



# THE ENVIRONMENTAL QUALITY COMPANY

EQ FLORIDA • 7202 EAST EIGHTH AVENUE • TAMPA, FL 33619 • tel 800-624-5302 • fax 813-628-0842

October 1, 2012

Mr. James Dregne  
Environmental Manager  
Florida Department of Environmental Protection  
Southwest District  
13051 North Telecom Parkway  
Temple Terrace, FL 33637-0926

Dept. of Environmental  
Protection  
OCT 02 2012  
Southwest District

Re: EQ Florida, Inc. – FLD 981 932 424  
Incident Report for September 21, 2012 Incident

Dear Mr. Dregne:

EQ Florida, Inc. is reporting an incident that occurred at the EQ Florida, Inc., Tampa Florida hazardous waste treatment, storage and disposal facility (TSDF) on September 21, 2012.

## Incident Summary

On September 20, 2012, EQ Florida, Inc. received an 7 drum "lab pack" shipment of Minntech Renalin 100 (20-24% peracetic acid, 4-6% hydrogen peroxide, and 8-10% acetic acid). The 7 drums contained approximately 182 one gallon plastic jugs of the Minntech Renalin 100. When the metal 55-gallon drums were offloaded at the facility, it was noted that the outside of the drums showed visible signs of corrosion. Upon further investigation it was discovered that the inner plastic containers had not been properly packaged as no cushioning or absorbent had been added to prevent breakage. At some point during the course of transportation the inner containers broke and began leaking inside the metal drums. Since the metal drums were no longer DOT shippable, it was determined that the drums would have to be repackaged prior to off-site shipment.

On September 21, 2012, at approximately 8:15 AM, the repackaging operation began. The first drum was opened and the empty plastic containers were removed and placed in plastic bags. At approximately 8:30 AM, the remaining free liquids that had accumulated in the bottom of the drum was being poured into a plastic pail when the liquid began to react, generating heat and a deminimus release of corrosive vapors to the atmosphere. The operation was immediately halted and the facility was evacuated. When the area became safe enough to re-enter, the repacking operation was moved from inside Bay 1 to outside Bay 3. As the second drum was opened, and prior to any material being removed, a similar reaction occurred. Once again, the operation was immediately halted and the facility was evacuated. At this point the repackaging

operation was completely halted until sodium bicarbonate was obtained and could be used to neutralize all free liquids prior to repackaging.

On September 21, 2012, at approximately 5:30 PM, the repackaging operation was completed, resulting in the generation of 20 drums of a mixture of liquids, solids and debris. No further reactions occurred during the rest of the repackaging operation and there were no injuries. At no time was there a threat to human health or the environment.

**The name and telephone number of the person(s) reporting the incident:**

Stuart Stapleton, QEHS Manager, Primary Alternate Emergency Coordinator, 813-319-3423

Ken Dean, Operations Manager, Secondary Alternate Emergency Coordinator 813-319-3433

EQ Florida, Inc. Emergency Coordinators Ken Dean and Stuart Stapleton, were in the immediate area of the incident and observed the reactions. Ken Dean immediately implemented the Contingency Plan and instructed all personnel to evacuate the building. Gene Cieply, General Manager and Primary Emergency Coordinator, was notified of the incident at this time.

Beth Knauss, FDEP Southwest District, was at the facility at the time of the incident conducting the annual hazardous waste inspection of the facility, and notified Jim Dregne, FDEP Southwest District, at approximately 10:35 AM. Stuart Stapleton called Jim Dregne at approximately 1:30 PM but had to leave a message. They finally spoke on the morning of 9/25/12.

After having brought the situation under control, Stuart Stapleton and Ken Dean notified the National Response Center (NRC) of the incident at approximately 11:30 AM (Report # 1025135, spoke with Petty Officer Diaz).

At approximately 11:45 AM, Stuart Stapleton notified the Florida Department of Environmental Protection of the incidents (Report # 21026723, spoke with Jed Hall).

**The name, address, telephone number, and EPA identification number of the facility:**

EQ Florida, Inc.  
2002 North Orient Road  
Tampa, Florida 33619  
800-624-5302

**The name, address and telephone number of the owner or operator:**

EQ Florida, Inc.  
2002 North Orient Road  
Tampa, Florida 33619  
800-624-5302

**The date, time and type of incident:**

The reactions occurred on September 21, 2012 beginning at approximately 8:30 AM and brought under control at approximately 11:30 AM. Final repackaging of the deactivated material was completed at approximately 5:30 PM on September 21, 2012.

**The name and quantity of the material or materials involved and released:**

A 7 drum "lab pack" shipment of Minntech Renalin 100 (20-24% peracetic acid, 4-6% hydrogen peroxide, and 8-10% acetic acid) was received at the facility and required repackaging prior to off-site shipment. The reactions, as described above, released deminimus amounts of corrosive vapors to the atmosphere. A copy of manifest number 008955322 JJK is attached.

**The estimated quantity and disposition of recovered material that resulted from the incident, if any:**

The repackaging operation resulted in the generation of 20 drums of a mixture of liquids, solids and debris including:

- 6 poly 55-gallon-drums of liquid going to EQ Detroit for treatment
- 14 poly 55-gallon-drums of solids going to Veolia for incineration including:
  - 3 drums contaminated cardboard pieces / Sodium bicarbonate / oil dry
  - 2 drums of contaminated PPE / visqueen / broom heads / broomstick
  - 9 drums of contaminated broken bottles / Sodium bicarbonate

**The extent of injuries, if any:**

The incident did not result in any injury to persons, or cause any damage to structures or equipment. At no time was there a threat to human health or the environment.

**An assessment of actual or potential hazards to human health or the environment:**

EQ Florida, Inc. does not believe that the incident resulted in any actual or potential hazard to human health or the environment because:

- 1) The reaction was short in duration and resulted in only a deminimus release of corrosive vapors to the atmosphere;
- 2) EQ trained personnel wore proper PPE at the time of the release;
- 3) EQ trained personnel used proper Contingency Plan procedures in response to the incident.

**The immediate response action taken:**

EQ Florida, Inc. stopped all activities in the facility until the reaction was complete. The facility was evacuated until it was safe to re-enter the affected areas.

**Investigation and prevention of reoccurrence:**

The plastic inner containers had not been properly packaged as no cushioning or absorbent had been added to prevent breakage. The generator of the material was made aware of the incident and has been instructed on proper packaging requirements.

*I have reviewed the information provided above and best to my knowledge and belief, is true, accurate and complete so that this document was prepared under my direction or supervision. Base on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.*

If you have any questions or comments concerning this matter, please call me at 813-319-3423.

Sincerely,

Stuart Stapleton  
QEHS Manager

SS6

183805

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number <b>FLCESQG</b>	2. Page 1 of	3. Emergency Response Phone <b>3E @ 800-451-8346</b>	4. Manifest Tracking Number <b>00895322 JJK</b>	
5. Generator's Name and Mailing Address <b>NOVIS PHARMACEUTICAL</b> <b>3728 W GREEN TRAIL</b> <b>TALLAHASSEE, FL 32311</b>			Generator's Site Address (if different than mailing address) <b>NOVIS PHARMACEUTICAL</b> <b>10000 GW 70 AVENUE</b> <b>MIAMI, FL 33126</b>			<b>PROLINE CARGO</b> <b>7758 NW 46th St.</b> <b>MIAMI, FL 33166</b>
6. Transporter 1 Company Name <b>CLIFF BERRY, INC. (DANIA)</b>				U.S. EPA ID Number <b>FLR000083071</b>		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>E. Q. OF FLORIDA INC.</b> <b>2002 N. ORIENT RD, TAMPA, FL 33619</b>				U.S. EPA ID Number <b>FLD981932494</b>		
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity
				No.	Type	12. Unit Wt./Vol
	X	UN3098, WASTE, Oxidizing liquid, corrosive, n.o.s. (Contains Peracetic acid and Hydrogen peroxide), 5.1, PG-II (HW OXIDIZER, CORROSIVE)		7	DM	1100
	X	UN3085, WASTE, Oxidizing solid, corrosive, n.o.s. (contains peracetic acid and hydrogen peroxide) 5.1(B) PGI		1	DM	100
13. Waste Codes <b>D001, D002</b>						
14. Special Handling Instructions and Additional Information <b>1. 7 x 55 gal DM LAsquech of 1 gallon jars -194, 175, 16A, 89P, 94P, 101P, 96A, 150P.</b> <b>2. 1 x 55 gal dm oil dry, boxes 175P</b>						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. <b>236744-1</b>						
Generator/Offeror's Printed/Typed Name <b>NOVIS PHARMACEUTICAL</b>				Signature <i>[Signature]</i>		Month Day Year <b>09 14 12</b>
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
17. Transporter Acknowledgment of Receipt of Materials						
Transporter 1 Printed/Typed Name <b>Ken Hill</b>				Signature <i>[Signature]</i>		Month Day Year <b>09 14 12</b>
Transporter 2 Printed/Typed Name				Signature		Month Day Year
18. Discrepancy						
18a. Discrepancy indicator: Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection <input type="checkbox"/>						
18b. Alternate Facility (or Generator) _____ Manifest Reference Number: _____ U.S. EPA ID Number _____						
18c. Signature of Alternate Facility (or Generator) _____ Month Day Year _____						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. <b>H141</b>		2. <b>H141</b>		3. _____		4. _____
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name <b>Michael Bramberg</b>				Signature <i>[Signature]</i>		Month Day Year <b>09 20 12</b>



Cliff Berry, Incorporated  
Environmental Services

# LAB PACK- DRUM INVENTORY

Container Number: <u>1</u>	DOT Shipping Name: <u>Waste Oxidizing liquid, corrosive, n.o.s. (contains peracetic acid &amp; Hydrogen Peroxide)</u>
Generator: <u>NOVIS PHARMACEUTICALS</u>	Hazard Class, UNNA Number & Packing Group: <u>5.1(8), UN3098, PGI</u>
Date: <u>9-14-12</u>	Profile Number:
Container Size: <u>55 gal Drum</u>	Packed By: <u>NRoc</u>

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (containing peracetic acid + hydrogen peroxide)	1 gallon x 26	L	D001, D002
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas



### LAB PACK-DRUM INVENTORY

Container Number: <b>2</b>	DOT Shipping Name: <b>Waste Oxidizing liquid, corrosive, n.o.s. (contains)</b>
Generator: <b>NOVIS PHARMACEUTICALS</b>	Hazard Class, UNNA Number & Packing Group: <b>5.1(8), UN3098, PGII</b>
Date: <b>9-14-12</b>	Profile Number:
Container Size: <b>55 gal Drum</b>	Packed By: <b>NRoc</b>

*Permeate  
o.c. id as  
Hydroge  
Permeate*

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (containing peracetic acid + hydrogen peroxide)	1 gallon x 26	L	D001, D002
2				
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas



Cliff Berry, Incorporated  
Environmental Services

# LAB PACK-DRUM INVENTORY

Container Number: <b>3</b>	DOT Shipping Name: <b>Waste Oxidizing liquid, corrosive, n.o.s.</b> (contains peracetic acid and hydrogen peroxide)
Generator: <b>NOVIS PHARMACEUTICALS</b>	Hazard Class, UNNA Number & Packing Group: <b>5.1(8), UN3098, PGII</b>
Date: <b>9-14-12</b>	Profile Number:
Container Size: <b>55 gal Drum</b>	Packed By: <b>N Roc</b>

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (containing peracetic acid + hydrogen peroxide)	1 gallon x 26	L	D001, D002
2				
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas





LAB PACK-DRUM INVENTORY

Container Number: <b>4</b>	DOT Shipping Name: <b>Waste Oxidizing liquid, corrosive, n.o.s. (contains peracetic acid and hydrogen peroxide)</b>
Generator: <b>NOVIS PHARMACEUTICALS</b>	Hazard Class, UN/NA Number & Packing Group: <b>5.1(8), UN3098, PGII</b>
Date: <b>9-14-12</b>	Profile Number:
Container Size: <b>55 gal Drum</b>	Packed By: <b>NRoc</b>

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (containing peracetic acid + hydrogen peroxide)	1 gallon x 24	L	D001, D002
2				
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas



Cliff Berry, Incorporated  
Environmental Services

### LAB PACK-DRUM INVENTORY

Contains  
acidic  
Hydroxide  
peroxide

Container Number: <b>(5)</b>	Generator: <b>NOVIS PHARMACEUTICALS 5118</b>	Date: <b>9-14-12</b>	Container Size: <b>55 gal Drum</b>
DOT Shipping Name: <b>WASTE OXIDIZING LIQUID, CORROSIVE, n.o.s. (CONTAINS ACIDIC HYDROXIDE PEROXIDE)</b>	Hazard Class, UNNA Number & Packing Group: <b>UN3098, PG II</b>	Profile Number:	Packed By: <b>N Rose</b>

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (containing peracetic acid + hydrogen peroxide)	1 gallon x 21	L	D001, D002
2				
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas



### LAB PACK- DRUM INVENTORY

Container Number: <b>6</b>	DOT Shipping Name: <b>Waste Oxidizing liquid, corrosive, n.o.s. (contains Peracetic acid &amp; Hydrogen Peroxide)</b>
Generator: <b>NOVIS PHARMACEUTICALS</b>	Hazard Class, UNNA Number & Packing Group: <b>5.1(8), UN3098, PGI</b>
Date: <b>9-14-12</b>	Profile Number:
Container Size: <b>55 gal Drum</b>	Packed By: <b>N Roc</b>

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (containing peracetic acid + hydrogen peroxide)	1 gallon x 26	L	D001, D002
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas



Cliff Berry, Incorporated  
Environmental Services

### LAB PACK- DRUM INVENTORY

Container Number: <u>7</u>	DOT Shipping Name: <u>Waste oxidizing liquid, corrosive, n.o.s.</u>
Generator: <u>Novis Pharmaceutical</u>	Hazard Class, UN/NA Number & Packing Group: <u>S1(8) UN3098, PGII</u>
Date: <u>11-14-12</u>	Profile Number:
Container Size: <u>55 GAL DM</u>	Packed By: <u>N Roe</u>

*(contains  
peracetic  
acid +  
hydrogen  
peroxide)*

Line No.	Material Description	Quantity x Container Size	Physical State	EPA Waste codes
1	Cleaner (contains	26 x 1	L	D001, D002
2	peracetic acid + hydrogen peroxide	gallon		
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\*Physical State: S=Solid, L=Liquid, R=Residue, A=Aerosol, G=Gas