

From: [Hardin, Monica](#)
To: jandrews@groendyke.com
Cc: [Salley, Ethan F](#); lballard@groendyke.com
Subject: hazardous waste inspection follow-up
Date: Tuesday, February 15, 2022 9:45:00 AM

Good Morning Mr. Andrews,

Thank you for your time (and that of Mr. Edwards and the gentleman at the wash rack, I did not write down his name) during our hazardous waste (transporter) inspection last Friday February 11; your time and the information provided is much appreciated! There were a couple items we discussed that I wanted to outline.

At the wash rack, we observed a 5-gallon bucket holding what appeared to be sludge/dirt/debris. This bucket was described as material removed from the grate in the center of the building and it was explained this bucket is dumped into a drum; the company that delivers liquid chemical products then takes the drum when needed. This sludge appeared as waste of which we will need a waste determination to ensure appropriate disposal is occurring. Any information you can provide regarding this sludge/practice/disposal method will assist us in determining compliance.

In the maintenance shop, we discussed management of aerosol cans. You explained products in aerosol cans are used until gone and the cans are disposed in the trash. We then discussed 'RCRA empty'; if your facility chooses to ensure the cans are RCRA empty, we do strongly encourage recycling of the metal cans. I have included a link for RCRA empty. In addition, EPA has added aerosol cans to the universal waste rules, which Florida has adopted. Managing the waste aerosol cans generated at your facility may be a good option. If waste aerosol cans do not meet the definition of RCRA empty, they must be managed as universal waste or have a hazardous waste determination conducted.

Also, as a reminder all containers that hold used oil (including small transfer containers) must be labeled with 'Used Oil', likewise used oil filters containers must be clearly labeled with 'Used Oil Filters'.

[Universal Waste](#)
[RCRA Empty](#)
[DEP Hazardous Waste](#)

I will be drafting the inspection report over the next several weeks, any additional information you can provide on the above topics will assist us in determining compliance.

Please feel free to reach out if you have any questions.

Thanks so much,

Monica Hardin
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Request Pre-Application Meeting