

**RCRA FACILITY ASSESSMENT REPORT**

for

UNIVERSAL WASTE & TRANSIT, INC.  
2002 N. Orient Road  
Tampa, Florida

**FLD981932494**

FLD 981-932-494

Prepared by

Florida Department of Environmental Protection  
Division of Waste Management  
Bureau of Solid and Hazardous Waste

Site Visit: Wanda Parker  
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There have been three (3) subsequent Comprehensive Evaluation Inspections (CEI) at the facility. The CEI conducted on March 26, 1991 resulted in siting three (3) violations with a penalty paid in the amount of \$1600.00. As of this report date, the facility has no pending compliance and/or enforcement actions with FDER.

## G. RELEASE HISTORY

The facility has had no reported and/or recorded release(s) to the environment.

UW&T installed three (3) monitoring wells prior to operation to verify non-contamination of the site and to monitor for future reference due to the activities surrounding the site location (see Figure 3). The facility is located across the street from Stauffer Chemical Superfund site and adjacent to the Helena Superfund site. Subsequent sampling and analysis of the wells have indicated that there is some contamination present. The ground water flow of the area is southeast from the Helena Superfund site to UW&T (see Figure 5).

### 1. HELENA CHEMICAL SITE HISTORY

The Helena Chemical Company is located at 2405 North 71st Street bound on the north by 14th Avenue; on the east by Orient Park Road; on the west by 71st street; and on the south by an active rail line (see Appendix N). The facility is located on a site covering approximately 8 acres, including an office, laboratory, bathhouse, a processing and storage building, a warehouse, numerous holding tanks, and a run-off retention pond of approximately 10,400 square feet. The terrain at the facility is relatively flat, with a gradual slope toward the south and southeast. Helena manufactured sulfur dust and other products for use in citrus orchards. In the mid-1970's, pesticide mixing operations were conducted in the current warehouse building. The pesticides manufactured and repackaged at the facility include organochloride and organophosphate insecticides (toxaphene, parathion, methyl parathion, mevinphos, naled, malathion, EPN, dimethoate, dioxathion, dimpylate, endrin, and chlordane), acaricides (chlorobenzilate), nematicides (1,2-dibromo-3-chloropropane), insecticidal petroleum oil, and herbicides (dimethylamine salt of 2,4-D and dinoseb).

underlying limestone and dolomite by thick beds of stiff, green clay which has an average thickness of approximately 10 feet and acts as a semi-permeable confining layer over the formations.

The geologic units form a hydrologic system composed of a shallow water-table aquifer, a confining bed, and the Floridan aquifer. The saturated parts of the unconsolidated materials form a shallow water-table aquifer which has an average thickness of about 20 feet. The majority of the water in the aquifer is derived from local rainfall and the water table is only a few feet below land surface. The water enters the Floridan aquifer in recharge areas and moves down-gradient to points of discharge. The majority of the recharge to the aquifer in Hillsborough county is derived locally from leakage through confining beds and sinkholes.

#### 5. FLOODPLAIN

The site is located outside the 100-year floodplain. A Federal Emergency Management Agency (FEMA) map outlining the area of the site and verifying floodplain information is included (see Figure 4). The information is also certified on the site survey by a registered surveyor. The facility is also located outside of the hurricane storm surge zone.

## V. SUGGESTED SAMPLING STRATEGY

Unit No.	Unit Name	Operational Dates	Suggested Sampling	Evidence of Release (Yes/No) <sup>1</sup>
3	Retention Pond (Surface Impoundment)	June 1990 to Present	<p>Objective is to determine if hazardous constituents have contaminated the soil and groundwater underneath the unit. The entire area and around the berm should be evaluated to determine the extent of contamination from prior releases. A grid approach should be used to determine the location of the borings. A Sampling interval of approximately 5 feet should be used. The boring should be to the depth of ground water.</p> <p>Samples should be analyzed for Appendix I <span style="float: right;">IX</span> volatiles, semi-volatiles and TCLP metals. Analytical procedure should be in accordance with EPA Manual SW-846, "Test Methods for Evaluating Solid-Waste," Latest edition.</p>	No

1. Evidence of Release is defined as visual signs of contamination, analytical documentation of a release(s), discharge permit violations, facility representative statements, or file material references indicating a release.

ATTACHMENT

DEP

EPA's Comments and Responses Attachment

1. The Executive Summary should include only the Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) related activities. The list of hazardous wastes stored at the storage facility should be deleted from the Executive Summary because they are listed in the RCRA permit. In addition, Appendix C - "Permitted RCRA Wastes Summary", in the RFA Report, provides this information. A reference in this matter should also be made in Section II F - "Regulatory Applicability and History".

Response: The list of hazardous wastes stored at the facility was deleted from the Executive Summary and a reference was made in Section II F.

2. The last paragraph of the Executive Summary should include a short explanation regarding the purpose of the monitoring wells and a background history of the Universal Waste and Transit site. Specifically the status of the Stauffer Chemical and Helena Chemical sites, since the reference regarding groundwater monitoring is made in the Executive Summary of the RFA Report.

Response: The purpose of the monitoring wells is stated and the current status of the Superfund sites is given. A more detailed background of the sites is referenced.

3. Page I-1 - Executive Summary - Last Paragraph - The report mentioned that at the time of the VSI site inspection by the Environmental Protection Agency (EPA) in August 1988, this was a new facility. Please note that the construction of the facility was not completed at the time of inspection by EPA. The error regarding the new facility should be corrected.

Response: The third paragraph of the Executive Summary has been changed to correct the error.

4. Facility Description - A clarification is needed regarding physical treatment. The RCRA permit includes a filter press for physical treatment. However, the permittee cannot use the filter press because the storage in the tank, which is essential for the operation of the filter press, is not permitted. The status of the permit application or permit modification for the storage tank should be clarified in this section.

Response: Status information regarding the facility's physical treatment has been clarified in the Facility Description.

5. Waste Management Practices - Are "tote tanks" and "jumbo sacks" permitted for storage? This should be clarified. Also, is storage on open pallets permitted? Since the pictures of this practice are included in the RFA Report, the waste management practices need to be discussed in detail.

Response: The issue of permitted containers is clarified and reference is made to the permit (Appendix O). All unrelated photos were removed.

6. Waste Management Practices - The report mentioned that inspection of the containers and the containment areas are performed daily. Does the facility maintain an inspection log? Detailed description is needed.

Response: Copies of inspection logs from the week of February 15-19, 1993 are provided in Appendix M.

7. Facility Waste Generation - This section needs to discuss, in detail, the waste generated and the activities at all identified SWMUs. Information should be provided as to where waste is generated and how it is handled. This section in the report does provide descriptions of SWMUs, but fails to discuss the waste generation and handling practices.

Response: As previously stated the UW&T is primarily a storage facility and does not generate wastes from operation/processes.

8. Facility Waste Generation - SWMU #4 (Filter Press) - The dimensions and capacity of this SWMU should be provided. Since this is a regulated unit, the text should provide more information about specific uses of this unit and the reason for permitting it. Particularly, since it is not operable without the storage tank permit.

Response: The dimensions of the unit were previously provided and the capacity is provided in the SWMU #4 information.

9. Figure No.2 - SWMU #3 is cut off. Please include a new location map showing all SWMUs.

Response: The SWMU location map is the most accurate the facility provided. The unit lines were completed for SWMU #6 on Figure No. 2.

10. Facility Waste Generation - SWMU #6 (Storm Water Pretreatment Unit) - The limitation of the sump pump flow rate (30 gals. per minute) and the flow rate to the pretreatment unit (5 gals. per minute) from the sump tank, should be explained. Also, the possibility of over flow from the pretreatment unit (SWMU #6) to the ground should be addressed.

Response: The pretreatment unit limitations are explained in the SWMU #6 information.

11. Regulatory Applicability and History - The Waste Minimization and Land Disposal Restriction provisions are mentioned in the report. The Air Emission Standards for process vents - 40 CFR 264.1030, Subpart AA and Air Emission Standards for Equipment Leaks, 40 CFR 264.1030, Subpart BB, should also be included in this section of the report.

Response: The referenced standards have been add to the Regulatory Applicability and History section.

12. Regulatory History - Figure 3, "Monitoring Well Location Map", A reference regarding the Helena Chemical Superfund site is made in the report. However, the site map does not show the location of the site. Include this Superfund site on the map and also, include the direction of the groundwater flow.

Response: The Helena and Stauffer Superfund sites are shown on the Figure 4 - Drainage Path Location Map.

13. Flood Plain - Figure 4 - The UW&T site location is not shown on the map.

Response: The error to the map has been corrected with an addition of the site location *and figures are renumbered.*

14. Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) - Why are three groundwater monitoring wells considered AOCs? These monitoring wells are used to monitor the contaminant levels at the Universal Waste and Transit's (UW&T) site. The facility wants to establish that the contaminants are coming from the adjoining Stauffer Chemical and Helena Chemical Superfund sites and not from UW&T. The three monitoring wells do not seem to fit the definition of

AOC (see below). Therefore, if it is necessary the AOC (three monitoring wells) should be renamed.

Definition - Area of Concern

Any area having a probable release of a hazardous waste or hazardous constituent which is not form a solid waste management unit and is determined by the Regional Administrator to pose a Current of Potential threat to human health or the environment.

Response: After reevaluation, the referenced AOCs have been deleted and the Summary and Recommendations section recommend that UW&T demonstrate the facility is not contributing to the contamination of the three monitoring wells.

15. The groundwater samples from the three monitoring wells at the UW&T's site indicate the presence of hazardous waste contaminants. Therefore, the whole of UW&T's site will require further investigation. UW&T should demonstrate that the contaminants found in the groundwater samples are not from any SWMUs on the site. This information should be included in the text of the RFA Report.

Response: The report does provide the referenced information in section IV - Summary and Recommendations.

16. As background information, a brief summary of contaminants that have been found in the three monitoring wells should be provided in the report.

Response: The reference background information is located in summary in section IV - Summary and Recommendations and in detail in Appendix H.

17. Table 1 - SWMU Identification Summary

- a. The Pollution Migration Pathways column should include groundwater, soil and/or surface water for SWMU #1, SWMU #2, SWMU #4 and SWMU #5. It is conceivable that a spill in the storage area could cause the pollutants to move in other migration pathways.

Response: These changes have been made to Table 1 and the SWMU Data Sheets.



- b. Table 2 - Delete this table if it is established that the three monitoring wells are not Areas of Concern.

Response: Table 2 has been deleted.

18. SWMU Data Sheets

- a. SWMU #1 - In the comments it should be mentioned that this is a regulated unit.
- b. SWMU #2 - Loading Dock - This is not a Concrete Surface Impoundment. It should be renamed.
- c. SWMU #2 - If there is a crack in the concrete, soil and groundwater might be pollutant release pathways. Please address these on the data sheet.
- d. SWMU #6 - Pretreatment Unit - Sump tank is part of the pretreatment unit, therefore it should be included in this SWMU. The limiting factors are size of the tank and capacity of the sump pump and the feed rate to the pretreatment unit.

Response: (18. a-d) The appropriate changes have been made the referenced SWMU Data Sheets.

- e. Photographs - There are many photos that are unrelated to the RFA (e.g. batteries stored on a pallet, picture #25 showing a storage area ..., Are these SWMUs?). Explanation about RFA related photos should be provided in the text of RFA Report. Please review all photographs and remove unrelated photos or provide explanation in the text of the report as to why these photos are pertinent.

Response: All unrelated photographs have been removed.