



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET N.E.  
ATLANTA, GEORGIA 30365

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4WD-RCRA

Mr. Satish Kastury  
Environmental Administrator  
Hazardous Waste Regulation  
Florida Department of Environmental Protection  
Twin Towers Office Building  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

SUBJ: Comments on Revised Draft RFA Report  
Universal Waste & Transit, Inc., Tampa, Florida  
EPA I.D. No. FLD 981 932 494


Dear Mr. Kastury:

The United States Environmental Protection Agency (EPA) has reviewed the Revised Draft RFA Report for the above-referenced facility. This report was submitted to EPA by the Florida Department of Environmental Protection (FDEP) in fulfillment of a corrective action workplan commitment in the FY-93 grant. Enclosed are general and specific comments on the report.

In general the Revised Draft RFA Report for Universal Waste & Transit (UW&T) lacks the detail required of such a report and did not provide the complete spectrum of information that EPA normally expects to be developed in an RFA. The RFA, as you know, is the first step in the corrective action process. As the basis for the Hazardous and Solid Waste Amendments (HSWA) permit and subsequent corrective action, the RFA report needs to be a complete review of the site and should be a stand alone document whose findings and recommendations can support the HSWA permit. An RFA report should include, among other things, full descriptions of the processes, waste management practices, regulatory history, environmental setting, as well as, the solid waste management units (SWMUs) and/or Areas of Concern (AOCs).

EPA has included both general and specific comments outlining what we would like to see in the final RFA Report. Please have your staff review these comments and recommendations in the preparation of a final report that may serve as a model for future FDEP conducted RFAs. If you have any questions regarding these comments, please contact Ms. Kimberly C. Clifton, of my staff, at (404) 347-3555 ext. 6320.

Sincerely,



G. Alan Farmer  
Chief, RCRA Branch  
Waste Management Division

Enclosure

UNIVERSAL WASTE & TRANSIT, INC.  
2002 N. Orient Road  
Tampa, Florida  
FLD 981 932 494

GENERAL COMMENTS

1. Appendix A - SWMU DATA SHEETS

Under the title Release Pathways, the potential for release (Low, Moderate, or High) should be included beside each media, on each SWMU DATA SHEET.

2. Summary and Recommendations

The following summary tables should be included as the summary: (1) a list of all SWMUs and/or AOCs, (2) a list of SWMUs and AOCs requiring no further action, (3) a list of SWMUs that are RCRA-regulated units, (4) SWMUs and AOCs that require confirmatory sampling, and (5) SWMUs and AOCs that require an RFI. The summary tables basically consist of lists of SWMUs and AOCs which correspond to the particular table heading.

3. SWMU and AOC Descriptions

None of the data sheets are adequately detailed. These data sheets should include a complete physical description, including location, physical dimensions, materials of construction, condition of unit, description and condition of any containment, brief mention of the use of the unit.

In addition to these comments, specific comments on each SWMU data sheet are included.

4. The operating period for all the SWMUs identified at the facility is listed on the SWMU Data Sheets as June 1990 - present, for some of the SWMUs this is incorrect. The actual dates of operation for all SWMUs needs to be verified.

SPECIFIC COMMENTS

I. Executive Summary (p. I-1)

1. Paragraph 1 - The words "Preliminary Review" should be capitalized.

## 2. Paragraph 2

- a. This paragraph describes Universal Waste and Transit (UW&T) as a permitted drum storage and physical treatment facility. Page II-4, under the title, "Facility Description" states that UW&T has never utilized any physical treatment..... This is contradictory, please explain.
- b. Lines 5 - 8 state, "Hazardous wastes stored and transported at the facility include characteristic and listed hazardous and nonhazardous wastes. Delete the highlighted words as they contradict line 5.

## 3. Paragraph 4

This paragraph is written as follows: During the February 25, 1993 VSI, regulatory staff and facility staff discussed sampling and analysis results on effluent prior to release into the retention pond. The facility stated that the effluent had undergone analysis once and the current carbon and sand filters from the storm water pre-treatment system had been solely utilized since the facility began operations.

- a. What type of effluent is being discussed? Should this say wastewater effluent? stormwater effluent?
- b. This paragraph seems awkward. At this point in the RFA, the SWMUs have not yet been introduced, so the reader has no knowledge of a retention pond, not to mention any sampling that was done. This paragraph would be more appropriate if included after paragraph 1, on page I-2, although more background information is needed on the sampling and the pre-treatment system. For example, when did sampling take place? What type of sampling was done? What were the results of sampling and analysis? Why is effluent being treated? When was this system installed?

## 4. Paragraph 1 (page I-2)

Line 8 - The words "RFA Phase II" should be replaced with the word "Confirmatory."

## 5. Paragraph 2

Line 4 - The word "contamination" should be replaced with the words "ground-water contamination."

## II. Introduction (p. II-3)

1. Paragraph 1, line 1 - Delete the letter "s" in the word "constituents."
2. Paragraph 2, line 4 - The complete date of the preliminary review should be listed here (February 15-19, 1993). Please insert.
3. Delete paragraph 3 as it is not necessary in this section.

## A. File Search and Visual Site Inspection (p. II-4)

1. Delete lines 5-10 starting with the words "The VSI" and ending with the word "investigation."
2. Paragraph 3, line 2
  - a. Insert the word "is" after the word "information."
  - b. Delete the word "as" following the word "appendix," which should be capitalized.
  - c. Define the acronym SWFWMD used on line 6.

## B. Facility Description (p. II-4)

1. Paragraph 1
  - a. The first two lines of this paragraph describe UW&T as a drum storage and physical treatment facility. Lines 7 & 8 claim UW&T never utilized any physical treatment. Which statement is correct? If UW&T never utilized any physical treatment, then this facility should not be identified as a treatment and storage facility. Explain.
  - b. Lines 5,6, & 7 belong in the section titled Regulatory Applicability and History. Please revise.
  - c. Lines 7-10 are unclear. Please revise.
  - d. Line 13 mentions Helena Chemical. The words **Superfund site** should be enclosed in parenthesis.
  - e. Line 15 mentions Stauffer Chemical. The words **Superfund site** should be enclosed in parenthesis.
  - f. On line 16, the word "consultant firm" should be replaced with "consulting firm."

2. The Facility Description section needs to be restructured, You may want to use the following:

Universal Waste and Transit (UW&T) is a storage facility and transporter which accepts hazardous and non-hazardous wastes from \_\_\_\_\_. The facility has a maximum storage capacity of 33,600 gallons.

UW&T is located at 2002 N. Orient Road in Tampa, Florida, within the northwest quadrant of the intersection of Orient Road and 9th Avenue in Tampa, Florida. The facility is located on 1.4 acres of previously undeveloped land, approximately five miles east of downtown Tampa in a heavy industrial zone. UW&T is bound to the west by National Fisheries, to the northwest by Helena Chemical (Superfund site), and north by a metal recycling facility, to the east by Stauffer Chemical (Superfund site), and to the south by a consulting firm.

The facility occupies a 5,866 square foot building, which contains the drum storage area. The drum storage is composed of three separate bays. Bays 1 & 3 are non-flammable storage areas (each containing 2 sumps), while Bay 2 is a flammable, reactive, and aerosol storage area (containing a single sump). Each sump has a storage capacity of approximately 1000 gallons. The facility also contains a Loading/Unloading dock, Retention Pond, and Office Trailer Laboratory (information about these SWMUs should be discussed here also).

The above description is based upon information gathered in this RFA report, the State permit, and information in EPA's administrative files. Any information which is lacking in the above paragraph or in any suggested wording should be added by FDEP.

#### C. Process Description (p. II-6)

The Process Description needs to be restructured. The discussion of the filter press in paragraph 1 does not belong here as paragraph 1 goes on to indicate the filter press was never used. The discussion of solidification in paragraph 2 does not belong here, since solidification, according to this report, was not a process used at this facility. The vague description of the stormwater pretreatment system, retention pond, and loading/unloading area in paragraph 3, should be mentioned briefly in the facility description and discussed in more detail under Waste Management Practices. Delete everything currently included under Process Description. You may want to replace this section with the following:

Universal Waste and Transit began accepting hazardous and non-hazardous wastes in 1990. These wastes are transported into and out of the facility via \_\_\_\_\_. The facility primarily utilizes 55 gallon drums for storage, although "tote tanks" and "jumbo sacks" are used occasionally.

D. Waste Management Practices (p. II-7)

The first paragraph under Waste Management Practices is actually the Process Description. You may want to rewrite this section using the following:

Universal waste and Transit accepts hazardous and non-hazardous wastes via \_\_\_\_\_ shipment. The following hazardous wastes are approved for acceptance in the facility's hazardous waste permit:

D001-D043	K071, K073, K106	K060, K087
F001-F012	K031-K043	"P" Listed Wastes
F020-F028	K097-K099	"U" Listed Wastes
K001-K011	K048-K052	
K013-K030	K061-K062	
K083, K085	K069, K100	
K093-K096	K084, K101, K102	
K103-K105	K086	

A representative sample of each shipment of waste is analyzed in the on-site laboratory located in the office trailer. A fingerprint analysis is conducted consisting of physical characteristics such as Ph, flash point, and percent solids. All waste laboratory samples are held for approximately three months pending potential need for re-evaluation. Samples are then managed as wastes and bulked into waste drums and manifested to an off-site disposal facility. Rags and residues are emptied into satellite accumulation hazardous waste containers, bulked to drums and manifested to an off-site disposal facility.

All hazardous wastes are stored and managed in the drum storage area. Non-regulated wastes (usually soils with trace petroleum) are occasionally stored in the truck-loading containment area.

The vehicles back up directly to the storage area so drums can be loaded and off-loaded directly to and from the vehicle and warehouse. All waste containers are closed except when transfer of wastes is occurring. All containers and containment areas are inspected daily (See Appendix M).

Most wastes are manifested off-site for disposal in less than one (1) month.

Waste oil mixed with hazardous waste is received from generators by permitted transporters and manifested off-site to permitted TSD's for fuel blending (see Appendix D).

Domestic refuse is emptied in a dumpster which is emptied and disposed of by Tampa/Hillsborough County Municipal Solid Waste.

[Discuss Stormwater Drainage System (pretreatment), Retention Pond, and Loading/Unloading Area].

E. Facility Waste Generation (p. II-8)

1. Paragraph 1 states that according to UW&T's 1991 Hazardous Waste Biennial Report, they generated 525,690 pounds of waste at the facility in 1991. What type of waste is this? Is this wastewater? Explain.
2. The information included in the remaining paragraphs belongs in the SWMU data sheets and should be deleted from this section.

F. Regulatory Applicability and History (p. II-10)

1. Paragraph 1 states that FDER Tampa issued UW&T a full RCRA permit. FDEP (formerly FDER) could not have issued UW&T a full RCRA permit because they are not authorized to issue the HSWA portion of the RCRA permit. A full RCRA permit includes the base portion of the permit issued by the State and the HSWA portion which is issued by EPA.
2. EPA recommends that lines 8-10 be deleted, as the information presented here is no longer correct.
3. The CEI's that were mentioned on page II-11, paragraph 1, who were they conducted by?
4. Is this facility really subject to Subpart AA/BB requirements or was this added due to previous comments submitted?

G. Release History (p. II-11)

1. In paragraph 2, what constituents were found in the ground water? How many monitoring wells exist at this facility? When were the wells installed and what was the rationale for their placement?



2. On line 8, the word "ground-water" should be inserted between the words "some" and "contamination."
3. Paragraph 3, line 8 - The words "storm water" should precede the word "run-off."
4. Paragraph 3, page II-14 - A word appears to be missing from line 11. Should it say, "...and ground water contamination."
5. Figure 3 - Monitoring Well Location Map

This figure is illegible. Please replace this with a legible copy.

#### H. Environmental and Demographic Setting

1. Topography and Drainage (p. II-13)

Identify UW&T on Figure 4.

2. Geology and Ground Water (II-15)

On line 5, the word "silt" is misspelled. Delete the word "snaky."

#### III. Solid Waste Management Units (p. III-18)

In paragraph 2, insert the word "were" proceeding the word "identified."

#### V. Suggested Sampling Strategy (p. V-21)

Delete the Suggested Sampling Strategy tables on pages V-21 and V-22.

#### SWMU DATA SHEETS

1. Drum Storage Area (SWMU 1, Appendix A)

- a. Under TYPE of SWMU it should say, "Drum Storage Area." Delete the word "concrete."
- b. The Physical Description and Condition section should include the location, physical dimensions, material of construction, condition of unit, brief mention of the use of the unit. Some of these details were included under "Facility Waste Generation," and "Facility Description" should be included here.

- c. The photos included in Appendix B of the revised RFA report appear to have had their numbers revised, but, the SWMU data sheets located in Appendix A have not been revised to reflect the new photo numbers. For example, under the title "Photo Number," photos 13-17 and 19 should be added and photos 20-24 should be deleted. Also, photos 20-24 have not been included in Appendix B. Please revise.
- d. Under "Release Pathways," the potential for release [Low (L), Moderate (M), High (H), Unknown (U)] should be included beside each media. For example, the potential for release to air, soil, and ground water may be moderate, while the potential release to surface water and subsurface gas may be low.

2. Loading/Unloading Dock (SWMU 2, Appendix A)

- a. Under TYPE of SWMU it should say, "Loading/Unloading Dock." Delete the word "concrete."
- b. The Physical Description and Condition section should include the location, physical dimensions, material of construction, condition of unit, brief mention of the use of the unit. Was there any visible staining or cracks in the concrete? Was there exposed soil in the vicinity of the dock? Some of these details were included under "Facility Waste Generation" and should be included here.
- c. Under the title "Photo Number," photos 8 should be added.
- d. Under "Release Pathways," the potential for release [Low (L), Moderate (M), High (H), Unknown (U)] should be included beside each media. For example, the potential for release to air, soil, and ground water may be moderate, while the potential release to surface water and subsurface gas may be low.
- e. The page numbering throughout this appendix is incorrect. Please revise.

3. Retention Pond (SWMU 3, Appendix A)

- a. Under NAME of SWMU it should say, "Retention Pond." Delete the words "Surface Impoundment."
- b. Under TYPE of SWMU it should say, "Surface Impoundment." Delete the words "Retention Pond."
- c. The Physical Description and Condition section should include the location (this should reference the closest SWMU), physical dimensions (as given under Facility Waste

Generation), material of construction, condition of unit, brief mention of the use of the unit. Was there any visible staining or cracks in the concrete? Was there exposed soil in the vicinity of the SWMU? Where is the effluent coming from? What type of effluent are you referring to? Describe the carbon/sand filter system in more detail? Does the facility have a NPDES permit?

- d. Under "Release Pathways," the potential for release [Low (L), Moderate (M), High (H), Unknown (U)] should be included beside each media. For example, the potential for release to air, soil, and ground water may be moderate, while the potential release to surface water and subsurface gas may be low.
  - e. Under "Recommendations," RFA Phase II Sampling should be replaced with Confirmatory Sampling.
  - f. Under the title "Photo Number," photos 10 and 11 should replace photos 15-17.
4. Filter Press (SWMU 4, Appendix A)
- a. Under NAME of SWMU it should say, "Filter Press." Delete the words "treatment unit."
  - b. Under TYPE of SWMU it should say, "Treatment Unit." Delete the words "steel filter press."
  - c. The period of operation, listed under the title of the same name, is incorrect. If this filter press was only used once as stated under "Physical Description and Condition," then, how could this filter press still be operating? Please revise.
  - d. The statement made under the title "Physical Description and Condition," is incorrect. The first three lines are totally misleading and contradict the next few lines. This paragraph should be deleted. The following information should be included in this paragraph:
 

The location (this should reference the closest SWMU), physical dimensions and material of construction (as given under Facility Waste Generation), condition of unit, brief mention of the use of the unit. Was there any visible staining or cracks in the concrete?
  - e. Under "Release Pathways," the potential for release [Low (L), Moderate (M), High (H), Unknown (U)] should be included beside each media. For example, the potential for release to air, soil, and ground water may be moderate, while the

potential release to surface water and subsurface gas may be low.

- f. Photo 24 has not been included in the revised RFA report. Photo numbers 17 and 20 should be included on this SWMU Data Sheet.
  - g. Under the section titled "comments," the short-lived use of this unit and the reason for its abandonment should be explained.
5. Municipal Waste Dumpster (SWMU 5, Appendix A)
- a. Under NAME of SWMU it should say, "Municipal Waste Dumpster." Delete the word "Steel."
  - b. Physical Description and Condition - Delete the information included in this paragraph and replace it with the description given on page II-8, under "Facility Waste Generation." Was there any staining on or around the dumpster? Was the dumpster located on a concrete or soil surface? Is there any exposed soil in the vicinity of the SWMU?
  - c. Under "Release Pathways," the potential for release [Low (L), Moderate (M), High (H), Unknown (U)] should be included beside each media. For example, the potential for release to air, soil, and ground water may be moderate, while the potential release to surface water and subsurface gas may be low.
6. Pre-treatment Unit (SWMU 6, Appendix A)
- a. Under "Type of Unit" it should say, "Pre-treatment Unit, including a carbon-sand filter and a sump pump."
  - b. The name of the unit should simply be "Pre-treatment Unit."
  - c. Physical Description and Condition - Describe the function of this unit, the dimensions, why it is being utilized? When was this unit installed? Lines 4-6 are unclear, words are missing.
  - d. Under "Release Pathways," the potential for release [Low (L), Moderate (M), High (H), Unknown (U)] should be included beside each media. For example, the potential for release to air, soil, and ground water may be moderate, while the potential release to surface water and subsurface gas may be low.

- e. Under "Recommendations," RFA Phase II Sampling should be replaced with Confirmatory Sampling.
- f. Under "Photo Number," photos 12 and 13 are listed. These should be deleted and replaced with photo 9.

EPA comments on revised draft RFA report

Florida Department of Environmental Protection

RCRA PERMITTING -- ROUTING SLIP

FACILITY/ITEM: Universal Waste & Transit, Inc.

PATS NO: HD29-171163

TO	NAME	INITIALS	DATE
<input type="checkbox"/>	SATISH KASTURY		
<input type="checkbox"/>	MERLIN RUSSELL		
<input type="checkbox"/>	SHELTON GRAVES		
<input type="checkbox"/>	AMRISAR KAHAROEDDIN		
<input type="checkbox"/>	CAMILLE PLAUTZ		
<input type="checkbox"/>	CINDY SMITH		
<input type="checkbox"/>	BILL LINN		
<input type="checkbox"/>	JIM LADNER		
<input type="checkbox"/>	JOYCE PAPP		
<input checked="" type="checkbox"/>	DOUG OUTLAW	<u>DO</u>	<u>9/16/94</u>
<input type="checkbox"/>	JOHN GRIFFIN		
<input type="checkbox"/>	HARBHAJAN SINGH		
<input type="checkbox"/>	ALEX ON-WUTAKA		
<input type="checkbox"/>	RAVI SHAH		
<input checked="" type="checkbox"/>	BHEEM KOTHUR		
<input type="checkbox"/>	RABIN PRUSTY		
<input checked="" type="checkbox"/>	JANET ASHWOOD	<u>BU</u>	<u>9/16/94</u>
<input type="checkbox"/>	DIANE HUNT		
<input type="checkbox"/>	FRED WICK		
<input type="checkbox"/>	DAVID MASON		
<input checked="" type="checkbox"/>			

REQUIRED ACTION & COMMENT: URGENT ( ) ROUTINE ( )

PROJECT MANAGER: Parker Outlaw  
 LOGGED IN JANET ASHWOOD

\* FLD 981-932-494