

**Knauss, Elizabeth**

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**From:** Knauss, Elizabeth  
**Sent:** Wednesday, March 28, 2012 5:11 PM  
**To:** 'Ruede, Richard'  
**Cc:** Dregne, James  
**Subject:** FW: wastewater treatment unit receipts  
**Attachments:** 9-30-11 and 12-2-11 wash water 002.pdf; factory direct waste water results.pdf

Rick – Attached are some additional documents regarding waste waters shipped from Factory Direct, (FLR000176313) to Aqua Clean via Heritage Crystal Clean.

The material is waste water from a booth used to wash industrial batteries, not oily waste water. Analytical results from September 2011 had .55 mg/kg lead , (not hazardous).

**From:** Honey, Kelly  
**Sent:** Wednesday, March 28, 2012 2:33 PM  
**To:** Knauss, Elizabeth  
**Subject:** FW: wastewater treatment unit receipts

Beth,

Here's confirmation from HCC that the battery wash wastewater is going to Aqua Clean.

-kelly

**From:** Pendry, Anita [<mailto:Anita.Pendry@Crystal-Clean.com>]  
**Sent:** Wednesday, March 28, 2012 2:03 PM  
**To:** Honey, Kelly  
**Cc:** McCord, Catherine  
**Subject:** FW: wastewater treatment unit receipts

Kelly,  
The Used Oily Water is taken to Aqua Clean Environmental in Lakeland, FL

Please let me know if you have any other questions.  
Thanks  
Anita

**From:** Collard, Toby  
**Sent:** Friday, March 23, 2012 8:05 AM  
**To:** Pendry, Anita  
**Subject:** Fw: wastewater treatment unit receipts

\*\* This message may contain information that is confidential and is intended only for the use of the designated recipient(s). \*\*

**From:** Honey, Kelly <[Kelly.Honey@dep.state.fl.us](mailto:Kelly.Honey@dep.state.fl.us)>  
**To:** Collard, Toby  
**Sent:** Fri Mar 23 07:59:24 2012  
**Subject:** FW: wastewater treatment unit receipts  
Toby,

Could you please tell me the ultimate destination for this material from Factory Direct? Thanks!

*Kelly Honey*  
*FL Department of Environmental Protection*  
*RCRA Compliance and Enforcement*  
*T: 813/632-7600, ext. 369*  
*F: 813/632-7664*

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

**From:** Bob Fischer [[mailto:bob\\_fischer@fdbattery.com](mailto:bob_fischer@fdbattery.com)]  
**Sent:** Friday, March 23, 2012 7:38 AM  
**To:** Honey, Kelly  
**Cc:** 'Bob Fischer'  
**Subject:** RE: wastewater treatment unit receipts

See attached, I think this is what you were looking for...

Thank you,

*Bob Fischer*

Factory Direct Inc  
Tel: 813-621-3338  
Cell: 813-927-7001

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**From:** Honey, Kelly [<mailto:Kelly.Honey@dep.state.fl.us>]  
**Sent:** Thursday, March 22, 2012 5:05 PM  
**To:** 'Bob Fischer'  
**Subject:** RE: wastewater treatment unit receipts

No problem. I will look for it tomorrow.

-k

**From:** Bob Fischer [[mailto:bob\\_fischer@fdbattery.com](mailto:bob_fischer@fdbattery.com)]  
**Sent:** Thursday, March 22, 2012 4:34 PM  
**To:** Honey, Kelly  
**Subject:** Re: wastewater treatment unit receipts

Kelly I didnt forget about you. I will email this in the morning. Busy day sorry!

On Mar 21, 2012 5:30 PM, "Honey, Kelly" <[Kelly.Honey@dep.state.fl.us](mailto:Kelly.Honey@dep.state.fl.us)> wrote:

Hi again Bob,

Could you please send me a copy of the paperwork for the last couple of cleanouts of that unit? I did not write down the final destination where Heritage Crystal Clean has been taking it. (oops!) The dates are 09-30-11 and 12-02-11. You can either fax them or email them.

Thanks in advance!

Kelly Honey  
FL Department of Environmental Protection  
RCRA Compliance and Enforcement  
T: 813/632-7600, ext. 369  
F: 813/632-7664

Please Note: Florida has a very broad public records law. Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Your e-mail communications may therefore be subject to public disclosure.

**Please take a few minutes to share your comments on the service you received from the department by clicking on this link Copy the url below to a web browser to complete the DEP survey:**  
**<http://survey.dep.state.fl.us/?refemail=Kelly.Honey@dep.state.fl.us>**

The information contained in this e-mail communication and any attached documentation is intended only for the exclusive use of the designated recipient(s). If the reader or recipient of this e-mail and any attached documentation is not the intended recipient or an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail and any attached documentation is strictly prohibited. If you have received this e-mail in error, please immediately notify the sender by return e-mail and promptly delete the e-mail and any attached documentation. This e-mail and any attached documentation may contain information that is privileged, confidential, proprietary or otherwise protected by law. This notice serves as a confidentiality marking for the purpose of any confidentiality or nondisclosure agreement. Receipt of this e-mail and the attached documentation by anyone other than the intended recipient shall not be deemed a waiver of any rights of confidentiality.

EMPID#	SYG#	ORDER#	SVCREQ	7#	PURCHASE/ORDER#	PAGE
30484	39	454614		156070		
CCMS/CUSTID#	ROUTE				FEDERAL/EPAID#	
152316						
GEN STATUS	STATE/EPAID#			COMMENTS		
SQG						
CCMS WO#:						

**CUSTOMER/SHIPPER:** Factory Direct Inc  
6601 ADAMS DRIVE  
TAMPA FLORIDA 33618  
**Contact Name:** Rob F. Schae

**DESTINATION:** Heritage Crystal Clean  
9940 OLIVER DRIVE  
TAMPA FLORIDA 33618  
**Phone Number:** 813-656-1901

**CARRIER:** HERITAGE-CRYSTAL CLEAN, LLC **EPA ID #:** ILR 000 130 062 **Phone Number:** (877) 938-7948

BILL OF LADING					
16 GAL. DRUMS	30 GAL. DRUMS	55 GAL. DRUMS	PROPER SHIPPING NAME	TOTAL	UNITS
		11	110W-305 REGULATED SOLVENT	500	G

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport according to the applicable regulations of the Department of Transportation, as required. I also certify that neither hazardous waste, nor PCBs have been mixed with the used oil and/or parts cleaner solvent (if applicable).

Per *[Signature]* 9/30/11  
Customer/Shipper Date

Per *[Signature]* 9/30/11  
HCC/Carrier Date

SUMMARY OF CHARGES										
TODAY'S SERVICE										
WS #	PROD. CODE	DESCRIPTION	RTD. GALS.	UNIT	SI	NEXT SVC.	LOCATION COMMENTS	UNIT PRICE	QTY.	TOTAL CHARGE

								TAX		
								SERVICE SUBTOTAL		

PRODUCTS										
PRODUCT DESCRIPTION:								UNIT PRICE	QTY.	CHARGE
								PRODUCT SALES TAX		
								SUBTOTAL PRODUCT & TAX		

MACHINE INSPECTION		SERVICE/PRODUCTS CHARGE SUMMARY	
Cleanliness G P Lamp Assembly G P Drum Condition G P Fusible Link Installed G P Lid Unobstructed G P Properly Grounded G P Local Phone # affixed G P Decals in Place G P	CUSTOMER HEREBY VERIFIES THAT THE ABOVE SERVICES WERE PERFORMED AND THAT SAID SERVICES AND THE CHARGES THEREFORE ARE HEREBY ACCEPTED. CUSTOMER ALSO HEREBY REAFFIRMS THE ACCURACY AND COMPLETENESS OF ALL INFORMATION CONTAINED IN THIS WORK ORDER AND ALL DOCUMENTATION PREVIOUSLY SUBMITTED TO HCC. THIS WORK ORDER IS DEEMED PART OF THE SERVICE AGREEMENT BETWEEN HERITAGE-CRYSTAL CLEAN, LLC AND THE CERTIFICATIONS CONTAINED THEREIN CONCERNING THE MATERIALS TO BE HANDLED AND THE SERVICES TO BE PROVIDED ARE INCORPORATED HEREIN BY REFERENCE AND DEEMED PART HEREOF AND SAID CERTIFICATIONS ARE DEEMED REMADE FOR THE SERVICES COVERED BY THIS WORK ORDER.	TODAY'S SERVICE PRODUCT & TAX TOTAL AMOUNT DUE TOTAL REMITTANCE CHECK NUMBER	PER <i>[Signature]</i> DATE 9/30/11



EMPID#	WORKORDER#	SVCREQ	GRI	PURCHASEORDER#	PAGE
30584	454638				
CCMSCUSTID#	ROUTE	FEDERAL EPA ID#			
152216					
GEN STATUS	STATE EPA ID#	COMMENTS			
509					
CCMS WO#:					

**CUSTOMER/SHIPPER:** Factory Direct  
4601 Adams Drive  
Tampa Florida 33619  
Contact Name: Bob Fischer

**DESTINATION:** Heritage Crystal Clean  
9940 Curcio Davis Drive #101  
Tampa Florida 33619  
Phone Number: 813-626-6902

**CARRIER:** HERITAGE-CRYSTAL CLEAN, LLC **EPA ID #:** ILR 000 130 062 **Phone Number:** (877) 938-7948

BILL OF LADING					
16 GAL. DRUMS	30 GAL. DRUMS	55 GAL. DRUMS	PROPER SHIPPING NAME	TOTAL	UNITS
		11	NON-DET REGULATED CORROSIVE LIQ. WATER	550	6

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transport according to the applicable regulations of the Department of Transportation, as required. I also certify that neither hazardous waste, nor PCBs have been mixed with the used oil and/or parts cleaner solvent (if applicable).

Per V  
Customer/Shipper

Date

Per SD  
HCC/Carrier

Date

**SUMMARY OF CHARGES**

**TODAY'S SERVICE**

WS #	PROD. CODE	DESCRIPTION	RTD. GALS.	UNIT	SI	NEXT SVC.	LOCATION COMMENTS	UNIT PRICE	QTY.	TOTAL CHARGE
1101		1.9000						\$1.35	400	532.00
1103		Truck						235.00	1	235.00
1110		Fuel						30.00	1	30.00
1109		Roller						n/c	100	n/c
								TAX		807.00
								SERVICE SUBTOTAL		

**PRODUCTS**

**PRODUCT DESCRIPTION:**

1470 100 gal F100 cleaner

UNIT PRICE	QTY.	CHARGE
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135.00	1	135.00
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PRODUCT SALES TAX

SUBTOTAL PRODUCT & TAX 135.00

MACHINE INSPECTION	SERVICE/PRODUCTS CHARGE SUMMARY										
Less Assembly Drum Condition Fusible Link Installed Lid Unobstructed Properly Grounded Local Phone # affixed Decals in Place	CUSTOMER HEREBY VERIFIES THAT THE ABOVE SERVICES WERE PERFORMED AND THAT SAID SERVICES AND THE CHARGES THEREFORE ARE HEREBY ACCEPTED. CUSTOMER ALSO HEREBY REAFFIRMS THE ACCURACY AND COMPLETENESS OF ALL INFORMATION CONTAINED IN THIS WORK ORDER AND ALL DOCUMENTATION PREVIOUSLY SUBMITTED TO HCC. THIS WORK ORDER IS DEEMED PART OF THE SERVICE AGREEMENT BETWEEN HERITAGE-CRYSTAL CLEAN, LLC AND THE CERTIFICATIONS CONTAINED HEREIN CONCERNING THE MATERIALS TO BE HANDLED AND THE SERVICES TO BE PROVIDED ARE INCORPORATED HEREIN BY REFERENCE AND DEEMED PART HEREOF AND SAID CERTIFICATIONS ARE DEEMED REMADE FOR THE SERVICES COVERED BY THIS WORK ORDER. PER <u>X</u> DATE <u>12/5/11</u>										
	<table border="1"> <tr> <td>TODAY'S SERVICE</td> <td>807.00</td> </tr> <tr> <td>PRODUCT &amp; TAX</td> <td>135.00</td> </tr> <tr> <td>TOTAL AMOUNT DUE</td> <td>942.00</td> </tr> <tr> <td>TOTAL REMITTANCE</td> <td></td> </tr> <tr> <td>CHECK NUMBER</td> <td></td> </tr> </table>	TODAY'S SERVICE	807.00	PRODUCT & TAX	135.00	TOTAL AMOUNT DUE	942.00	TOTAL REMITTANCE		CHECK NUMBER	
TODAY'S SERVICE	807.00										
PRODUCT & TAX	135.00										
TOTAL AMOUNT DUE	942.00										
TOTAL REMITTANCE											
CHECK NUMBER											

**Honey, Kelly**

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**From:** Bob Fischer [bob\_fischer@fdbattery.com]  
**Sent:** Wednesday, February 29, 2012 5:28 PM  
**To:** Honey, Kelly  
**Subject:** FW: Factory Direct  
**Attachments:** factory direct dirty water analysis.pdf

Analytical attached. Working on the LDR.

Thank you,

*Bob Fischer*

Factory Direct Inc  
Tel: 813-621-3338  
Cell: 813-927-7001

**CERTIFICATE OF ANALYSIS**

<b>Service Location</b> HERITAGE ENVIRONMENTAL SERVICES, LLC COMMERCIAL LABORATORY OPERATIONS 7901 W. MORRIS ST. INDIANAPOLIS, IN 46231 (317)243-8304	<b>Received</b>	<b>Lab ID</b>
	21-SEP-11	A929123
	<b>Completed</b>	<b>PO Number</b>
	27-SEP-11	HCC113
	<b>Printed</b>	<b>Sampled</b>
	28-SEP-11	16-SEP-11 13:00

<b>Report To</b>	<b>Bill To</b>
CATHERINE MCCORD HERITAGE- CRYSTAL CLEAN, LLC 2175 POINT BLVD. SUITE 375 - EHS DEPT. ELGIN, IL 60123-9211	CATHERINE MCCORD HERITAGE CRYSTAL CLEAN 2175 POINT BOULEVARD, SUITE 375 ELGIN, IL 60123

<b>Sample Description</b>
CLIENT ID: FACTORY DIRECT MATRIX TYPE: SLUDGE, SOIL, SOLID OR SEDIMENT SUBMITTER: 9018 - HERITAGE- CRYSTAL CLEAN DATA PACKAGE #: N/A DESCRIPTION: DIRTY WATER CC NUMBER: HCC13391611 SALES REP: T. COLLARD

PHYSICAL APPEARANCE SAS		NELAG:N	
Analyst: S. PATEL	Analysis Date: 28-SEP-11 08:45	Test: G622.00	
Parameter	Result	Det. Limit	Units
COLOR	*		
PHYSICAL STATE	**		
NUMBER OF LAYERS	1		
PHYSICAL APPEARANCE	***		
*Colorless			
**Liquid			
***Colorless aqueous liquid			

PCB SEPARATORY FUNNEL LIQUID-LIQUID EXTRACTION SW846-3510C			
Analyst: J. WATSON	Analysis Date: 22-SEP-11	Instrument: PREP	Test: P230.110
Parameter	Result	Det. Limit	Units
INITIAL WEIGHT OR VOLUME	1.0		mL
FINAL VOLUME	5		mL
d=1.089 g/ml			

PCB AROCLORS BY GAS CHROMATOGRAPHY/EGD SW846-8082A			NELAG:Y
Analyst: R. DALAL	Analysis Date: 22-SEP-11 15:41	Instrument: GC/EGD	Test: Q301.7.0
Prep: PCB SEPARATORY FUNNEL LIQUID-LIQUID EXTRACTION SW846-3510C P230.110			
Parameter	Result	Det. Limit	Units

Sample ID: A929123 FACTORY DIRECT

PCB AROCLOR 1016	BDL	0.10	mg/L
PCB AROCLOR 1221	BDL	0.10	mg/L
PCB AROCLOR 1232	BDL	0.10	mg/L
PCB AROCLOR 1242	BDL	0.10	mg/L
PCB AROCLOR 1248	BDL	0.10	mg/L
PCB AROCLOR 1254	BDL	0.10	mg/L
PCB AROCLOR 1260	BDL	0.10	mg/L
PCB AROCLOR 1262	BDL	0.10	mg/L
...			
SURROGATE RECOVERY			
DECACHLOROBIPHENYL (DCB)	123.0		% Rec

<b>SETAFLASH CLOSED-CUP METHOD FOR IGNITABILITY SW846-1020B</b>			<b>NELAC/N</b>
Analyst: S. PATEL	Analysis Date: 23-SEP-11		Test: G509.6.0
Parameter	Result	Det. Limit	Units
IGNITABILITY	> 200		Degrees F

<b>PH (AQUEOUS) SW846-9040C</b>			<b>NELAC/Y</b>
Analyst: S. MCNEAL	Analysis Date: 23-SEP-11 11:50		Test: G607.6.0
Parameter	Result	Det. Limit	Units
PH	6.1	0.1	Std. Units

<b>ROA SOLVENTS GC/MS SW846-8000A</b>			<b>NELAC/N</b>
Analyst: H. WILLIAMS	Analysis Date: 22-SEP-11 12:37	Instrument: GC/MS SVOA	Test: G523.6.0
Parameter	Result	Det. Limit	Units
METHANOL	BDL	50	mg/kg
TRICHLOROFLUOROMETHANE	BDL	50	mg/kg
ETHYL ETHER	BDL	50	mg/kg
1,1,2-TRICHLORO-1,2,2-TRIFLUOROETHANE	BDL	50	mg/kg
ACETONE	BDL	50	mg/kg
DICHLOROMETHANE (METHYLENE CHLORIDE)	BDL	50	mg/kg
METHYL ETHYL KETONE	BDL	50	mg/kg
ETHYL ACETATE	BDL	50	mg/kg
1,1,1-TRICHLOROETHANE	BDL	50	mg/kg
CARBON TETRACHLORIDE	BDL	50	mg/kg
BENZENE	BDL	50	mg/kg
ISOBUTANOL (ISOBUTYL ALCOHOL)	BDL	50	mg/kg
TRICHLOROETHYLENE	BDL	50	mg/kg
N-BUTANOL	BDL	50	mg/kg
2-NITROPROPANE	BDL	50	mg/kg
2-ETHOXYETHANOL	BDL	50	mg/kg

Sample ID: A929123 FACTORY DIRECT

METHYL ISOBUTYL KETONE	BDL	50	mg/kg
PYRIDINE	BDL	50	mg/kg
TOLUENE	BDL	50	mg/kg
1,1,2-TRICHLOROETHANE	BDL	50	mg/kg
TETRACHLOROETHYLENE	BDL	50	mg/kg
N-BUTYL ACETATE	BDL	50	mg/kg
CHLOROBENZENE	BDL	50	mg/kg
ETHYL BENZENE	BDL	50	mg/kg
M/P-XYLENE	BDL	100	mg/kg
O-XYLENE	BDL	50	mg/kg
CYCLOHEXANONE	BDL	50	mg/kg
1,2-DICHLOROBENZENE (O-DICHLOROBENZENE)	BDL	50	mg/kg
2-METHYLPHENOL (O-CRESOL)	BDL	50	mg/kg
NITROBENZENE	BDL	50	mg/kg
3-METHYLPHENOL/4-METHYLPHENOL (M/P-CRESOL)	BDL	100	mg/kg

Prep 1.04g to 5ml.

FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A			
Analyst: K. KAMARA		Analysis Date: 23-SEP-11 09:00	Instrument: PREP
		Test: P130.5.0	
Parameter	Result	Det. Limit	Units
INITIAL WEIGHT OR VOLUME	2.53		Grams
FINAL VOLUME	50		mL

ARSENIC ICP SW846-3010B			NELAC-Y
Analyst: J. KRAMER		Analysis Date: 24-SEP-11 06:51	Instrument: ICP
		Test: M103.3.0	
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			
Parameter	Result	Det. Limit	Units
ARSENIC	BDL	0.20	mg/kg

BARIUM ICP SW846-3010B			NELAC-Y
Analyst: J. KRAMER	Analysis Date: 24-SEP-11 06:51	Instrument: ICP	Test: M104.3.0
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			
Parameter	Result	Det. Limit	Units
BARIUM	BDL	0.20	mg/kg

CADMIUM ICP SW846-3010B			NELAC-Y
Analyst: J. KRAMER	Analysis Date: 24-SEP-11 06:51	Instrument: ICP	Test: M108.3.0
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			
Parameter	Result	Det. Limit	Units
CADMIUM	BDL	0.099	mg/kg

<b>CHROMIUM ICP SW846-6010B</b>		<b>NELAP Y</b>	
Analyst: J. KRAMER	Analysis Date: 24-SEP-11 06:51	Instrument: ICP	Test: M1103.0
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			

Parameter	Result	Det. Limit	Units
CHROMIUM	BDL	0.20	mg/kg

<b>LEAD ICP SW846-6010B</b>		<b>NELAP Y</b>	
Analyst: J. KRAMER	Analysis Date: 24-SEP-11 06:51	Instrument: ICP	Test: M1163.0
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			

Parameter	Result	Det. Limit	Units
LEAD	0.55	0.20	mg/kg

<b>SELENIUM ICP SW846-6010B</b>		<b>NELAP Y</b>	
Analyst: J. KRAMER	Analysis Date: 24-SEP-11 06:51	Instrument: ICP	Test: M1283.0
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			

Parameter	Result	Det. Limit	Units
SELENIUM	BDL	0.20	mg/kg

<b>SILVER ICP SW846-6010B</b>		<b>NELAP Y</b>	
Analyst: J. KRAMER	Analysis Date: 24-SEP-11 06:51	Instrument: ICP	Test: M1303.0
Prep: FAA OR ICP ACID DIGESTION OF AQUEOUS SAMPLES SW846-3010A P130.5.0			

Parameter	Result	Det. Limit	Units
SILVER	BDL	0.20	mg/kg

<b>PERCENT SOLIDS BY CENTRIFUGE ASTM D-1796</b>		<b>NELAP N</b>	
Analyst: S. PATEL	Analysis Date: 28-SEP-11	Instrument: CENTRIFUGE	Test: G604.0.0

Parameter	Result	Det. Limit	Units
SOLIDS	1	0.2	Percent

**Sample Comments**

ANALYSES PERFORMED CONFORM TO THE WASTE ANALYSIS QUALITY ASSURANCE PLAN.

- \* See Note for Parameter
- \*\* See Note for Parameter
- \*\*\* See Note for Parameter
- > Greater Than
- BDL Below Detection Limit

Sample was not received on ice at temperature 26.2 C.  
 Sample chain of custody number HCC.

This Certificate shall not be reproduced, except in full, without the written approval of the lab. The sample results relate only to the analytes of interest tested or to the sample as received by the lab. Heritage Environmental Services, LLC certifies that the test results indicated as NELAP (National Environmental Laboratory Accreditation Program) accredited (Yes for NELAP) meet all requirements of NELAP and Kansas (KDHE) unless otherwise explained or justified as to the exact nature of the deviations.

KS ELAP / NELAP Accreditation # E-10177      Indiana SDWA C-49-01

*Christopher Boyle*

Approved by: CHRISTOPHER BOYLE 28-SEP-11

# HERITAGE-CRYSTAL CLEAN

## PREQUALIFICATION ANALYSIS REQUEST FORM

Completed form MUST accompany every physical sample

<u>Factory Direct</u> GENERATOR NAME	<u>T. COLLARD</u> HCC SAMPLER NAME
<u>152266</u> CCMS GENERATOR #	<u>9/16/11</u> <u>1 PM</u> DATE OF SAMPLE, TIME OF SAMPLE
<u>6661 Adamo Dr. Tampa FL</u> GENERATOR ADDRESS	<u>HCC 15391611</u> HCC SAMPLE #
<u>Dirty Water</u> WASTE DESCRIPTION	<u>Tampa</u> BRANCH NAME

- ☐ **Organic Analysis (Z138878)**  
Flash, RCRA solvent scan, BTU, specific gravity, % organic, % solids
- ☐ **Inorganic Analysis (Z138877)**  
Metals scan, pH, total solids, specific gravity, water solubility
- ☐ **Full TCLP Analysis (Z138745)**  
Volatiles, Semi-Volatiles, metals - does not include pH, flash, pesticides, herbicides
- ☐ **Partial TCLP Analysis** \_\_\_\_\_  
Specify test(s)
- ☒ **Other Analysis** Vac Pre Qual  
Specify test(s)

### Oil and Vac Services Request

- ☐ **Used Oil (Z138538)**  
Min 80% used oil
- ☐ **Oily Water (Z138480)**  
Must have recoverable oil
- ☐ **Non Haz (Z138481)**  
Waste stream does not contain used oil
- ☐ **Dallas Vac - all Dallas bulk waste streams (Z146680)**  
Dallas branch only



2229123

01055909

Sample Relinquished Signature

Date

Sample Relinquished Signature

Date

[Signature] 9/21/11 1435  
262 N3

9/16/11  
Date



## Knauss, Elizabeth

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**From:** Knauss, Elizabeth  
**Sent:** Tuesday, March 27, 2012 3:28 PM  
**To:** 'Noble, Ron'  
**Cc:** Dregne, James  
**Subject:** RE: Quality Aerospace Coatings

A short form consent order was executed with Quality Aerospace on December 16<sup>th</sup>. The penalty amount was \$7,700 plus \$300 costs, for a total of \$8,000.

**From:** Noble, Ron [<mailto:rnoble@fowlerwhite.com>]  
**Sent:** Tuesday, March 27, 2012 3:18 PM  
**To:** Knauss, Elizabeth  
**Subject:** Quality Aerospace Coatings

Hi Beth: I am following up on the voice mail I left you regarding the status of the Department's investigation and enforcement action against Quality Aerospace Coatings. We are preparing for a meeting with the City of Lakeland and I need to know the status of the QAC RCRA compliance issues. Specifically, has the Department resolved this matter by Short Form Consent Order or other settlement documents, and was QAC assessed any civil penalties?

A prompt response before 9 a.m. tomorrow morning would be greatly appreciated Beth.

Thanks, Ron



Ron Noble  
Fowler White Boggs P.A.  
501 E. Kennedy Blvd, Suite 1700  
Tampa, Florida 33602  
Direct: 813 222 1175  
Fax: 813 229 8313  
[www.fowlerwhite.com](http://www.fowlerwhite.com)

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Disclaimer under IRS Circular 230: Unless expressly stated otherwise in this transmission, nothing contained in this message is intended or written to be used, nor may it be relied upon or used, (1) by any taxpayer for the purpose of avoiding penalties that may be imposed on the taxpayer under the Internal Revenue Code of 1986, as amended and/or (2) by any person to support the promotion or marketing of or to recommend any Federal tax transaction(s) or matter(s) addressed in this message.

If you desire a formal opinion on a particular tax matter for the purpose of avoiding the imposition of any penalties, we will discuss the additional Treasury requirements that must be met and whether it is possible to meet those requirements under the circumstances, as well as the anticipated time and additional fees involved.

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Confidentiality Disclaimer: This e-mail message and any attachments are private communication sent by a law firm, Fowler White Boggs P.A., and may contain confidential, legally privileged information meant solely for the intended recipient. If you are not the intended recipient, you are hereby notified that any use, dissemination, distribution or copying of this communication is strictly prohibited. Please notify the sender immediately by replying to this message, then delete the e-mail and any attachments from your system. Thank you.

**Knauss, Elizabeth**

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**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Wednesday, March 14, 2012 7:29 AM  
**To:** Knauss, Elizabeth  
**Subject:** Aqua Clean  
**Attachments:** Aqua\_Clean\_Tampa\_Permit.pdf

Beth,

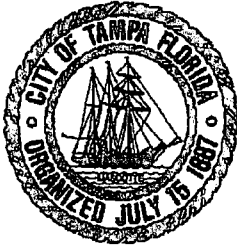
Here is the copy o f discharge permit from Tampa for Aqua Clean....

Rick

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**PUBLIC RECORDS NOTICE:**

All e-mail sent to and received from the City of Lakeland, Florida, including e-mail addresses and content, are subject to the provisions of the Florida Public Records Law, Florida Statute Chapter 119, and may be subject to disclosure.



# CITY OF TAMPA

Pam Iorio, Mayor

Wastewater Department

Mr. W. D. Miller, III  
Aqua Clean Environmental Co., Inc.  
3210 Whitten Rd.  
Lakeland, FL 33811

June 22, 2010

Re: Issuance of an Industrial Wastewater Discharge Permit to Aqua Clean Environmental Co., Inc., by the City of Tampa, Wastewater Department.


Dear Mr. Miller:

The enclosed issued permit, No. 1107, governs the wastewater discharge from the facility located at 1008 19<sup>th</sup> St., Tampa, Florida 33605, into the City of Tampa's wastewater collection system. All discharges from this facility and actions and reports relating thereto shall be in accordance with the terms and conditions of this permit.

There are two copies of the "Acceptance of Permit" page at the end of the discharge permit with a block reserved for your signature indicating acceptance of the limitations and conditions specified in the permit. Please sign both copies of the page, retain one copy with the permit, and return one of the signed copies to Mr. John Daily, City of Tampa, Industrial Waste Section, 2700 Maritime Blvd., Tampa, FL 33605.

If you have any questions about this permit please do not hesitate to contact Mr. Daily at (813) 247-3451, ext. 222.

Sincerely,

  
Ralph L. Metcalf II, P.E.  
Director  
Wastewater Department

RLM:jmd

CITY OF TAMPA

WASTEWATER DEPARTMENT

INDUSTRIAL WASTEWATER DISCHARGE PERMIT

City of Tampa  
Wastewater Department  
Industrial Wastewater Discharge Permit

Cover Page

Permit No. 1107

Company Name Aqua Clean Environmental Co., Inc.

Address 1008 19<sup>th</sup> St.

Tampa, FL 33605

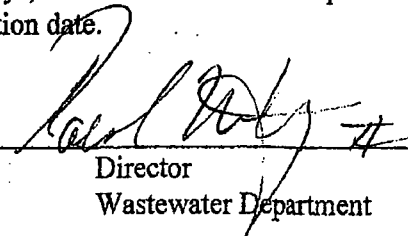
Telephone Number (863) 644-0665

Name of Applicant Aqua Clean Environmental Co., Inc.

Aqua Clean Environmental Co., Inc., a Florida Profit Corporation, with principal place of business located at 1008 19<sup>th</sup> St., Tampa, Florida 33605, herein referred to as "permittee," is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein, and hereinafter referred to as "facility," into the City of Tampa sewer system in accordance with the conditions set forth in this Industrial Wastewater Discharge Permit, hereinafter referred to as the "permit." Issuance of this permit shall not be construed as a representation by the City of Tampa that the permittee herein complies with the terms and conditions of this permit, and does not relieve the permittee of its obligation to comply with all Federal and State pretreatment standards or requirements or with other applicable requirements under Federal, State, and/or local laws, rules, and regulations, including, but not limited to, Chapter 26 of the City of Tampa Code, and the provisions of the City of Tampa Wastewater Department Technical Manual (Manual of Standards for Industrial and Special Users) as updated April 2006, as amended, hereinafter referred to as the "Technical Manual." Compliance with this permit does not relieve the permittee of responsibility for compliance with all applicable Federal and State pretreatment standards, including those which become effective during the term of this permit. Noncompliance with any term or condition of this permit shall constitute a violation of Chapter 26 of the City of Tampa Code entitled "Utilities" and the Technical Manual.

This permit shall become effective on July 1, 2010  
and shall expire at midnight on June 30, 2012

If the permittee wishes to continue to discharge after the expiration date of this permit, an application must be filed for a renewal permit a minimum of ninety (90) days, in accordance with the requirements of Section 4.5 of the above described Technical Manual, prior to the expiration date.

  
\_\_\_\_\_  
Director  
Wastewater Department

7/6/10  
\_\_\_\_\_  
Date

Industry Name Aqua Clean Environmental Co., Inc.

Permit No. 1107

## PART 1 - APPLICABLE EFFLUENT LIMITATIONS

### SECTION 1 - EFFLUENT DISCHARGE LIMITS

- A. During the period of this permit, the permittee is authorized to discharge process wastewater to the City of Tampa from only the outfall described below.

Description of outfalls:

Outfall

Description

001

Outfall 001 is the manhole located at the northeast corner of the facility. All process wastewater from the water storage tanks is discharged to the City of Tampa from this outfall.

- B. During the period of this permit the discharge from outfall 001 must comply with the following pretreatment regulations established in 40 CFR Part 437 - Subpart C (Centralized Waste Treatment Point Source Category - Organics Treatment and Recovery).

40 CFR Part 437 - Subpart C  
Centralized Waste Treatment Point Source Category - Organics Treatment and Recovery  
437.36 Pretreatment Standards for New Sources (PSNS)

Parameter	Maximum Daily Milligrams per liter (mg/l)	Maximum Monthly Avg. Milligrams per liter (mg/l)
o-Cresol	1.92	0.561
p-Cresol	0.698	0.205
2,4,6-Trichlorophenol	0.155	0.106

Industry Name Aqua Clean Environmental Co., Inc.

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- C. During the period of this permit the discharge from the facility at the point where the discharge enters the City's sanitary sewer system shall not exceed the following effluent limitations. In addition, the discharge shall comply with all applicable regulations and standards contained in Chapter 26, City of Tampa code.

Parameter	Daily Maximum mg/l
Arsenic as As	0.21
Beryllium as Be	0.001
Cadmium as Cd	0.13
Chromium as Cr (Total)	2.77
Copper as Cu	0.67
Lead as Pb	0.80
Mercury as Hg	0.0002
Molybdenum as Mo	0.10
Nickel as Ni	0.42
Selenium as Se	0.47
Silver as Ag	1.80
Zinc as Zn	4.60
Oil & Grease (Mineral fraction)	100.0
pH	6.0 - 11.0

Industry Name Aqua Clean Environmental Co., Inc.

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## PART 2 - MONITORING AND REPORTING REQUIREMENTS

### SECTION 1 - MONITORING REQUIREMENTS

A During the period of this permit, the permittee shall monitor outfall 001 for the following:

<u>Parameter</u>	<u>Location</u>	<u>Frequency</u>	<u>Sample Type</u>
pH	(1)	(2) Quarterly	(3) Grab
o-Cresol	(1)	(2) Quarterly	(3) Grab
p-Cresol	(1)	(2) Quarterly	(3) Grab
2,4,6-Trichlorophenol	(1)	(2) Quarterly	(3) Grab
Purgeable Organics	(1)	(2) Quarterly	(3) Grab
Total Dissolved Solids	(1)	(2) Quarterly	(3) Grab
Chloride	(1)	(2) Quarterly	(3) Grab

(1) - Outfall 001

(2) - January, April, July, and October

(3) - Definitions of sample types are located in PART 4 SECTION 1 of this permit.

B. All activities related to sampling and analysis shall be performed in accordance with Chapter 62-160, F.A.C. and 40 CFR 136 as appropriate. Sample collection methods shall be consistent with the standard operating procedures defined in the most recent revisions of DEP-SOP-001/01. Analyses must be performed by a laboratory certified by the State of Florida, Department of Health, Bureau of Laboratories, to be in compliance with the NELAC Standards and FAC Rule 64E-1 regulations for the examination of environmental samples in the appropriate category.

1. *o-Cresol, p-Cresol, and 2,4,6-Trichlorophenol* shall be analyzed in accordance with EPA Method 625.
2. *Purgeable Organics* shall be analyzed in accordance with EPA Method 624.



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## SECTION 2 - REPORTING REQUIREMENTS

### A. Monitoring Reports

1. Analytical monitoring results obtained shall be summarized and reported as follows:

a. Monitoring reports shall be submitted within 30 days of receiving the analytical data. The report shall include:

- copies of the analytical results and the sample chain of custody form, and
- a signed cover sheet with the certification statement established in PART 4 SECTION 4 (E) of this permit.

B. Pursuant to the reporting requirements of 62-625.600(6)(e) F.A.C., the results of all monitoring performed more frequently than required by this permit, using test procedures approved under PART 2 SECTION 1 (B), shall be submitted with the report.

C. When a self-monitoring report shows any violation of the applicable standards included in PART 1 of this permit, the permittee must resample and submit both results within thirty (30) days of receiving original sample results, except the permittee is not required to resample if:

- (1) The City of Tampa performs sampling at the permittee at a frequency of at least once per month, or
- (2) The City of Tampa performs sampling at the permittee between the time when the permittee performs its initial sampling and the time when the permittee receives the results of this sampling.

D. The permittee must notify the City of Tampa, Wastewater Department, Industrial Waste Section by telephone, within twenty-four (24) hours of receipt of monitoring results, if the results indicate any violation of applicable standards. The current telephone number at date of issuance of this permit is (813) 247-3451.

It shall be the permittee's responsibility to ensure that it has updated contact information for the City of Tampa, Wastewater Department, Industrial Waste Section in order to provide all required verbal and written notices as required under this permit.

E. Signatory requirements are established in PART 4 SECTION 4 (E) of this permit.

Industry Name Aqua Clean Environmental Co., Inc.

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**F. Accidental Discharge Report**

1. The permittee shall notify the City of Tampa, Wastewater Department, Industrial Waste Section, immediately upon its having knowledge of the occurrence of an accidental discharge of substances regulated by this permit or prohibited by Chapter 26, City of Tampa Code. At all times the City of Tampa, Wastewater Department, Industrial Waste Section shall be notified by telephone (currently 813-247-3451 at date of issuance of this permit, or as changed) during the term of this permit. The notification shall include location of discharge, date and time thereof, the type of waste, including concentration and volume, and corrective actions taken.
2. Within five (5) days following such discharge, the permittee shall submit to the City of Tampa, Wastewater Department, Industrial Waste Section a detailed written report. The report shall specify:
  - a. Description and cause of the upset, slug or accidental discharge, the cause thereof, and the impact on the permittee's compliance status. The description should also include location of discharge, type, concentration and volume of waste.
  - b. Duration of noncompliance, including exact dates and times of noncompliance, and if the noncompliance continues, the time by which compliance is reasonably expected to occur.
  - c. All steps taken or to be taken to reduce, eliminate, and prevent recurrence of such an upset, slug, accidental discharge, or other conditions of non-compliance.
  - d. All written reports required of this permit shall be submitted to:

City of Tampa  
Industrial Waste Section  
2700 Maritime Blvd.  
Tampa, FL 33605.
  - e. Such notifications shall not relieve the user of any expense, loss, damage, or other liability which may be incurred as a result of damage to the City of Tampa's Publicly Owned Treatment Works (hereinafter referred to as "POTW"), natural resources, or any other liability which may be imposed pursuant to the Technical Manual.
3. A notice shall be permanently posted on the user's bulletin board, or other prominent place, advising employees who to call in the event of a discharge described in paragraph 1. above. Permittee shall insure that all employees who may cause or suffer such an accidental discharge to occur are advised of emergency notification procedures.

Industry Name Aqua Clean Environmental Co., Inc.

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**PART 3 - SPECIAL CONDITIONS / COMPLIANCE SCHEDULES**

1. It shall be the goal of the permittee to avoid discharging wastewater having a concentration of Total Dissolved Solids exceeding 20,000 mg/l by blending different sources of wastewater or by other means.
2. The total volume of wastewater discharged to the City of Tampa wastewater treatment system by the permittee shall not exceed 75,000 gallons per day unless expressly authorized otherwise by the City.
3. The City of Tampa, at its discretion; may collect split samples of wastewater.

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## PART 4 - STANDARD CONDITIONS

### SECTION 1 - DEFINITIONS

- A. AWTP - Advanced Wastewater Treatment Plant
- B. Composite sample - shall mean a sample collected over time, formed either by continuous sampling or by mixing discrete samples. A minimum of eight (8) discrete grab samples shall be collected at equally spaced one (1) hour intervals, per operating shift, and proportioned according to flow. The use of a properly operated automatic composite sampler is acceptable.
- C. Daily maximum - shall mean the results of one day sampling, either a single grab sample or composite sample during a twenty-four hour period.
- D. Grab sample - shall mean a single "dip and take" sample collected at a representative point in a wastestream without regard to the flow in the wastestream and over a period of time not to exceed fifteen (15) minutes. Daily pH monitoring may be performed by either grab sample or continuous pH electrometric probe monitoring.
- E. Monthly average - shall mean the average results of all sampling, either grab samples or 24-hour composite samples, taken during a calendar month
- F. POTW - Publicly Owned Treatment Works - shall mean a treatment works as defined by Section 212 of the Act, which is owned by a state or municipality (as defined by Section 502(4) of the Act). POTW as used in this permit references the City of Tampa's Treatment Works.

### SECTION 2 - GENERAL CONDITIONS

#### A. Duty to Comply

The permittee must comply with all conditions of this permit, Chapter 26 of the City of Tampa Code, the Technical Manual, and all applicable Federal, State, or local laws, rules, and regulations in effect at the time of issuance of this permit, and that may become effective during the term of this permit.

Any violation of the terms and conditions of this permit shall be deemed a violation of the Technical Manual and subjects the permittee, or any other person, to the sanctions set forth in Sections 10 and 11 of the Technical Manual and/or as set forth in Part 4, Section 6 of this permit entitled "Enforcement."

Failure to comply with the terms and conditions of this permit, Chapter 26 of the City of Tampa Code, the Technical Manual, and all applicable Federal, State, and/or local laws, rules and regulations may subject the permittee to administrative or judicial enforcement remedies. Administrative enforcement remedies include, but are not limited to, the suspension, modification and/or revocation of this permit. Judicial enforcement remedies include, but are not limited to, civil or criminal penalties, injunctive relief, and/or other legal remedies and relief as provided by law. These remedies are not exclusive and any, all, or any combination of these actions may be taken against a noncompliant permittee or against any other person when circumstances warrant by the City of Tampa. See Sections 10 and 11 of the Technical Manual.

**B. Duty to Mitigate**

The permittee shall take all reasonable steps to minimize or correct any adverse impact on the environment, public health, worker health and safety, and POTW resulting from noncompliance with this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

**C. Permit Action**

This permit may be modified, revoked and reissued, or terminated for causes including, but not limited to, the following:

1. Violation of any terms or conditions of this permit, the Technical Manual, Chapter 26 of the City of Tampa Code, any applicable pretreatment standard or requirement, Federal, State, and/or local law, rules and regulations.
2. Transfer of facility ownership or operation to a new owner or operator.
3. Misrepresentations or failure to fully disclose all relevant facts in the permit application or in any required reporting under the terms and conditions of this permit, the Technical Manual, Chapter 26 of the City of Tampa Code, any applicable pretreatment standard or requirement, Federal, State, and/or local law, rules, and regulations.
4. A change in any condition of the discharge or POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;
5. Information indicating that the permitted discharge poses a threat to human health or welfare, worker health or safety, receiving waters, environment, POTW, or real property.
6. Upon request of the permittee, provided such request does not create a violation of any existing applicable requirements, standards, laws, or rules and regulations;

Industry Name Aqua Clean Environmental Co., Inc.

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7. Material or substantial alterations or additions to the dischargers operation that adversely impact the wastewater discharge and which were not in existence as of the date of the issued permit;
8. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements, to protect the operation of the treatment plant;
9. Wastewater discharge volumes that have an average change of 20% or more during a six month period. (For new industries, the baseline monitoring report can be used to determine if an average change in discharge volume has exceeded 20% during the first six months of operation.)
10. To correct typographical or other errors in the wastewater discharge permit.

The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

D. Property Rights

The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State, and/or local laws, rules, or regulations.

E. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

F. Limitation on Permit Transfer

Industrial Wastewater Discharge Permits are issued to a specific user for a specific operation and are not assignable or transferable to any other user. The permittee must inform the Tampa Wastewater Director at least thirty (30) days in advance of all proposed owner/operator transfers.

G. Dilution

No permittee shall increase the use of potable or process water, or in any way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in this permit.

Industry Name Aqua Clean Environmental Co., Inc.

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H. Duty To Reapply

If the permittee desires to continue to discharge after the expiration of this permit, the permittee shall reapply on the application forms then in use in accordance with Section 5.4 of the Technical Manual at least ninety (90) days before this permit expires. Under no circumstances shall the permittee continue to discharge after the expiration of the permit, unless reapplication was submitted as required, and the City of Tampa's Wastewater Director provides permittee with written authorization for the temporary extension of this permit until the new permit is issued.

I. Personnel Safety

- The permittee shall provide safe inspection conditions for City of Tampa, and/or any State or Federal pretreatment program personnel, agents, and /or their designated representatives and shall provide such personnel with all necessary safety information regarding the facility's safety policy pertaining to required personal safety gear.

SECTION 3 - OPERATIONS AND MAINTENANCE OF POLLUTION CONTROLS

A. Proper Operation and Maintenance

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

B. Duty to Halt or Reduce Activity

Upon reduction, loss or failure of the pretreatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or all discharges or both until operation of the pretreatment facility is restored. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**C. Bypass of Treatment Facilities**

1. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, severe property damage, or no feasible alternative exists, and the permittee submitted notices as required by paragraph 3 below. No feasible alternative exists to the bypass means for instance, the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. The requirement of no feasible alternative is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance. Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can be reasonably expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
2. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause pretreatment standards or requirements to be violated, such as exceedances of effluent limitations, but only if it is also for essential maintenance to assure efficient operation.
3. Notification of bypass:
  - Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior written notice, at least ten (10) days before the date of the bypass, if possible, to the City of Tampa, Wastewater Department, Industrial Waste Section (addresses specified in PART 2 SECTION 2 (E) of this permit).
  - Unanticipated bypass. The permittee shall immediately notify the City of Tampa, Wastewater Department, Industrial Waste Section orally of any unanticipated bypass that exceeds applicable pretreatment standards within twenty-four (24) hours from the time it becomes aware of the bypass. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the bypass to the City of Tampa, Wastewater Department, Industrial Waste Section as specified in PART 2 SECTION 2 (E) of this permit. The written submission shall contain a description of the bypass and its cause, the duration of the bypass, including exact dates and times, and if the bypass has not been corrected, the anticipated time it is expected to continue, and steps taken or planned to reduce, eliminate and prevent reoccurrence of this bypass.

**D. Removed Substances**

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.



SECTION 4 - MONITORING AND RECORDSA. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. Samples for oil and grease, temperature, pH, cyanide, phenols, sulfides, and volatile organic compounds must be obtained using grab sample techniques. The sampling shall be done on a day of normal to maximum process operation. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water or substance. Monitoring points shall not be changed without notification to and the approval of the City of Tampa.

B. Inspection and Entry

The permittee shall allow the City of Tampa's employees, agents, and/or authorized representative(s), upon the presentation of a City of Tampa employee photo-identification card, ready access to all parts of its' premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties, including, but not limited to the following:

1. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the requirements and terms and conditions of this permit;
2. Have access to and copy any records that must be kept under the requirements and terms and conditions of this permit;
3. Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;
4. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any location;
5. The Wastewater Director of the City of Tampa shall have the right to set up on the user's property, or require the installation of, such devices as are necessary to conduct sampling and/or metering of the permittee's operation;
6. The Wastewater Director of the City of Tampa may require the user to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the user at its own expense. All devices used to measure wastewater flow and quality shall be calibrated regularly to ensure their accuracy; and
7. Inspect any production, manufacturing, fabricating or storage area where pollutants, regulated under the permit, could originate.

Industry Name Aqua Clean Environmental Co., Inc.

Permit No. 1107

C. Retention of Records

1. The permittee shall retain and make available for inspection and copying, records of all information obtained pursuant to any monitoring activities required by this permit, Technical Manual, Federal, State, or local laws, and/or any other records of information obtained pursuant to monitoring activities undertaken by permittee independent of such requirements, including all calibration and maintenance records, all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the City of Tampa at any time.
2. All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City of Tampa shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

D. Record Contents

Records of sampling information shall include:

1. The date, exact place, time and methods of sampling or measurements, and sample preservation techniques or procedures;
2. The name of the person who performed the sampling or measurements;
3. The date(s) analyses were performed;
4. The name of the person who performed the analyses;
5. The analytical techniques or methods used;
6. The results of such analyses; and
7. Proper chain of custody documentation.

E. Signatory Requirements

All applications, permits, reports or information submitted to the City of Tampa shall be signed and certified as indicated below:

1. By the owner or an authorized representative of the industrial user. An authorized representative of an industrial user shall mean:

Industry Name Aqua Clean Environmental Co., Inc.

Permit No. 1107

- a. A president, secretary, treasurer or vice president of a corporation in charge of a principal business function, or any person who performs a similar policy-or decision-making function for the corporation.
  - b. A manager of one or more manufacturing, production or operation facilities employing more than two hundred and fifty (250) persons, or having gross annual sales or expenditures exceeding twenty five million dollars (\$25,000,000.00), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
  - c. A general partner or proprietor if the industrial user is a partnership or sole proprietorship respectively.
  - d. A duly authorized representative of a person indicated in (a), (b) or (c) above if authorization has been made in writing on a prescribed authorization form submitted to the City of Tampa Industrial Waste Section. (Should authorization no longer be accurate because a different individual or position has responsibility for environmental matters for the company, a new authorization form for the new representative must be submitted to the City of Tampa, Wastewater Department, Industrial Waste Section.)
2. Certification. Any person signing a document required by this permit shall make the following certification:
- "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
3. Any change in signature of an authorized representative of the permittee shall be submitted to the City of Tampa, Wastewater Department, Industrial Waste Section in writing within thirty (30) days after the change.

F. Falsifying Information

Any person who knowingly makes any false statements, representation, or certification in any application, record, report, or other document filed or required to be maintained pursuant to the requirements and conditions of Chapter 26 of the City of Tampa Code, Technical Manual, or as required by the terms and conditions of this permit, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method pursuant to Chapter 26 of the City of Tampa Code, Technical Manual, or as required by the terms and conditions of this permit, shall upon conviction be subject to a penalty in an amount not to exceed One Thousand Dollars (\$1000.00), or by imprisonment of not more than six (6) months or by both.

**SECTION 5 - ADDITIONAL REPORTING REQUIREMENTS****A. Planned Changes**

The permittee shall give notice to the Wastewater Director of the City of Tampa of any planned significant changes to the permittee's operations or system which might alter the nature, quality, or volume of its wastewater, at least ninety (90) days before the change.

1. The Wastewater Director of the City of Tampa may require the user to submit such information as may be deemed necessary to evaluate the changed condition, including the submission of a wastewater discharge permit application under Section 4.5 of the Technical Manual.
2. The Wastewater Director of the City of Tampa may issue a wastewater discharge permit under Section 4.7 of the Technical Manual or modify an existing wastewater discharge permit under Section 5.3 of the Technical Manual in response to changed conditions or anticipated changed conditions.
3. For purposes of this requirement, significant changes include, but are not limited to, flow increases of twenty percent (20%) or greater, and the discharge of any previously unreported pollutants.

**B. Duty to Provide Information**

The permittee shall furnish to the City of Tampa, within a reasonable time, at a frequency determined by the Wastewater Director, any information which the City of Tampa may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also furnish to the City of Tampa upon request, copies of records required to be kept by this permit.

**SECTION 6 - ENFORCEMENT****A. Recovery of Damages**

The permittee, violating any of the provisions of this permit, such as, but not limited to violations of the effluent discharge limits, and/or violations of the requirements of Chapter 26, of the City of Tampa Code, the Technical Manual, Federal, State, and/or local laws, rules, and regulations, as amended, causing a discharge producing a deposit or obstruction, and/or causing damage to or otherwise inhibiting the City of Tampa's POTW, Treatment Works, and/or other infrastructure, caused by such violation or discharge, and/or any other action or nonaction by permittee, its employees, agents, representatives, or other persons, that lead to any type or nature of damages, expense, loss, costs, and/or penalty to be suffered by the City of Tampa, the City of Tampa shall bill the permittee for the costs incurred for any cleaning, repair, or replacement work caused by the violation or discharge, and/or for any other type of expense loss, damage, and/or penalty as described above. Refusal to pay the assessed costs shall constitute a violation of the terms and conditions of this permit, Chapter 26 of the City of Tampa Code, and the Technical Manual.

Industry Name Aqua Clean Environmental Co., Inc.

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The City of Tampa may recover reasonable attorney fees, court costs, court reporter fees, and other expenses of litigation by appropriate suit at law against the permittee or person found in violation of the terms and conditions of the permit, Chapter 26, of the City of Tampa Code, Technical Manual, and applicable Federal, State, and/or local laws, rules, and regulations.

B. Civil and Criminal Liability

Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for non-compliance with this permit, and applicable requirements under Chapter 26 of the City of Tampa Code, Technical Manual, Federal, State, and local laws, rules, and regulations.

C. Penalties for Violations

Pursuant to Chapter 26 of the City of Tampa Code, and the Technical Manual, any person who is found to have violated any condition of the permit issued under the requirements of Chapter 26 of the City of Tampa Code, and the Technical Manual, is subject to a penalty not to exceed One Thousand Dollars (\$1000.00) per day, or by imprisonment for a period not exceeding six (6) months, or by both, for each offense. Each separate violation shall constitute a separate offense and upon conviction of a specified ordinance violation, each day of violation shall constitute a separate violation.

## SECTION F. SIGNATORY REQUIREMENTS

This application must be signed by:

- (a) A president, secretary, treasurer or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation.
- (b) A manager of one or more manufacturing, production or operation facilities employing more than 250 persons, or having gross annual sales or expenditures exceeding \$25 million dollars (in second quarter 1980 dollars) if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (c) A general partner or proprietor if the industrial user is a partnership or sole proprietorship respectively.
- (d) A duly authorized representative of a person indicated in (a),(b) or (c) above if authorization has been made in writing by the individual indicated in (a),(b) or (c) on this application.

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based 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. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

Aqua Clean Environmental Co., Inc.

By

  
(signature)

3/16/10  
(date)

Name W D Miller III, P. E.

Title Vice President and General Manager

I hereby duly authorize Michael Zellars, whose signature appears below to be my

representative. I authorize my representative to sign all City of Tampa Industrial Pretreatment certification statements on my behalf.

Signed

  
W.D. Miller

Title Vice President and General Manager

Signature of Authorized Representative

  
Michael Zellars, Plant Manager

Title of Representative

Vice President and General Manager

AUTHORIZATION OF APPROVED REPRESENTATIVE

Industrial User Name \_\_\_\_\_

Address \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date \_\_\_\_\_

Discharge Permit No. \_\_\_\_\_

To:                                      Industrial Waste Division  
    City of Tampa  
    2700 Maritime Blvd.  
    Tampa, FL 33605

I, \_\_\_\_\_, hereby certify that I am a responsible corporate officer, manager, general partner or proprietor of the above named company and that I am in charge of principal business functions and am able to perform policy and decision making functions for the company.

I hereby duly authorize \_\_\_\_\_, whose signature also appears below to be my representative. I authorize my representative to sign all Industrial Pretreatment self-monitoring certification statements on my behalf.

Signed \_\_\_\_\_

Title \_\_\_\_\_

Signature of Authorized Representative \_\_\_\_\_

Title of Representative \_\_\_\_\_

Industry Name Aqua Clean Environmental Co., Inc.

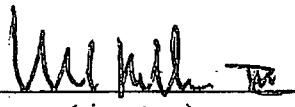
Permit No. 1107

**Acceptance of Permit**

Aqua Clean Environmental Co., Inc. accepts the conditions of the  
(name of company)

permit and agrees to meet the conditions herein.

Permit period: July 1, 2010 through June 30, 2012

By  7/1/10  
(signature) (date)

\*Name W. D. Miller, III

Title Vice President and General Manager

\* Must be the owner or an authorized representative of the company.



Industry Name Aqua Clean Environmental Co., Inc.

Permit No. 1107

### Acceptance of Permit

Aqua Clean Environmental Co., Inc. accepts the conditions of the  
(name of company)  
permit and agrees to meet the conditions herein.

Permit period: July 1, 2010 through June 30, 2012

By \_\_\_\_\_  
(signature) (date)

\*Name W. D. Miller, III

Title Vice President and General Manager

\* Must be the owner or an authorized representative of the company.

(Return this signed page to the Industrial Waste Division)



Ron H. Noble  
Direct Dial: 813-222-1175  
rnoble@fowlerwhite.com

RECEIVED

FEB 21 2012

February 17, 2012

W.U. WASTEWATER

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

MAR 13 2012

SOUTHWEST DISTRICT  
TAMPA

**VIA TELECOPY (863) 834-6271  
AND U.S. MAIL**

Mr. Richard J. Ruede  
Wastewater Collection Superintendent  
Department of Water Utilities  
City of Lakeland  
1825 Glendale Street  
Lakeland, FL 33803-4300

Re: Preliminary Response to City of Lakeland Notice of Violation and Notice of  
Significant Non-Compliance for Aqua Clean Environmental Co., Inc.  
Wastewater Discharge Permit No. 1041C

Dear Mr. Ruede:

On behalf of Aqua Clean Environmental Co., Inc. ("Aqua Clean"), we are in receipt of the City of Lakeland Department of Water Utilities' Notice of Violation Letter and Notice of Significant Non-Compliance dated February 9, 2010 for the Aqua Clean facility located at 3210 Whitten Road in Lakeland, Florida. The purpose of this correspondence is to provide the preliminary response requested by the City of Lakeland regarding the alleged acceptance by Aqua Clean of metal-bearing wastes from the generator Quality Aerospace Coatings.

As an initial matter, please be assured that Aqua Clean does not knowingly or intentionally accept wastewater from any customers that is defined or characterized as metal-bearing waste as set forth in 40 C.F.R. Part 437. As the City of Lakeland is aware, the Florida Department of Environmental Protection ("FDEP") issued Warning Notices to Aqua Clean and Quality Aerospace Coatings regarding the wastewater generated by Quality Aerospace Coatings that was accepted by Aqua Clean. Upon issuance of the Warning Letter, Aqua Clean and this

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office conducted a detailed investigation regarding the facts and circumstances for the wastewater generated by Quality Aerospace Coatings. We also carefully evaluated wastewater characterization and due diligence activities implemented by Aqua Clean in connection with this wastewater. Based upon several followup meetings with the FDEP in Tampa, the Department has made a preliminary determination that the Warning Letter issued to Aqua Clean will be resolved without formal enforcement action or the assessment of civil penalties against Aqua Clean because Aqua Clean acted reasonably and performed adequate due diligence in connection with the characterization of the wastewater generated by Quality Aerospace Coatings. In addition, the FDEP reportedly has pursued a formal enforcement action against Quality Aerospace Coatings based upon the facts and circumstances set forth below.

As the generator of the wastewater in question, it is the legal responsibility of Quality Aerospace Coatings to properly characterize the wastewater and to provide Aqua Clean sufficient information to make a determination as to whether the wastewater constitutes metal-bearing wastes. In addition, pursuant to the provisions of the Resource Conservation and Recovery Act, it is the legal responsibility of Quality Aerospace Coatings as the generator of such waste to perform a proper waste characterization to determine whether the waste constitutes regulated hazardous waste. As the City of Lakeland is aware, Quality Aerospace Coatings provided Aqua Clean a Material Data Certification that certified the wastewater in question was not a hazardous waste under RCRA.

As the FDEP has confirmed, Quality Aerospace Coatings did not properly characterize the wastewaters that were accepted by Aqua Clean. Aqua Clean made reasonable waste determination and/or characterization for this wastewater based upon the incomplete and potentially inaccurate information provided by Quality Aerospace Coatings in the Material Data Certification provided to Aqua Clean by Quality Aerospace Coatings. Below please find additional detailed information regarding the diligence exercised by Aqua Clean in connection with the wastewater generated by Quality Aerospace Coatings.

Quality Aerospace Coatings contacted Mr. Bob Torok of Aqua Clean with a request that Aqua Clean provide pricing for wastewaters that would be generated in Quality Aerospace Coatings' new business operation. Mr. Torok first visited Quality Aerospace Coatings in August or October 2010 prior to active operations of the new Quality Aerospace Coatings' business operations. Quality Aerospace Coatings informed Aqua Clean they would be performing aluminum anodizing, and Mr. Torok clearly informed Quality Aerospace Coatings that Aqua Clean does not accept hazardous waste.

Prior to Quality Aerospace Coatings opening for business operations and generating wastewaters that would be accepted by Aqua Clean, Mr. Torok again visited Quality Aerospace Coatings to obtain waste profile information and the referenced Material Data Certification. During that site visit meeting, Quality Aerospace Coatings asked Aqua Clean if it would accept hazardous waste, and Mr. Torok clearly informed Quality Aerospace Coatings that Aqua Clean would not accept any hazardous waste. Mr. Torok referred Quality Aerospace Coatings to another consultant that could assist Quality Aerospace Coatings on the proper characterization and handling of hazardous waste.

During Mr. Torok's site visit and in connection with Quality Aerospace Coatings' descriptions of its business operations, Aqua Clean was never made aware that Quality Aerospace Coatings was actually performing metal plating operations. Rather, Quality Aerospace Coatings informed Aqua Clean that it was performing aluminum anodizing that would generate a waste stream that was neutralized wastewater with a pH in the range of 2.5 to 12. Before Aqua Clean accepted any wastewater from Quality Aerospace Coatings, Mr. Torok returned to the Quality Aerospace Coatings facility again and obtained a pH reading of the wastewater which indicated a pH in the mid-range of 6 from a sample of the drummed wastewater. In summary, Quality Aerospace Coatings did not properly characterize the wastewaters that were accepted by Aqua Clean, and as set forth above, Aqua Clean maintains written documentation which informs all generators that it does not accept hazardous waste.

As a result of additional negotiations with the FDEP to resolve the Warning Letter involving the wastewater generated by Quality Aerospace Coatings, Aqua Clean has agreed to require all generators to complete additional information on the Aqua Clean Material Data Certification prior to the acceptance of any wastewater by Aqua Clean from new customers. Aqua Clean has also agreed to expand its sampling program to ensure the proper evaluation of these wastewaters. Aqua Clean will discuss these issues in greater detail during the meeting that has been requested by the City of Lakeland with Aqua Clean to address the Notice of Violation Letter.

Pursuant to the City of Lakeland's request, Aqua Clean is enclosing a Certification Statement pursuant to Chapter 102, Section 102-46(b) of the City of Lakeland Code in connection with the City's request for a Certification Statement that Aqua Clean does not accept any wastewater that would fall under Subpart A of 40 C.F.R. Part 437 as metal-bearing waste. Aqua Clean will provide the original executed certification to the City of Lakeland during our upcoming meeting to discuss the remaining issues set forth in the Notice of Violation Letter and Notice of Significant Non-Compliance dated February 9, 2012.

Aqua Clean has also reviewed Attachments #1, #2 and #3 included in the City of Lakeland's Notice of Violation letter dated February 9, 2012, which were provided by the City of Lakeland, the FDEP and the United States Environmental Protection Agency. Again, had Aqua Clean been made aware of the facts and circumstances regarding the appropriate characterization of the wastewaters generated by Quality Aerospace Coatings as described in Attachment #1, Aqua Clean would not have accepted this wastewater from Quality Aerospace Coatings. As set forth above, Aqua Clean performed reasonable and diligent activities to properly evaluate the wastewater based upon the information provided by Quality Aerospace Coatings, the multiple site visits performed by representatives of Aqua Clean and the Material Data Certification information provided to Aqua Clean by Quality Aerospace Coatings.

Again, Aqua Clean looks forward to meeting with the City of Lakeland to provide the requested Certification Statement pursuant to the provisions of Chapter 102 of the City of Lakeland Code as well as to address any outstanding issues in connection with the Notice of Violation Letter and Notice of Significant Non-Compliance dated February 9, 2012 for the Quality Aerospace Coatings wastewater. For now, please be assured that Aqua Clean will not knowingly or intentionally accept any wastewater that is defined in 40 C.F.R. Part 437 as metal-

Mr. Richard J. Ruede  
February 17, 2012  
Page 4

bearing wastes. As always, please do not hesitate to contact me or representatives of Aqua Clean if the City of Lakeland requires any additional information regarding the above matters prior to our upcoming meeting.

Sincerely yours,

FOWLER WHITE BOGGS P.A.



Ron H. Noble

cc: Mr. W.D. Miller  
William Preston, Esquire  
Timothy Campbell, Esquire

Enclosure

43759984v1

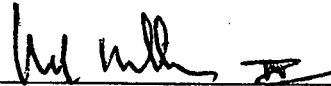
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## **CERTIFICATION STATEMENT**

Aqua Clean Environmental Co., Inc. does not knowingly or intentionally accept wastewater for treatment or disposal to the City of Lakeland sewer system which meets the definition of metal-bearing wastes as defined in 40 C.F.R. Part 437.2.

I certify under penalty of law that this document and all attachments were prepared under my direct supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based 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. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.



---

W.D. Miller  
Vice President

**Knauss, Elizabeth**

---

**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Wednesday, March 07, 2012 12:24 PM  
**To:** Thomas, Douglas; Delgado, Tony; McCausland, Timothy; Conner, Robert  
**Cc:** O'Steen, Alan; Knauss, Elizabeth  
**Subject:** Aqua Clean Update Letter  
**Attachments:** AC\_Letter\_030712.pdf

The attached letter is going out to Aqua Clean Environmental requesting an update on their March 5, 2012 Waste Profile Sampling that was required in the 2 letters that were sent on February 9<sup>th</sup>, 2012.

We are asking for a copy of their sampling plan they were to develop by March 5, 2012 and a certification that any new customer they have/are receiving any waste from has a waste profile submitted contains sampling data as required in the February 9<sup>th</sup> letters.

There was an oversight in our February 9<sup>th</sup> letters that did not require Aqua Clean to submit any information regarding the March 5, 2012 requirement for their sampling schedule and that any new customer was being sampled.

If you have any questions, please let me know.

Rick

---

**PUBLIC RECORDS NOTICE:**

All e-mail sent to and received from the City of Lakeland, Florida, including e-mail addresses and content, are subject to the provisions of the Florida Public Records Law, Florida Statute Chapter 119, and may be subject to disclosure.



**DEPARTMENT OF WATER UTILITIES**

Wastewater Collection Division  
1825 Glendale Street  
Lakeland, Florida 33803-4300  
(863) 834-8277 FAX (863) 834-6271  
[www.waterutilities.lakelandgov.net](http://www.waterutilities.lakelandgov.net)

**"TREATING YOUR WATER SERIOUSLY"**

Alan O'steen, Manager of Wastewater Collection  
James A. (Drew) Adcock, Collection System Supervisor

Richard Ruede, Wastewater Collection Superintendent  
David Smith, Pumping Station Supervisor

March 7, 2012

Mr. W.D. Miller, III, P.E.  
Vice President - General Manager  
Aqua Clean Environmental Co., Inc.  
3210 Whitten Rd  
Lakeland, FL 33811-1086

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

**Re: Wastewater Discharge Permit No. 1041C  
Waste Profile Sampling Update**

Dear Mr. Miller:

In letters dated February 9, 2012 Aqua Clean Environmental was required by March 5, 2012 to establish a sampling schedule for verifying current customers waste profiles have not changed. In addition, Aqua Clean Environmental was to require initial waste profiles to be done on all new customers with the parameters outlined in your Wastewater Discharge Permit.

The City of Lakeland is hereby requesting a copy of the sampling schedule established by Aqua Clean Environmental by March 16, 2012. The sampling schedule should outline the minimum sampling of at least once per year per customer and show the increase sampling frequency, based on a tiered approach on the customers' annual volume, for larger customers. The sampling schedule shall also include a date by which all current customers' initial waste profile samples will be completed.

Also, as required, Aqua Clean Environmental shall certify that beginning on March 5, 2012 that any new customer accepted had a waste profile with parameters outlined in your Wastewater Discharge Permit No. 1041C Section 1, Part 3 prior to accepting the waste. This sampling shall be required in order to demonstrate equivalent treatment and ensure proper subpart classifications. This certification shall also be submitted to the City of Lakeland by March 14, 2012.

Failure to comply with any date or action listed above may also result in additional enforcement actions against Aqua Clean Environmental by the City of Lakeland. Escalated enforcement actions include, but are not limited to, Consent or Compliance Orders, Cease and Desist Order, Termination of Service, Fines.



Mr. Miller  
March 7, 2012  
Page 2

If you have any questions or require any additional information regarding this matter, please contact this office at the address or numbers listed above.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard J. Ruede", written in a cursive style.

Richard J. Ruede  
Wastewater Collection Superintendent

pc: D. Thomas, City Manager  
T. Delgado, Deputy City Manager  
T. McCausland, City Attorney  
R. Conner, Asst. Director Water Utilities  
A. O'Steen, Manager of Wastewater Collection  
E. Knauss, FDEP  
File

## Knauss, Elizabeth

---

**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Tuesday, February 21, 2012 3:13 PM  
**To:** Knauss, Elizabeth  
**Cc:** Dregne, James  
**Subject:** RE: Aqua Clean

Thanks Beth,

So basically we have no idea exactly what Aqua Clean is saying in the paragraph below except that are expanding what they are going to require from their customers and Aqua Clean will also expand its sampling program. To what extent is remains unknown.....

Would you agree with the paragraph below or do you feel it is a stretch of the imagination?

Well we put in our letters that they will sample their new customers before accepting their waste and sample periodically every customer at least 1 per year. I think the City is going to stay pretty firm on that requirement since that data is needed not only to verify what Subpart a facility will fall under but also is required to demonstrate equivalent treatment per Federal, State and Local regulations.

Rick

**From:** Knauss, Elizabeth [mailto:Elizabeth.Knauss@dep.state.fl.us]  
**Sent:** Tuesday, February 21, 2012 3:01 PM  
**To:** Ruede, Richard  
**Cc:** Dregne, James  
**Subject:** RE: Aqua Clean

Aqua Clean specifically said that they were not willing to enter into an enforceable document (consent order) that would require them to change their waste profiling practices or specify the information they would ask for. I drafted a letter to the facility's attorney last month, after the meeting described in the attached minutes. It has not been mailed.

*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](#).*

**From:** Ruede, Richard [mailto:Richard.Ruede@lakelandgov.net]  
**Sent:** Monday, February 20, 2012 10:19 AM  
**To:** Knauss, Elizabeth  
**Subject:** Aqua Clean  
**Importance:** High

Beth, Good Morning,

We received the first response letter from Aqua Clean regarding the Quality Aerospace Coating wastewater. They are contending that they were misled by QAC and that they are the victim in all this. I have attached a paragraph below that was included in the letter where Aqua Clean indicated that after negotiations with FDEP they have agreed to require all generators to complete additional information on the Material Data Certification and that they have also agreed to expand its sampling program to ensure the proper evaluation of these wastewaters. Please see below.

As a result of additional negotiations with the FDEP to resolve involving the wastewater generated by Quality Aerospace Coatings, Aqua require all generators to complete additional information on the Aqua Certification prior to the acceptance of any wastewater by Aqua Clean. Aqua Clean has also agreed to expand its sampling program to ensure these wastewaters. Aqua Clean will discuss these issues in greater detail has been requested by the City of Lakeland with Aqua Clean to address Letter.

I would like to request a copy of all agreements or letters between FDEP and Aqua Clean which details any and all agreements related to the Material Data Certifications and/or the expanded sampling program.

Please let me know if you have any questions.

I am in the office this week on Monday, Wednesday and Thursday they will be gone on vacation next week.

Rick

*Richard J. Ruede*

**Wastewater Collection Superintendent**

Water Utilities Department

1825 Glendale Street

Lakeland, FL 33803

Phone (863) 834-6571

Fax (863) 834-6271

[Richard.ruede@lakelandgov.net](mailto:Richard.ruede@lakelandgov.net)

---

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**"TREATING YOUR WATER SERIOUSLY"**

Alan O'steen, Manager of Wastewater Collection  
James A. (Drew) Adcock, Collection System Supervisor

Richard Ruede, Wastewater Collection Superintendent  
David Smith, Pumping Station Supervisor

February 9, 2012

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. W.D. Miller, III, P.E.  
Vice President - General Manager  
Aqua Clean Environmental Co., Inc.  
3210 Whitten Rd  
Lakeland, FL 33811-1086

**Re: Wastewater Discharge Permit No. 1041C  
Notice of Violation Letter  
Notice of Significant Noncompliance**

Dear Mr. Miller:

After reviewing monitoring results collected downstream from your facility during the months of August, September and October, 2011, the City of Lakeland has determined that your facility was in violation of its Wastewater Discharge Permit (WDP) No. 1041C, Chapter 102 of the City of Lakeland Code as amended, and Rule 62-625 F.A.C.

Also, in accordance with WDP 1041C, Section 4, Part 2.A.(2) and (8), Chapter 102 of the City of Lakeland Code as amended, Sections 102-26 and 102-75(a)(2) and (8), Section 102-104, and Rule 62-625.500(2)(b)8.b. and h., F.A.C. and Rule 62-625.600(6)(c) and (d), F.A.C., your facility is also in the status of Significant Noncompliance for the following violations:

- Zinc violations for the monitored period of July through December 2011
- Failure to submit data representative of the conditions occurring during the reporting period

Attachment #1 is a summary of the violations from the City of Lakeland's sampling directly downstream from your facility. This manhole only receives wastewater from the Aqua Clean Environmental facility. The results indicate a pattern of violations that in accordance with Chapter 102 of the City of Lakeland Code, as amended, Section 102-75(a)(2) and (b) constitutes Significant Noncompliance.

Attachment #2 is a summary of all tests performed and the number of violations, Chronic (exceedance by any magnitude) or Technical Review Criteria (TRC = 1.4 times the limit), for each rolling quarter for the 2011 – 2012 Pretreatment Year. At the end of the second rolling quarter, July through December 2011, the number of TRC violations divided by the number of

tests performed exceeded 33% which places Aqua Clean Environmental in Significant Noncompliance for that period.

Attachment #3 is a summary of the tests performed during the months of August, September and October 2011. The results listed are only average values for the month comparing City sampling data with data submitted as part of Aqua Clean Environmentals' monthly Discharge Monitoring Report (DMR). Numbers listed in parenthesis are the maximum value during that month for that parameter. Based on the differences in average values and the number of violations not reported by Aqua Clean Environmental in its DMR, the data submitted by Aqua Clean Environmental is not representative of the monitoring period covered in the reports.

In accordance with Section 102-72 of the City of Lakeland Code, as amended, the City of Lakeland shall hereby impose a fine in the amount \$1,000.00 per violation for a total of \$42,000 as follows:

1. Discharge Violations totaling \$39,000.00 as follows:

- |                              |          |
|------------------------------|----------|
| a. 1 pH Violation            | \$ 1,000 |
| b. 9 BOD Violations          | \$ 9,000 |
| c. 20 Zinc Violations        | \$20,000 |
| d. 1 FOG Violation           | \$ 1,000 |
| e. 8 Conductivity Violations | \$ 8,000 |

2. Non-representative Sampling Totaling \$3,000.00

- |              |          |
|--------------|----------|
| a. August    | \$ 1,000 |
| b. September | \$ 1,000 |
| c. October   | \$ 1,000 |

Aqua Clean Environmental shall submit a new initial Certification Statement in accordance with 40 CFR 437.41(a) and a Periodic Certification Statement in accordance with 40 CFR 437.41(b). These certification statements shall contain all required information as described in 40 CFR 437.41(a)(1), (2), and (3). In accordance with 40 CFR 437.4 facilities subject to more than one subpart of this part must monitor for compliance with the applicable subpart after treatment and before mixing of the waste with wastes from any other subpart. Aqua Clean Environmental shall also demonstrate equivalent treatment and that dilution is not used as a substitute for treatment as described in Rule 62-625.410(5).

Aqua Clean Environmental shall submit all calculations and supporting documentation used to demonstrate equivalent treatment. Submittal of self-monitoring results alone, with no treatment technologies, removal rates, and/or actual removal data is not acceptable. In accordance with 40 CFR 437.2 equivalent treatment shall mean a wastewater treatment system that achieves comparable pollutant removals to the applicable treatment technology selected as the basis for the limitations and pretreatment standards. Comparable treatment may be demonstrated through literature, treatability tests, or self-monitoring data.

In order to assure that there is sufficient data to be used for demonstrating equivalent treatment for the annual periodic certification statement, Aqua Clean Environmental shall establish a sampling frequency in order to verify that each customer's waste profile has not changed. This

frequency shall not be less than 1 per year for any customer. Aqua Clean Environmental shall also require initial waste profiles to be done on all new customers with the parameters outlined in your Wastewater Discharge Permit 1041C Section 1, Part 3. This sampling shall be required in order to demonstrate equivalent treatment and ensure proper subpart classifications.

The City of Lakeland shall also immediately modify your existing WDP requiring increased monitoring. This increase shall be daily monitoring of all regulated pollutants contained in your existing WDP to ensure representative data. This sampling shall be done by the City of Lakeland at Aqua Clean Environmental's expense.

Aqua Clean Environmental shall also submit a complete detailed site layout and piping diagram. This site layout shall specify where each Subpart wastes are:

1. Received and stored prior to treatment,
2. The location and type of treatment for each Subpart Wastes,
3. Discharge piping showing location of all discharges that flow through the on-site wastewater flow meter.

Please be advised that the data collected during the months of August, September and October 2011 shall be entered into the database and the monthly surcharges and any Impact Fees associated with the additional data shall be invoiced. All sampling and analysis costs incurred during this period will also be invoiced. Sampling charges for the period of August, September and October totaled \$11,583.32.

THEREFORE, Aqua Clean Environmental shall submit to the City of Lakeland the following information by no later than the date stipulated below:

1. By February 29, 2012 contact the City of Lakeland to arrange a meeting to discuss these violations and actions required by the City of Lakeland.
2. By March 5, 2012 begin customers waste profile sampling;
  - a. Sampling shall also include a schedule for verifying current customers waste profiles have not changed. At a minimum this sampling shall occur at least once per year per customer. This sampling schedule shall be based on a tiered approach based on the customers annual volume
  - b. All new incoming wastewater shall have a waste profile with the parameters outlined in your WDP at a minimum
3. By March 30, 2012 submit the Initial Certification and Periodic Certification Statements along with all supporting data and documentation including the equivalent treatment calculations

Mr. W.D. Miller  
February 9, 2012  
Page 4

The City of Lakeland also reserves the right to take additional enforcement actions or permitting regarding these violations.

Failure to comply with any date or action listed above or to contact the City to arrange a meeting within 14 days of receipt of this letter may also result in additional enforcement actions against Aqua Clean Environmental by the City of Lakeland. Escalated enforcement actions include, but are not limited to, Consent or Compliance Orders, Cease and Desist Order, Termination of Service, Fines.

If you have any questions or require any additional information regarding this matter, please contact this office at the address or numbers listed above.

Sincerely,



Richard J. Ruede  
Wastewater Collection Superintendent

**Attachments**

pc: D. Thomas, City Manager  
T. Delgado, Deputy City Manager  
T. McCausland, City Attorney  
R. Conner, Asst. Director Water Utilities  
A. O'Steen, Manager of Wastewater Collection  
E. Knauss, FDEP Tampa  
File

## Attachment #1

### Summary of Discharge Violations:

Discharge Violation #	Violation Date	Parameter	Value(mg/l)	Rule Violated
DV1	8/11/11	Zinc	0.763	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV2	8/12/11	Zinc	0.989	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV3	8/16/11	Zinc	0.906	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV4	8/17/11	BOD	2330	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV5	8/17/11	Zinc	1.933	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV6	8/19/11	BOD	2670	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV7	8/19/11	Zinc	4.389	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV8	8/20/11	Oil/Grease	720	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV9	8/20/11	Zinc	2.076	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV10	8/21/11	Zinc	1.140	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV11	8/31/11	Zinc	10.360	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV12	9/7/11	Conductivity	9300 S.U.	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV13	9/7/11	Zinc	1.010	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV14	9/8/11	Zinc	2.224	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV15	9/14/11	Conductivity	9500 uS	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV16	9/20/11	Conductivity	6700 uS	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV17	9/20/11	Zinc	5.034	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV18	9/26/11	Zinc	0.954	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV19	9/27/11	pH	11.9 S.U.	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV20	9/27/11	BOD	2270	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV21	9/28/11	BOD	5550	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV22	9/28/11	Zinc	2.888	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV23	9/28/11	Zinc	1.349	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV24	10/3/11	Molybdenum	0.285	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV25	10/5/11	BOD	2640	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV26	10/11/11	Conductivity	15500	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV27	10/11/11	Zinc	0.806	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV28	10/25/11	Conductivity	11300 uS	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV29	10/25/11	BOD	2440	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV30	10/25/11	Zinc	3.179	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV31	10/26/11	BOD	4030	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV32	10/27/11	BOD	10600	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV33	10/27/11	Zinc	3.505	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV34	10/28/11	BOD	3913	Chapter 102-99, WDP 1041C Part 3(A), 62-625.400(1)(a)&(4)
DV35	10/28/11	Zinc	3.549	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV36	10/29/11	Zinc	1.813	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)
DV37	10/30/11	Zinc	3.427	Chapter 102-99, WDP 1041C Part 3(B), 62-625.400(1)(a)&(4)



## ATTACHMENT #2

AQUA-CLEAN ENVIRONMENTAL  
PERMIT NUMBER 1041CANNUAL SIGNIFICANT NONCOMPLIANCE REPORT  
FOR THE YEAR ENDING JUNE 2012

PARAMETER	Apr-11	May-11	Jun-11	Jul-11	Aug-11	Sep-11	Oct-11	Nov-11	Dec-11	Jan-12	Feb-12	Mar-12	Apr-12	May-12	Jun-12	SNC AUDIT QUARTERS				SNC STATUS PERCENTAGES				
QUARTERS	FIRST QUARTER				SECOND QUARTER				THIRD QUARTER				FOURTH QUARTER				1ST	2ND	3RD	4TH	1ST	2ND	3RD	4TH
pH	VIOLATIONS	0	0	0	0	0	1	0	0								1	1	0	0	1%	1%	0%	#DIV/0!
	TESTS	25	19	24	22	26	14	25	28								130	115	53	0	NO	NO	NO	#DIV/0!
BOD																								
	CHRONIC	0	0	0	0	1	1	5	0								2	7	5	0	4.4%	13.0%	31.3%	#DIV/0!
	TRC	0	0	0	0	0	1	3	0								1	4	3	0	2.2%	7.4%	18.8%	#DIV/0!
	TESTS	2	3	2	2	21	15	14	2								45	54	16	0	NO	NO	NO	#DIV/0!
Oil/Grease																								
	CHRONIC	0	0	0	0	1	0	0	0								1	1	0	0	4.3%	4.2%	0.0%	#DIV/0!
	TRC	0	0	0	0	1	0	0	0								1	1	0	0	4.3%	4.2%	0.0%	#DIV/0!
	TESTS	1	2	1	1	14	4	4	1								23	24	5	0	NO	NO	NO	#DIV/0!
CYANIDE																								
	CHRONIC		0				0		0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TRC		0				0		0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS		1				1		1								2	2	1	0	NO	NO	NO	#DIV/0!
Nickel																								
	CHRONIC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TRC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS	1	1	1	1	1	1	1	1								6	5	2	0	NO	NO	NO	#DIV/0!
Zinc																								
	CHRONIC	0	0	0	0	7	2	5	0								13	19	6	0	32%	37%	40%	#DIV/0!
	TRC	0	0	0	0	7	6	3	0								13	18	5	0	32%	35%	33%	#DIV/0!
	TESTS	1	2	1	1	21	16	16	1								41	52	15	0	NO	YES	YES	#DIV/0!
Molybdenum																								
	CHRONIC	0	0	0	0	0	0	1	0								0	1	1	0	0.0%	1.9%	6.7%	#DIV/0!
	TRC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS	1	1	1	1	21	15	14	1								40	52	15	0	NO	NO	NO	#DIV/0!
COBALT																								
	CHRONIC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TRC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS	1	1	1	1	1	1	1	1								6	5	2	0	NO	NO	NO	#DIV/0!
TIN																								
	CHRONIC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TRC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS	1	1	1	1	1	1	1	1								6	5	2	0	NO	NO	NO	#DIV/0!
LEAD																								
	CHRONIC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TRC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS	1	1	1	1	1	1	1	1								6	5	2	0	NO	NO	NO	#DIV/0!
COPPER																								
	CHRONIC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TRC	0	0	0	0	0	0	0	0								0	0	0	0	0.0%	0.0%	0.0%	#DIV/0!
	TESTS	1	1	1	1	1	1	1	1								6	5	2	0	NO	NO	NO	#DIV/0!

### ATTACHMENT #3 – Sample Discrepancies

#### August 2011

Parameter	City Results	Aqua Clean	City #Viol/#Sample	Aqua Clean #Viol/#Sample
BOD	997	1203	2/20	0/2
TSS	1025	865	NA/20	NA/2
TN	247	202	NA/20	NA/2
FOG	85	5	1/12	0/1
Zinc	1.324(10.36)	0.094(0.094)	8/20	0/1
Mo	0.020(0.082)	0.010(0.010)	0/20	0/1
Conductivity	8900(29800)	3412(3960)	3/12	0/26

#### September 2011

Parameter	City Results	Aqua Clean	City #Viol/#Sample	Aqua Clean #Viol/#Sample
BOD	1415	926	2/15	0/2
TSS	1239	178	NA/15	NA/2
TN	231	40	NA/15	NA/2
FOG	75	80	0/4	0/1
Zinc	1.065(5.034)	0.261(0.357)	6/15	0/5
Mo	0.043	0.029	0/15	0/5
Conductivity	7,150	2,026	3/4	0/14

#### October 2011

Parameter	City Results	Aqua Clean	City #Viol/#Sample	Aqua Clean #Viol/#Sample
BOD	2353	519	5/13	0/2
TSS	845	70	NA/13	NA/2
TN	814	102	NA/13	NA/2
FOG	20	27	0/3	0/1
Zinc	1.456(3.549)	0.167	6/13	0/1
Mo	0.101(0.285)	0.021	1/13	0/1
Conductivity	9,967(15500)	2,611(3888)	2/3	0/25



DEPARTMENT OF WATER UTILITIES  
Wastewater Collection Division  
1825 Glendale Street  
Lakeland, Florida 33803-4300  
(863) 834-8277 FAX (863) 834-6271  
[www.waterutilities.lakelandgov.net](http://www.waterutilities.lakelandgov.net)

**"TREATING YOUR WATER SERIOUSLY"**

Alan O'steen, Manager of Wastewater Collection  
James A. (Drew) Adcock, Collection System Supervisor

Richard Ruede, Wastewater Collection Superintendent  
David Smith, Pumping Station Supervisor

February 9, 2012

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. W.D. Miller, III, P.E.  
Vice President - General Manager  
Aqua Clean Environmental Co., Inc.  
3210 Whitten Rd  
Lakeland, FL 33811-1086

**Re: Wastewater Discharge Permit No. 1041C  
Notice of Violation Letter  
Notice of Significant Noncompliance**

Dear Mr. Miller:

The City of Lakeland was notified by the Southwest District Office of the Florida Department of Environmental Protection (FDEP) on September 23, 2011 regarding the Wastewater Discharge Permit (WDP) for your facility, Aqua Clean Environmental. This request by FDEP was a result of a FDEP inspection conducted at Quality Aerospace Coatings located at 3536 DMG Dr. in Lakeland Florida.

In the inspection report from FDEP, Quality Aerospace Coating was described as a mil-spec surface coating job shop that receives machined aluminum parts and performs sulfuric acid anodizing, metal coloring, chromic acid anodizing and chromate conversion coating. FDEP noted that wastewater from their chromating and phosphatizing operations was taken to your facility. FDEP was inquiring as to whether or not Aqua Clean Environmental was allowed to accept Hazardous waste. The wastewater and sludge from this operation are regulated F006 and F019 Hazardous wastes.

On October 6, 2011 the City of Lakeland sent a letter requesting information and 40 CFR Part 437 Subpart determinations from Aqua Clean Environmental regarding this wastewater. On October 21, 2011 Aqua Clean Environmental responded that this waste was classified as Subpart C – Organic wastewater generated from washing and coating operations. This was based on the data submitted by Quality Aerospace Coatings in their Material Data Certification as well as a site visit inspection by Aqua Clean Environmental personnel.

On December 20, 2011, the City visited Quality Aerospace Coatings to do a facility inspection and inquire as to what the representatives from Aqua Clean Environmental were told about the waste and if they were given a tour of the facility. According to Ms. Roberts, Aqua Clean Environmental representatives walked through the facility and were told the nature of the waste material.

A description of the facility was sent to the FDEP Pretreatment office in Tallahassee and also to Environmental Protection Agency's (EPA) Office of Water in Washington, DC. The information sent to FDEP and EPA can be found in Attachment #1. Based on the information provided, both FDEP and EPA would classify this waste as Subpart A – Metals waste based on the definition in 40 CFR 437.2(l) which states:

*Metal-bearing wastes means wastes and/or used materials from manufacturing or processing facilities or other commercial operations that contain significant quantities of metal pollutants, but not significant quantities of oil and grease (generally less than 100 mg/L). Examples of these wastes are spent electroplating baths and sludges, metal-finishing rinse water and sludges, chromate wastes, blow-down water and sludges from air pollution control, spent anodizing solutions, incineration air pollution control wastewaters, waste liquid mercury, cyanide containing wastes greater than 136 mg/L, and waste acids and bases with or without metals.*

Based on the definition in 40 CFR Part 437.2(l) and the responses from FDEP and EPA, the City has determined that Aqua Clean Environmental misclassified Subpart A – Metals bearing waste as Subpart C – Organic waste so that it could be accepted by Aqua Clean Environmental. This is also a violation of your Wastewater Discharge Permit No 1041C. This violation also constitutes Significant Noncompliance under Section 102-75 and Rule 62-625.500(2)(b)8.

Aqua Clean Environmental shall immediately halt the acceptance of any wastewater as defined in 40 CFR Part 437.2(l) Metal-bearing wastes.

In order to assure proper Subpart Classification and have sufficient data to be used for demonstrating equivalent treatment for the annual Periodic Certification Statement, Aqua Clean Environmental shall establish a sampling frequency in order to verify every customer's waste profile has not changed. This frequency shall not be less than 1 per year for any customer.

Aqua Clean Environmental shall also require initial waste profiles to be done on all new customers with at least the parameters outlined in your WDP 1041C Section 1, Part 3. This sampling shall be required in order to demonstrate equivalent treatment and ensure proper subpart classifications.

**THEREFORE**, Aqua Clean Environmental shall submit to the City of Lakeland the following information by no later than the date stipulated below:

1. By February 13, 2012 submit a letter to the City of Lakeland including the certification statement found in Chapter 102, Section 102-46(b) that Aqua Clean Environmental has ceased accepting any wastewater that would fall under Subpart A – Metal-bearing wastewater.
2. By February 29, 2012 contact the City of Lakeland to arrange a meeting to discuss these violations and actions required by the City of Lakeland

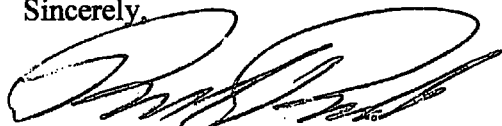
3. By March 5, 2012 begin customers waste profile sampling;
  - a. Sampling shall also include a schedule for verifying current customers waste profiles have not changed. At a minimum this sampling shall occur at least once per year per customer. This sampling schedule shall be based on a tiered approach based on the customers annual volume
  - b. All new incoming wastewater shall have a waste profile with the parameters outlined in your WDP at a minimum

The City of Lakeland also reserves the right to take additional enforcement actions or permitting regarding these violations.

Failure to comply with any date or action listed above or contact the City to arrange a meeting within 14 days of receipt of this letter may also result in additional enforcement actions against Aqua Clean Environmental by the City of Lakeland. Escalated enforcement actions include, but are not limited to, Consent or Compliance Orders, Cease and Desist Order, Termination of Service, Fines.

If you have any questions or require any additional information regarding this matter, please contact this office at the address or numbers listed above.

Sincerely,



Richard J. Ruede  
Wastewater Collection Superintendent

**Attachments**

pc: D. Thomas, City Manager  
T. Delgado, Deputy City Manager  
T. McCausland, City Attorney  
R. Conner, Asst. Director Water Utilities  
A. O'Steen, Manager of Wastewater Collection  
E. Knauss, FDEP  
File

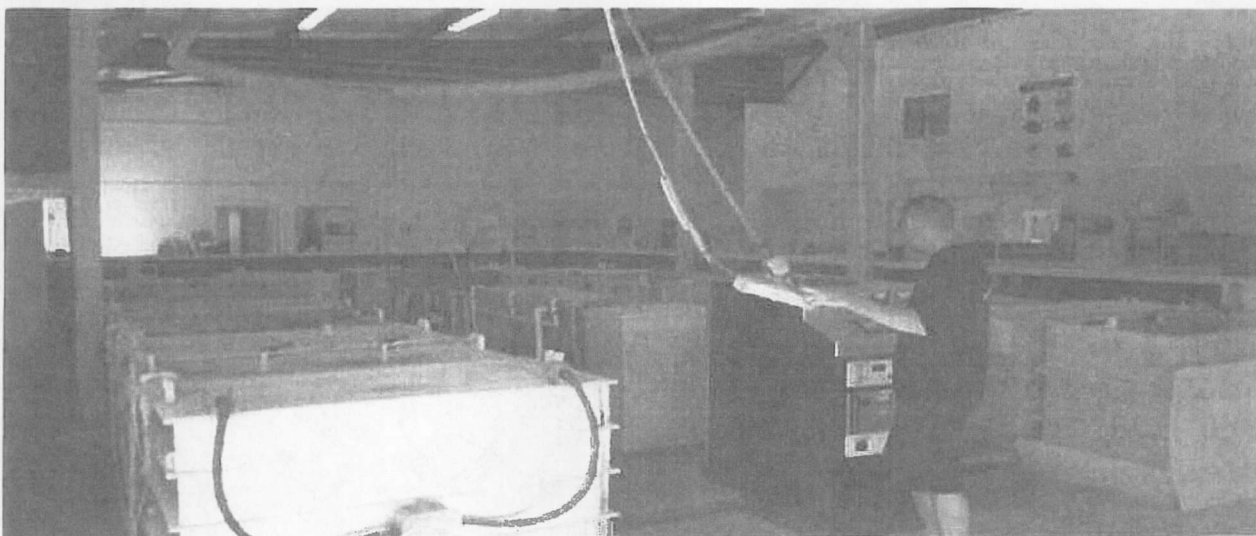
## ATTACHMENT #1

### Information supplied to FDEP and EPA

Our local CWT has excepted some wastewater that they classified as one type and I think it should have been another. I would like to describe the operation and let you decide to see if I am correct.

This facility is not connected to the City of Lakeland Sewer System. QAC is a mil-spec surface coating job shop that receives machined aluminum parts and performs sulfuric acid anodizing, metal coloring, chromic acid anodizing and chromate conversion coating.

The facility's wet processing line includes a series of plastic tanks arranged in a U shape that hold 150-160 gallons of process solutions or rinse waters. The wet process line includes, in order, a mild alkaline cleaner, rinse bath 1, alkaline etch, rinse bath 2, sulfuric acid deox, rinse bath 3, Type II sulfuric acid anodizing (in two tanks, including a larger 220 gallon tank), Type 1 chromic acid anodizing, rinse bath 4 (for both the sulfuric and chromic lines), rinse bath 5, four dye baths (gold, blue, Bordeaux red and black), rinse bath 6, rinse bath 7, nickel acetate seal, rinse bath 8, Chem Film CL-3, Chem Film CL-1A, rinse bath 9, and a heated rinse bath 10. Rinses 1, 2, 3, 4, 7 and 8 are running rinses, with water supplied by a wastewater recycling system. In the center of the process area is a heated bath containing a sodium metasilicate and d-limonene based stripper, plus two more rinses. Another tank for stripping coatings from racks and hooks was located across an aisle, towards the center of the building. Below is a picture of the entire anodizing area.



All rinse waters, carry over and drippings are sent to a 2500 gallon holding tank. Water is removed from this tank through an RO process to return water back to the process. When the level of solids in this tank reaches a certain point, they have the solids and liquid cleaned out by CompanyX

Spend anodizing baths, dyes and etching tanks are drummed up and stored until this water can be sucked out of the drums and hauls away but CompanyX

Based on the information above would you classify the wastewater as 40 CFR 437 Subpart A or Subpart C wastewater? Assume the O/G level is less than 100 mg/l..

**Subpart A - Metal-bearing wastes** means wastes and/or used materials from manufacturing or processing facilities or other commercial operations that contain significant quantities of metal pollutants, but not significant quantities of oil and grease (generally less than 100 mg/L). Examples of these wastes are spent electroplating baths and sludges, metal-finishing rinse water and sludges, chromate wastes, blow-down water and sludges from air pollution control, spent anodizing solutions, incineration air pollution control wastewaters, waste liquid mercury, cyanide containing wastes greater than 136 mg/L, and waste acids and bases with or without metals.

**Subpart C - Organic wastes** means wastes and/or used materials that contain organic pollutants, but not a significant quantity of oil and grease (generally less than 100 mg/L) from manufacturing or processing facilities or other commercial operations. Examples of these wastes are landfill leachate, contaminated groundwater clean-up from non-petroleum sources, solvent-bearing wastes, off-specification organic product, still bottoms, byproduct glycols, wastewater from paint washes, wastewater from adhesives and/or epoxies, wastewater from chemical product operations, and tank clean-out from organic, non-petroleum sources.

ATTACHMENT #2

FDEP Response:

Rick,

Based on the information supplied a centralized waste treatment facility that accepts waste from the facility you describe would be classified under 40 CFR 437 Subparts A and C and must be monitored for applicable standards at the end of treatment for Subpart A waste and again at end of treatment for Subpart C waste. However, if the wastes are mixed the facility should request Subpart D. Which basically applies the individual Subparts at the end of combined treatment. The caveat with Subpart D is that the facility must demonstrate that treatment is occurring for all wastestreams (i.e., metals and organics removal) and that they are not diluting one wastestream with another.

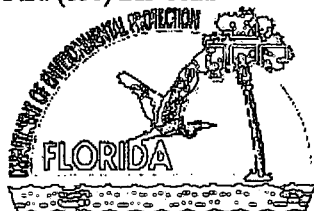
If a facility, not permitted for Subpart A wastes, accepts Subpart A waste and does not notify the Control Authority before accepting the waste, this constitutes failure to report changed conditions. If so, the Control Authority should take appropriate enforcement action in accordance with their approved enforcement response plan.

If you have further questions please contact me.

Regards,



John E. Palenchar, E.I.  
Pretreatment Engineer  
Florida Department of Environmental Protection  
2600 Blair Stone Rd. MS#3540  
Tallahassee, FL 32399-2400  
(850) 245-7566  
Fax: (850) 245-8621



### ATTACHMENT #3

EPA Response:

Based on the information you provided me here, it appears that this waste stream would fall under Subpart A. Please let me know if you have any additional questions.

---

Brian D'Amico  
Chemical Engineer  
Office of Water  
United States Environmental Protection Agency 1200 Pennsylvania Avenue, NW  
(4303T) Washington, DC 20460-0001  
(202) 566-1069  
Fax: (202) 566-1053  
<http://www.epa.gov/waterscience>



## Knauss, Elizabeth

---

**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Thursday, February 02, 2012 8:45 AM  
**To:** Knauss, Elizabeth  
**Subject:** Aqua Clean

Beth,

I am heading out the door and will be going to meeting today with City officials prior to send out 2 letters tomorrow hopefully...

You will be copied on these and I think you will like what is in them.....SAMPLING REQUIREMENT for incoming wastes.....along with a ton of other stuff..

I will call you this afternoon and let you know where we stand on getting these letters out...

Rick

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### PUBLIC RECORDS NOTICE:

All e-mail sent to and received from the City of Lakeland, Florida, including e-mail addresses and content, are subject to the provisions of the Florida Public Records Law, Florida Statute Chapter 119, and may be subject to disclosure.

## Florida Department of

### Memorandum

### Environmental Protection

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To: File

From: Elizabeth Knauss, Hazardous Waste Section

Meeting Date: 1/9/2012, 10:00 AM

Subject: Meeting Notes  
Aqua Clean Environmental  
Polk County

Ron Noble and W.D. Miller met with and Elizabeth Knauss to submit and explain the documents requested regarding acceptance of PCB waste at the facility. Decontamination of the tank and equipment was verified by wipe samples and analysis of diesel used as a final triple rinse after collection of the wipe samples. PCB wastes were disposed of to Veolia. FRS and Aqua Clean explained that the outgoing materials did not balance with the incoming, as some waste water had been separated from the incoming waste and transferred to Aqua Clean for treatment prior to discovery of the PCB contamination.

The facility did not make it a practice to collect "retain" samples from incoming waste, and therefore was not able to prove which of the loads placed in their tank were PCB contaminated. The facility is considering changing this practice. Oil screening procedures were discussed. A driver's Tek Mate was not operational for some of the period in question. However, neither a Tek Mate nor a Chlor d Tect test kit would have detected PCB contamination at regulated levels.

Follow up discussion occurred regarding the issue of acceptance of hazardous waste due to inadequate waste profiling practices. Mr. Miller said that staff had been directed to ensure that profiles were complete prior to accepting the waste. However, he was not willing to enter into a Consent Order that would provide for revisions to the profile form or adoption of a written standard operating procedure for reviewing and approving the forms. The forms do not currently include space for information on or chemical characteristics of the material except for hazardous waste constituents. Non RCRA metals information is not collected, although regulated under the facility's pretreatment permit. Currently, drivers, sales staff, Mike Zellars and Miller all have the ability to authorize waste acceptance. The Aqua Clean staff that approve a profile do not have to sign the profile. Mr. Miller said that the company has an internal, unwritten policy regarding who is allowed to approve wastes for acceptance, with Mr. Miller having the final authority.

Department staff will respond to Aqua Clean's position in this matter.

## Knauss, Elizabeth

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**From:** Noble, Ron [rnoble@fowlerwhite.com]  
**Sent:** Wednesday, January 04, 2012 3:17 PM  
**To:** Knauss, Elizabeth  
**Subject:** RE: Aqua Clean Environmental

Beth:

Dee and I are both available Monday morning.  
We will be at your office at 10:00 am Monday.  
See you then,  
Ron



Ron Noble  
Fowler White Boggs P.A.  
501 E. Kennedy Blvd, Suite 1700  
Tampa, Florida 33602  
Direct: 813 222 1175  
Fax: 813 229 8313  
[www.fowlerwhite.com](http://www.fowlerwhite.com)

---

**From:** Knauss, Elizabeth [mailto:Elizabeth.Knauss@dep.state.fl.us]  
**Sent:** Wednesday, January 04, 2012 10:55 AM  
**To:** Noble, Ron  
**Subject:** RE: Aqua Clean Environmental

No – I have an appointment Friday. I can meet Monday or Tuesday morning.

---

**From:** Noble, Ron [mailto:rnoble@fowlerwhite.com]  
**Sent:** Wednesday, January 04, 2012 10:02 AM  
**To:** Knauss, Elizabeth  
**Subject:** RE: Aqua Clean Environmental

Beth:

We are all booked up for tomorrow. Do you have any availability for Friday of this week?? If not, we can do it early next week,  
Ron



Ron Noble  
Fowler White Boggs P.A.  
501 E. Kennedy Blvd, Suite 1700

Tampa, Florida 33602  
Direct: 813 222 1175  
Fax: 813 229 8313  
[www.fowlerwhite.com](http://www.fowlerwhite.com)

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**From:** Knauss, Elizabeth [<mailto:Elizabeth.Knauss@dep.state.fl.us>]  
**Sent:** Wednesday, January 04, 2012 8:58 AM  
**To:** Noble, Ron  
**Subject:** Aqua Clean Environmental

Do you still want to meet to submit the information we requested on Aqua Clean's PCB incident? I am available tomorrow, or next week except for Tuesday afternoon.

*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](#).*

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Disclaimer under IRS Circular 230: Unless expressly stated otherwise in this transmission, nothing contained in this message is intended or written to be used, nor may it be relied upon or used, (1) by any taxpayer for the purpose of avoiding penalties that may be imposed on the taxpayer under the Internal Revenue Code of 1986, as amended and/or (2) by any person to support the promotion or marketing of or to recommend any Federal tax transaction(s) or matter(s) addressed in this message.

If you desire a formal opinion on a particular tax matter for the purpose of avoiding the imposition of any penalties, we will discuss the additional Treasury requirements that must be met and whether it is possible to meet those requirements under the circumstances, as well as the anticipated time and additional fees involved.

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**Knauss, Elizabeth**

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**From:** Knauss, Elizabeth  
**Sent:** Wednesday, December 14, 2011 2:56 PM  
**To:** Ron Noble (rnoble@fowlerwhite.com)  
**Cc:** Dregne, James  
**Subject:** Aqua Clean

Jim and I are still discussing the Generator Certification/Waste Profile issue, but we wanted to get you the information request on the PCB issue in the mean time.

We are requesting that Aqua Clean submit copies of:

1. The waste profile(s) and shipping papers for the material transported from the original generator to Aqua Clean/FRS. If the material was a bulked load from several generators, all the profiles and shipping papers for the load should be provided.
2. All analytical results for the material(s), including field screening results.
3. All records related to the transfer of the material between Aqua Clean and FRS. This should include record that identify which tank(s), trucks and compartments held the material.
4. All records related to the shipment of the material to and from FCC Environmental.
5. All records related to the final disposal of the material and any decontamination wastes generated by cleaning out your tanks, piping, transfer pumps and mobile equipment.
6. Analytical results showing that all tanks, piping, pumps and mobile equipment that contacted the PCBs have been decontaminated in accordance with 40 CFR Part 761 requirements.

Thanks,

Beth Knauss

## Knauss, Elizabeth

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**From:** Noble, Ron [rnoble@fowlerwhite.com]  
**Sent:** Monday, December 12, 2011 3:48 PM  
**To:** Knauss, Elizabeth  
**Cc:** Dregne, James  
**Subject:** RE: Aqua Clean Environmental

Beth:

Below is the contact information you requested:

Environmental Marketing Services  
107 Wall Street, Suite 1  
Clemson, SC 29631

Contact:  
Jodi Gentzlinger  
321 749 6894

Let me know if you need anything more from our end,  
Ron



Ron Noble  
Fowler White Boggs P.A.  
501 E. Kennedy Blvd, Suite 1700  
Tampa, Florida 33602  
Direct: 813 222 1175  
Fax: 813 229 8313  
[www.fowlerwhite.com](http://www.fowlerwhite.com)

**From:** Knauss, Elizabeth [<mailto:Elizabeth.Knauss@dep.state.fl.us>]  
**Sent:** Friday, December 09, 2011 2:47 PM  
**To:** Noble, Ron  
**Cc:** Dregne, James  
**Subject:** Aqua Clean Environmental

Ron – can you ask for Bob’s contact at Environmental Marketing Services that he referred Quality Aerospace to? There are several listings under that company name. A phone number and name would save me some time.

I have given some draft language to Jim on the profiling and PCB issues, and will forward it after review.

Thanks,

Beth

*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](#).*

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---

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## Knauss, Elizabeth

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**From:** Knauss, Elizabeth  
**Sent:** Monday, December 12, 2011 4:00 PM  
**To:** Dregne, James  
**Subject:** Aqua Clean/Quality Aerospace

I called Environmental Marketing Service, and discussed the situation with Duane Shively and Jodi Gentzlinger over a speaker phone. They say the only contact they had with Quality was with regard to arranging for disposal of a drum of paint waste, and that no one from either Aqua Clean or Quality ever discussed brokering any aqueous wastes or plating type wastes with them.

They gave them a bid for paint waste disposal and never heard anything further.



## Knauss, Elizabeth

---

**From:** Knauss, Elizabeth  
**Sent:** Friday, December 09, 2011 2:47 PM  
**To:** Ron Noble (rnoble@fowlerwhite.com)  
**Cc:** Dregne, James  
**Subject:** Aqua Clean Environmental

Ron – can you ask for Bob's contact at Environmental Marketing Services that he referred Quality Aerospace to? There are several listings under that company name. A phone number and name would save me some time.

I have given some draft language to Jim on the profiling and PCB issues, and will forward it after review.

Thanks,

Beth

## Florida Department of

### Memorandum

### 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.

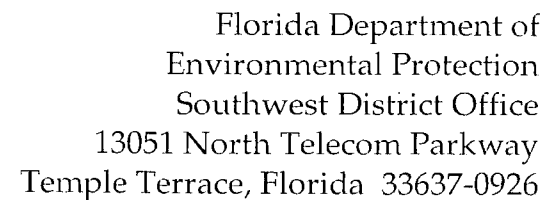
Thomas Morgan was also interviewed. No hazardous waste manifests or any other shipping papers are on his vehicles. Morgan has been with Aqua Clean for 3 years, and before that worked for CTL delivering sulfuric acid. He has a DOT license with Hazmat endorsement. Morgan said he thought the signature on 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

E-Mail (all DEP attendees @dep.state.fl.us)

DRR MILLER      AQUA CLEAN      863 644 0665



SUBJECT: AQUA CLEAN

[illegible]

A meeting was held with representatives of Aqua Clean to discuss the inspection report and warning letter. City of Lakeland Pretreatment Program representatives also attended the meeting. Attorney Ron Noble and W.D Miller represented Aqua Clean. Information was also requested regarding an incident involving PCB oil rejected by FCC Environmental and returned to Aqua Clean. Aqua Clean will provide documentation regarding the oil acceptance, subsequent disposal and equipment decontamination.

Regarding the electroplating waste water and sludge accepted from Quality Aerospace Coatings, Aqua Clean gave a history of their dealings with the company. Miller was given copies of the duplicate shipping papers submitted by QAC, and he said that he was not familiar with the records, and would immediately question their staff in detail about the records and dealings with the company, and would follow up with DEP.

Miller and Noble said that they had been having internal discussions about the advisability of revising their waste profiles, and agreed that some revisions would be wise. DEP re-iterated that the profile form was not the only issue. Aqua Clean must cease accepting incomplete forms.

## Knauss, Elizabeth

---

**From:** Audrey Scruggs [ajscruggs@tampabay.rr.com]  
**Sent:** Friday, December 02, 2011 10:35 AM  
**To:** Knauss, Elizabeth  
**Subject:** Re: Aqua Clean meeting

Thanks Beth. Now it makes sense. The meeting Tuesday was not for this issue. I will let Dee know this will be an addition to the meeting.

Have a great evening, Audrey



----- Original Message -----

**From:** Knauss, Elizabeth  
**To:** [rnoble@fowlerwhite.com](mailto:rnoble@fowlerwhite.com)  
**Cc:** 'Audrey Scruggs'; Dregne, James; Kothur, Bheem  
**Sent:** Friday, December 02, 2011 9:38 AM  
**Subject:** Aqua Clean meeting

Ron -

A new issue came up regarding Aqua Clean at an inspection I did at FCC Environmental this week. FCC's nonconforming load log indicates that FCC was sent a load of PCB oil by AquaClean/FRS on October 4, and it was rejected and returned October 7, with additional cleanout residues returned later. The oil had 89.9 ppm PCBs, according to a lab analysis by Phoslab.

I called the facility this morning and requested that they bring all available documentation regarding the shipment to our meeting next Tuesday.

If this will be an issue for you, as you have represented both facilities in the past, please let me know.

Thanks,

Beth Knauss

*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](#).*

## Knauss, Elizabeth

---

**From:** Knauss, Elizabeth  
**Sent:** Friday, December 02, 2011 9:38 AM  
**To:** Ron Noble (rnoble@fowlerwhite.com)  
**Cc:** 'Audrey Scruggs'; Dregne, James; Kothur, Bheem  
**Subject:** Aqua Clean meeting

Ron –

A new issue came up regarding Aqua Clean at an inspection I did at FCC Environmental this week. FCC's nonconforming load log indicates that FCC was sent a load of PCB oil by AquaClean/FRS on October 4, and it was rejected and returned October 7, with additional cleanout residues returned later. The oil had 89.9 ppm PCBs, according to a lab analysis by Phoslab.

I called the facility this morning and requested that they bring all available documentation regarding the shipment to our meeting next Tuesday.

If this will be an issue for you, as you have represented both facilities in the past, please let me know.

Thanks,

Beth Knauss



## Knauss, Elizabeth

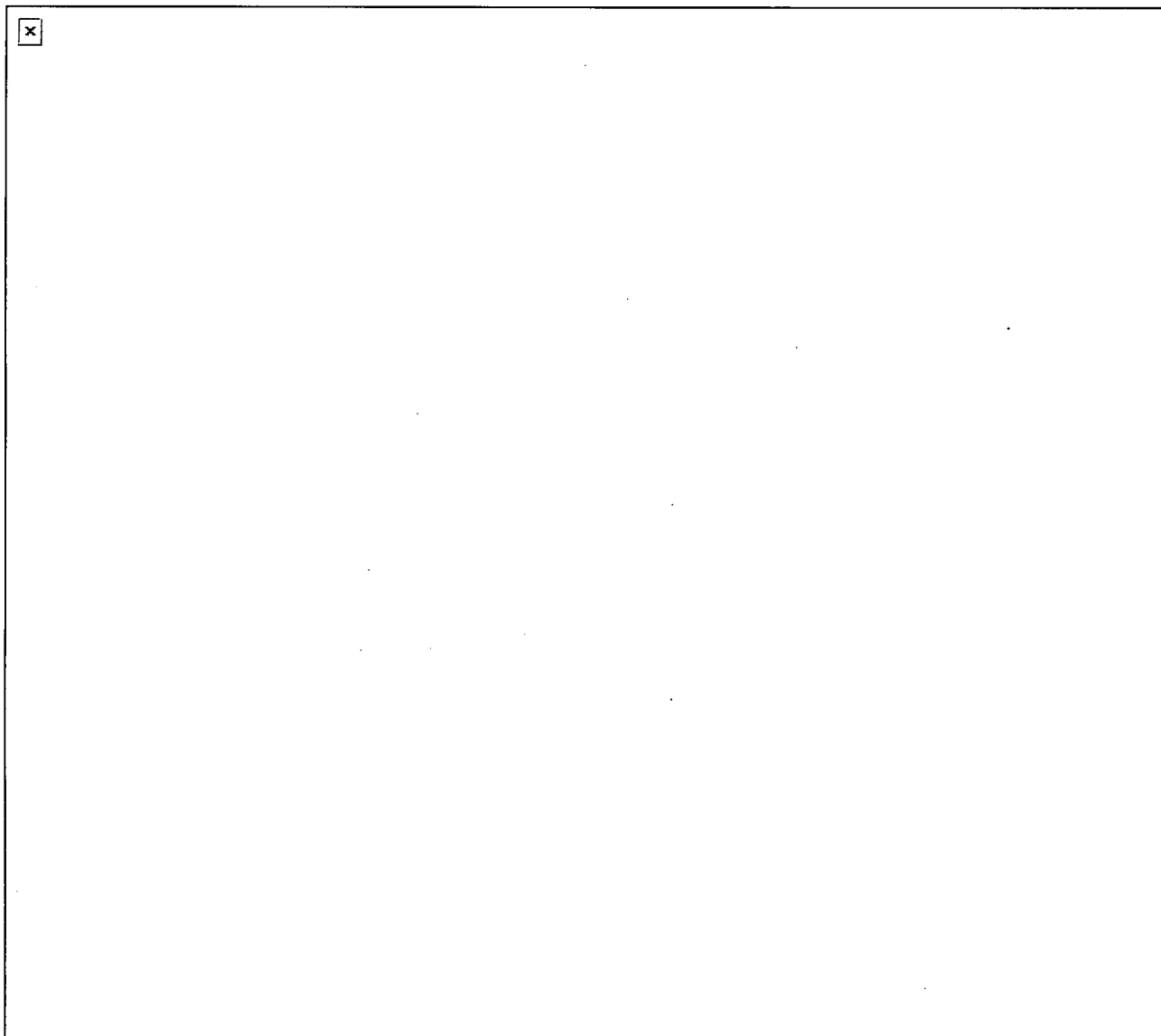
---

**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Thursday, November 10, 2011 7:08 AM  
**To:** Knauss, Elizabeth  
**Subject:** (Archived w/ Attachments) Profile Form  
**Attachments:** image001.jpg

Beth,

Just in case you needed this, here is the EPA manual that waste profile came from..Pages 2-5 and 2-6

Rick



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**Table 2.1 Example Waste Profile Form**

<b>Generator Information</b>		(Correspondence will be sent to "Billing Name" address)	
Generator Name: _____		Billing Name: _____	
Street: _____		Street: _____	
City: _____ State: _____ ZIP: _____		City: _____ State: _____ ZIP: _____	
Phone: _____ Fax: _____		Phone: _____ Fax: _____	
<b>Waste Description</b>			
Common Name of Waste: _____			
Process Generating Waste: _____			
_____			
Is the process by which this waste is generated subject to Federal Categorical Pretreatment Standards? <input type="checkbox"/> YES <input type="checkbox"/> NO			
If yes, identify process: _____			
Is the waste a characteristic or listed hazardous waste defined by 40 CFR Part 261? <input type="checkbox"/> YES <input type="checkbox"/> NO			
Frequency of shipment: _____			
Waste is: <input type="checkbox"/> Industrial Process Waste		<input type="checkbox"/> Unused or Off-Spec Product	
<input type="checkbox"/> Commercial Process Waste		<input type="checkbox"/> UST or Spill-Related Waste	
<input type="checkbox"/> Food-Related Waste		<input type="checkbox"/> Other, please specify _____	
MSD ATTACHED? <input type="checkbox"/> YES <input type="checkbox"/> NO Comment: _____			
TCLP ATTACHED? <input type="checkbox"/> YES <input type="checkbox"/> NO Comment: _____			
GENERATOR PROCESS KNOWLEDGE CERTIFICATION ATTACHED? <input type="checkbox"/> YES <input type="checkbox"/> NO			
<b>Physical Data (@70 F):</b>			
1) Color: _____		6) Is Waste Pumpable? <input type="checkbox"/> YES <input type="checkbox"/> NO	
2) Odor: _____		7) Flash Point <input type="checkbox"/> <100 F <input type="checkbox"/> 100–139 F <input type="checkbox"/> 140–200 F <input type="checkbox"/> >200 F	
3) Number of Layers: _____		8) pH <input type="checkbox"/> <2 <input type="checkbox"/> 1.2–7 <input type="checkbox"/> 7.1–12.4 <input type="checkbox"/> >12.4	
4) Total Solids by Volume: ____%		9) Specific Gravity: <input type="checkbox"/> <1 <input type="checkbox"/> 1–1.5 <input type="checkbox"/> >1.5	
5) Does waste contain free liquids? <input type="checkbox"/> YES <input type="checkbox"/> NO If yes ____%			
Waste Composition:			
_____ %		_____ %	
_____ %		_____ %	
_____ %		Total 100%	
<b>Sample Information</b>			
Sample Provided? <input type="checkbox"/> YES <input type="checkbox"/> NO			
If yes, complete the following:		Date Collected: _____ Time Collected: _____	
		Sampled by: _____ Grab: _____	
		Composite: _____ Sampling Location: _____	

Concentration in ppm

### INORGANIC CHARACTERISTICS

D004	Arsenic	_____	D010	Selenium	_____
D005	Barium	_____	D011	Silver	_____
D006	Cadmium	_____		Copper	_____
D007	Chromium	_____		Zinc	_____
D008	Lead	_____		Nickel	_____
D009	Mercury	_____			

### ORGANIC CHARACTERISTICS

D018	Benzene	_____	D032	Hexachlorobenzene	_____
D019	Carbon Tetrachloride	_____	D033	Hexachlorobutadiene	_____
D021	Chlorobenzene	_____	D034	Hexachloroethane	_____
D022	Chloroform	_____	D035	Methyl Ethyl Ketone	_____
D023	o-Cresol	_____	D036	Nitrobenzene	_____
D024	m-Cresol	_____	D037	Pentachlorophenol	_____
D025	p-Cresol	_____	D038	Pyridine	_____
D026	Cresol	_____	D039	Tetrachloroethylene	_____
D027	1,4-Dichlorobenzene	_____	D040	Trichloroethylene	_____
D028	1,2-Dichloroethane	_____	D041	2,4,5-Trichlorophenol	_____
D029	1,1-Dichloroethylene	_____	D042	2,4,6-Trichlorophenol	_____
D030	2,4-Dinitrotoluene	_____	D043	Vinyl Chloride	_____

### PESTICIDE/HERBICIDE WARRANTY

I hereby certify the following: The waste identified in Section B of this waste profile form does not contain Endrin, Methoxychlor, 2,4-D Lindane, Toxaphene, 2,4,5-TP (Silvex), Chlordane, or Heptachlor (and its Epoxide). These constituents are not used at the location where this waste was generated, nor are they known to be present in the materials of which the above waste is comprised. Hence, there is no reason to suspect their presence in the waste. Generator's Initials: \_\_\_\_\_

### POLYCHLORINATED BIPHENYL (PCB) WARRANTY

I hereby certify the following: The waste identified in Section B of this waste profile form does not contain PCBs at a concentration of 40 ppm when measured in each container or vessel; that the material is not contaminated with PCBs from a source containing 50 ppm or greater PCBs; and hereby agree to indemnify and hold harmless from any cost, damages, or liability resulting from the breach of this warranty. Generator's Initials: \_\_\_\_\_

### HAZARDOUS WASTE WARRANTY

I hereby certify the following: The waste identified in Section B of this waste profile form does not contain any material at a concentration which would render it as hazardous as defined in 40 CFR 261.3 when measured in each container or delivered to and hereby agree to indemnify and hold harmless from any cost, damages, or liability resulting from the breach of this warranty. Generator's Initials: \_\_\_\_\_

### FEDERAL CATEGORICAL PRETREATMENT STANDARD WARRANTY

I hereby certify the following: (Please circle and initial) The waste identified in Section B of this waste profile form is/is not generated from a manufacturing process that is subject to Federal Categorical Pretreatment standards; and hereby agree to indemnify and hold harmless from any cost, damages, or liability resulting from the breach of this warranty.

Generator's Initials: \_\_\_\_\_

Name (Print) \_\_\_\_\_ Title \_\_\_\_\_  
Signature \_\_\_\_\_ Date \_\_\_\_\_

## **12/13/2011 Meeting Activity Knauss**

Admin Conf Rm

W.D Miller, Ron Noble, Jim Dregne and Beth Knauss met to discuss the results of Aqua Clean's internal investigation regarding the shipping papers from Quality Aerospace. Sales Rep Tom B first visited the facility before it was operating, and next visited just after it opened. He said he made it clear to Quality that Aqua Clean only accepted non hazardous waste. Quality was referred to Environmental Marketing Services regarding arranging for hazardous waste disposal. The second shipping paper with Aqua Clean's drivers' signatures appeared to have been presented on a clip board. The form appeared to have been printed from an on-line source, and was not a typical multi page manifest form. The drivers have been re-trained regarding signing anything other than the Aqua Clean shipping papers. Aqua Clean trucks only carry Aqua Clean non hazardous waste manifests. Aqua Clean will provide contact information for Environmental Marketing for follow up. DEP will request the PCB cleanup information and send suggested waste profile language via email

### **Events:**

Event Type: Finished Date: 12/13/2011

A meeting was held with representatives of Aqua Clean to discuss the inspection report and warning letter. City of Lakeland Pretreatment Program representatives also attended the meeting. Attorney Ron Noble and W.D Miller represented Aqua Clean. Information was also requested regarding an incident involving PCB oil rejected by FCC Environmental and returned to Aqua Clean. Aqua Clean will provide documentation regarding the oil acceptance, subsequent disposal and equipment decontamination.

Regarding the electroplating waste water and sludge accepted from Quality Aerospace Coatings, Aqua Clean gave a history of their dealings with the company. Miller was given copies of the duplicate shipping papers submitted by QAC, and he said that he was not familiar with the records, and would immediately question their staff in detail about the records and dealings with the company, and would follow up with DEP.

Miller and Noble said that they had been having internal discussions about the advisability of revising their waste profiles, and agreed that some revisions would be wise. DEP re-iterated that the profile form was not the only issue. Aqua Clean must cease accepting incomplete forms.

## Knauss, Elizabeth

---

**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Tuesday, November 08, 2011 9:22 AM  
**To:** Knauss, Elizabeth  
**Cc:** Dregne, James  
**Subject:** RE: Aqua Clean Meeting

Beth,

Thanks for the information. It looks like it will be Bob Conner (Asst. Water Utilities Director) and myself attending.

I assume its going to be at the FDEP offices over there in Tampa?

Rick

*Richard J. Ruede*

**Wastewater Collection Superintendent**

Water Utilities Department

1825 Glendale Street

Lakeland, FL 33803

Phone (863) 834-6571

Fax (863) 834-6271

[Richard.ruede@lakelandgov.net](mailto:Richard.ruede@lakelandgov.net)

**From:** Knauss, Elizabeth [<mailto:Elizabeth.Knauss@dep.state.fl.us>]  
**Sent:** Monday, November 07, 2011 4:58 PM  
**To:** Ruede, Richard  
**Cc:** Dregne, James  
**Subject:** Aqua Clean Meeting

Will Tuesday December 6 at 10:00 am work for the meeting with Aqua Clean? Who from the City would be attending?

*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](#).*

**From:** Ruede, Richard [<mailto:Richard.Ruede@lakelandgov.net>]  
**Sent:** Thursday, November 03, 2011 11:19 AM  
**To:** Knauss, Elizabeth  
**Subject:** Tuesday Meeting

Beth,

Do you know if the EPA enforcement person is going to be at this meeting?

Also, we, the City, would like to have 2 people attend the meeting with Aqua Clean if that is ok with FDEP.

Rick

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## Knauss, Elizabeth

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**From:** Ruede, Richard [Richard.Ruede@lakelandgov.net]  
**Sent:** Thursday, November 03, 2011 6:35 AM  
**To:** Knauss, Elizabeth  
**Cc:** Dregne, James; 'John Daily'  
**Subject:** (Archived w/ Attachments) RE: Aqua Clean  
**Attachments:** SKMBT\_C45211110306290.pdf

Beth,

Here is some information I can up with regarding Aqua Cleans' Tampa Facility I told you about. I have attached a copy of their permit that I received from John for your records. I do know that they have been taking some tank bottoms and wastewater with high Zinc over to Tampa since they have a high Zn Limit that was discovered during our daily sampling at their location.

Permit #1107 – City of Tampa  
1008 19<sup>th</sup> st  
Tampa, FL 33605

I will let you know what comes out of our internal meeting this morning.

Rick

**From:** Knauss, Elizabeth [<mailto:Elizabeth.Knauss@dep.state.fl.us>]  
**Sent:** Wednesday, November 02, 2011 4:22 PM  
**To:** Ruede, Richard  
**Cc:** Dregne, James  
**Subject:** RE: Aqua Clean

Per our discussion, I will let you know when Aqua Clean responds to our warning letter.

*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](#).*

**From:** Ruede, Richard [<mailto:Richard.Ruede@lakelandgov.net>]  
**Sent:** Wednesday, November 02, 2011 10:26 AM  
**To:** Knauss, Elizabeth  
**Subject:** Aqua Clean

Beth,

Would you please keep me informed as to when the Aqua Clean meeting take place and where. I am having a meeting tomorrow with the Deputy City Manager, City Attorney and Utility Director regarding Aqua Clean and they may want to know when the meeting will take place.

Thanks

Rick



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## **Knauss, Elizabeth**

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**Sent:** Wednesday, November 02, 2011 10:26 AM  
**To:** Knauss, Elizabeth  
**Subject:** Aqua Clean

Beth,

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Thanks

Rick

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Quality Aerospace Coatings  
3536 DMG Drive  
Lakeland, FL 33811  
863-619-2628  
FLR000178525

November 4<sup>th</sup>, 2011

Re: Aqua Clean Environmental

Dear Mrs. Knauss and Mr. Dregne,

Per your request, I am constructing this letter to describe the relationship and events that have taken place between Quality Aerospace Coatings and Aqua Clean Environmental.

We contacted Aqua Clean Environmental in the late summer of 2009. Bob Torok visited Quality Aerospace Coatings on behalf of Aqua Clean Environmental, shortly after our initial contact, to discuss our needs for processing and transporting of liquid waste materials. During Bob's visit we discussed the different materials used at Quality Aerospace Coatings and the waste generated. Most of the discussion was based on waste waters produced, spent dye baths and spent nickel acetate sealing solutions. Bob reviewed all the MSDS sheets for all products on the chemical processing line and informed us that he was capable of removing all items with the exception of the hexavalent chromium solutions, which included the chromic acid anodizing and chromate conversion solutions. To date, none of the hexavalent chromium solutions have been removed from the facility.

Quality Aerospace Coatings agreed to send copies of all MSDS sheets with each shipment of materials. After we were invoiced on the first two shipments, I noticed that the manifest attached to the invoice listed waste water as the materials being picked up. I immediately called Bob Torok and asked why he had listed waste water on the manifest instead of the specific materials based on the MSDS sheets supplied. He then explained to me that all of our products met the pH and content for waste water because once they are combined with liquids from other customers it balances the mixture and does not exceed the allowable limits for his discharge to the City of Lakeland system. I asked him if they maintain copies of the supplied documents and MSDS sheets for a record of traceability. He replied that it was not necessary and he throws them away. The documents that he is referring to are MSDS sheets of each liquid being disposed of and our manifest that describes the individual products. Over the last two years Bob has had waste profile forms filled out by Quality Aerospace Coatings. The requests were not submitted to his point of contact (Mike Shiver or Jay Creasy), nor were they requested at the time when service was needed. There was no clear understanding of his waste profile form and so they were filled out as a general information sheet. The profiles were supplied by the MSDS sheets.

This letter is for the purpose of explaining our position with the Florida Department of Environmental Protection and is not designed to harm or place judgment on Aqua Clean Environmental. Aqua Clean provides a service to many facilities that expect to be given honest information and provided with the proper documentation to protect them from liability. We appreciate the services that Aqua Clean provides and understand that there are limitations to what they can accept. We hope that they will be clearer in the future for both parties involved.

Sincerely,

Jay Creasy  
President

# NON-HAZARDOUS WASTE MANIFEST

M-9

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quality Aerospace Coatings 3536 DMB Drive Lakeland FL 33811							
4. Generator's Phone ( )							
5. Transporter 1 Company Name Agua Clean		6. US EPA ID Number FLR000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
9. Designated Facility Name and Site Address Agua Clean 3240 Winton RD Lakeland FL 33811		10. US EPA ID Number FLR000034033		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone 813-644-0665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. Non HAZ / Non Reg Waste Water				5 Drums		265 gals	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information VAC 5 Barrels							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
						Date	
Printed/Typed Name D. Marie Roberts				Signature D. Marie Roberts		Month Day Year 02 17 11	
17. Transporter 1 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name Terry Bianchi				Signature Terry Bianchi		Month Day Year 02 17 11	
18. Transporter 2 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
						Date	
Printed/Typed Name				Signature		Month Day Year	

NON-HAZARDOUS WASTE

GENERATOR  
TRANSPORTER  
FACILITY

# NON-HAZARDOUS WASTE MANIFEST

M-4

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quality Aerospace Coatings 3536 DMG Drive Lakeland FL 33811				1102254			
4. Generator's Phone ( )							
5. Transporter 1 Company Name Agia Clean		6. US EPA ID Number FLR000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
9. Designated Facility Name and Site Address Agia Clean 3240 Whittier RD Lakeland FL 33811		10. US EPA ID Number FLR000034033		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone 863-644-0665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit Wt./Vol.	
a. NON HAZ/Non Reg Waste Water				5 Drums		265 391	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information VAC 5 Barrels							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name Christie Roberts						Date 02/17/11	
Signature Christie Roberts							
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Terry Branch						Date 02/17/11	
Signature Terry Branch							
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name						Date	
Signature							
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name Tina Marie Dubose						Date 2/17/11	
Signature Tina Marie Dubose							

NON-HAZARDOUS WASTE

TRANSPORTER

FACILITY

# NON-HAZARDOUS WASTE MANIFEST

M-3

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address <i>QUALITY AEROSPACE COATINGS 3536 DMG Drive</i>				1100238			
4. Generator's Phone <i>(863) 619-2628</i>				<i>LAKELAND FL 33811</i>			
5. Transporter 1 Company Name <i>AQUA CLEAN</i>		6. US EPA ID Number <i>FLR000034033</i>		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
9. Designated Facility Name and Site Address <i>AQUA CLEAN 3210 WHITTEN RD LAKELAND FL 33811</i>		10. US EPA ID Number <i>FLR000034033</i>		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone <i>863-644-0665</i>			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. <i>NON HAZ NON-REG WASTEWATER</i>				<i>4 55</i>			
				<i>2 30</i>		<i>280 GAL</i>	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name <i>Mark Norris</i>				Signature <i>Mark Norris</i>		Date <i>1/18/11</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>Chris Maddox</i>		Date <i>1/18/11</i>	
Printed/Typed Name <i>Chris Maddox</i>				Signature		Date	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.				Signature <i>Thermaine Dubose</i>		Date <i>1/18/11</i>	
Printed/Typed Name <i>Thermaine Dubose</i>				Signature		Date	

NON-HAZARDOUS WASTE

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
5. Generator's Name and Mailing Address <b>Quality Aerospace Coatings 3536 DMG Drive Lakeland, FL 33811</b>			Generator's Site Address (if different than mailing address)		
Generator's Phone: <b>(863) 619-2628</b>					
6. Transporter 1 Company Name <b>Agua Clean</b>			U.S. EPA ID Number <b>FLR000034033</b>		
7. Transporter 2 Company Name			U.S. EPA ID Number		
8. Designated Facility Name and Site Address <b>Agua Clean 3210 Whitten Rd. Lakeland, FL 33811</b>			U.S. EPA ID Number <b>FLR000034033</b>		
Facility's Phone: <b>(863) 644-0665</b>					
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.
14. Special Handling Instructions and Additional Information					
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.					
Generator's/Officer's Printed/Typed Name <b>Mark Norris</b>					Month Day Year <b>12 15 10</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.: _____					
Transporter signature (for exports only): _____					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials				
	Transporter 1 Printed/Typed Name <b>Chris Mandley</b>				Month Day Year <b>10 18 11</b>
	Transporter 2 Printed/Typed Name				Month Day Year
DESIGNATED FACILITY	18. Discrepancy				
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection				
	Manifest Reference Number:				
	18b. Alternate Facility (or Generator) U.S. EPA ID Number				
	Facility's Phone:				
	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.	2.	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					Month Day Year
Signature					Month Day Year

# NON-HAZARDOUS WASTE MANIFEST

M-3

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quariti Aerospace Coatings 3536 DMG Drive Lakeland FL 33811							
4. Generator's Phone 863 619-2628		5. Transporter 1 Company Name AQUACLEAN		6. US EPA ID Number FLR000034033		A. State Transporter's ID	
		7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone	
						C. State Transporter's ID	
						D. Transporter 2 Phone	
9. Designated Facility Name and Site Address AQUACLEAN 3210 WHISTLER RD LAKELAND FL 33811		10. US EPA ID Number FLR000034033		E. State Facility's ID		F. Facility's Phone 863-644-0665	
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. Non HAZ Non-REG Wastewater				4 55 2 30		280 GAL	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name Mark Norris						Date 1/18/11	
Signature X Mark Norris							
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Chris Maddox						Date 1/18/11	
Signature Chris Maddox							
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name						Date	
Signature							
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name						Date	
Signature							

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY



# NON-HAZARDOUS WASTE MANIFEST

m7

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address <i>Aerospace Coating 3536 DMG DR. Lakeland, FL, 33811</i>				1103310			
4. Generator's Phone ( )							
5. Transporter 1 Company Name <i>aqua clean</i>		6. US EPA ID Number <i>FLR000034033</i>		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address <i>aqua clean 3210 Whitten Rd. Lakeland FL, 33811</i>		10. US EPA ID Number <i>FLR000034033</i>		E. State Facility's ID			
				F. Facility's Phone <i>(863) 644-0665</i>			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. <i>non haz/ non reg. waste water</i>				6 drums		275 GALS	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
						Date	
Printed/Typed Name <i>Christie Roberts</i>						Signature <i>Christie Roberts</i>	
						Month Day Year <i>3/21/11</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <i>Thomas Morgan</i>						Signature <i>[Signature]</i>	
						Month Day Year <i>3/21/11</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name						Signature	
						Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name <i>Theraine Dubose</i>						Signature <i>Theraine Dubose</i>	
						Month Day Year <i>3/22/11</i>	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

# NON-HAZARDOUS WASTE MANIFEST

mm

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

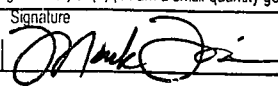
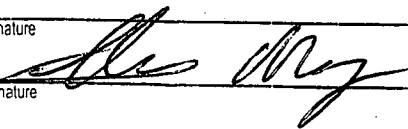
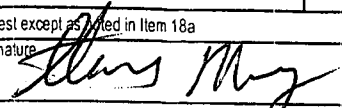
<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address <i>Aerospace Coating 3536 DMG DR Lakeland, FL, 33811</i>							
4. Generator's Phone ( )							
5. Transporter 1 Company Name <i>aqua clean</i>		6. US EPA ID Number <i>FLR0000034033</i>		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address <i>aqua clean 3210 Whitten Rd. Lakeland FL, 33811</i>		10. US EPA ID Number <i>FLR0000034033</i>		E. State Facility's ID			
				F. Facility's Phone <i>(863) 644-0665</i>			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit	
a. <i>non haz/ non reg. waste water</i>				6 drums		275 GALS	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name <i>Christine Roberts</i>				Signature <i>Christine Roberts</i>		Date Month Day Year <i>3/21/11</i>	
17. Transporter 1 Acknowledgement of Receipt of Materials						Date	
Printed/Typed Name <i>Thomas Morgan</i>				Signature <i>Thomas Morgan</i>		Month Day Year <i>3/21/11</i>	
18. Transporter 2 Acknowledgement of Receipt of Materials						Date	
Printed/Typed Name				Signature		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.						Date	
Printed/Typed Name				Signature		Month Day Year	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

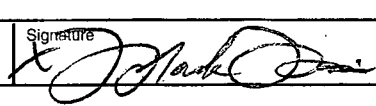
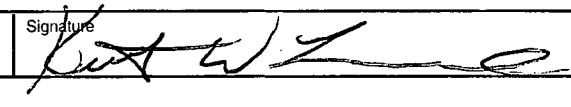
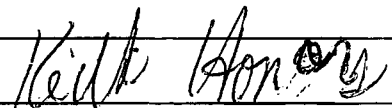
FACILITY

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number  	2. Page 1 of <b>1</b>	3. Emergency Response Phone  	4. Manifest Tracking Number  	
5. Generator's Name and Mailing Address <b>Quality Aerospace Coatings 3536 DMG Drive Lakeland, FL 33811</b>				Generator's Site Address (if different than mailing address)  		
Generator's Phone: <b>863-619-2628</b>						
6. Transporter 1 Company Name <b>Aqua Clean</b>				U.S. EPA ID Number <b>FLR000034033</b>		
7. Transporter 2 Company Name  				U.S. EPA ID Number  		
8. Designated Facility Name and Site Address <b>AQUA Clean 3710 Whitten Rd. Lakeland, FL, 33811</b>				U.S. EPA ID Number <b>FLR000034033</b>		
Facility's Phone: <b>(863) 644-0665</b>						
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	12. Unit Wt./Vol.
			No.	Type		
	1.	<b>Etch Waste</b>	<b>2</b>	<b>55</b>	<b>110</b>	
	2.	<b>Aluminum Cleaner Waste</b>	<b>2</b>	<b>55</b>	<b>110</b>	
	3.	<b>Etch Waste</b>	<b>2</b>	<b>30</b>	<b>60</b>	
4.				<b>(275)</b>		
14. Special Handling Instructions and Additional Information  						
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, 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.						
Generator's/Offor's Printed/Typed Name <b>Mark Norris</b>			Signature 		Month Day Year <b>3 9 11</b>	
TRANSPORTER INT'L	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	Transporter 1 Printed/Typed Name <b>Thomas Morgan</b>		Signature 		Month Day Year <b>3 21 11</b>	
	Transporter 2 Printed/Typed Name  		Signature  		Month Day Year  	
DESIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	18b. Alternate Facility (or Generator) Manifest Reference Number: _____ U.S. EPA ID Number _____					
	Facility's Phone: _____					
	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.		2.		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>Thomas Morgan</b>			Signature 		Month Day Year <b>3 31 11</b>	

# NON-HAZARDOUS WASTE MANIFEST

M-4

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address <b>QUALITY AEROSPACE 3536 DMG Dr LAKELAND, FL 33811</b>				1011358			
4. Generator's Phone ( )							
5. Transporter 1 Company Name <b>AQUA CLEAN ENV</b>		6. US EPA ID Number <b>FLR 000034033</b>		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
9. Designated Facility Name and Site Address <b>AQUA CLEAN ENV 3210 Whitten Rd LAKELAND, FL 33811</b>		10. US EPA ID Number <b>FLR 000034033</b>		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone <b>863 6440665</b>			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit Wt./Vol.	
a. <b>Non HAZ Non Reg Wastewater</b>				1 tank		2300 gal	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information  <b>P. H. 3</b>							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name <b>X Mark Norris</b>				Signature 		Date <b>11/23/20</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <b>Keith W Lemelle</b>				Signature 		Date <b>11/23/20</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name <b>Keith Honors</b>				Signature 		Date <b>11/23/20</b>	

NON-HAZARDOUS WASTE

# NON-HAZARDOUS WASTE MANIFEST

M-4

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address QUALITY AEROSPACE 3536 DMG Dr LAKELAND, FL 33811							
4. Generator's Phone ( )							
5. Transporter 1 Company Name AQUA CLEAN ENV		6. US EPA ID Number FLR 000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address AQUA CLEAN ENV 3210 WHITTEN Rd LAKELAND, FL 33811		10. US EPA ID Number FLR 000034033		E. State Facility's ID			
				F. Facility's Phone 863 6440665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. Non Haz Non Reg WASTEWATER				1 tank		2300	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information P. H. 3							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name X Mark Norris				Signature [Signature]		Date Month Day Year 11 23 10	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Keith W Lemelle				Signature [Signature]		Date Month Day Year 11 23 10	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name				Signature		Date Month Day Year	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

# NON-HAZARDOUS WASTE MANIFEST

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

M-3

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No. <b>1011382</b>		2. Page 1 of	
3. Generator's Name and Mailing Address <b>QUALITY AEROSPACE</b> <b>3536 DMG Dr.</b> <b>LKLD, FL 33811</b>							
4. Generator's Phone ( )							
5. Transporter 1 Company Name <b>AQUA CLEAN ENV</b>		6. US EPA ID Number <b>FLR 000034033</b>		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address <b>AQUA CLEAN ENV</b> <b>3210 Whitten Rd</b> <b>LKLD, FL 33811</b>		10. US EPA ID Number <b>FLR 000034033</b>		E. State Facility's ID			
				F. Facility's Phone <b>823 644 0665</b>			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit Wt./Vol.	
a. <b>Non HAZ Non Reg Wastewater</b>				1 tank		100 gal	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name <b>Mark Norris</b>				Signature <i>[Signature]</i>		Date Month Day Year <b>11 24 10</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name <b>Kerth W Lemelle</b>				Signature <i>[Signature]</i>		Date Month Day Year <b>11 24 10</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name				Signature		Date Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name <b>Tumaine Dubose</b>				Signature <i>[Signature]</i>		Date Month Day Year <b>11 24 10</b>	

NON-HAZARDOUS WASTE

GENERATOR  
TRANSPORTER  
FACILITY

# NON-HAZARDOUS WASTE MANIFEST

M-3

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address QUALITY AEROSPACE 3736 DMG Dr. LKLD, FL 33511							
4. Generator's Phone ( )							
5. Transporter 1 Company Name AQUA CLEAN ENV		6. US EPA ID Number FLR 000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address AQUA CLEAN ENV 3210 WHITTEN RD LKLD, FL 33511		10. US EPA ID Number FLR 000034033		E. State Facility's ID			
				F. Facility's Phone 863 644 0665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. Non Haz Non Res Wastewater				1 tank		100 gal	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name Y Mark Norris						Signature Y Mark Norris	
						Date 11/24/10	
17. Transporter 1 Acknowledgement of Receipt of Materials							
Printed/Typed Name Keith W Lemelle						Signature Keith W Lemelle	
						Date 11/24/10	
18. Transporter 2 Acknowledgement of Receipt of Materials							
Printed/Typed Name						Signature	
						Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name						Signature	
						Date	
						Month Day Year	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

# NON-HAZARDOUS WASTE MANIFEST

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quality Aerospace Coating 3536 DMG Drive Lakeland, FL 33811							
4. Generator's Phone ( )							
5. Transporter 1 Company Name AquaClean		6. US EPA ID Number FLR000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address AquaClean 3210 White Herd Rd. Lakeland, FL 33811		10. US EPA ID Number FLR000034033		E. State Facility's ID			
				F. Facility's Phone (863) 644-0665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit	
a. Nonhaz/nonreg waste water.				5 drums		275 GALS	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Pumped 5 drums.							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name X				Signature X		Date Month Day Year 11/15/10	
17. Transporter 1 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name Thomas Morgan				Signature Thomas Morgan		Month Day Year 11/15/10	
18. Transporter 2 Acknowledgement of Receipt of Materials				Date			
Printed/Typed Name Mark Norris				Signature Mark Norris		Month Day Year	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name				Signature		Date Month Day Year	

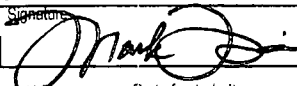
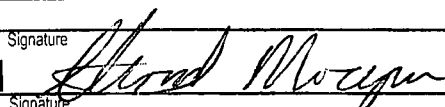
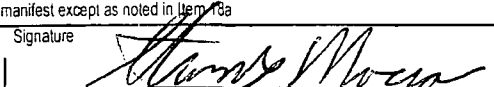
NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number		
5. Generator's Name and Mailing Address <b>Quality Aerospace Coatings</b> <b>3536 DMG Drive</b> <b>Lakeland, FL 33811</b> Generator's Phone: <b>863-619-2628</b>			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name <b>Aqua Clean</b>			U.S. EPA ID Number <b>FLR000034033</b>				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address <b>Aqua Clean</b> <b>3510 Whitten Rd, Lakeland, FL, 33811</b> Facility's Phone: <b>(863) 644-0665</b>			U.S. EPA ID Number <b>FLR000034033</b>				
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	12. Unit Wt./Vol.	13. Waste Codes
			No.	Type			
	1.	<b>Nickel Acetate</b>	<b>3</b>		<b>165</b>	<b>gal.</b>	
	2.	<b>Organic Dye (Black)</b>	<b>2</b>		<b>110</b>	<b>gal.</b>	
	3.						
4.							
14. Special Handling Instructions and Additional Information							
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.							
Generator's/Officer's Printed/Typed Name <b>Mark Norris</b>		Signature 		Month <b>11</b>		Day <b>10</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>Thomas Morgan</b>		Signature 		Month <b>11</b>	
		Transporter 2 Printed/Typed Name		Signature		Day <b>15</b>	
						Year <b>10</b>	
TRANSPORTER INT'L	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number:						
	18b. Alternate Facility (or Generator) U.S. EPA ID Number						
	Facility's Phone:						
DESIGNATED FACILITY	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. 2. 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>Thomas Morgan</b>		Signature 		Month <b>11</b>		Day <b>15</b>	
				Year <b>10</b>			

# NON-HAZARDOUS WASTE MANIFEST

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quality Airspace coating 3536 DMG Drive Lakeland, FL 33811				1011224			
4. Generator's Phone							
5. Transporter 1 Company Name AquaClean		6. US EPA ID Number FL000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address AquaClean 3210 Whitten Rd. Lakeland FL 33811		10. US EPA ID Number FL000034033		E. State Facility's ID			
				F. Facility's Phone (863) 644-0665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
a. Nonhaz/nonreg. waste water.				5 drums		275 GALS	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above			
15. Special Handling Instructions and Additional Information Pumped 5 drums.							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name				Signature		Date	
X				X		11/15/10	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name Thomas Morgan				X		11/15/10	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name Mark Norris				X			
19. Discrepancy Indication Space							
20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.				Signature		Date	
Printed/Typed Name Bernaine DeRose				X		11/15/10	

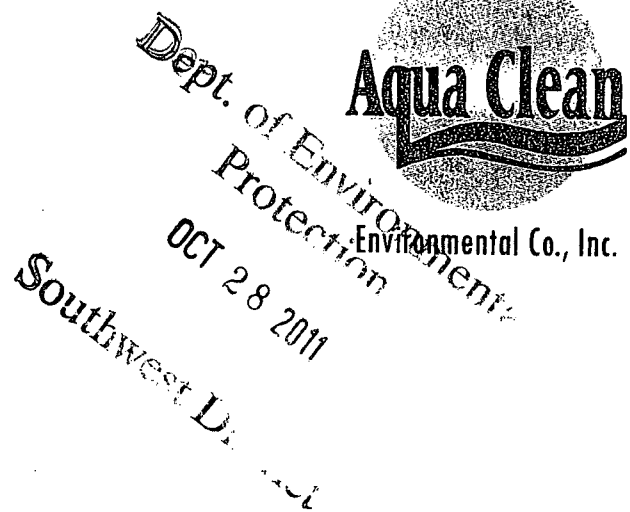
NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

October 21, 2011



Mr. Richard J. Ruede  
Wastewater Collection Superintendent  
Wastewater Collection Division  
City of Lakeland  
1825 Glendale Street  
Lakeland, FL 33803-4300

Re: Response to City of Lakeland Request for Information  
Wastewater Discharge Permit No.: 1041C

Dear Mr. Ruede:

Aqua Clean Environmental Co., Inc. ("Aqua Clean") is in receipt of the City of Lakeland's Request for Information dated October 6, 2011 in connection with wastewater generated by Quality Aerospace Coatings and Prima Die Casting, Inc. The purpose of this correspondence is to provide the information and documents requested by the City. Below please find Aqua Clean's responses which are identified by the same numbered paragraphs as set forth in the City's October 6, 2011 Request for Information for Quality Aerospace Coatings:

1. Enclosed please find a copy of all shipment manifests received from Quality Aerospace Coatings which are maintained by Aqua Clean.
2. Aqua Clean was not provided any analytical data from Quality Aerospace Coatings, and Aqua Clean did not generate any analytical data in connection with the Quality Aerospace Coatings wastewater. Aqua Clean reasonably relied on the certification provided by Quality Aerospace Coatings set forth in the Material Data Certification Sheet which was attached to the City of Lakeland's request for information.
3. Aqua Clean classified the Quality Aerospace Coatings' wastewater pursuant to the Material Data Certification Sheet provided by Quality Aerospace Coatings as well as a site visit inspection by Aqua Clean personnel at the Quality Aerospace Coatings facility which classified the wastewater as Subpart C organic wastewater generated from washing and coating operations.

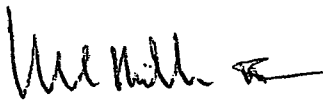
*[Handwritten signature]*

Below please find the responses provided by Aqua Clean which are identified by the same numbered paragraphs as set forth in the City of Lakeland's October 6, 2011 Request for Information for Prima Die Casting, Inc.:

1. Enclosed please find a copy of all shipping manifests received from Prima Die Casting, Inc. which are maintained by Aqua Clean.
2. Enclosed please find copies of all Material Data Certification Sheets received by Aqua Clean from Prima Die Casting, Inc.
3. Aqua Clean was not provided any analytical data from Prima Die Casting, Inc., and Aqua Clean did not generate any analytical data in connection with the Prima Die Casting, Inc. wastewater. Aqua Clean reasonably relied on the certification provided by Prima Die Casting, Inc. set forth in the Material Data Certification Sheet which was attached to the City of Lakeland's request for information.
4. Aqua Clean classified the Prima Die Casting, Inc.'s wastewater pursuant to the Material Data Certification Sheet provided by Prima Die Casting, Inc. as well as a site visit inspection by Aqua Clean personnel at the Prima Die Casting, Inc. facility which classified the wastewater as Subpart C organic wastewater generated from washing and coating operations.

We trust the information set forth above and the attached documentation is fully responsive to the City's Request for Information. In summary, Aqua Clean has reasonably relied upon the Material Data Certification and all other documentation provided by these generators, as well as site visits by Aqua Clean personnel to the subject facilities, for classification of these wastewaters for acceptance by Aqua Clean pursuant to 40 C.F.R. part 437. Aqua Clean remains available to provide any additional information requested by the City of Lakeland and to meet with the City if necessary to address the City's Request for Information in greater detail. In the interim, please do not hesitate to contact me should the City of Lakeland require any additional information regarding the above matters.

Sincerely,



W.D. Miller III, P.E.  
Vice President and General manager

Enclosures

Mr. Richard J. Ruede

October 21, 2011

Page 3

cc: T. Delgado, Deputy City Manager  
T. McCausland, City Attorney  
R. Conner, Asst. Director, Water Utilities Department  
A. O'Steen, Wastewater Collection Manager  
B. Knauss, FDEP Hazardous Waste Program  
R. Noble, Esquire, Fowler White Boggs  
T. Campbell, Esquire, Clark, Campbell, Mawhinney & Landcaster

MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.  
3210 WHITTEN ROAD  
LAKELAND, FL 33811  
PHONE: (863) 644-0665 FAX: (863) 646-1880

☒ New Profile  
☐ Amendment

GENERATOR INFORMATION

X Generator Name: QUALITY AEROSPACE COATINGS  
Address: 3536 DMG Dr  
City: LAKELAND State: FL Zip: 33811  
Contact: MARK NORRIS  
Phone: 813 619 2628 Fax: 813 646-5058

BILLING INFORMATION

X Bill To: SAME AS ABOVE  
Address: SAME AS ABOVE  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

TRANSPORTATION INFORMATION

Transporter: AQUA CLEAN ENV

Estimated  
Total Gallons

Actual  
Total Gallons

Shipping  
Container

- ☐ Drum  
☐ Tanker  
☒ Other

Shipping  
Frequency

- ☐ One Time  
☐ Week  
☐ Month  
☐ Year  
☐ Other

D.O.T. SHIPPING NAME: None HAZ None Reg Wastewater

MATERIAL COMPOSITION

Component

Concentration  
\_\_\_\_\_ %

# MATERIAL INFORMATION

Flashpoint ☐ Exact ☐ <140 ☐ 140-200 ☐ >200  
 pH ☐ Exact ☐ <2 ☐ 2-5 ☐ 5-9 ☐ 9-12.5 ☐ >12.5  
 Specific Gravity ☐ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2  
 Reactive ☐ Yes ☐ No  
 %Liquid \_\_\_\_\_ %Solid \_\_\_\_\_ %Sludge \_\_\_\_\_  
 Phases ☐ Single ☐ Double ☐ Multi  
 Viscosity ☐ Low ☐ Medium ☐ High  
 Odor ☐ None ☐ Mild ☐ Strong  
 Color/Appearance: \_\_\_\_\_

Specify if any of the contaminants appear below. Attach all MSDSs and current analyses.

Contaminants	Amount Present(mg/l)	Contaminants	Amount Present(mg/l)
Arsenic	_____	Chloromethane	_____
Cadmium	_____	1,2 Dichlorobenzene	_____
Chromium	_____	1,4 Dichlorobenzene	_____
Copper	_____	Ethylbenzene	_____
Cyanide	_____	Methyl Chloride	_____
Lead	_____	Methyl Ethyl Ketone	_____
Mercury	_____	Methylene Chloride	_____
Molybdenum	_____	Naphthalene	_____
Nickel	_____	1,1,2,2,-Tetrachloroethane	_____
Selenium	_____	Tetrachloroethylene	_____
Silver	_____	Toluene	_____
Zinc	_____	1,2,4-Trichlorobenzene	_____
Benzene	_____	1,1,1-Trichlorobenzene	_____
Carbon Tetrachloride	_____	1,1,2-Trichlorobenzene	_____
Chlorobenzene	_____	Trichloroethylene	_____
Chlorethane	_____	Vinyl Chloride	_____

Is this certification made "applying knowledge of the hazard characteristics of the waste in light of the materials or process used?" ☒ Yes ☐ No

## CERTIFICATION

Are any pesticides, herbicides or dioxin present? ☐ Yes ☒ No  
 Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ☐ Yes ☒ No  
 Are any PCBs present in the material? ☐ Yes ☒ No  
 Is there more than one fuel present? ☐ Yes ☒ No  
 Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ☐ Yes ☒ No

## GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to Aqua Clean, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by Aqua Clean Environmental.

Authorized Signature *Mark Norris* Printed Name Mark Norris  
 Date Quality Assurance Mgr. Date 11/23/10

**MATERIAL DATA CERTIFICATION SHEET**

**AQUA CLEAN ENVIRONMENTAL CO., INC.**  
3210 WHITTEN ROAD  
LAKELAND, FL 33811  
PHONE: (863) 644-0665 FAX: (863) 646-1880

☒ New Profile  
☒ Amendment

**GENERATOR INFORMATION**

Generator Name: Quality Aerospace Coatings  
Address: 3536 DMG Drive  
City: Lakeland State: FL Zip: 33811  
Contact: Kristie Roberts  
Phone: (863) 619-2628 Fax: (863) 646-5058

**BILLING INFORMATION**

Bill To: Same As Above ↑  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

**TRANSPORTATION INFORMATION**

Transporter: Aqua clean

Estimated  
Total Gallons

245

Actual

Total Gallons

245

Shipping  
Container

- ☐ Drum  
☒ Tanker  
☐ Other

Shipping  
Frequency

- ☒ One Time  
☐ Week  
☐ Month  
☐ Year  
☐ Other

D.O.T. SHIPPING NAME: non haz/non reg waste water

**MATERIAL COMPOSITION**

Component

Concentration  
\_\_\_\_\_%



## MATERIAL INFORMATION

Flashpoint ☐ Exact ☐ <140 ☐ 140-200 ☐ >200  
 pH ☐ Exact ☐ <2 ☐ 2-5 ☐ 5-9 ☐ 9-12.5 ☐ >12.5  
 Specific Gravity ☐ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2  
 Reactive ☐ Yes ☐ No  
 %Liquid \_\_\_\_\_ %Solid \_\_\_\_\_ %Sludge \_\_\_\_\_  
 Phases ☐ Single ☐ Double ☐ Multi  
 Viscosity ☐ Low ☐ Medium ☐ High  
 Odor ☐ None ☐ Mild ☐ Strong  
 Color/Appearance: \_\_\_\_\_

Specify if any of the contaminants appear below. Attach all MSDSs and current analyses.

<u>Contaminants</u>	<u>Amount Present(mg/l)</u>	<u>Contaminants</u>	<u>Amount Present(mg/l)</u>
Arsenic	_____	Chloromethane	_____
Cadmium	_____	1,2-Dichlorobenzene	_____
Chromium	_____	1,4-Dichlorobenzene	_____
Copper	_____	Ethylbenzene	_____
Cyanide	_____	Methyl Chloride	_____
Lead	_____	Methyl Ethyl Ketone	_____
Mercury	_____	Methylene Chloride	_____
Molybdenum	_____	Naphthalene	_____
Nickel	_____	1,1,2,2-Tetrachloroethane	_____
Selenium	_____	Tetrachloroethylene	_____
Silver	_____	Toluene	_____
Zinc	_____	1,2,4-Trichlorobenzene	_____
Benzene	_____	1,1,1-Trichlorobenzene	_____
Carbon Tetrachloride	_____	1,1,2-Trichlorobenzene	_____
Chlorobenzene	_____	Trichloroethylene	_____
Chloroethane	_____	Vinyl Chloride	_____

Is this certification made "applying knowledge of the hazard characteristics of the waste in light of the materials or process used?" ☒ Yes ☐ No

### CERTIFICATION

Are any pesticides, herbicides or dioxin present? ☐ Yes ☒ No

Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)?

☐ Yes ☒ No

Are any PCBs present in the material? ☐ Yes ☒ No

Is there more than one fuel present? ☐ Yes ☒ No

Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ☐ Yes ☒ No

### GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to Aqua Clean, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by Aqua Clean Environmental.

Authorized Signature \_\_\_\_\_

Printed Name Mark Norrie

Title Quality Assurance Mgr.

Date 10/13/10

QUA002

MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.

3210 WHITTEN ROAD

LAKELAND, FL 33811

PHONE: (863) 644-0665 FAX: (863) 646-1880

☒ New Profile  
☐ Amendment

GENERATOR INFORMATION

Generator Name: Quality Aerospace Coatings

Address: 3530 DMG Dr.

City: Lakeland State: FL Zip: 33811

Contact: Kristie Roberts / Jay Creasey

Phone: 813-619-2628 Fax: 813-646-5058

BILLING INFORMATION

Bill To: Quality Aerospace Coatings

Address: 3530 DMG Dr.

City: Lakeland State: FL Zip: 33811

Contact: Kristie Roberts

Phone: 813-619-2628 Fax: 813-646-5058

TRANSPORTATION INFORMATION

Transporter:

Aqua Clean Env.

Estimated

Total Gallons

Shipping  
Container

☒ Drum

☐ Tanker

☐ Other

Shipping  
Frequency

☒ One Time

☐ Week

☐ Month

☐ Year

☐ Other

Actual

Total Gallons

D.O.T. SHIPPING NAME: NON HAZ NON Reg. WASTE WATER

MATERIAL COMPOSITION

Component

Concentration  
%

Quality  
Aerospace  
Coatings

## MATERIAL INFORMATION

Flashpoint: ☐ Exact \_\_\_\_\_ ☐ <140 ☐ 140-200 ☐ >200  
 pH: ☐ Exact \_\_\_\_\_ ☐ <2 ☐ 2-5 ☐ 5-9 ☐ 9-12.5 ☐ >12.5  
 Specific Gravity: ☐ \_\_\_\_\_ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2  
 Reactive: ☐ Yes ☐ No  
 %Liquid: \_\_\_\_\_ %Solid: \_\_\_\_\_ %Sludge: \_\_\_\_\_  
 Phases: ☐ Single ☐ Double ☐ Multi  
 Viscosity: ☐ Low ☐ Medium ☐ High  
 Odor: ☐ None ☐ Mild ☐ Strong  
 Color/Appearance: \_\_\_\_\_

Specify if any of the contaminants appear below. Attach all MSDSs and current analyses.

<u>Contaminants</u>	<u>Amount Present(mg/l)</u>	<u>Contaminants</u>	<u>Amount Present(mg/l)</u>
Arsenic	_____	Chloromethane	_____
Cadmium	_____	1,2 Dichlorobenzene	_____
Chromium	_____	1,4 Dichlorobenzene	_____
Copper	_____	Ethylbenzene	_____
Cyanide	_____	Methyl Chloride	_____
Lead	_____	Methyl Ethyl Ketone	_____
Mercury	_____	Methylene Chloride	_____
Molybdenum	_____	Naphthalene	_____
Nickel	_____	1,1,2,2-Tetrachloroethane	_____
Selenium	_____	Tetrachloroethylene	_____
Silver	_____	Toluene	_____
Zinc	_____	1,2,4-Trichlorobenzene	_____
Benzene	_____	1,1,1-Trichlorobenzene	_____
Carbon Tetrachloride	_____	1,1,2-Trichlorobenzene	_____
Chlorobenzene	_____	Trichloroethylene	_____
Chlorethane	_____	Vinyl Chloride	_____

Is this certification made "applying knowledge of the hazard characteristics of the waste in light of the materials or process used?" ☒ Yes ☐ No

### CERTIFICATION

Are any pesticides, herbicides or dioxin present? ☐ Yes ☒ No  
 Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ☐ Yes ☒ No  
 Are any PCBs present in the material? ☐ Yes ☒ No  
 Is there more than one fuel present? ☐ Yes ☒ No  
 Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ☐ Yes ☒ No

### GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to Aqua Clean, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by Aqua Clean Environmental.

Authorized Signature: Krista Roberts Printed Name: Krista Roberts  
 Title: General Manager Date: 9/28/09

# Material Safety Data Sheet

## Section 1 - Product and Company Identification

### DECORATIVE ANODIZING SOLUTION

Product Identification: DECORATIVE ANODIZING SOLUTION  
Date of MSDS: 11/01/2004

#### Manufacturer's Information

Product Identification: DECORATIVE ANODIZING SOLUTION  
Manufacturer's Name: P&A SALES  
Manufacturer's Address1: 2420 Holly Neck Blvd  
Manufacturer's Address2: Baltimore, MD 21221  
Manufacturer's Country:  
General Information Telephone: 410-236-9826  
Emergency Telephone: 1-800-424-9300  
Proprietary: Y  
Reviewed: Y  
Published: Y  
CAGE: E00960  
Special Project Code: N

TYP II

#### Section 2 - Composition/Information on Ingredients

##### DECORATIVE ANODIZING SOLUTION

Name: SULFURIC ACID SOLUTION 85%

CAS: 7664-93-9

RTECS #: WS5600000

OSHA PEL: 0.1 MG(CRO\*3)/M3 C OSHA PEL Code: M

OSHA STEL: OSHA STEL Code:

ACGIH TLV: 0.05 MG(CRVI)/M3 ACGIH TLV Code: M

ACGIH STEL: N/P

Name: Proprietary 4%

Other REC Limits: NA

OSHA PEL: NA

ACGIH TLV: NA

Ingred Name: ALUMINUM SULFATE

CAS: 10043-01-3

RTECS #: BD1700000

Fraction by Wt: 3%

ACGIH TLV: 2 MG/CUM

EPA Rpt Qty: 5000 LBS

DOT Rpt Qty: 5000 LBS

Name: WATER Balance

Other REC Limits: NA

OSHA PEL: NA

ACGIH TLV: NA

ACGIH STEL: NA

#### Section 3 - Hazards Identification, Including Emergency Overview

**CLARIANT CORP 104960 SANODAL DEEP BLACK MLW POWDER**

**MSDS Safety Information**

FSC: 6820  
NIIN: 01-417-3575  
MSDS Date: 11/01/1995  
MSDS Num: CDKRW  
Product ID: 104960 SANODAL DEEP BLACK MLW POWDER  
MFN: 01  
Responsible Party  
Cage: NO627  
Name: CLARIANT CORP (FORMERLY SANDOZ CHEMICALS CORP)  
Address: 4000 MONROE RD  
City: CHARLOTTE NC 28205  
Info Phone Number: 704-331-7000  
Emergency Phone Number: 704-827-9651  
Preparer's Name: UNKNOWN  
Proprietary Ind: Y  
Review Ind: Y  
Published: Y

**Contractor Summary**

Cage: 1Y044  
Name: CLARIANT CORP  
Address: 4000 MONROE RD  
City: CHARLOTTE NC 28205  
Phone: 908-429-3582  
Cage: NO627  
Name: CLARIANT CORP (FORMERLY SANDOZ CHEMICALS CORP)  
Address: 4000 MONROE RD  
City: CHARLOTTE NC 28205  
Phone: 704-331-7000

**Item Description Information**

Item Manager: S9C  
Item Name: DYE MIX BLACK  
Specification Number: NONE  
Type/Grade/Class: NONE  
Unit of Issue: LB  
UI Container Qty: 0  
Type of Container: UNKNOWN

**Ingredients**

Name: \*\*\* PROPRIETARY \*\*\*

**Health Hazards Data**

LD50 LC50 Mixture: UNKNOWN  
Route Of Entry Inds - Inhalation: YES  
Skin: YES  
Ingestion: YES  
Carcinogenicity Inds - NTP: NO  
IARC: NO  
OSHA: NO  
Effects of Exposure: ACUTE: EXPOSURE MAY CAUSE EYE, SKIN & RESPIRATORY TRACT IRRITATION. CHROMIUM & CERTAIN CHROMIUM COMPOUNDS HAVE BEEN REPORTED TO CAUSE CUMULATIVE LUNG DAMAGE. CHRONIC: PROLONGED/REPEATED EXPOSURE MAY CAUSE DERMATITIS, SENSITIZATION, SKIN DEFLATTING.  
Explanation Of Carcinogenicity: NO INGREDIENT OF A CONCENTRATION OF 0.1% OR GREATER IS LISTED AS A CARCINOGEN OR SUSPECTED CARCINOGEN.  
Signs And Symptoms Of Overexposure: EYES IRRITATION, SKIN IRRITATION, DERMATITIS, SENSITIZATION, INHALED IRRITATION. INGESTED NONE STATED.  
Medical Cond Aggravated By Exposure: NO KNOWN EFFECTS ON OTHER ILLNESSES FOR THIS PRODUCT.  
First Aid: EYES: FLUSH WITH WATER FOR 15 MINUTES. SEEK MEDICAL ATTENTION IF IRRITATION OCCURS. SKIN: WASH WITH MILD SOAP & WATER. SEEK MEDICAL

# NON-HAZARDOUS WASTE MANIFEST

M-3

## NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of

3. Generator's Name and Mailing Address

QUALITY AEROSPACE COATINGS  
3536 DMG Drive

4. Generator's Phone

863-619-2628 Lakeland FL 33811

5. Transporter 1 Company Name

AQUACLEAN

6. US EPA ID Number

FLR000034033

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

AQUACLEAN  
3210 Whistler Rd  
Lakeland FL 33810

10. US EPA ID Number

Agri Source Inc  
FLR000034033

A. State Transporter ID

B. Transporter 1 Phone

C. State Transporter ID

D. Transporter 2 Phone

E. State Facility ID

F. Facility Phone

863-644-0665

11. WASTE DESCRIPTION

3.800

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt/Vol.

a. NON HAZ NON REG WASTEWATER

4

55

2

30

280

Gal

b.

c.

G. Additional Descriptions for Materials Listed Above

H. Handling Codes for Wastes Listed Above

11 JAN 18 15:59

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name

Mark Norris

Signature

Mark Norris

Date

Month Day Year

1 11 18

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Chris Maddox

Signature

Chris Maddox

Date

Month Day Year

1 11 18

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

1 11 18

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name

Tramaine Dubose

Signature

Tramaine Dubose

Date

Month Day Year

1 11 18



# NON-HAZARDOUS WASTE MANIFEST

M-4

Print on type (Form designed for use on (12 pitch) typewriter)

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quality Aerospace Coatings 3536 DMG Drive Lakeland FL 33811				1102254			
4. Generator's Phone ( )							
5. Transporter 1 Company Name Agua Clean		6. US EPA ID Number FLR000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
9. Designated Facility Name and Site Address Agua Clean 3210 Whitler RD Lakeland FL 33811		10. US EPA ID Number FLR000034033		C. State Transporter's ID			
				D. Transporter 2 Phone			
				E. State Facility's ID			
				F. Facility's Phone 863-644-0665			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit Wt./Vol.	
NON HAZ from Reg Waste Water				5 Drum		265 gal	
15. Additional Descriptions for Materials Listed Above				16. Handling Codes for Wastes Listed Above			
				'11 FEB 17 14H			
17. Special Handling Instructions and Additional Information VAC 5 Barrels							
18. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name Eric Roberts				Signature Eric Roberts		Date 02/17/11	
17. Transporter 1 Acknowledgment of Receipt of Materials				Signature Harry Braschi		Date 02/17/11	
18. Transporter 2 Acknowledgment of Receipt of Materials				Signature		Date	
19. Discrepancy Indication Space				Signature Katherine Dubose		Date 2/17/11	
20. Facility Owner or Operator: Certification of receipt of the waste materials covered by this manifest; except as noted in item 19.							
Printed/Typed Name Katherine Dubose				Signature Katherine Dubose		Date 2/17/11	

NON-HAZARDOUS WASTE



# NON-HAZARDOUS WASTE MANIFEST

nm7

(Form designed for use on 11" x 17" (2-pitch) typewriter)

## NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

5. Transporter 1 Company Name

6. US EPA ID Number

A. State Transporter's ID

B. Transporter 1 Phone

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address

10. US EPA ID Number

E. State Facility's ID

F. Facility's Phone

11. WASTE DESCRIPTION

12. Containers

13. Total Quantity

14. Unit Wt/Vol.

a. non haz/ non reg waste water

6 drums

215

GALS

G. Additional Descriptions for Materials Listed Above

H. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name

Signature

Date

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

19. Discrepancy Indication Space

20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name

Signature

Date

NON-HAZARDOUS WASTE

TRANSPORTER FACILITY





# NON-HAZARDOUS WASTE MANIFEST

M3

(Form designed for use on 2 ptch type writer)

## NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of

3. Generator's Name and Mailing Address

Quality Aerospace 3536 Dmg dr.  
LCID.FI. 338H

11043910

4. Generator's Phone

(863) 619-2628

5. Transporter 1 Company Name

Aqua clean

6.

US EPA ID Number

PIR000034033

A. State Transporter's ID

B. Transporter's Phone

PIR000034033

7. Transporter 2 Company Name

8.

US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address

Aqua clean  
3210 Whitford  
LCID.FI. 338H

10.

US EPA ID Number

PIR000034033

E. State Facility's ID

F. Facility's Phone

(863) 644-6665

11. WASTE DESCRIPTION

Non Hae / non reg. waste water

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt/Vol

5 drums

295

gals

4-26-11

3:30

15. Additional Descriptions for Materials Listed Above

16. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name

Mark Norris

Signature

[Signature]

Date

Month Day Year  
4 26 11

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

John Koryha

Signature

[Signature]

Date

Month Day Year  
4 26 11

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in Item 19.

Printed/Typed Name

Travis Dubose

Signature

[Signature]

Date

Month Day Year

NON-HAZARDOUS WASTE

# NON-HAZARDOUS WASTE MANIFEST

M-2

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No.		Manifest Document No.		2. Page 1 of	
3. Generator's Name and Mailing Address Quality Aerospace Coatings 3536 Dwyer Dr. Lakeland FL 33811				1107372			
4. Generator's Phone (863) 619-2628							
5. Transporter 1 Company Name Aqua Clean		6. US EPA ID Number FIR000034033		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address Aqua Clean 3210 W. Hwy 101 Lakeland FL 33811		10. US EPA ID Number FIR000034033		E. State Facility's ID			
				F. Facility's Phone 863-644-0065			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		14. Unit	
a. Non-Haz / Non Reg. waste water				5 25g drum		gals.	
				6 55g drum		490	
				2 5g drum			
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above				H. Handling Codes for Wastes Listed Above 4143 PM 7-26-11			
15. Special Handling Instructions and Additional Information							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name X KRISTIE ROBERTS				Signature X KRISTIE ROBERTS		Date 7/26/11	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature John Koryha		Date 7/26/11	
Printed/Typed Name John Koryha				Signature John Koryha		Date 7/26/11	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in Item 19.							
Printed/Typed Name Chris Torman				Signature Chris Torman		Date 7/26/11	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

# NON-HAZARDOUS WASTE MANIFEST

M2

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

12 pitch typewriter

## NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of

3. Generator's Name and Mailing Address

Quality Aerospace

3536 DM G dr.  
LKID. FI. 33811

1108437

4. Generator's Phone

803 619-2623

5. Transporter 1 Company Name

Acme Clean

6. US EPA ID Number  
FIR000034027

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

3210 Whittier Rd  
LKID. FI. 33811

10. US EPA ID Number

1. FIR000034027

A. State Transporters ID

B. Transporter 1 Phone

C. State Transporters ID

D. Transporter 2 Phone

E. State Facility's ID

F. Facility's Phone

863-644-0665

11. WASTE DESCRIPTION

Non-Haz / non reg. waste water

12. Containers

No.

Type  
Tank

13. Total Quantity

2906

14. Unit Wt/Vol

gal

G. Additional Descriptions for Materials Listed Above

H. Handling Codes for Wastes Listed Above

8-23-11

10:38 A.M.

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name

X KRISTAR ROBERTS

Signature

X KRISTAR ROBERTS

Date

Month Day Year  
8 23 11

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

John Konyha

Signature

[Signature]

Date

Month Day Year  
8 23 11

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name

John Konyha

Signature

[Signature]

Date

Month Day Year  
8 23 11

NON-HAZARDOUS WASTE

# MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.  
3210 WHITTEN ROAD  
LAKELAND, FL 33811

PHONE: (863) 644-0665 FAX: (863) 646-1880

☒ New Profile  
☐ Amendment

## GENERATOR INFORMATION

Generator Name: PRIMA DIE CAST  
Address: 5300 118<sup>th</sup> AVE N  
City: CLEARWATER State: FL Zip: 33760  
Contact: Jerry Cutchin  
Phone: 727 522-7040 Fax: \_\_\_\_\_

## BILLING INFORMATION

Bill To: SAM  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

## TRANSPORTATION INFORMATION

Transporter: Aqua Clean Environmental  
Estimated Total Gallons \_\_\_\_\_  
Actual Total Gallons 1,600  
Shipping Container  
☐ Drum  
☐ Tanker  
☐ Other  
Shipping Frequency  
☐ One Time  
☐ Week  
☐ Month  
☐ Year  
☐ Other

D.O.T. SHIPPING NAME: Non haz non regulated wastewater

## MATERIAL COMPOSITION

Component	Concentration %
<u>Waste Water</u>	_____

**MATERIAL INFORMATION**

Flashpoint ☐ Exact \_\_\_\_\_  
pH ☐ Exact \_\_\_\_\_  
Specific Gravity ☐ \_\_\_\_\_  
Reactive ☐ Yes ☐ No  
%Liquid \_\_\_\_\_  
Phases \_\_\_\_\_  
Viscosity ☐ Single ☐ Double ☐ Multi  
Odor ☐ Low ☐ Medium ☐ High  
Color/Appearance: ☐ None ☐ Mild ☐ Strong

☐ <140 ☐ 140-200 ☐ >200  
☐ <2 ☐ 2-5 ☐ 5-9 ☐ 9-12.5 ☐ >12.5  
☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2

## Contaminants

Amount Present(mg/l)

A diagram showing a hyperbola with two intersecting branches. A series of horizontal lines are drawn across the image, passing through both branches of the hyperbola. The lines are evenly spaced and extend across the width of the page.

## Contaminants

- Chloromethane
- 1,2 Dichlorobenzene
- 1,4 Dichlorobenzene
- Ethylbenzene
- Methyl Chloride
- Methyl Ethyl Ketone
- Methylene Chloride
- Naphthalene
- 1,1,2,2-Tetrachloroethane
- Tetrachloroethylene
- Toluene
- 1,2,4-Trichlorobenzene
- 1,1,1-Trichlorobenzene
- 1,1,2-Trichlorobenzene
- Trichloroethylene
- Vinyl Chloride

Amount Present(mg/l)

## CERTIFICATION

Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ☐ Yes ☒ No

I hereby certify that the above description, as well as any other information provided to Aqua Clean, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by Aqua Clean Environmental.

Authorized Signature: [Signature]

Authorized Signature Rudolph W. Fisher Printed Name Rudolph W. Fisher  
Title Maintenance

Title Maintenance Date 9/21/10

## MATERIAL INFORMATION

Flashpoint ☐ Exact \_\_\_\_\_ ☐ <140 ☐ 140-200 ☐ >200  
 pH ☐ Exact \_\_\_\_\_ ☐ <2 ☐ 2-5 ☐ 5-9 ☐ 9-12.5 ☐ >12.5  
 Specific Gravity ☐ \_\_\_\_\_ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2  
 Reactive ☐ Yes ☐ No  
 %Liquid \_\_\_\_\_ %Solid \_\_\_\_\_ %Sludge \_\_\_\_\_  
 Phases ☐ Single ☐ Double ☐ Multi  
 Viscosity ☐ Low ☐ Medium ☐ High  
 Odor ☐ None ☐ Mild ☐ Strong  
 Color/Appearance: \_\_\_\_\_

Specify if any of the contaminants appear below. Attach all MSDSs and current analyses.

<u>Contaminants</u>	<u>Amount Present(mg/l)</u>	<u>Contaminants</u>	<u>Amount Present(mg/l)</u>
Arsenic	_____	Chloromethane	_____
Cadmium	_____	1,2 Dichlorobenzene	_____
Chromium	_____	1,4 Dichlorobenzene	_____
Copper	_____	Ethylbenzene	_____
Cyanide	_____	Methyl Chloride	_____
Lead	_____	Methyl Ethyl Ketone	_____
Mercury	_____	Methylene Chloride	_____
Molybdenum	_____	Naphthalene	_____
Nickel	_____	1,1,2,2,-Tetrachloroethane	_____
Selenium	_____	Tetrachloroethylene	_____
Silver	_____	Toluene	_____
Zinc	_____	1,2,4-Trichlorobenzene	_____
Benzene	_____	1,1,1-Trichlorobenzene	_____
Carbon Tetrachloride	_____	1,1,2-Trichlorobenzene	_____
Chlorobenzene	_____	Trichloroethylene	_____
Chlorethane	_____	Vinyl Chloride	_____

Is this certification made "applying knowledge of the hazard characteristics of the waste in light of the materials or process used?" ☒ Yes ☐ No

### CERTIFICATION

Are any pesticides, herbicides or dioxin present? ☐ Yes ☒ No  
 Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ☐ Yes ☒ No  
 Are any PCBs present in the material? ☐ Yes ☒ No  
 Is there more than one fuel present? ☐ Yes ☒ No  
 Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ☐ Yes ☒ No

### GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to Aqua Clean, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by Aqua Clean Environmental.

Authorized Signature A. E. Swanson Printed Name A. E. Swanson  
 Title VP/GM Date 9/12/11

# NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12) /pewriter)

M-4

## NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of

3. Generator's Name and Mailing Address

Prima Diecasting Inc  
5300 115th Ave NE  
Clearwater FL

1109178

4. Generator's Phone ( )

5. Transporter 1 Company Name

Aqua Clean Env

6. US EPA ID Number

FLR 000034033

A. State Transporter's ID

B. Transporter 1 Phone

7. Transporter 2 Company Name

8. US EPA ID Number

C. State Transporter's ID

D. Transporter 2 Phone

9. Designated Facility Name and Site Address

Aqua Clean Env  
3210 Whitten Rd  
Lakeland, FL 33811

10. US EPA ID Number

FLR 000034033

E. State Facility's ID

F. Facility's Phone

813 644 0665

11. WASTE DESCRIPTION

12. Containers  
No. Type

13. Total  
Quantity

14. Unit  
WT/Vol.

a.

Non Haz Non Reg Wastewater

24 Drum

1320

gal

b.

c.

d.

G. Additional Descriptions for Materials Listed Above

H. Handling Codes for Wastes Listed Above

S45 P11

9-12-11

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name

X Rick Roalson

Signature

X Rick Roalson

Date

Month Day Year  
9/12/11

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Keith W. Lemelle

Signature

Keith W. Lemelle

Date

Month Day Year  
9/12/11

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name

Keith W. Lemelle

Signature

Keith W. Lemelle

Date

Month Day Year  
9/12/11

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY



# NON-HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite, (ch) typewriter)

## NON-HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1 of 1

3. Generator's Name and Mailing Address

Prima Dig Cast  
5300 118th Ave North

4. Generator's Phone ( )

Clearwater FL

5. Transporter 1 Company Name

Aqua Clear Environmental Services

7. Transporter 2 Company Name

FIR 000034033

US EPA ID Number

9. Designated Facility Name and Site Address

Aqua Clear Environmental  
3200 White St

10. US EPA ID Number

Tampa FL 33611

FIR 000034033

F. Facility's Phone

863 644-0665

11. WASTE DESCRIPTION

4 75 x 80

12. Containers

No. Type

13. Total Quantity

14. Unit Wt/Vol

a. NO HAZ, NO REG WASTE WATER

Drums

1,600

G

b. x 15

M3

c. x 15

d. x 15

e. x 15

f. x 15

g. x 15

h. x 15

i. x 15

j. x 15

k. x 15

l. x 15

m. x 15

n. x 15

o. x 15

p. x 15

q. x 15

r. x 15

s. x 15

t. x 15

u. x 15

v. x 15

w. x 15

x. x 15

y. x 15

z. x 15

aa. x 15

ab. x 15

ac. x 15

ad. x 15

ae. x 15

af. x 15

ag. x 15

ah. x 15

16. Handling Codes for Wastes Listed Above

10 SEP 21 1997

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Rudolph W. Fisher

Printed/Typed Name

Signature

Rudolph W. Fisher

Date

9/21/97

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Alberto Martinez

Signature

Alberto Martinez

Date

9/21/97

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

IV

Signature

IV

Date

9/21/97

19. Discrepancy Indication Space

None

20. Facility Owner or Operator, Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name

Toumaie D. Bosc

Signature

Toumaie D. Bosc

Date

9/21/97

NON-HAZARDOUS WASTE

TRANSPORTER

FACILITY





MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.

3210 WHITTEN ROAD

LAKELAND, FL 33811

PHONE: (863) 644-0665 FAX: (863) 646-1880

☐ New Profile  
☒ Amendment

GENERATOR INFORMATION

Generator Name: PRIMA DIE CASTING  
Address: 5300 115th Avenue North  
City: Clearwater State: FL Zip: 33760  
Contact: Jerry  
Phone: 727-572-7040 Fax: 727-573-0213

BILLING INFORMATION

Bill To: SAME  
Address: \_\_\_\_\_  
City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
Contact: \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

TRANSPORTATION INFORMATION

Transporter: Aqua Clean Environmental

Estimated  
Total Gallons

Actual  
Total Gallons

Shipping  
Container

- ☒ Drum  
☐ Tanker  
☐ Other

Shipping  
Frequency

- ☐ One Time  
☐ Week  
☐ Month  
☐ Year  
☒ Other

PRIMA  
DIE CASTING  
PROFILE

D.O.T. SHIPPING NAME: Non HAZ non REGULATED WASTE

MATERIAL COMPOSITION

Component


water/liquor



Concentration  
%


# Memorandum

# Florida Department of Environmental Protection

## SOUTHWEST DISTRICT ENFORCEMENT COVER MEMO

TO:  Gary S. Colecchio, District Director

THROUGH:  William Kutash, Waste Program Administrator  
 James Dregne, Hazardous Waste Program Manager 10/18

FROM:  Elizabeth Knauss, HW Enforcement Coordinator

DATE: October 18, 2011

File Name: Aqua Clean Environmental Co., Inc. Inspection Date 8/31/2011  
Florida Recycling Solutions, Inc.

Program: Hazardous Waste County: Polk

Type of Document: Warning Letter

REQUESTED ACTION: Signature

DESCRIPTION OF VIOLATIONS: Failure to conduct hazardous waste determinations and receipt of misidentified hazardous materials due to inadequate waste profiling forms and procedures

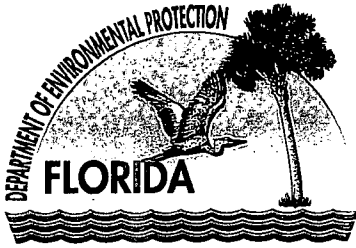
Unlabeled used oil tanks

STATUS OF PENALTY ASSESSMENT: Pending

PENALTY: Amount: \$ Pending

Costs & Expenses: \$

Total: \$



# Florida Department of Environmental Protection

Southwest District  
13051 North Telecom Parkway  
Temple Terrace, Florida 33637-0926  
Telephone: 813-632-7600

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

October 21, 2011

Mr. W.D. Miller  
Aqua Clean Environmental Co., Inc.  
and Florida Recycling Solutions, Inc.  
3210 Whitten Rd.  
Lakeland, FL 33811

Re: Aqua Clean Environmental Co., Inc.  
Florida Recycling Solutions, Inc.  
FLR000034033  
Warning Letter #WL11-0026HW53SWD  
Polk County

Dear Mr. Miller:

The purpose of this letter is to advise you of possible violations of law for which you may be responsible, and to seek your cooperation in resolving the matter. A hazardous waste program field inspection conducted on August 31, 2011 indicates that violations of Florida Statutes and Rules may exist at the above referenced facility. Department of Environmental Protection personnel made observations described in the attached inspection report. The report lists a summary of alleged violations of Department Rules.

Sections 403.161 and 403.727, Florida Statutes (F.S.) provide that it is a violation to fail to comply with rules adopted by the Department. The activities observed during the Department's field inspection and any other activities at your facility that may be contributing to violations of Florida Statutes or Department Rules should cease.

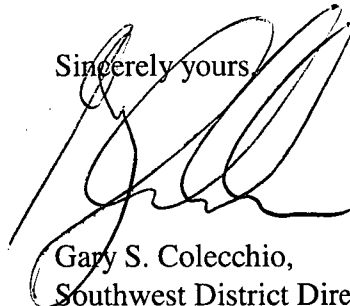
You are requested to contact Elizabeth Knauss at (813)632-7600, extension 383 within 15 days of receipt of this Warning Letter to arrange a meeting to discuss this matter. The Department is interested in reviewing any facts you may have that will assist in determining whether any violations have occurred. You may bring anyone with you to the meeting that you feel could help resolve this matter.

Please be advised that this Warning Letter is part of an agency investigation, preliminary to agency action in accordance with Section 120.57(5), F.S. If after further investigation

the Department's preliminary findings are verified, this matter may be resolved through the entry of a Consent Order which will include a compliance schedule, an appropriate penalty, and reimbursement of the Department's costs and expenses. In accordance with the United States Environmental Protection Agency's (EPA) RCRA Civil Penalty Policy of 2003, the penalties which could be assessed in hazardous waste cases are up to \$37,500 per day per violation.

If this investigation confirms that your facility is significantly out of compliance, and the case is not resolved through timely entry of a Consent Order, under the Department's agreement with the EPA, a formal referral for judicial action must be made to the Department's Office of General Counsel. We look forward to your cooperation in completing the investigation and resolution of this matter.

Sincerely yours,



Gary S. Colecchio,  
Southwest District Director  
Florida Department of Environmental Protection

GSC/ebk

Attachment

cc: Glen Perrigan, HWR Section ([Glen.Perrigan@dep.state.fl.us](mailto:Glen.Perrigan@dep.state.fl.us))  
Bheem Kothur, HWR Section ([Bheem.Kothur@dep.state.fl.us](mailto:Bheem.Kothur@dep.state.fl.us))  
Laurie DiGaetano, USEPA Region IV ([Benton-DiGaetano.Laurie@epa.gov](mailto:Benton-DiGaetano.Laurie@epa.gov))  
Richard Ruede, City of Lakeland ([Richard.Ruede@lakelandgov.net](mailto:Richard.Ruede@lakelandgov.net))  
Andrea Stermer, Polk County ([andreastermer@polk-county.net](mailto:andreastermer@polk-county.net))



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

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**FACILITY INFORMATION:**

**Facility Name:** Aqua Clean Environmental Company Inc  
**On-Site Inspection Start Date:** 08/31/2011      **On-Site Inspection End Date:** 08/31/2011  
**ME ID#:** 21896      **EPA ID#:** FLR000034033  
**Facility Street Address:** 3210 Whitten Rd, Lakeland, Florida 33811-1086  
**Contact Mailing Address:** 3210 Whitten Rd, Lakeland, Florida 33811-1086  
**County Name:** Polk      **Contact Phone:** (863) 644-0665

**NOTIFIED AS:**

Non-Handler  
Used Oil

**INSPECTION TYPE:**

Routine Inspection for Used Oil Processor facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Elizabeth Knauss, Environmental Manager  
**Other Participants:** Mike Zellars, Plant Manager; Audrey Scruggs, Office Manager; W. D. Miller, Vice President

**LATITUDE / LONGITUDE:** Lat 28° 0' 18.6604" / Long 82° 2' 33.4423"

**SIC CODE:** 7389 - Services - business services, nec

**TYPE OF OWNERSHIP:** Private

**Introduction:**

A routine inspection was conducted at Aqua Clean Environmental Company (Aqua Clean) and Florida Recycling Solutions, a permitted used oil processing facility. Aqua Clean is currently registered as a used oil transporter and transfer facility. Florida Recycling Solutions and Aqua Clean have the same facility identification number. Florida Recycling Solutions was not registered as a used oil processor in the most recent registration for the facility, dated March 2011. Aqua Clean processes industrial waste water as an NPDES permitted centralized waste water processing facility. Florida Recycling does not transport any material, and mainly receives oil through Aqua Clean. Aqua Clean is currently still operating at partial capacity due to fire earlier this year, on July 7, 2011. Mechanical reconstruction is complete, and staff anticipate that full operation will resume soon. At the time of the inspection, electrical work was 95% complete, with some building department inspections pending. Mike Zellars, the Plant Manager and Audrey Scruggs, the Office Manager provided assistance during the inspection.

**Process Description:**

The fire at the facility was caused by a contractor conducting welding during vehicle unloading operations. A load of material shipped to Aqua Clean as "Non Hazardous Non DOT regulated (water with trace petroleum product)" from the Marathon Petroleum Ft. Lauderdale bulk terminal was unloaded into the facility's open collection sump. Dense vapors from unloading traveled along the ground surface to the welding operations, ignited and flashed back to the truck. As a result of the fire, a control panel and several tanks were damaged. The facility has continued to accept waste water during repair operations. Other changes since the previous inspection included installing insulation on Florida Recycling's used oil processing tanks. The insulation covered the old labels on Tanks 6 and 7. New labels had been received, but not yet applied to the tanks.

The facility is currently having problems with excess storm water from the summer rainy season. Storm water collects from traffic areas into the the open pit used to unload vacuum trucks. The pit

Inspection Date: 08/31/2011

was full at the time of the inspection, and the sump previously used to transfer waste water to the water treatment tanks was also full. A trench had been opened in the pavement nearby to place new electrical lines to the new control panel.

The solidification pad was full of wood chips soaking up excess liquid. The facility disposed of 37 - 26 cubic yard loads of this material between August 24 and August 31 to the Cedar Trails landfill in Polk County. The sludge is analyzed once a calendar month, and has not been found to be characteristically hazardous. Ms. Scruggs indicated that this is typical of the current rate of generation. Neither Florida Recycling Solutions nor Aqua Clean had shipped any recovered oil off site as of the initial date of the inspection. The facility intends to burn its on-specification processed oil in an on site process heater to assist in treatment. In a telephone conversation after the inspection, Mike Zellars stated that Florida Recycling had recently shipped 6,000 gallons of oil to Synergy.

The containment area around the pumps of the unloading area on the east side of the solidification pad had standing discolored water that could not fully drain back to the plant headworks. The storm water containment and aeration tank north of the large tank farm and south of the traffic area contained contaminated water, dark in color, and with a sheen that appeared to be biological in origin rather than petroleum. The biofilm was also noted in the lined ditch leading from the aeration tank to the storm water pond. No sheen was observed on the pond. The facility's permit requires removal of collected storm water within 24 hours from secondary containment areas around units containing used oil.

Records were reviewed, including all incoming manifests for the previous day. A number of issues were noted with regard to the company's waste profiling procedures. Aqua Clean does not require the generator to provide information on the process generating the waste water. In addition, Aqua Clean approves profiles that do not have information provided in the material composition, flash point, number of phases or percent solids fields as long as the generator signs the Generator Certification statement. This has been an area of concern in previous inspections. The Department has documented several incidents where Aqua Clean has accepted hazardous waste that has been misidentified on profiles and shipping papers, including acid digestion waste from Rincat LLC's catalytic converter recycling process and flammable glycerin bottoms from biodiesel manufacturing.

During this inspection, the Department found that Aqua Clean has accepted chromic acid anodizing and chromate conversion coating waste waters and sludge from a non-notified surface finishing facility, Quality Aerospace Coatings. Treatment of chromic acid anodizing waste water will generate a listed hazardous waste, EPA Waste No. F006. Treatment of chromate conversion coating waste water generates EPA Waste No. F019 sludge. Aqua Clean accepted 2,906 gallons of this material on August 22, 2011, and previously accepted 2,300 gallons of the material on November 23, 2010. None of the solids separated from treating waste in this time frame were managed as listed hazardous waste. Aqua Clean's failure to require the generator of the waste water to submit process information has resulted in Aqua Clean's failure to conduct a hazardous waste determination and the improper disposal of listed hazardous waste to a facility that is not permitted to accept hazardous waste. This issue was previously discussed during the 2005 inspection, when Aqua Clean was treating waste waters from MRC Precision Metal Optics and PCI of Titusville.

Aqua Clean also transported oil skimmings from Prima Die Casting's oil water separator belt press as waste water and solids, although Prima manages these as used oil while being accumulated on site. The Department is concerned that Aqua Clean is recycling very little oil compared to the volume accepted, and that the company is primarily treating the material for landfill disposal. Used oil that is recycled for energy recovery is excluded from regulation as a hazardous waste. However, used oil that is treated for disposal is not excluded, and is subject to the requirement that the generator perform a hazardous waste determination prior to treatment, storage or disposal. This would include water soluble cutting oils and coolants. Aqua Clean's profile approval process does not require the generator to disclose the percent of non aqueous phase material or solids in the waste streams.

Inspection Date: 08/31/2011

**New Potential Violations and Areas of Concern:****Checklist Independent Potential Violations and Areas of Concern**

Type: Violation

Rule: 279.54(f)(1)

Explanation: Used Oil tanks were not labeled. (Corrected)

Corrective Action: Replacement labels had been obtained, but not yet applied to the used oil tanks. In the future, Florida Recycling Solutions must ensure that all containers and tanks holding used oil are labeled as soon as oil is placed in the unit. Temporary labels are permissible.

Type: Violation

Rule: 262.11(b)

Explanation: Aqua Clean failed to address the pre-existing area of concern identified in 2008, and as a result has accepted and disposed of F006/F019 listed waste water treatment sludge generated by Quality Aerospace Coatings from chromic acid anodizing and chromate conversion coating. Aqua Clean accepted this waste based on incomplete profiles. Aqua Clean does not required its customers to submit process information that would ensure that the facility is able to determine if listed hazardous waste is generated by its treatment process.

Corrective Action: Aqua Clean must amend its waste profiles and train sales personnel to ensure that process information is submitted in its waste profiles. Process information must include sufficient detail to ensure that accurate hazardous waste determinations may be conducted on Aqua Clean's treatment residues.

**Pre-existing Potential Violations and Areas of Concern:****Pre-Inspection Checklist**

Type: Area Of Concern

Rule: 262.12

Question Number: 26.10

Question: Facility notified with correct status.

Explanation: Aqua Clean has made the business decision not to accept manifested hazardous wastewater for pretreatment. However, the Department has documented several occasions after the facts where unmanifested hazardous waste has been accepted by Aqua Clean on the basis of inaccurate or incomplete profiles.

Corrective Action: Aqua Clean should improve its waste profiling and review procedures to ensure that hazardous waste is rejected in the future.

**Summary of Potential Violations and Areas of Concern:**Potential Violations

Rule Number	Area	Date Cited	Explanation
-------------	------	------------	-------------

Inspection Date: 08/31/2011

Rule Number	Area	Date Cited	Explanation
Checklist Independent Violations			
279.54(f)(1)		08/31/2011	Used Oil tanks were not labeled. (Corrected)
262.11(b)		08/31/2011	Aqua Clean failed to address the pre-existing area of concern identified in 2008, and as a result has accepted and disposed of F006/F019 listed waste water treatment sludge generated by Quality Aerospace Coatings from chromic acid anodizing and chromate conversion coating. Aqua Clean accepted this waste based on incomplete profiles. Aqua Clean does not required its customers to submit process information that would ensure that the facility is able to determine if listed hazardous waste is generated by its treatment process.

Areas of Concern

Rule Number	Area	Date Cited	Explanation
Pre-Inspection Checklist			
262.12		11/18/2008	Aqua Clean has made the business decision not to accept manifested hazardous wastewater for pretreatment. However, the Department has documented several occasions after the facts where unmanifested hazardous waste has been accepted by Aqua Clean on the basis of inaccurate or incomplete profiles.

**Conclusion:**

Aqua Clean Environmental is accepting waste water that will generated listed hazardous waste sludges, and has not performed accurate hazardous waste determinations on the solids generated from the treatment process. Aqua Clean's waste profiling practices are not adequate to allow the facility to exclude waste water that will cause the facility's treatment residuals to be listed hazardous waste. Aqua Clean is also transporting materials that have high concentrations of oil as "waste water" for treatment rather than recycling, without requiring complete hazardous waste determination information.



Inspection Date: 08/31/2011

**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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Elizabeth Knauss

**PRINCIPAL INSPECTOR NAME**

Environmental Manager

**PRINCIPAL INSPECTOR TITLE****PRINCIPAL INSPECTOR SIGNATURE**

FDEP - SWD

**ORGANIZATION**

9/26/2011

**DATE**

Mike Zellars

**REPRESENTATIVE NAME**

Plant Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Aqua Clean

**ORGANIZATION**

Audrey Scruggs

**REPRESENTATIVE NAME**

Office Manager

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Aqua Clean

**ORGANIZATION**

W. D. Miller

**REPRESENTATIVE NAME**

Vice President

**REPRESENTATIVE TITLE**

NO SIGNATURE

**REPRESENTATIVE SIGNATURE**

Aqua Clean

**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.

**Coogle, Deon**

---

**From:** Microsoft Exchange  
**To:** Kothur, Bheem  
**Sent:** Friday, October 21, 2011 1:43 PM  
**Subject:** Delivered: Aqua Clean Environmental Co., Inc. - Warning Letter

**Your message has been delivered to the following recipients:**

Kothur, Bheem

Subject: Aqua Clean Environmental Co., Inc. - Warning Letter

---

Sent by Microsoft Exchange Server 2007

## Coogle, Deon

---

**From:** Microsoft Exchange  
**To:** Perrigan, Glen; Stewart, Patricia  
**Sent:** Friday, October 21, 2011 1:41 PM  
**Subject:** Delivered: Aqua Clean Environmental Co., Inc. - Warning Letter

**Your message has been delivered to the following recipients:**

Perrigan, Glen

Stewart, Patricia

Subject: Aqua Clean Environmental Co., Inc. - Warning Letter

---

Sent by Microsoft Exchange Server 2007

# NON-HAZARDOUS WASTE MANIFEST

M-2

Please

Manifest Document No.

2. Page 1

of

5. Transporter 1 Company Name

AQUA CLEAN ENV

6.

US EPA ID Number

FLR 0000 34033

7. Transporter 2 Company Name

8.

US EPA ID Number

9. Designated Facility Name and Site Address

AQUA CLEAN ENV  
3210 Whitten Rd  
LAKELAND, FL 33811

10.

US EPA ID Number

FLR 0000 34033

A. State Transporter's ID

B. Transporter 1 Phone

C. State Transporter's ID

D. Transporter 2 Phone

E. State Facility's ID

F. Facility's Phone

863 644 0665

11. WASTE DESCRIPTION

12. Containers

No.

Type

13. Total Quantity

14. Unit Wt./Vol.

a.

None HAZ None Reg Wastewater

12

Drum

660

gal

b.

c.

d.

G. Additional Descriptions for Materials Listed Above

H. Handling Codes for Wastes Listed Above

8-31-11

6:15 A.M

15. Special Handling Instructions and Additional Information

16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.

Printed/Typed Name

X Patrick Josephik

Signature

X [Signature]

Date

Month Day Year  
8 30 11

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Keith W Lemelle

Signature

[Signature]

Month Day Year  
8 30 11

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.

Printed/Typed Name

George L. Almones

Signature

[Signature]

Date

Month Day Year  
8 31 11

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY

## MATERIAL INFORMATION

Flashpoint ☐ Exact \_\_\_\_\_ ☐ <140 ☐ 140-200 ☐ >200  
 pH ☐ Exact \_\_\_\_\_ ☐ <2 ☐ 2-5 ☐ 5-9 ☐ 9-12.5 ☐ >12.5  
 Specific Gravity ☐ \_\_\_\_\_ ☐ <0.8 ☐ 0.8-1.0 ☐ 1.0 ☐ 1-1.2 ☐ >1.2  
 Reactive ☐ Yes ☐ No  
 %Liquid \_\_\_\_\_ %Solid \_\_\_\_\_ %Sludge \_\_\_\_\_  
 Phases ☐ Single ☐ Double ☐ Multi  
 Viscosity ☐ Low ☐ Medium ☐ High  
 Odor ☐ None ☐ Mild ☐ Strong  
 Color/Appearance: \_\_\_\_\_

Specify if any of the contaminants appear below. Attach all MSDSs and current analyses.

Contaminants	Amount Present(mg/l)	Contaminants	Amount Present(mg/l)
Arsenic	_____	Chloromethane	_____
Cadmium	_____	1,2 Dichlorobenzene	_____
Chromium	_____	1,4 Dichlorobenzene	_____
Copper	_____	Ethylbenzene	_____
Cyanide	_____	Methyl Chloride	_____
Lead	_____	Methyl Ethyl Ketone	_____
Mercury	_____	Methylene Chloride	_____
Molybdenum	_____	Naphthalene	_____
Nickel	_____	1,1,2,2-Tetrachloroethane	_____
Selenium	_____	Tetrachloroethylene	_____
Silver	_____	Toluene	_____
Zinc	_____	1,2,4-Trichlorobenzene	_____
Benzene	_____	1,1,1-Trichlorobenzene	_____
Carbon Tetrachloride	_____	1,1,2-Trichlorobenzene	_____
Chlorobenzene	_____	Trichloroethylene	_____
Chlorethane	_____	Vinyl Chloride	_____

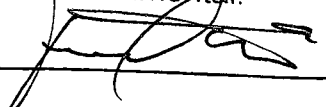
Is this certification made "applying knowledge of the hazard characteristics of the waste in light of the materials or process used?" ☒ Yes ☐ No

### CERTIFICATION

Are any pesticides, herbicides or dioxin present? ☐ Yes ☒ No  
 Are any biotoxic components present in the material such as cyanide, chlorine, ethylene glycol, etc.)? ☐ Yes ☒ No  
 Are any PCBs present in the material? ☐ Yes ☒ No  
 Is there more than one fuel present? ☐ Yes ☒ No  
 Does the material meet the definition of a hazardous waste according to 40CFR Part 261 and the Florida Hazardous Waste Regulations? ☐ Yes ☒ No

### GENERATOR'S CERTIFICATION

I hereby certify that the above description, as well as any other information provided to Aqua Clean, is complete and accurate to the best of my knowledge and ability. I certify that the above described material is the specified material as defined by the above conditions. If my material is found not to be the specified material as defined by any of the above conditions, I am liable for any and all penalties and fines assessed against or expenses, costs (including legal fees), or other damages incurred by Aqua Clean Environmental.

Authorized Signature  Printed Name Jorge Arteaga  
 Title Purchasing Date 5-6-11

# MATERIAL DATA CERTIFICATION SHEET

AQUA CLEAN ENVIRONMENTAL CO., INC.

3210 WHITTEN ROAD

LAKELAND, FL 33811

PHONE: (863) 644-0665 FAX: (863) 646-1880

☒ New Profile

☒ Amendment

## GENERATOR INFORMATION

Generator Name: Master cut Tools

Address: 965 Harbor lake dr

City: Safety Harbor State: FL

Zip: 34695

Contact: Patrick Josephik

Phone: 727-726-5336 Fax:

## BILLING INFORMATION

Bill To: Same As Above

Address:

City:

State:

Zip:

Contact:

Phone:

Fax:

## TRANSPORTATION INFORMATION

Transporter: Aqua Clean

Estimated

Total Gallons

455

Actual

Total Gallons

Shipping  
Container

☐ Drum

☒ Tanker

☐ Other

Shipping  
Frequency

☐ One Time

☐ Week

☐ Month

☐ Year

☐ Other

D.O.T. SHIPPING NAME: Non Haz/non Reg wastewater

## MATERIAL COMPOSITION

Component

Concentration

%

F7 362 3639

## NON-HAZARDOUS WASTE MANIFEST

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

<b>NON-HAZARDOUS WASTE MANIFEST</b>		1. Generator's US EPA ID No. <b>FID 000604657</b>		Manifest Document No. <b>212255</b> <b>070611</b>		2. Page 1 of 1	
3. Generator's Name and Mailing Address <b>Marathon Petroleum Company</b> <b>909 South East 24th Street</b> <b>Fort Lauderdale, FL 33316</b>							
4. Generator's Phone (954) <b>525 0410</b>							
5. Transporter 1 Company Name <b>Cham Harkins Env.</b>		6. US EPA ID Number <b>MA0039322250</b>		A. State Transporter's ID			
7. Transporter 2 Company Name		8. US EPA ID Number		B. Transporter 1 Phone <b>1781 792 5000</b>			
				C. State Transporter's ID			
				D. Transporter 2 Phone			
9. Designated Facility Name and Site Address <b>Adva Chem Environmental</b> <b>3210 Whitten Rd</b> <b>Lakeland, FL 33810</b>		10. US EPA ID Number <b>FLR000034033</b>		E. State Facility's ID			
				F. Facility's Phone <b>863 644 0665</b>			
11. WASTE DESCRIPTION				12. Containers		13. Total Quantity	
				No. Type		Unit	
a. <b>Non Hazardous, non DOT regulated, (water with trace Petroleum Product)</b>				1 1T		2128 G	
b.							
c.							
d.							
G. Additional Descriptions for Materials Listed Above <b>11A DS-MAG185-AC</b>				H. Handling Codes for Wastes Listed Above <b>1-1-1</b> <b>8-1-1</b>			
15. Special Handling Instructions and Additional Information <b>W110212235</b> <b>Er # (800) 483-3718</b>							
16. GENERATOR'S CERTIFICATION: I hereby certify that the contents of this shipment are fully and accurately described and are in all respects in proper condition for transport. The materials described on this manifest are not subject to federal hazardous waste regulations.							
Printed/Typed Name <b>Joseph D. Lammers</b>				Signature <i>[Signature]</i>		Date Month <b>7</b> Day <b>6</b> Year <b>11</b>	
17. Transporter 1 Acknowledgement of Receipt of Materials				Signature <i>[Signature]</i>		Date Month <b>08</b> Day <b>06</b> Year <b>11</b>	
Printed/Typed Name <b>Francisco Alvarado</b>				Signature <i>[Signature]</i>		Date Month <b>08</b> Day <b>06</b> Year <b>11</b>	
18. Transporter 2 Acknowledgement of Receipt of Materials				Signature		Date	
Printed/Typed Name				Signature		Date	
19. Discrepancy Indication Space							
20. Facility Owner or Operator; Certification of receipt of the waste materials covered by this manifest, except as noted in item 19.							
Printed/Typed Name <i>[Signature]</i>				Signature <i>[Signature]</i>		Date Month <b>7</b> Day <b>1</b> Year <b>11</b>	

NON-HAZARDOUS WASTE

GENERATOR

TRANSPORTER

FACILITY



# INVOICE



Environmental Co., Inc.

## AQUA CLEAN

Environmental Co., Inc.  
3210 Whitten Road  
Lakeland, FL 33811  
Phone (863) 644-0665  
Fax (863) 646-1880

### SOLD TO:

PRIMA DIECASTING  
5300 115TH AVE N

CLEARWATER FL 33760

### SHIP TO:

INVOICE  
NUMBER 01009348

INVOICE  
DATE 09/21/2010

PAGE  
NUMBER 1

CUSTOMER  
NUMBER PRI004

CUSTOMER P.O.  
NUMBER 1009348

CUSTOMER P.O.  
DATE

OUR JOB  
NUMBER 100934

SALES  
REP. 001

PLEASE  
REMIT  
TO

**AQUA CLEAN**  
Environmental Co., Inc.  
3210 Whitten Road  
Lakeland, FL 33811

TAX EXEMPT #

VIA

- TERMS: NET 30 DAYS: F.O.B. OUR PLANT  
1 1/2% FINANCE CHARGE (18% ANNUAL RATE)  
WILL BE APPLIED ON PAST DUE ACCOUNTS.

QUANTITY		ITEM DESCRIPTION	UNITS	UNIT PRICE	EXTENSION
ORDERED	SHIPPED				
4.7500	4.7500	VAC SERVICE	GAL	80.0000	380.00
600.0000	600.0000	SOLIDS	GAL	.6500	390.00
1000.0000	1000.0000	DISPOSAL WASTEWATER	GAL	.2500	250.00



NON-TAXABLE	TAXABLE	SALES TAX	FREIGHT	OTHER	AMOUNT DUE
1250.00	00	00	00	00	1250.00

NO GOOD MAY BE RETURNED FOR CREDIT WITHOUT WRITTEN CONSENT OF THE COMPANY

CUSTOMER COPY



## INVOICE



Environmental Co., Inc.

**AQUA CLEAN**  
 Environmental Co., Inc.  
 3210 Whitten Road  
 Lakeland, FL 33811  
 Phone (863) 644-0665  
 Fax (863) 646-1880

INVOICE  
 NUMBER 00906484  
 INVOICE  
 DATE 06/25/2009

PAGE  
 NUMBER 1

CUSTOMER  
 NUMBER PRI004

CUSTOMER P.O.  
 NUMBER 906484

CUSTOMER P.O.  
 DATE

OUR JOB  
 NUMBER 906484

SALES  
 REP. 001

**SOLD TO:**

PRIMA DIECASTING  
 5300 115TH AVE N

CLEARWATER FL 33760

**SHIP TO:**

PLEASE  
 REMIT  
 TO

**AQUA CLEAN**  
 Environmental Co., Inc.  
 3210 Whitten Road  
 Lakeland, FL 33811

TAX EXEMPT #

VIA

- TERMS: NET 30 DAYS: F.O.B. OUR PLANT  
 1 1/2% FINANCE CHARGE (18% ANNUAL RATE)  
 WILL BE APPLIED ON PAST DUE ACCOUNTS.

QUANTITY		ITEM DESCRIPTION	UNITS	UNIT PRICE	EXTENSION
ORDERED	SHIPPED				
14.0000	14.0000	DISPOSAL WASTEWATER	DRUMS	50.0000	700.00

NON-TAXABLE	TAXABLE	SALES TAX	FREIGHT	OTHER	AMOUNT DUE
700.00	.00	.00	.00	.00	700.00

NO GOOD MAY BE RETURNED FOR CREDIT WITHOUT WRITTEN CONSENT OF THE COMPANY

CUSTOMER COPY

# INVOICE



Environmental Co., Inc.

**AQUA CLEAN**  
Environmental Co., Inc.  
3210 Whitten Road  
Lakeland, FL 33811  
Phone (863) 644-0665  
Fax (863) 646-1880

INVOICE NUMBER 00911313

INVOICE DATE 11/23/2009

PAGE NUMBER 1

CUSTOMER NUMBER PRI004

CUSTOMER P.O. NUMBER 911313

CUSTOMER P.O. DATE

OUR JOB NUMBER 911313

SALES REP. 001

## SOLD TO:

PRIMA DIECASTING  
5300 115TH AVE N

CLEARWATER FL 33760

## SHIP TO:

PLEASE  
REMIT  
TO  
**AQUA CLEAN**  
Environmental Co., Inc.  
3210 Whitten Road  
Lakeland, FL 33811

TAX EXEMPT #

VIA

- TERMS: NET 30 DAYS: F.O.B. OUR PLANT  
1 1/2% FINANCE CHARGE (18% ANNUAL RATE)  
WILL BE APPLIED ON PAST DUE ACCOUNTS.

QUANTITY		ITEM DESCRIPTION	UNITS	UNIT PRICE	EXTENSION
ORDERED	SHIPPED				
1.0000	1.0000	DISPOSAL WASTEWATER	EACH	1400.0000	1400.00



NON-TAXABLE	TAXABLE	SALES TAX	FREIGHT	OTHER	AMOUNT DUE
1400.00	.00	.00	.00	.00	1400.00

NO GOOD MAY BE RETURNED FOR CREDIT WITHOUT WRITTEN CONSENT OF THE COMPANY

CUSTOMER COPY

## Knauss, Elizabeth

---

**From:** Knauss, Elizabeth  
**Sent:** Thursday, September 01, 2011 3:57 PM  
**To:** 'Audrey Scruggs'  
**Subject:** RE: Tank picture

Thanks, Audrey – I got your fax as well.

---

**From:** Audrey Scruggs [<mailto:ajscruggs@tampabay.rr.com>]  
**Sent:** Thursday, September 01, 2011 3:41 PM  
**To:** Knauss, Elizabeth  
**Subject:** Tank picture

Finally, I have a computer that is functioning!! YYYaaaaa. I have attached the picture of the tanks for you. You should have received the driver certification already, I faxed it this morning.

I hope you are having a wonderful time with you son. Have a great holiday weekend.

Audrey Scruggs  
Aqua Clean Environmental Co., Inc.  
3210 Whitten Road  
Lakeland, FL 33811  
800-644-0665 Phone  
863-646-1880 Fax



corrective  
action  
submitted  
via  
email

see quality  
Perospace  
coating  
F-10



AQUA CLEAN ENVIRONMENTAL  
3210 Whitten Road  
Lakeland, FL 33811

863-644-0665 Phone  
863-646-1880 Fax

## facsimile transmittal

To: Beth K. Fax: 813-632-7664  
From: Audrey Date: 9-1-11  
Re: \_\_\_\_\_ Pages: 2  
CC: \_\_\_\_\_  
☐ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

My computer is still inoperable  
from the virus. I am falling  
behind in a big hurry! LOL!  
Anyway, I am faxing this  
document in that I can't  
scan or email. Pictures of  
the tanks lettered will be  
to you shortly. Thank you

PS.  
you can't  
read his  
writing - but  
Robert Torak  
was the mgr.  
signing

# Record of Compliance

## DRIVER/EMPLOYEE FORM

I hereby acknowledge receipt of a copy of the *Used Oil Transporters Certification and Training Manual*. I have familiarized myself with these regulations and will comply with their provisions at all times on duty as a driver/employee.

I understand that by signing this form I am indicating that I have reviewed and understand the materials in the certification manual. I further understand that a copy of this form will remain on file as a personnel record at the firm and that a copy will be available upon request to the Department.

At least once a year, I will review the applicable state and federal laws and rules governing used oil transporting and sign a new form for the personnel record.

(Signature of Driver)

(Print Full Name of Driver)

(Today's Date: Include Month, Date & Year)

(Name of Employer/Firm)

(Address of Firm)

(City, State and Zip Code)

(Work Phone, Include Area Code)

(Signature of Owner/Manager)

Instructions: This receipt is to be read and signed by the driver/employee. It should be countersigned by the firm's owner/manager and placed in the driver's qualification file. It must be updated annually. Violations of the certification law can lead to denial or revocation of certification. (Make copies of this form for additional employees.)



















