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*Tropical Shipping Hazardous Waste Shipping SOP-PPB*

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A shipment of Resource Conservation and Recovery Act (RCRA) hazardous waste (HW) from the Bahamas (or other foreign countries) to the US shall be a HW import. The below SOP shall be followed to ensure compliance with the US Environmental Protection Agency (EPA).

**Hazmat Specialist Team**

All documents relating to the HW shipment must be scanned into Doc Register in T-Link for tracking and record retention requirements.

1. Hazardous material/waste shipments are to be coordinated through a member of the Tropical Shipping Hazmat Specialist Team.
2. Shipper to forward a copy of the letter of consent from the US EPA for the hazardous waste generator.
3. Shipper to forward a copy of the approval letter from the hazardous waste receiving facility. (For example, Geocycle in Holly Hill, SC for a particular hazardous waste stream with an approval **profile number** and facility contact)
4. Hazmat Specialist Team Member to confirm in Partner or with Pricing that a current HW import contract is on file.
5. Shipper to forward Land Disposal Restriction document.
6. Shipper to forward a completed copy of the Hazardous Material Declaration, Bill of Lading and Proforma.
7. Hazmat Specialist Team Member to clear the HW Shipment to sail once items 1-6 have been satisfied. Tropical will now accept cargo for carriage.
8. Once operations Interchange Hazmat Specialist completes section 6, Transport 1 and section 17, Transporter 1 of the Uniform HW Manifest EPA Form and scans into T-Link, The Hazmat Specialist Team Member must verify this information has been completed and scanned into T-Link.
9. The Hazmat Specialist Team Member managing the shipment must inspect the Uniform HW Manifest to ensure all sections are complete and accurate. See below Uniform HW Manifest section description in Appendix A.

10. The Hazmat Specialist Team must ensure the HW Cargo leaves the Port of Palm Beach within the 10-day storage requirement.
11. Shipper to forward notice of the completed Uniform HW Manifest EPA Form to the Hazmat Specialist Team to be scanned into T-Link in the original shipment.
12. Shipment complete.

## **Appendix A**

### **Uniform Hazardous Waste Manifest Section Descriptions**

Section 1. Generator ID number.

Section 2. Page number.

Section 3. Emergency Response number.

Section 4. Manifest tracking number.

Section 5. left side of manifest Generator name and address and contact phone number.

Section 5. right side of manifest Generator site address if different from mailing address.

Section 6. Transporter 1 including their EPA identification number.

Section 7. Transporter 2 (if there is one) including their EPA identification number.

Section 8. Designated Facility name and address and their EPA identification number.

Section 9a. Mark X if material is a hazardous material

Section 9b1. The correct shipping name of the waste material (same for 9b2, 9b3, 9b4)

Section 10. Container(s) quantity and type

Section 11. Total quantity

Section 12. Unit weight or volume measure

Section 13. EPA Waste codes

Section 14. Special handling instructions i.e. Emergency Response information and waste approvals number for the individual waste streams.

Section 15. Generator certification by generator's printed name, signature and date.

Section 16. International shipment acknowledgement

Section 17. Transporter 1 signature and transporter 2 signature if there is a second transporter.

Sections 18-20. To be completed by the receiving facility.

## **Pricing**

1. Pricing to ensure Imports of HW must occur under the terms of the Hazardous Waste Importation Agreement and Movement Document.

## **Operations**

1. Operations to be notified of the date of expected incoming HW shipment.
2. Operations to receive HW shipment and transfer to HW Transfer Facility Site.
3. Operations to retrieve the original Uniform HW Manifest EPA Form from the HW shipment's storage device located on the ISO Tank holding the HW.
4. Interchange Hazmat Specialist to complete section 6, Transporter 1 (enter company name: Tropical Shipping and EPA ID FLR000095737) and section 17, Transporter 1 (Print and sign your name and enter today's date) on the original Uniform HW Manifest EPA Form and scan into T-Link then return to HW shipment's storage device.
5. Operations to collect from the HW Transfer Facility Site and position HW shipment onto outbound equipment.
6. HW shipment should not be held onsite longer than 10 days in the HW Transfer Facility Site. The Shipper must collect the HW shipment well before this time.
7. Shipment complete.

## **HW Transfer Storage Site Administration**

1. HW Transfer Facility Site Administration Team should inspect the HW Transfer Facility Site once per week to ensure the area is maintained and equipment containing HW does not pose a threat to the environment or public.

**HAZARDOUS WASTE IMPORTATION AGREEMENT AND MOVEMENT DOCUMENT**  
(Completed Before Shipping Commences)

**Entities**

Shipper: ("Foreign Exporter")<sup>1</sup>  
Carrier: Tropical Shipping and Construction Company Limited ("Importer/Transporter")<sup>2</sup>  
Hazardous Waste Disposal Site Owner or Operator: ("Receiving Facility")<sup>3</sup>

**A. Hazardous Waste**

US EPA ID No. of the Foreign Exporter (where available):  
Description of Commodity to be Shipped: ("Hazardous Waste")  
Hazardous Waste Quantity being Shipped:  
AOC Number:  
Waste Number:  
RCRA Hazardous Waste Code:  
For Shipments from OECD, OECD Waste Code (see 40 CFR §260.11):  
United Nations or US DOT Identification Number:

**B. Foreign Exporter**

Full Legal Name of Company:  
Address:  
Telephone Number:  
Fax Number(s):  
Email Address:

**C. Importer/Transporter**

Full Legal Name of Company: Tropical Shipping and Construction Company Limited  
EPA ID Number:  
Address:  
Telephone Number:  
Fax Number(s):  
Email Address:

**D. Receiving Facility**

Full Legal Name of Owner or Operator of Receiving Facility:  
EPA ID Number:  
Technologies Employed:  
Applicable Recovery or Disposal Operations (as defined in 40 CFR §262.81):  
Address (of Receiving Facility):  
Address (of Owner or Operator of Receiving Facility):  
Telephone Number:  
Fax Number(s):  
Email Address:

**E. Means of Transport**

License, Registered Name, Registration Number:  
Types of Packaging:  
Special Precautions:

**F. Foreign Exporter's Responsibilities:**

1. Provide letter of consent for import to Importer/Transporter;
2. Provide the approval letter from the Receiving Facility;
3. Initiate shipment of Hazardous Waste;

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<sup>1</sup> *Foreign exporter* means the person under the jurisdiction of the country of export who has, or will have at the time the planned transboundary movement commences, possession or other forms of legal control of the hazardous wastes and who proposes shipment of the hazardous wastes to the United States for recovery or disposal operations. 40 CFR §262.81.

<sup>2</sup> *Importer* means the person to whom possession or other form of legal control of the hazardous waste is assigned at the time the imported hazardous waste is received in the United States. 40 CFR §262.81. *Transporter* means a person engaged in the offsite transportation of hazardous waste by air, rail, highway, or water. 40 CFR §260.10.

<sup>3</sup> *Receiving facility* means a U.S. facility which, under RCRA and other applicable domestic laws, is operating or is authorized to operate to receive hazardous wastes and to perform recovery or disposal operations on them. 40 CFR §262.81.

4. Provide Hazardous Waste as required under terms of the Confidential Service Contract (“Agreement”) in clean, non-leaking containers in good condition, properly labeled in accordance with U.S. laws and regulations;
5. [Submit to EPA notification of intent to import and receive EPA approval]
6. Complete Foreign Exporter portions of Movement Document during shipping;
7. If for any reason disposition of the Hazardous Waste cannot be carried out as described in the notification of intent to import then, upon notification from Importer/Transporter or Receiving Facility, assume responsibility for the adequate management of the Hazardous Waste in compliance with applicable laws and regulations, including return of the Hazardous Waste and the notification of re-export required by 40 CFR §262.83(b)(7).

**G. Importer/Transporter Responsibilities:**

1. If, while in physical possession or actual control of the Hazardous Waste the disposition of the Hazardous Waste cannot be carried out as described in the notification of intent to import for any reason, notify the Foreign Exporter, and the Florida Department of Environmental Protection of the location of the Hazardous Waste and the need to arrange return shipment.
2. Complete Importer/Transporter portions of Movement Document during shipping;

**H. Receiving Facility Responsibilities:**

1. Complete Receiving Facility portions of Movement Document during shipping;
2. If, while in physical possession or actual control of the Hazardous Waste the disposition of the Hazardous Waste cannot be carried out as described in the notification of intent to import for any reason, notify the Foreign Exporter, the Importer/Transporter, and the Florida Department of Environmental Protection of the location of the Hazardous Waste and the need to arrange return shipment.

**I. Physical Custody**

Entities that will have physical custody of the Hazardous Waste from Load Port to Receiving Facility, in sequence:

- 1.
- 2.
- 3.

Add others in Notes, if necessary.

NOTES:

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**J. Legal Control**

Entities that will have legal control of the Hazardous Waste from Load Port to Receiving Facility, in sequence:

1. Foreign Exporter;
2. Importer/Transporter;
3. Receiving Facility;

Add others in Notes, if necessary.

NOTES:

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**J. GOVERNING LAW.**

This **HAZARDOUS WASTE IMPORTATION AGREEMENT AND MOVEMENT DOCUMENT** shall be governed by the laws of Florida, United States of America, without regard to any choice of law principles or laws.

**K. COUNTERPARTS.**

This **HAZARDOUS WASTE IMPORTATION AGREEMENT AND MOVEMENT DOCUMENT** may be executed in two or more counterparts, each of which will be deemed an original, but all of which together will constitute one and the same instrument.

By signing below, I agree to the **HAZARDOUS WASTE IMPORTATION AGREEMENT AND MOVEMENT DOCUMENT**, acknowledge that it is part of a valid written contract, the Agreement, and state that all persons assuming obligations on behalf of my Company have the appropriate legal status to conduct the operations specified in the Agreement and this **HAZARDOUS WASTE IMPORTATION AGREEMENT AND MOVEMENT DOCUMENT**, and that the information in the **HAZARDOUS WASTE IMPORTATION AGREEMENT AND MOVEMENT DOCUMENT** is complete and correct.

For Foreign Exporter:

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_

Date: \_\_\_\_\_

For Receiving Facility:

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Company: \_\_\_\_\_

Date: \_\_\_\_\_

For Importer/Transporter:

Printed Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Title: \_\_\_\_\_

Company: Tropical Shipping and Construction Co.

Date: \_\_\_\_\_

**MOVEMENT DOCUMENT**  
(Completed During Shipment)

**Date Movement Commenced:**

**Signatures for Each Custody Transfer**

From Foreign Exporter to Importer/Transporter

Date:

Foreign Exporter (Company):

Signature:

Name:

Title:

Importer/Transporter (Company):

Signature:

Name:

Title:

From Importer/Transporter to Receiving Facility

Date:

Importer/Transporter:

Signature:

Name:

Title:

Receiving Facility

Signature:

Name:

Title:

Other Custody Transfers (describe change of custody and provide date and signatures):

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# HAZARDOUS WASTE TRANSFER FACILITY INSPECTION

Year: \_\_\_\_\_

Weekly Inspections of Transfer Facility Site - PPB

Month	Inspector	Date	Time	Leaks/ Spills (Yes/No)	Area Clean ( Yes/No)	Description of Cleanup or Repairs (If required)
<i>January</i>						
<i>February</i>						
<i>March</i>						
<i>April</i>						
<i>May</i>						
<i>June</i>						

<i>July</i>						
<i>August</i>						
<i>September</i>						
<i>October</i>						
<i>November</i>						
<i>December</i>						

# CENTRAL ACCUMULATION AREA INSPECTION

Weekly Inspections of Containers Stored for Disposal

Month	Inspector	Date	Leaks/ Spills (Yes/No)	Labels (Yes / No)	Area Clean ( Yes/No)	Description of Cleanup (If required)
<i>January</i>						
<i>February</i>						
<i>March</i>						
<i>April</i>						
<i>May</i>						
<i>June</i>						

<i>July</i>						
<i>August</i>						
<i>September</i>						
<i>October</i>						
<i>November</i>						
<i>December</i>						

