

## Memorandum

## Florida Department of Environmental Protection

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To: File

From: Elizabeth Knauss, Hazardous Waste Section

Date: 12/9/2011

Subject: Meeting Notes  
Aqua Clean Environmental  
Polk County

Ron Noble and Dee Miller met with Jim Dregne and Elizabeth Knauss to follow up on the meeting of 12/6/2011. Miller and Noble had followed up on the information regarding the second shipping papers signed by Aqua Clean drivers for pickups at Quality Aerospace Coatings (QAC). Noble interviewed Bob Toric(sp?) and Thomas Morgan regarding QAC contacts.

Aqua Clean had previously disposed of cutting fluids from JC Machine on Brannan Rd, Lakeland. Jay Creasy and Kristie Roberts were known to Bob from that disposal. The next contact was in August 2010. Bob was contacted for a quote on wastewater disposal. QAC was not yet operating, and no build out had taken place. Bob said that the company said they would be conducting aluminum anodizing and provided him with an MSDS for sulfuric acid. This is the only MSDS in Aqua Clean's files. Bob said he specifically told them that Aqua Clean does not manage hazardous waste.

Bob's second contact was after the buildout, but before the plant started operating. He said what he saw was empty plastic bins and piping. He brought over waste profiles for signature. He said that at that time he met with Mark (Norris) (also used names Mike Shiver and Mike Skinner) who asked Bob how Aqua Clean would manage the company's hazardous waste. Bob said he reiterated that Aqua Clean does not manage hazardous waste. Per Ron, Bob said that Mark became agitated during the conversation because it was Mark's position that they were "contracting with Aqua Clean to take all the waste." Bob said he told Mark that Aqua Clean was not in a position to say what was hazardous and what was not hazardous, and that it was the generator's responsibility to make that determination. Bob will occasionally broker loads, but that he told QAC they needed to hire a consultant to look at the process and sample the waste. That will determine how it has to be treated and whether it has to be managed as hazardous.

Bob said he referred the company to Environmental Marketing Service for a quote for hazardous waste disposal in May 2011.

He indicated that Bob made a third trip out just before the first pickup, where a drum was tested for pH. The first loads appeared to be clear water.

Thomas Morgan was also interviewed. No hazardous waste manifests or any other shipping papers are on his vehicles. Morgan has been with Aqua Clean for 3 years, and before that worked for CTL delivering sulfuric acid. He has a DOT license with Hazmat endorsement. Morgan said he thought the signature on the papers was his, but could not recall ever seeing the line items on the form. The form may have been on a clip board and covered by other forms. He said he was not given a copy of the form, and that he

does not recall signing any multiple page manifest forms. He said he would only sign as the designated facility for a load where he had money that had to be turned in immediately. He recalls pumping out drums, after pH testing, and also a small concrete containment out back. He said he was told the company finishes and cleans metal parts, and that Aqua Clean was picking up rinse and wash water.

Normal company procedure is to check the waste against the profile and that anything unusual is not picked up without approval from Dee or Bob.

Aqua Clean is agreeable to amending their profiles, and DEP will provide a copy of language that had been suggested previously.

A discussion regarding the difference in the electroplating category for RCRA vs Clean Water Act compliance took place. Sulfuric Acid anodizing is within the electroplating category for Clean Water Act compliance. Nickel and chrome can still be used in the process.



SUBJECT: Agua Clean / FRS

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