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To: [Lancellotti, Romina](#)
Cc: [Dean Beitler](#)
Subject: Tropical Shipping HW SOP
Date: Tuesday, June 16, 2020 3:09:16 PM
Attachments: [Tropical Shipping Hazardous Waste Shipping SOP v3.pdf](#)

Good afternoon Romina,

Attached please find our SOP for the transport of Hazardous Waste. Thank you for working with us and allowing time to develop such an extensive plan. If you have any questions or would like to discuss this SOP I am at your service.

Respectfully,

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Tropical Shipping Hazardous Waste Shipping SOP-PPB

A shipment of Resource Conservation and Recovery Act (RCRA) hazardous waste (HW) from any foreign country 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 or Non-HW shipment must be scanned into Doc Register in T-Link for tracking and record retention requirements.

1. Hazardous Material (HM), Hazardous Waste (HW) and Non-Hazardous Waste (Non-HW) shipments are to be coordinated through a member of the Tropical Shipping Hazmat Specialist Team. A list of the Tropical Shipping Hazmat Specialist Team and PPB Operational Team members is in Appendix B of this SOP.
 - a. Hazmat Specialist Team will work with the Safety Department and Tonnage center for shipments not covered by the Acceptance/Non-Acceptance charts or on the Hazmat Quick Tips document.
 - b. Hazmat Specialist Team must issue approval prior to acceptance of shipment.
2. Shipper to forward a copy of the letter of consent (LOC) from the US EPA for the HW generator to be stored in Partner for future reference.
 - a. Note: A LOC is only valid from 1 year from issuance.
3. Shipper to forward a copy of the approval letter from the HW receiving facility to be stored in Doc Register for each shipment. (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 for HW and Non-HW.
6. Shipper to forward a completed copy of the Hazardous Material Declaration, Bill of Lading and Proforma and Uniform HW/Non-HW Manifest Form if not attached to cargo.
7. Shipper to forward a completed copy of the Certificate of Compliance with Toxic Substances Control Act to be submitted to CBP.

8. Hazmat Specialist Team Member to clear the HW Shipment to sail once items 1-7 have been satisfied. Tropical will now accept cargo for carriage.
9. 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. (If Tropical is not Transporter 1 then operations shall complete the applicable sections such as Transporter 2)
10. The Hazmat Specialist Team Member managing the shipment must inspect the Uniform HW or Non-HW Manifest to ensure all sections are complete and accurate. See below Uniform HW Manifest Form section description in Appendix A.
11. The Hazmat Specialist Team must ensure the HW Cargo leaves the Port of Palm Beach within 24hrs of HW Cargo being discharged from the vessel. Non-HW Cargo has no storage time limitation.
12. Shipper to forward notice of the completed Uniform HW/Non-HW Manifest EPA Form to the Hazmat Specialist Team to be scanned into T-Link in the original shipment.
13. Shipment complete.

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/Non-HW shipment.
2. Operations to confirm receipt of HW/Non-HW shipment with Hazmat Specialist Team.
3. Operations to retrieve the original Uniform HW/Non-HW Manifest EPA Form from the HW/Non-HW shipment's storage device located on the ISO Tank holding the HW.
4. If the Uniform HW/Non-HW Manifest EPA Form is not attached the HW/Non-HW cargo then confirm with Hazmat Specialist Team to the whereabouts of the Uniform HW/Non-HW Manifest EPA Form.
5. 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. (If Tropical is not Transporter 1 then operations shall complete the applicable sections such as Transporter 2)
6. Operations to confirm with Hazmat Specialist Team member of documentation completion and then position HW/Non-HW shipment onto outbound equipment.
7. HW shipment should not be held onsite longer than 24hrs. The Shipper must collect the HW shipment well before this time. Non-HW has no storage time limitation.
8. Shipment complete.

Alternate Transport Plan

1. If, while in physical possession or actual control of the HW shipment the disposition of the HW Shipment cannot be carried out as described in the notification of intent to import for any reason, notify the customer/foreign exporter, and the Florida Department of Environmental Protection of the location of the HW Shipment and the need to arrange return of the HW shipment as soon as possible by either:
2. Promptly reloading the HW shipment onto the vessel and returning to the shipper, or
3. An alternative HW Certified transporter must be sourced removing the HW Shipment from the Port of Palm Beach.

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.

Appendix B

Tropical Shipping Hazmat Specialist Team Members

- Jesenia Cruz
- Tyler Higgins
- Jasmine Kurszewski
- Darryl Ricks
- Patti Bochniak
- Malinda Karashin
- Ryan Doyle (Support)
- Matthew King (Support)

PPB Operational Members

- Ed Shoemaker
- Grace Judge
- Brian Mungal
- Claude Clevinger