From:	Lancellotti, Romina
To:	Matthew King
Cc:	Tischler, Tarin
Subject:	RE: Tropical Shipping & Construction Co Ltd (EPAID FLR000095737) - Exit Interview
Date:	Tuesday, November 16, 2021 5:14:00 PM
Attachments:	image010.png image011.png image012.png image013.png

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I really appreciate it. Please let me know if anything. Thank you!

Romina Lancellotti
Environmental Specialist II
Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Romina.Lancellotti@floridadep.gov
Office: 561.681.6624

From: Matthew King <mking@tropical.com>
Sent: Tuesday, November 16, 2021 4:58 PM
To: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>
Cc: Tischler, Tarin <Tarin.Tischler@FloridaDEP.gov>
Subject: RE: Tropical Shipping & Construction Co Ltd (EPAID FLR000095737) - Exit Interview

EXTERNAL MESSAGE
This email originated outside of DEP. Please use caution when opening attachments, clicking links, or responding to this email.

Romina,

Thanks for stopping by last week and helping to ensure we are on the right track. We are wrapping up and organizing the paperwork as we speak. As soon as we are done I'll send you everything via email, drop box or a flash drive via FedEx (#SaveTheTrees). In the interim let me know if I can do anything else. Take care and be safe!

Matthew S. King CSP, SMS I Health, Safety & Environmental Manager I Tropical Shipping I 501 Avenue P I Riviera Beach, FL 33404
P: (561) 882-2556 I email: mking@tropical.com I **www.tropical.com**

Click to submit an Accident Prevention Item (API) – Nearmiss, Unsafe Act or Unsafe Condition.

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This information is intended to provide interpretative information in regard to the subject matter covered as a service to our clients and has been answered to the best of our ability based on the information provided to us. We do not guarantee the accuracy or completeness of any such interpretation or information, nor do we warrant that compliance with any advice we provide will guarantee compliance with any legal or regulatory requirements. Our statements or opinions do not convey legal interpretation and government authorities or legal counsel should be contacted for such a response.

From: Lancellotti, Romina <Romina.Lancellotti@FloridaDEP.gov>
Sent: Friday, November 12, 2021 5:59 PM
To: Matthew King <mking@tropical.com>
Cc: Tischler, Tarin <Tarin.Tischler@FloridaDEP.gov>
Subject: Tropical Shipping & Construction Co Ltd (EPAID FLR000095737) - Exit Interview

Notice: This email originated from outside the TSC network.

Good afternoon Matt,

This email serves as a follow up to the hazardous waste compliance evaluation inspection conducted on November 4, 2021 by the Florida Department of Environmental Protection (FDEP). Thank you and your team for taking the time to conduct the walkthrough and records review of Tropical Shipping & Construction Co. Ltd., located at 5 E 11th Street, Riviera Beach, FL 33404-6920. As discussed during the inspection, the facility is required to submit the following documentation/information to the Department:

1. Financial Responsibility 62-730.170(3) F.A.C.: Please provide your current Certification of Liability Insurance that covers pollution liability.
2. Identification of drums content: During the inspection, the inspectors observed one unlabeled 275-tote, located adjacent to the "E-House/Port Maintenance" Building. Additionally, the inspectors observed twenty-four 55-gallon drums, located out of the "Marine and Engineering" Building. Within the twenty-four drums, the inspectors observed some unlabeled and mislabeled drums. Additionally, some containers were observed rusty and dent.
    a. Please identify and describe the content of each container mentioned above.
    b. For containers with used oil, please label, provide secondary containment, and provide a photographic evidence to the Department.
    c. For drums containing used oil filters, please label them, and provide a

photographic evidence to the Department.

   d. For damaged containers holding used oil, used oil filters, and potentially hazardous waste, please replace the containers and provide a photographic evidence to the department.

3. Labeling: The inspectors observed one unlabeled 55-gallon container of used oil filters, and one mislabeled 55-gallon drum of use oil filters with the words “filters.” Please label these containers with the words “Used Oil Filters” and provide a photographic evidence to the Department.
4. Universal Waste lamps: The inspectors observed 4 unlabeled and open boxes containing spent mercury lamps. Please close and secure the boxes to prevent breakage and leakage, label the boxes with the words ““Universal Waste - Lamp(s),” or “Waste Lamp(s),” or “Used Lamp(s)”.,” and accumulation start date. Provide photographic evidence to the Department.
5. Identify content of drum: The inspectors observed one 55-gallon drum labeled “nonhazardous waste,” located in the central accumulation area. Please identify the content of the drum.
6. Shipment records: Please provide shipment or disposal records for used oil, used oil filters, spent solvent, oily rags, oily water, dry sludge, spent mercury lamps, spent lead acid batteries, scrap metal (few samples), and hazardous waste (if any), since 02/12/2020.
7. Training: Please provide training records of Tropical associates involved in the transportation activities of hazardous wastes.
8. Tanks removal: During the inspection, Tropical representatives informed that the facility ceased the use of one 20,000-gallon UST of Diesel, and one 10,000-gallon UST of Gasoline to be replaced by one 15,000-gallon AST and one 5,000-gallon AST, respectively. Please explain when the facility stopped using the USTs, how the facility plans to clean and close the UST, and when is this scheduled. Please note that the still bottoms or residues in the USTs may contain hazardous constituents, such as Benzene or Lead, therefore, the facility shall conduct a hazardous waste determination for the rinsewaters and residues generated when closing the tanks. If the facility generates more than 2,200 pounds of hazardous waste, should apply for a planned Episodic Event 30 days prior to the event.
9. Spill of alcohol: In August, 2021, the Department received a report from Tropical notifying a rail car incident which resulted in the spill of “food grade” alcohol. Please provide a brief description of what occurred, how Tropical responded, cleanup activities, and disposal records of waste generated from the incident.

Please submit the requested information by **(11/30/2021).** If you have any additional questions or concerns, please feel free to contact me via email or at the phone below.

Kind regards,

Romina Lancellotti
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Florida Department of Environmental Protection
Southeast District – West Palm Beach
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West Palm Beach, FL 33406
Romina.Lancellotti@floridadep.gov
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Dep Customer Survey