



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

FACILITY INFORMATION:

Facility Name: Univar Solutions USA Inc

On-Site Inspection Start Date: 03/29/2023

On-Site Inspection End Date: 03/29/2023

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: (425) 324-1275

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:** Used Oil, Oil Filters

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 Used Oil Transfer Facility Facility

Routine Inspection for Hazardous Waste Transfer Facility Facility

Routine Inspection for Hazardous Waste Transporter Facility

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

INSPECTION PARTICIPANTS:

Principal Inspector: Leslie Pedigo, Inspector

Other Participants: Coral Evans, Environmental Specialist II, Avery Ghirghi, Environmental Specialist I, Freddie Franks, Branch Operations Manager II, Charles Aspenwall, Operations Supervisor I

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 March 29, 2023, by the Florida Department of Environmental Protection (Department) to evaluate the facility's compliance with state and federal hazardous waste regulations. The facility was initially notified as a generator of hazardous waste on November 11, 1980. The facility is a large quantity generator of hazardous waste and has also notified as a transporter and transfer facility of hazardous waste, universal waste, used oil and used oil filters. The facility has been inspected numerous times by the Department, most recently on June 24, 2020. Freddie Franks, Branch Operations Manager II, and Charles Aspenwall, Operations Supervisor I, accompanied the inspectors during the inspection.

- The facility's current Used Oil and Used Oil Filter Transporter and Transfer Facility registration expires on June 30, 2023.

- The facility's current Transporter and Transfer Facility of Universal Waste Lamps and Devices and Small Quantity Handler Facility for Universal Waste Lamps and Devices registration expires on March 1, 2024.

Process Description:

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Univar has ninety facilities across the United States, three of which are located in Florida. At this location, Univar operates a chemical packaging and distribution warehouse. 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 contains 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; and the Tank Farm hours are 5 am to 1:30 am, Monday through Friday. The City of Tampa provides municipal water. Plant sewage is disposed of in a septic system. The facility was fully converted to LED lighting in October of 2022.

FACILITY SAFETY/CLEANUP

While the facility does not have an automatic alarm or fire control system, fire extinguishers are located throughout the facility and inspections were up to date. The facility operates an intercom system through the employee phones. Eye wash and showers stations are located throughout the warehouse, these 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 facility.

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. 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.

UNIVERSAL WASTE AREA

Although the facility was fully converted to LED lighting in October of 2022, one cardboard drum for 8-foot spent fluorescent bulbs was still present in the warehouse. The drum was closed, labeled as containing "Universal Waste – Lamps," and had an accumulation start date of May 8, 2022. Please note that in accordance with 40 CFR 273.15(a), this waste must not be accumulated for more than one year from the initial date of generation unless the conditions of 40 CFR 273.15(b) are met.

CHEMICAL PACKAGING AREA

A fill station for loading drums and IBCs is located inside the warehouse and next to the tank farm. There are separate designated satellite accumulation areas (SAAs) for the waste generated from container loading operations; each SAA contains a single drum:

- Hazardous Waste Flammable line flush SAA which contains a metal 55-gallon drum.
- Hazardous Waste Corrosive line flush SAA which contains a polypropylene 55-gallon drum.
- Hazardous Waste Spill cleanup materials and used protective gear SAA which contains a metal 55-gallon drum.
- Non-RCRA regulated corrosive solids (empty sample bottles) SAA contains a metal 55-gallon drum.
- Other non-hazardous waste SAA which contains a metal 55-gallon drum.

All three hazardous waste SAA drums contained a hazardous waste label and label with an indication of the hazard (flammable, corrosive and flammable solid, respectively).

Emergency equipment, including a telephone, eye washes, safety showers, fire extinguishers and the manual pull for the fire alarm, was located in this area. An emergency contact list was also posted in this area. 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

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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, the following waste containers were being stored in this area:

- One 55-gallon drum of flush waste with an accumulation start date of March 10, 2023.
- One 55-gallon drum of flush waste with an accumulation start date of March 13, 2023.
- Two 55-gallon drums of flush waste with an accumulation start dates of March 20, 2023.
- One 55-gallon drum of flush waste with an accumulation start date of March 22, 2023.
- One 55-gallon drum of flush waste with an accumulation start date of March 24, 2023.
- One 55-gallon drum of flush waste with an accumulation start date of March 28, 2023.
- One 55-gallon drum of flush waste with an accumulation start date of March 29, 2023.
- One ~250-gallon tote of non-regulated waste with an accumulation start date of January 9, 2023.

10-DAY 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 hazardous waste in bulk. Univar does not open or repackage any waste. If a container is found to be leaking or damaged, a contractor [typically CURA Emergency Services or National Response Corporation (NRC)/US Ecology] is hired to overpack the damaged container.

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 Department 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, the following containers were located in the Transfer Staging Area:

- Sixteen 55-gallon drums of hazardous waste
- Three 55-gallon drums of non-hazardous waste
- One 35-gallon polypropylene drum of hazardous waste.

Hazardous waste labels and labels with an indication of the hazard were present on all hazardous waste containers.

The trucks are parked inside the facility gates until they can be unloaded. On occasion, if the warehouse closes before the driver arrives, waste may be stored in a truck over the weekend. Most often, waste is picked up at Univar by Dupree Logistics, LAR000045963, for transport to Tradebe in Millington, Tennessee. Occasionally Univar will transport waste directly to EQ Florida. 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 located next to the fill station contained:

- One metal 55-gallon drum of flammable line flush waste.

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 six 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. The future plan is to use this building for the storage of water treatment chemicals.

RECORD

Facility records were on site and available for inspection.

- Hazardous waste manifests for the past three years were reviewed and included all hazardous waste shipments dating from April 15, 2020, to February 14, 2023. Typically, the transporter was Dupree Logistics

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(EPA ID #LAR000045963) and the designated facility was Tradebe Millington (EPA ID #TND000772186; however, the following transporters and designated facilities were also used:

- Transporters: AR Parquette (EPA ID #982105884); NRC Gulf Environmental Services (EPA ID #FLR000012823); Univar Solutions USA of Woodlands Texas (EPA ID #TXR000084862); and Freehold Cartage Inc. (EPA ID #NJD054126164)

- Designated facilities: US Ecology Tampa Inc (EPA ID #FLD981932494)

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 February 14, 2023. The facility maintains an email file for the return manifests from the designated facility. The facility ships waste between one and four times per month. The smallest hazardous waste shipment was for 80 pounds on June 10, 2020, and the largest shipment was for 27,370 pounds on August 23, 2022. Typical shipments range from around 2,000 pounds to 10,000 pounds.

- The facility contingency plan is a modified SPCC plan, last updated on August 24, 2022. A Quick Reference Guide (QRG) has been developed and was uploaded into the E-Plan Online System on July 19, 2022. The QRG was also emailed to the Tampa Bay Regional Planning Council and Hillsborough County on July 19, 2022. The Department recommends the following updates be made:

- The first map should be entitled "Evacuation and Emergency Equipment Map." The location of the nearest water supply must be marked on this map.

- The second map should be identified as the "Vicinity Map."

- The third map should be identified as "Locations of Hazardous Waste" and have a key that indicates what each colored dot represents.

- Emergency response arrangements with outside contractors are in place. The facility has distributed the QRG through E-Plan.

- Job titles and position descriptions are maintained and were available for review.

- Annual hazardous waste training is being provided to required facility personnel. Damon Blue, Branch Operations Supervisor, provided the most recent annual training on May 18, 2022, June 8, 2022, and June 9, 2022. They have now switched to computer-based on-line training, and this will be used for any new employees and annual training moving forward.

- The closure plan was on site.

- Since February of 2021, compliance with the 10-day transfer facility limit is tracked using the System Application and Products (SAP) database. When hazardous waste containers arrive on site, they are immediately logged into the system. Any container on site for 8 days is flagged and an email is issued for any containers that are on site for 10 days. The inventory is checked every Friday and shipments are arranged as needed, and there is an internal call each Wednesday to discuss the inventory status. The facility has not had any containers exceed the 10-day storage limit in the past three years.

- Inspection records were reviewed for the past three years 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.

- The 2021 Biennial Report was timely submitted on February 19, 2022.

PHOTO ATTACHMENTS:

10-Day Transfer Area



10-Day Transfer Area



Chemical Packaging Area SAA



Storage Tank Farm SAA



Forklift Charging Area



Universal Waste Lamp Storage



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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1.0: Pre-Inspection 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. | Pre-Inspection Review | Yes | No | N/A |
|----------|--|-----|----|-----|
| 1.1 | Has the facility notified with correct status? 262.18(a) | ✓ | | |
| 1.2 | Has the facility notified of change of status? 62-730.150(2)(b) | | | ✓ |
| 1.3 | Did the facility conduct a waste determination on all wastes generated? 262.11 | ✓ | | |

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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
Principal Investigator Name

Inspector
Principal Investigator Title

Leslie Pedigo
Principal Investigator Signature

DEP
Organization

02/01/2024
Date

Coral Evans
Inspector Name

Environmental Specialist II
Inspector Title

FDEP/SWD
Organization

Avery Ghirghi
Representative Name

Environmental Specialist I
Representative Title

FDEP/SWD
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.

Freddie Franks
Representative Name

Branch Operations Manager II
Representative Title

Univar Solutions
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.

Charles Aspenwall
Representative Name

Operations Supervisor I
Representative Title

Univar Solutions
Organization

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Report Approvers:

Approver: Michael Miller

Inspection Approval Date: 02/05/2024