UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IV
345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

Mr. Charles Dudley
General Manger
Industrial Water Services, Inc.
P.O. Box 43369
Jacksonville, Florida 32203

Reference: EPA Contract No. 68-W9-0040; Work Assignment No. R04-21-05; Industrial Water Services, Inc.; Jacksonville Florida; EPA I.D. No. FLD981928484; VSI Notirication Letter and Agenda

Dear Mr. Dudley:

The Environmental Protection Agency Region IV is conducting a RCRA Facility Assessment (RFA) of the Industrial Water Services, Inc. facility in Jacksonville, Florida on April 29, 1992. The Hazardous and Solid Waste Amendments (HSWA) of 1984 provide EPA authority under RCRA to require comprehensive corrective actions on releases of hazardous constituents to air, surface water, soil, and ground water at all facilities which manage hazardous wastes. The RFA includes a review of the pertinent files at the Regional and State offices, as well as a Visual Site Inspection (VSI) of the facility, and, if necessary, a Sampling Visit.

The objectives of the VSI are to identify all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) located at the facility in order to determine their potential for past or ongoing releases of hazardous constituents. The VSI will be conducted by an EPA contractor under the above-referenced contract.

Attachment A is a tentative agenda and inspection plan for the VSI. The agenda also includes a list of the potential SWMUs and AOCs identified from the file material during the preliminary review. Attachment B is a summary of information needed in order to fill in information gaps which have been identified to date.

Please develop a response to each of these questions listed in Attachment B of the VSI agenda. We wish the RFA Report to reflect only accurate information regarding your facility. It is requested that the responses should be presented to the VSI team during the VSI. The attachments will be reviewed with

facility personnel at the beginning of the VSI in order to facilitate the actual inspection. At that time the VSI schedule will be adjusted as needed to allow a complete, thorough, and expeditious inspection of all current and past SWMUs, and a review of current waste management practices at the facility. The inspection will encompass all current and past waste handling, storage, treatment, staging, transfer, and disposal areas including both indoor and outdoor units. During the VSI, photographs will be taken to document the condition and location of all SWMUs and AOCs identified during the VSI, and facility waste management practices in general.

In preparation for the VSI, the contractor is required to identify any potentially hazardous conditions likely to be encountered during the VSI, and if necessary, prepare a safety plan to deal with anticipated hazards. The contractor will contact you prior to the VSI in order to obtain specific information on health and safety requirements at your facility, and specific information on the materials handled there.

The VSI team will consist of two technical representatives from A.T. Kearney. Personnel from state and federal agencies may also join the VSI.

If you have any questions concerning the VSI, please contact the EPA Work Assignment Manger, Mr. Hugh Hazen who can be reach at (404) 347-3433.

Sincerely,

G. Alan Farmer
Chief, RCRA Branch
Waste Management Division

Enclosure

cc: R. Sheffield
H. Hazen
W. Jordan, ATK
L. Poe, ATK
D. Turner, ATK

# ATTACHMENT A

## PROPOSED RCRA VISUAL SITE INSPECTION AGENDA

**Facility:** Industrial Water Services, Inc.
Jacksonville, Florida

**EPA I.D. No.:** FLD981928484

**Facility Contact:** Mr. Charles Dudley
(904) 354-0372

**Date of Inspection:** April 29, 1992

**Inspection Team:** Jim Ashworth
Jasmine Schliesmann
Hugh Hazen

## OBJECTIVES OF VISUAL SITE INSPECTION

The Hazardous and Solid Waste Amendments (HSWA) of 1984 broadened EPA's authority under RCA to require corrective action for releases of hazardous wastes and solid wastes containing hazardous constituents at facilities which manage hazardous wastes. This corrective action authority extends to all Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) which are found at a facility. The first phase of the program is the performance of a RCRA Facility Assessment (RFA). The RFA process consists of a number of steps, including a Preliminary Review (PR) of all available file information, a Visual Site Inspection (VSI) of the facility, and if deemed necessary, a Sampling Visit. A PR of this facility has been conducted and it has been determined that a VSI is necessary. The purpose of the VSI is:

1. To collect all available, relevant information on solid waste management practices that have been used, or are currently in use at the facility;

2. To gain first-hand information with regard to the identification, location, construction, function and method of operation of each SWMU identified in the PR, and any other SWMUs located during the course of the VSI;

3. To validate the information obtained during the PR phase;

4. To determine if additional SWMUs or AOCs are located on the site;

5. To identify potential sampling points for possible future sampling activities;

6. To review the site information and collect additional information, and to address the information needs found in Attachment B; and,

7. To make a photographic record of the SWMUs and AOCs, and the current waste management practices at the facility.

**INSPECTION PLAN AND SCHEDULE**

EPA's contractor, A.T. Kearney, will send a two-person field team to perform the VSI. Observers from EPA Region IV, and the Florida Department of Environmental Regulation may also participate in the inspection. It is expected that the inspection will take one day to perform. However, the field team is prepared to extend the VSI through April 30, 1992 if necessary.

The field team will inspect all past and current SWMUs and AOCs, and all hazardous waste handling, storage, treatment, and disposal areas on the site. Both indoor and outdoor units will be inspected. Production and product storage areas will also be inspected in order to acquire a complete understanding of the facility processes, water flow, and water management practices. The team will also identify, inspect, and document potential pathways for the release of hazardous constituents or waste to the environment. Facility staff will be interviewed to develop a better understanding of past and current waste management practices, and the local environment (particularly, geological and hydrogeological information requested in Attachment B). At this time the facility may present any additional data which they believe may be germane.

The rationale for the inspection is to allow the team to trace waste flow at the facility from the point(s) of generation to its ultimate disposal. In doing this, all SWMUs will be identified, located, and described in sufficient detail to allow a determination to be made as to whether they are currently, or have in the past, released hazardous constituents or wastes to the environment.

The schedule on the next page is based on the initial PR and is intended to allow for a thorough inspection of the facility. Further investigation during the VSI may reveal additional SWMUs, or that some units previously identified are in fact not SWMUs. Some adjustments to the agenda will more than likely be necessary and/or operational constraints. The schedule will be reviewed during the introductory meeting, and adjusted at that time. The VSI team will make every reasonable effort to adjust to the facility's normal operating schedule.

# PROPOSED VSI SCHEDULE

**April 29, 1992**

| TIME | ACTIVITY |
|---|---|
| 8:30 - 8:45 | Introductory meeting with facility representatives; discuss agenda, safety and health considerations, information needs, transportation arrangements. |
| 8:45 - 12:00 | Detailed discussion of information needs, past and present facility operations, waste streams, and waste management practices. Identify any SWMUs and AOCs not in tentative list, resolve any other problems with SWMUs and AOCs. |
| 12:00 - 1:00 | Lunch Break |
| 1:00 - 4:00 | Begin facility tour of SWMUs and AOCs. |
| 4:00 - 5:00 | Closeout meeting with facility representatives. Discuss additional information needs generated by VSI. Obtain copies of any facility offered information. |

**April 30, 1992**

Reserved, if additional time is needed. To be determined by VSI Team Leader.

**TABLE 1**
**POTENTIAL SWMUs and AOCs**

1. Facility storage tanks (A, B, C, D, E, F and/or tank 6)
2. Parallel plate separator
3. System piping and pumps
4. Hazardous waste strainer baskets
5. Hazardous waste drum container storage area
6. Facility storage tank truck loading/unloading areas
7. Discharge tank (tank 9)
8. DAF unit
9. Oil treatment area
10. Oil holding tank (tank 5)
11. Treated wastewater tank (tank 7)
12. Dewatering treatment tank (tank 16)
13. Centrifuger for DAF solids
14. Roll-off container (for DAF solids)
15. Laboratory generated hazardous waste
16. Dumpsters

**ATTACHMENT B**
**RFA INFORMATION NEEDS**

1. Provide description of waste management practices, dates implemented, and any changes in these practices.

2. Provide type and volume of waste generated.

3. Provide most recent biennial report.

4. Provide surrounding land use information (e.g., distance to population centers).

5. Provide description of drum storage area:

   - Location
   - Type and volume of waste
   - Secondary containment
   - Frequency of pick-up for disposal/treatment
   - Treatment/disposal method

6. For each accumulation area, provide:

   - Description
   - How long was waste normally stored
   - Secondary containment
   - Type and number of containers
   - Type waste generated
   - Waste management procedures
   - Spill/release history

7. For each SWMU and AOC listed, please give:

   - Date unit began operating
   - Date operations ceased (if applicable)
   - Dimensions of unit
   - Location of unit in facility
   - Description of waste handled
   - Unit function
   - Source and destination of waste managed
   - Volumes of waste handled
   - Release controls
   - History of release
   - Whether unit is in the 100-year flood plain
   - Inspection and maintenance procedures to assure unit integrity

8. Provide information on any spills or accidental fires which have occurred, including:

   - Date(s) of spill(s)
   - Type and volume(s) and/or fire(s)
   - Location(s)
   - Notification report(s)
   - Description of clean-up activities including any sampling results

9. Does the facility generate any waste oil? If so, how is this waste handled?

10. Please provide information concerning the number of potable water sources within a one-mile radius of the facility. Where does the city of Jacksonville, Florida get its drinking water? Are there any existing streams, intermittent streams, or surface waters within a one-mile radius of the site? Where does the facility obtain its drinking and process water?

11. Estimate the population of Jacksonville, Florida and identify any endangered species which may live in the area.

12. If available, provide an up-to-date large scale topographic map of the facility.

13. Provide a site map of suitable scale to show boundaries of all contiguous property which can be used to show the locations of the SWMUs and AOCs on the property.

14. Provide copies of any historical aerial photographs of the facility.

15. Identify the former location(s) of any process units and provide other relevant information (i.e., waste managed, operating and design information). This includes active units and units which have been closed or abandoned.

16. Are there any existing or former underground storage tanks at the facility? If so, provide inspection reports if available.

17. Do facility personnel perform onsite vehicle maintenance? If so, how are these wastes handled?

18. What types of laboratory tests are conducted at the facility, and how are these wastes handled?

19. Please provide a current flow diagram of all the processes.

20. Provide any recent sampling results:

- Ground water
- Soil
- Waste streams

21. Provide sanitary, stormwater, and industrial sewer maps.

22. Provide information from any soil borings performed at the facility and any hydrogeological studies performed there.

23. Explain the NPDES permit status of the facility. Provide the results of the most recent compliance monitoring test results and documentation of any violations.

24. Provide a list of any air pollution control devices utilized at the facility and provide the most recent permit and permit applications.

25. Identify past or present SWMUs and AOCs which have not been identified in the VSI Agenda. Include a brief description of the wastes managed in these units, the period of operation, and a physical description. Units include, but are not limited to, the following:

- Aboveground and underground waste storage tanks
- Abandoned storage tanks
- Waste storage units for solid and hazardous wastes which fall under the 90-day exemption from RCRA
- All waste handling areas and associated activities including loading zones, transfer areas, and waste accumulation areas
- Runoff collection sumps

26. Provide the start-up date of the facility and submit a history of the facility prior to the start-up date, including former owners, site uses, manufacturing processes used, waste generated, and existing buildings and/or structures.

27. How are domestic refuse and sanitary wastes handled at the facility?

28. Provide copies of all current Federal and State permits granted.