

From: [Matthew King](#)
To: [LanceScott_Romina](#)
Subject: CAA Inspection Sheet
Date: Wednesday, May 4, 2022 2:51:13 PM

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Hey Romina!

I hope life is treating you well! Just wanted to send you an updated copy of our CAA inspection log. Let me know if there is anything outstanding or if I can help out in any way.

Matt

From: Matt <ehs.specialist@yahoo.com>
Sent: Wednesday, May 4, 2022 2:19 PM
To: Matthew King <mking@tropical.com>
Subject: CAA

Notice: This email originated from outside the TSC network.

CENTRAL ACCUMULATION AREA INSPECTION FORM

Year: 2022

Weekly Inspection of Containers Stored for Disposal

SGG Monthly Limit: 2200lbs

Month	Inspector	Date	Containers in good condition, labeled, closed & segregated? (Yes/No)	Spill containment nearby & containers on secondary containment? (Yes / No)	CAA condition: clean & orderly? (Yes/No)	Date of oldest HW container	Est. HW Weight on-site	# of HW containers on-site at time of inspection	Est. Safety Kleen solvent waste on-site
January									
February									
March									
April	MSK	4/7/22	Yes	Yes	Yes	2/22/22	1501b	2	N/A
	MSK	4/12/22	Yes	Yes	Yes	2/22/22	1501b	2	N/A
	NO	4/15/22	Yes	Yes	Yes	2/22/22	1501b	2	5001b
	NO	4/20/22	Yes	Yes	Yes	2/22/22	15001b	3	01b
May	NO	4/24/22	Yes	Yes	Yes	2/22/22	2001b	2	01b
	NO	5/12/22	Yes	Yes	Yes				

From: [Matthew King](#)
To: [Lancellotti, Romina](#)
Subject: RE: DEP Mail / Tropical Shipping USA, LLC. (EPA ID FLR000095737) Warning Letter # WL22-0002HW50SED
Date: Monday, February 14, 2022 5:34:16 PM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Hey Romina!

Yes, I notified Susan via email last week and we Fedex'd the wet signature copy up to Tallahassee. Below is a snap shot of the current weekly inspection document taken from our CAA. Let me know if I can assist with anything else. Lots of good projects going on over here!

CENTRAL ACCUMULATION AREA INSPECTION FORM

Year: 2022 SQG Monthly Limit: 2200lbs

Weekly Inspection of Containers Stored for Disposal

Month	Inspector	Date	Containers in good condition, labeled, closed & segregated? (Yes/No)	Spill containment nearby & containers on secondary containment? (Yes / No)	CAA condition: clean & orderly? (Yes/No)	Date of oldest HW container	Est. Haz. Waste Weight on-site	Est. Safety Kleen solvent waste on-site	Notes
January	RD	1/4/22	YES	YES	YES				
	RD	1/13/22	YES	YES	YES				
	RD	1/21/22	YES	YES	YES				
	RD	1/24/22	YES	YES	YES				
February	RD	2/3/22	YES	YES	YES				
	RD	2/14/22	YES	YES	YES				
March									
April									
May									

[Click](#) to submit an Accident Prevention Item (API) – Nearmiss, Unsafe Act or Unsafe Condition.



CONFIDENTIAL: UNAUTHORIZED USE OR DISCLOSURE IS STRICTLY PROHIBITED.

This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.

From: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>
Sent: Friday, February 11, 2022 9:44 AM
To: Matthew King <mking@tropical.com>
Subject: RE: DEP Mail / Tropical Shipping USA, LLC. (EPA ID FLR000095737) Warning Letter # WL22-0002HW50SED

Notice: This email originated from outside the TSC network.

Good morning Matt,

I hope this finds you well. I appreciate the additional information provided. Can you confirm if the notification was submitted to Tallahassee already? Also, when you implement the new weekly inspection log, please provide a copy of with 2 weeks' worth of inspections.

I will stay in contact to inform next steps to follow. Thank you for your cooperation on this matter.

Sincerely,



Romina Lancellotti
Environmental Specialist II
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Romina.Lancellotti@floridadep.gov
Office: 561.681.6624

From: Matthew King <mking@tropical.com>
Sent: Tuesday, February 8, 2022 4:43 PM
To: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>
Subject: DEP Mail / Tropical Shipping USA, LLC. (EPA ID FLR000095737) Warning Letter # WL22-0002HW50SED
Importance: High

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Romina,

I hope this correspondence finds you and the FL DEP team well. I have reviewed the documents you've shared with us and would like to provide an update. After further review of our Hazardous Waste activities I have concluded that we are in fact acting as a Small Quantity Generator (SQG). Tropical Shipping will abide by the regulations set forth in 40 CFR and 62-730.150(2)(b) FAC and have indicated this by resubmitting the form 8700 -12FL (attached). I've also attached our revised inspection document that will be used to record inspections of our CAA located in the Port of Palm Beach. Furthermore we have partnered with our Purchasing Department to manage the Safety Kleen waste stream of D039 waste code to ensure compliance of not exceeding 2200lbs per month. Regarding the 4500lbs generated in November 2020 (Manifest 014672515FLE), this should have been classified and reported as an episodic event and thus I am more than willing to submit the necessary notification documentation. Moreover, this was an isolated event and going forward will be managed accordingly.

I will be reaching out to follow-up to ensure you have received this email so we can coordinate a time to meet. If I may be of any

assistance until that time please feel free to reach out to me.

Respectfully,

Matthew S. King CSP, SMS I Health, Safety & Environmental Manager I Tropical Shipping | 501 Avenue P | Riviera Beach, FL 33404
P: (561) 882-2556 | email: mking@tropical.com | www.tropical.com



[Click](#) to submit an Accident Prevention Item (API) – Nearmiss, Unsafe Act or Unsafe Condition.



CONFIDENTIAL: UNAUTHORIZED USE OR DISCLOSURE IS STRICTLY PROHIBITED.

This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.

From: DEP_SED <DEP_SED@dep.state.fl.us>

Sent: Monday, January 24, 2022 2:11 PM

To: Dean Beitler <dbeitler@tropical.com>

Cc: DEP_SED <DEP_SED@dep.state.fl.us>; SED-BP <SED-BP@floridadep.gov>; Matthew King <mking@tropical.com>; Andreotta, Jason <Jason.Andreotta@FloridaDEP.gov>; Davila, Sirena <Sirena.Davila@FloridaDEP.gov>; Irwin, Alannah <Alannah.Irwin@FloridaDEP.gov>; Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Ammon, Pamela <Pamela.Ammon@FloridaDEP.gov>

Subject: DEP Mail / Tropical Shipping USA, LLC. (EPA ID FLR000095737) Warning Letter # WL22-0002HW50SED

Notice: This email originated from outside the TSC network.

Greetings,

The Department of Environmental Protection is using electronic correspondence rather than paper mail to deliver documents faster while reducing costs and waste. Please click on the link below to access the above referenced document in OCULUS, the Department of Environmental Protection's electronic document management system. Please open and review this document as it may require a time sensitive response from you.

[https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=2.474197.1\]&\[profile=Enforcement_Legal\]](https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=2.474197.1]&[profile=Enforcement_Legal])

To access the documents in OCULUS:



1. Click on the link to open OCULUS at the Login screen.
2. Click on PUBLIC OCULUS login to view the search results screen.
3. Click the arrow button next to *view* in the Operations drop-down menu to open and view the document in its native format. Most OCULUS documents are in .pdf format. Acrobat Reader is required to read the document. The free reader can be downloaded from <http://www.adobe.com/products/reader.html>.

If you are interested in reviewing documents from the Department's Information Portal, you can access the portal at <http://webapps.dep.state.fl.us/DepNexus/public/search-portal>.

Thank you for your attention to this matter.

FL. Department of Environmental Protection
Southeast District Office

PLEASE NOTE: Florida has a very broad public records law. Electronic communications regarding state business are public records available upon request. Your e-mail communications may therefore be subject to public disclosure.

Dep Customer Survey	
Dep Customer Survey	

From: [Matthew King](#)
To: [Lancellotti, Romina](#)
Subject: DEP Mail / Tropical Shipping USA, LLC. (EPA ID FLR000095737) Warning Letter # WL22-0002HW50SED
Date: Tuesday, February 8, 2022 4:54:27 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[CAA Inspection log - Final.xls](#)
[DEPForm62-730.900\(1\)\(b\)_8700 - 12FL SQG Revision.pdf](#)
Importance: High

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Romina,

I hope this correspondence finds you and the FL DEP team well. I have reviewed the documents you've shared with us and would like to provide an update. After further review of our Hazardous Waste activities I have concluded that we are in fact acting as a Small Quantity Generator (SQG). Tropical Shipping will abide by the regulations set forth in 40 CFR and 62-730.150(2)(b) FAC and have indicated this by resubmitting the form 8700 -12FL (attached). I've also attached our revised inspection document that will be used to record inspections of our CAA located in the Port of Palm Beach. Furthermore we have partnered with our Purchasing Department to manage the Safety Kleen waste stream of D039 waste code to ensure compliance of not exceeding 2200lbs per month. Regarding the 4500lbs generated in November 2020 (Manifest 014672515FLE), this should have been classified and reported as an episodic event and thus I am more than willing to submit the necessary notification documentation. Moreover, this was an isolated event and going forward will be managed accordingly.

I will be reaching out to follow-up to ensure you have received this email so we can coordinate a time to meet. If I may be of any assistance until that time please feel free to reach out to me.

Respectfully,

Matthew S. King CSP, SMS I Health, Safety & Environmental Manager I Tropical Shipping I 501
Avenue P I Riviera Beach, FL 33404
P: (561) 882-2556 I email: mking@tropical.com I www.tropical.com



[Click](#) to submit an Accident Prevention Item (API) – Nearmiss, Unsafe Act or Unsafe Condition.



CONFIDENTIAL: UNAUTHORIZED USE OR DISCLOSURE IS STRICTLY PROHIBITED.

This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.

From: DEP_SED <DEP_SED@dep.state.fl.us>

Sent: Monday, January 24, 2022 2:11 PM

To: Dean Beitler <dbeitler@tropical.com>

Cc: DEP_SED <DEP_SED@dep.state.fl.us>; SED-BP <SED-BP@floridadep.gov>; Matthew King <mking@tropical.com>; Andreotta, Jason <Jason.Andreotta@FloridaDEP.gov>; Davila, Sirena <Sirena.Davila@FloridaDEP.gov>; Irwin, Alannah <Alannah.Irwin@FloridaDEP.gov>; Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>; Ammon, Pamela <Pamela.Ammon@FloridaDEP.gov>

Subject: DEP Mail / Tropical Shipping USA, LLC. (EPA ID FLR000095737) Warning Letter # WL22-0002HW50SED

Notice: This email originated from outside the TSC network.

Greetings,

The Department of Environmental Protection is using electronic correspondence rather than paper mail to deliver documents faster while reducing costs and waste. Please click on the link below to access the above referenced document in OCULUS, the Department of Environmental Protection's electronic document management system. Please open and review this document as it may require a time sensitive response from you.

[https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&\[guid=2.474197.1\]&\[profile=Enforcement_Legal\]](https://depdms.dep.state.fl.us:443/Oculus/servlet/shell?command=getEntity&[guid=2.474197.1]&[profile=Enforcement_Legal])

To access the documents in OCULUS:

1. Click on the link to open OCULUS at the Login screen.
2. Click on PUBLIC OCULUS login to view the search results screen.
3. Click the arrow button next to *view* in the Operations drop-down menu to open and view the

document in its native format. Most OCULUS documents are in .pdf format. Acrobat Reader is required to read the document. The free reader can be downloaded from <http://www.adobe.com/products/reader.html>.

If you are interested in reviewing documents from the Department's Information Portal, you can access the portal at <http://webapps.dep.state.fl.us/DepNexus/public/search-portal>.

Thank you for your attention to this matter.

FL. Department of Environmental Protection
Southeast District Office

PLEASE NOTE: Florida has a very broad public records law. Electronic communications regarding state business are public records available upon request. Your e-mail communications may therefore be subject to public disclosure.

[Dep Customer Survey](#)



CENTRAL ACCUMULATION AREA INSPECTION FORM

Year: _____

Weekly Inspection of Containers Stored for Disposal

SQG Monthly Limit: 2200lbs

[illegible]

[illegible]

From: [Matthew King](#)
To: [Lancellotti, Romina](#)
Subject: Tropical - CAA - Inspection Log
Date: Friday, January 7, 2022 5:59:53 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[20220107170727391.pdf](#)

EXTERNAL MESSAGE

This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Romina,

Attached please find our inspection log for the CAA concerning 2021. Let me know if I can be of any assistance.

Have a great weekend!

Matthew S. King CSP, SMS I Health, Safety & Environmental Manager I Tropical Shipping I 501
Avenue P I Riviera Beach, FL 33404
P: (561) 882-2556 I email: mking@tropical.com I www.tropical.com



[Click](#) to submit an Accident Prevention Item (API) – Nearmiss, Unsafe Act or Unsafe Condition.



CONFIDENTIAL: UNAUTHORIZED USE OR DISCLOSURE IS STRICTLY PROHIBITED.

This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.

HAZARDOUS WASTE TRANSFER FACILITY INSPECTION

Year: 2021

Weekly Inspections of Transfer Facility Site - PPB

Month	Inspector	Date	Time	Leaks / Spills (Yes/No)	Area Clean (Yes/No)	Description of Cleanup or Repairs (if required)
January	RP	1/5/2021	1030	NO	YES	<u>NH Waste labels replaced on Drums 375</u>
	RP	1/12/2021	1200	NO	YES	
	RP	1/18/2021	1200	NO	YES	
	RP	1/28/2021	1130	NO	YES	
February	RP	2/3/2021	330	NO	YES	—
	RP	2/3/2021	1300	NO	YES	
	RP	2/18/2021	1245	NO	YES	
	RP	2/22/2021	0930	NO	YES	
March	RP	3/11/2021	1340	NO	YES	—
	RP	3/19/2021	1106	NO	YES	
	RP	3/16/2021	1300	NO	YES	
April	RP	4/7/2021	1000	NO	YES	—
	RP	4/9/2021	0830	NO	YES	
	RP	4/13/2021	0915	NO	YES	
	RP	4/22/2021	1436	NO	YES	
May	RP	4/27/2021	1005	NO	YES	<u>New Fire Ext.</u>
	RP	5/9/2021	1000	NO	YES	
	RP	5/13/2021	1330	NO	YES	
	RP	5/18/2021	1215	NO	YES	
June	RP	5/24/2021	1210	NO	YES	—
	RP	6/2/2021	1022	NO	YES	
	RP	6/9/2021	0930	NO	YES	
	RP	6/17/2021	1410	NO	YES	

	Initials	DATE	TIME	LEAKS?	CLEAN?	DESCRIPTION
	RD	6/21/21	1210	NO	YES	—
	RD	7/2/21	1000	NO	YES	Corrected Label on #20
	RD	7/6/21	0830	NO	YES	—
	RD	7/13/21	1058	NO	YES	—
	RD	7/30/21	1400	NO	YES	—
	RD	7/30/21	1447	NO	YES	Label Added to #21
	RD	8/3/21	1420	NO	YES	—
	RD	8/12/21	0829	NO	YES	—
	RD	8/22/21	1339	NO	YES	—
	RD	8/27/21	1123	NO	YES	Label Added to BOTES
	RD	9/3/21	0945	NO	YES	—
	RD	9/14/21	1130	NO	YES	Fixed up
	ML	9/23/21	1430	NO	YES	Very Clean
	ML	9/30/21	1135	NO	YES	Very Organized!
	RD	10/5/21	1000	NO	YES	—
	RD	10/14/21	1155	NO	YES	—
	RD	10/21/21	1520	NO	YES	—
	RD	10/26/21	1201	NO	YES	—
	RD	11/3/21	0940	NO	YES	—
	ML	11/5/21	1500	NO	YES	—
	RD	11/12/21	1135	NO	YES	—
	RD	11/18/21	1551	NO	YES	—
	RD	11/22/21	1518	NO	YES	—
	RD	12/3/21	1400	NO	YES	—
	RD	12/7/21	1047	NO	YES	—
	RD	12/16/21	1053	NO	YES	—
	RD	12/20/21	1545	NO	YES	—
	RD	12/28/21	1005	NO	YES	—