains a metal 55-gallon drum is located next to the fill station. SAA drum contained a hazardous waste label and label with an indication of the hazard (flammable) as does the drum containment unit.

Former DPC Building

DPC Enterprises, who manufactured bleach, left the second building approximately three years ago. The building was inspected, and currently is used to store drummed products, supplies, and as a cooling area for plant staff. No waste is being stored in the building.

Records

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. In July of 2018, updates were made to the evacuation drill portion of the plan. Emergency response arrangements with outside contractors are in place. The facility has distributed the plan. Per Mr. Franks, the facility is planning to update the contingency plan in the near future.

Please note that when the contingency plan is next updated that a "Quick Reference Guide" will need to be included in the plan: The Quick Reference Guide must include eight elements that are critical to local responders when an emergency is occurring at a facility. These include:

- The types and names of the hazardous wastes on site and their hazard in layman's terms (e.g., toxic paint wastes, spent ignitable solvents);
- An estimated maximum amount of each hazardous waste on site at any one time;
- The identification of any hazardous waste that would require unique or special treatment by medical staff in the event of exposure;
- A map of the facility identifying where hazardous waste may be located;
- A street map of the facility in relation to surrounding businesses, residences, and schools;
- The location of the water supply;
- Information about any on-site notification systems to communicate with people at the facility; and
- The name of an emergency coordinator available at any time.

Job titles and position descriptions are maintained.

Annual hazardous waste training was most recently provided to required facility personnel on September 4, 2019. The training was given by Damon Blue. Branch Operations Supervisor.

The closure plan was on site.

Since 2017 or 2018, compliance with the 10-day transfer facility limit is tracked using the Sales Force Data Base. When hazardous waste containers arrive on site, they are immediately logged into the system. Any

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container on site for 8 days is flagged and an email is issued for any containers that are on site for 10 days. The data base is checked every Monday and Friday and shipments are arranged as needed. Since the data base has been in place, the facility has not had any containers exceed the 10-day storage limit.

Inspection records were reviewed from January 3, 2017 through June 22, 2020 for both the central accumulation area and transfer facility. The inspection logs included all required information (name of inspector, date and time of the inspection, condition and number of containers). Univar maintains inspection records for satellite container inspections as well.

Hazardous waste manifests for 2017, 2018, 2019 and 2020 were reviewed. The transporter was Dupree Logistics (EPA ID #LAR000045963) and the designated facility was Tradebe Millington (EPA ID #TND000772186) for all manifests reviewed. Land Disposal Restriction forms were present; the final signed copies of the manifests were present for all manifests except for the most current shipment which occurred on June 10, 2020. In 2019, the facility shipped weekly or twice per week, in 2020 ships decreased to three in January 2020, to once every three to seven weeks thereafter. In 2020, the shipments were for between 2 drums and 12 drums of waste.

PHOTO ATTACHMENTS:

SAA at the Warehouse Chemical Packaging Area



90-day CAA



10-day Transfer Area



SAA at the Tank Farm

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.

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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.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Transporter Requirements	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)	✓		
6.2	Does the transporter repackage wastes with different USDOT shipping descriptions?			
6.3	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.4	Does the transporter transport waste into the US from abroad?			
6.5	If YES, does the transporter comply with 40 CFR 262 Generator Standards? 263.10(c)			✓
6.6	Does the transporter obtain a signed and dated manifest prior to accepting a hazardous waste for transport?			
6.7	If NO, is the waste exempt from the manifest requirement? 263.20(a)(1) <input type="checkbox"/> Exemption Type - Tolling Agreement <input type="checkbox"/> Exemption Type - VSQG 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)	✓		
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)	✓		
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)			✓


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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 recalculation (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) <input type="checkbox"/> Name, address, and EPA identification number of the generator of the waste <input type="checkbox"/> Quantity of waste accepted <input type="checkbox"/> All DOT-required shipping information <input type="checkbox"/> 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)(a)? 62-730.150(2)(a)			✓
6.35	Does the transporter verify the evidence of financial responsibility annually? 62-730.150(3)			✓

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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

Leslie Pedigo	Inspector	
Principal Investigator Name	Principal Investigator Title	
	DEP	07/23/2020
Principal Investigator Signature	Organization	Date
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Ileana Hernandez	Environmental Specicalist II	
Inspector Name	Inspector Title	
	FDEP/SWD	
	Organization	
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Sarah Brownlee	Environmental Specialist II	
Inspector Name	Inspector Title	
	FDEP/SWD	
	Organization	
<hr/>		
Freddie Franks	Branch Operations Manager II	
Representative Name	Representative Title	
	Univar Solutions USA, Inc.	
	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:	<u>Shannon Kennedy</u>	Inspection Approval Date:	<u>07/24/2020</u>
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