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To:	mking@tropical.com
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Subject:	Tropical Shipping & Construction Co Ltd.. (EPA ID FLR000095737) - Exit Interview
Date:	Thursday, February 20, 2020 4:21:00 PM
Attachments:	Authority Notification - Generic Letter.doc

Good Afternoon Mr. Matthew King,

This email serves as an exit interview to the routine hazardous waste inspection conducted by the Florida Department of Environmental Protection (FDEP) on Wednesday, February 12th, 2020. Thank you again for your time and assistance throughout the inspection. The following non-compliance items were observed during the inspection:

1. 62-710.850(5)(a) FAC – used oil filter labeling – the inspectors observed one (1) 55-gallon drum containing used oil filters that was not labeled, located in the Refrigeration Repair and Maintenance Shop. Please label the container with the words “used oil filters” and provide a picture to the Department.
2. 40 CFR 273.13(d)(1), 40 CFR 273.14(e), 62-737.400(5)(b) F.A.C., and 62-737.400(7) F.A.C.- Universal Waste Lamps – In the storage area, the inspectors observed 29 spent mercury lamps stored on the floor, unlabeled and without a container. Also, the inspectors observed 16 spent mercury lamps stored in an unlabeled and open box. Please provide a structurally sound and closed container for the 45 spent mercury lamps. The containers shall be labeled as “Universal waste – Lamps” and have the accumulation start date. Please provide a picture of the labeled containers to the Department.
3. 40 CFR 273.13 - Pallet of batteries stored outside – the inspectors observed a pallet of 24 used lead acid batteries stored on a pallet outside the Marine Division Shop, exposed to the weather conditions. Facility personnel informed the inspectors that the batteries were going to be picked up within hours. Please provide shipment receipts of the batteries or provide a picture demonstrating that the spent batteries were stored indoors and protected from the weather conditions.
4. 40 CFR 262.11 –
    a. The inspectors observed 43 unlabeled 55-gallon drums of an unknown liquid stored outside the Port Maintenance Shop, located at the northeast side of the facility. Facility staff suggested the contents were used antifreeze, degreaser and empty containers. Please identify the content of each one of the 45 55-gallon drums and provide a copy of the disposal records confirming if the waste was hazardous waste or not.
    b. The inspectors observed one unlabeled 55-gallon drum of unknown liquid stored outside the Marine Division Shop. Facility staff suggested the content was used oil. Please identify the content of the 55-gallon drum and provide disposal record to the Department. Is the content is confirmed to be used oil, label the container with the words “used oil,” install a proper secondary containment according to 62-710.401(6) F.A.C., and provide a

picture to the Department.

Also, please provide the following documentation for the Department to review:

5. All hazardous waste shipping records (including uniform HW manifests, bill of lading, etc.) from US territory for the last 3 years.
6. All hazardous waste shipping records (including uniform HW manifests, bill of lading, etc.) from out of US for the last 3 years.
7. Used tires recycling receipts for the last 3 years.
8. Spent lead acid batteries recycling records.
9. Spent mercury lamps shipping records for the last 3 years.
10. SPCC/Contingency plan (including the facility's emergency coordinator and his/her job duties).
11. Standard Operating Procedures (SOP) documentation describing the facility's response plan pertaining to leaks and/or spills (40 CFR 263.30 and 263.31).
12. Copy of certified mail or email of the arrangement with local authorities including police department, hospital, fire department, and emergency response contractor (template attached)
13. Employee training in used oil and hazardous waste management from past 3 years including those employees that manage hazardous wastes (for example, planners, on site drivers, etc.)
14. Log of transfer waste (hazardous waste and hazardous waste pharmaceutical) coming in and out of the facility from previous 3 years.
15. Sand blaster: Safety Data Sheet (SDS) of the media, spent sand blast media waste determination, shipping records and pictures of the sand blaster and waste containers.
16. Provide the square footage of the area in occupied by Tropical Shipping & Construction C Ltd..
17. Provide number of trucks used by Tropical.

Please provide a response and evidence of your corrective actions by **March 5th, 2020**. Please do not hesitate to reach out to myself if you have any questions or concerns.

Best Regards,

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