

Eckoff, Michael

From: Roberts, James L [james.l.roberts@lmco.com]
Sent: Thursday, July 19, 2012 3:08 PM
To: Eckoff, Michael
Subject: RE: EXTERNAL: RCRA inspection
Attachments: MCFD EMERGENCY RESPONSE AGREEMENT.pdf

Michael,

The Marion County Fire Department (MCFD) is the facility emergency response *provider* with whom we have a service agreement.

Any emergency response services would be billed by MCFD to Lockheed Martin – Ocala Operations after an incident response, and not pre-financed under a formal service contract with a typical purchase order, funding balance, etc., as are found in service contracts for “contractors.”

In addition to the attached, signed agreement to provide emergency response services received from MCFD, the MCFD schedules annual site visits with us to tour the facility and evaluate for fire and hazmat emergency preparedness/response issues. Lockheed Martin also meets quarterly along with the MCFD, in scheduled District V Local Emergency Planning Committee (LEPC) meetings to discuss emergency preparedness/response issues and concerns for the entire LEPC, covering a 5 county area.

Jim Roberts
Lockheed Martin – Ocala
ESH
352-687-5182

From: Eckoff, Michael [mailto:Michael.Eckoff@dep.state.fl.us]
Sent: Thursday, July 19, 2012 10:40 AM
To: Roberts, James L
Subject: RE: EXTERNAL: RCRA inspection

Thank you Mr. Roberts. Would you please send a copy of the agreement between Lockheed and the fire department as the emergency response contractor.

Thanks,
Michael

From: Roberts, James L [mailto:james.l.roberts@lmco.com]
Sent: Thursday, July 05, 2012 2:43 PM
To: Eckoff, Michael
Subject: FW: EXTERNAL: RCRA inspection

From: Roberts, James L
Sent: Thursday, July 05, 2012 12:37 PM
To: 'Eckoff, Michael '
Subject: EXTERNAL: RCRA inspection

Hello Michael,

Below is the information you requested on the lab pack items from the Dec. 2011 shipment. Copies of the MSDS's for each item are attached.

Polaroid film – The discarded Polaroid film items were old film packs that were at least 5 to 6 years past expiration dates, dehydrated, and contained no free liquids. The expired film was a solid waste and did not meet the hazardous waste characteristic criteria, including the corrosive characteristic which must be aqueous or liquid.

James Alexander Ammonia Inhalants – The discarded ammonia inhalants were old expired items. The physical state of the inhalants are a sealed solid paper unit and do not meet the hazardous waste characteristic criteria. The sealed paper packing surrounds a small, thin glass ampule containing 0.3 ml solution of 15% ammonia, 35% ethanol, and an estimated 45-50% water while it is a viable non-expired product. The MSDS represents the worst case scenarios for ammonia and ethanol, so it does not accurately represent the actual hazards of the integral product (no free liquids when crushed). The inhalants can yield no free liquids even when crushed with a total absorbent mass approximately 3 times the mass of the liquid retained in the 0.3 ml glass ampule sealed within the inhalant packing. The inhalant unit is a solid and the integral 0.3 ml glass ampule cannot be removed without de-manufacturing the inhalant product. The inhalant is a solid component that cannot yield free liquids, and cannot be tested in a closed cup flashpoint test, designed for liquids, for a valid flashpoint test. Nor is the solid material inhalant capable at Standard Temperature and Pressure of causing fire through friction, absorption of moisture or spontaneous chemical changes and does not burn so vigorously and persistently to create a hazard. Before the variable auto-ignition point of paper, (approximately 424–475 °F), the paper of the inhalant will begin to smolder at approximately 250° F, and at approximately 260° F exterior surface temperature, the interior ampule glass breaks from pressure built up by heating the sealed ampule contained within the inhalant product. No fire results from the heating of the inhalant to the breaking point at approximately 260° F exterior inhalant product temperature. Because they are a solid and do not exhibit any ignitability characteristics, they are not a hazardous waste.

Cholestech LDX System device & components are non-hazardous, and do not meet the hazardous waste characteristic criteria.

Vionex Antiseptic Towelette – These are small sealed towelettes similar to those used by restaurants and hospitals, containing 10% ethanol, with the remaining 90% soap and water in a fiber towelette with no free liquids. As there are no free liquids, and no flash point, and the sealed towelettes are a solid material, they do not meet the characteristic hazardous waste criteria.

All of the non-regulated lab pack items (profile ID # LCCRC on line 3 of the manifest and logged on the attached “Waste Tracking Detail Manifest 004815920FLE”) were shipped to Clean Harbors, Bartow, FL facility on 12/5/11, subsequently shipped to the Deer Park, TX hazardous waste TSDf on 12/9/11, and incinerated there (Deer Park, TX) on 12/20/11.

Also attached is the e-mail I sent to you the day of the audit with the requested photo of the used oil drum in a secondary containment device. I received no confirmation of receipt of the photos at that time. Did you get them on 5/22/12?

Jim Roberts
Lockheed Martin – Ocala
ESH
352-687-5182

From: Eckoff, Michael [<mailto:Michael.Eckoff@dep.state.fl.us>]
Sent: Tuesday, June 26, 2012 10:36 AM

To: Roberts, James L
Subject: EXTERNAL: RCRA inspection

Hello Mr. Roberts,

I am drafting the inspection report and have a question for you regarding the lab pack from the clinic that was shipped in Dec. 2011. I researched the items on the lab pack list, for the one's I could find information, and found five that I would like to know how you determined them to be non-hazardous. The four are: Polaroid film; James Alexander Ammonia Inhalants; Cholestech LDX; Vionex Antiseptic Towelette; and Cholestech LDX Liquid Controls Level 1 & 2.

Thanks,

Michael Eckoff
Environmental Specialist
Solid and Hazardous Waste Compliance Enforcement
FDEP - Central District
(407) 897-4308
Fax (850) 412-0488

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. [DEP Customer Survey](#).

Lockheed Martin Missiles and Fire Control
498 Oak Road MP-A33
Ocala, FL 34472-3099
(352) 687-5207

Attention: Robert R. Hisey

Reference: Lockheed Martin Missiles and Fire Control Environmental Contingency Plan for the Ocala Operations Facility

I (we) have received a copy of the Lockheed Martin Missiles and Fire Control Environmental Contingency Plan for the Ocala Operations facilities. The MARION county Fire-Rescue agrees to provide emergency response services in the event of any emergency at the Lockheed Martin - Ocala Operations facility located at 498 Oak Road, Ocala.


Signature Deputy Fire Chief

6-20-2006
Date



Marion County

Board of County Commissioners

Marion County Fire-Rescue

3230 S.E. Maricamp Rd., Ocala, Florida 34471

(352) 694-6667--Suncom (352) 667-6667--Fax (352) 694-5981

June 20, 2006

Mr. Robert R. Hisey
Lockheed Martin Missiles and Fire Control
498 Oak Road MP-A33
Ocala, FL 34472-3099

Dear Mr. Hisey:

Enclosed is the signed Lockheed Martin Missiles and Fire Control Environmental Contingency Plan receipt. Captain Ken Smithgall is our Special Team Officer for Hazmat and Technical Rescue. He will be in contact with you to schedule visits to your facility for these teams and fire stations that are in the first response assignment.

If you have any questions, please contact us at (352) 291-8000. Thank you and we look forward to meeting with you.

Sincerely,

David K. Cooper
Deputy Fire-Chief

enclosure

c: Captain Ken Smithgall