



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Univar Solutions USA Inc

On-Site Inspection Start Date: 07/30/2024

On-Site Inspection End Date: 07/30/2024

ME ID#: 50189

EPA ID#: FL0000596866

Facility Street Address: 155 Ellis Rd S, Jacksonville, Florida 32254-3546

Contact Mailing Address: 155 Ellis Road, Jacksonville, Florida 32254

County Name: Duval

Contact Phone: (425) 324-1275

NOTIFIED AS:

LQG (>1000 kg/month), Transporter, Used Oil

WASTE ACTIVITIES:

Generator: LQG **Transporter:** Own Waste, Commercial Waste **Used Oil:** Transporter **Universal Waste:**

Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Mercury Containing Lamps **Transport:** Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter Facility

Routine Inspection for Used Oil Transporter Facility

Routine Inspection for LQG (>1000 kg/month) Facility

INSPECTION PARTICIPANTS:

Principal Inspector: Cheryl L Mitchell, Inspector

Other Participants: Rachel Randall, Operations Supervisor I

LATITUDE / LONGITUDE: Lat 30° 19' 24.8286" / Long 81° 44' 32.9217"

NAIC: 424690 - Other Chemical and Allied Products Merchant Wholesalers

TYPE OF OWNERSHIP: Private

Introduction:

Univar Solutions USA, Inc. (Univar, the facility) was inspected on July 30, 2024. Univar was last inspected by the Department's hazardous waste program on August 13, 2020. The facility last notified the Department as a Hazardous Waste Transporter and Transfer Facility; a Used Oil and Used Oil Filter Transporter and Transfer facility; a Universal Waste Transporter and Transfer facility; and a Large Quantity Generator (LQG) of hazardous waste. Ms. Rachel Randall (Operations Supervisor) was present throughout the inspection.

The facility is currently operating as a an LQG of hazardous waste. Ms. Randall stated that at the end of 2023, this Univar facility ceased operating as a Hazardous Waste Transporter, Used Oil and Used Oil Filter Transporter and Transfer facility, and Universal Waste Transporter and Transfer facility.

Univar is a distributor of chemicals and industrial solvents. The facility operates Monday through Friday, 8:00 AM to 5:00 PM, and infrequently on weekends if workload requires. Univar has been in operation at this location since 2001, has 20 employees and operates seven tractors and four box trucks. The facility is connected to city water and sewer. The areas inspected are described below.

Process Description:

The Warehouse, Storage Yard, Tank Farm and Rail Car Area are used to store industrial chemicals including solvents, corrosives, and, less frequently, pharmaceutical powders for distribution. The facility receives product from the manufacturer through rail car and tanker truck, and redistributes them to its customers in totes or drums. Hazardous waste is generated at the facility if a product container leaks or breaks, a product exceeds its shelf life, is off-specification, or when any tank lines/sumps are flushed.

Inspection Date: 07/30/2024

WAREHOUSE

Products such as isopropyl alcohol, caustics, buffers, acids, and pharmaceuticals are stored in the Warehouse. Inside the Warehouse, the facility has a Lab, a <90-Day Hazardous Waste Accumulation Area (HWAA), and the former Hazardous Waste Transfer Area.

LAB

Univar operates a quality assurance lab to test products upon arrival to the Warehouse. The lab is located outside the administrative offices in a room off the main floor of the Warehouse. The lab performs various quality tests of the products that Univar receives and distributes including specific gravity, alcohol content, water content tests to determine whether the raw product is within control parameters. At the end of the work shift, any remaining sample waste is transferred to an appropriate 55-gallon satellite accumulation drum located adjacent to the lab.

Product "Retain Samples" are kept in flammable lockers for a period of six months to three years based on the specific manufacturer quality parameters for each type of product. The flammable lockers are located inside the Warehouse near the Lab (Photo 1). At the end of the retain timeframe, the lab technician transfers the samples to the Tank Farm area for screening to determine whether the product can be bulked with similar products for distribution to customers, or cannot be reused and managed as hazardous waste. Frequently, samples of food-grade products may not be reused for food-grade products, but may be used for technical grade products. If the samples cannot be reused the waste is transferred to a satellite accumulation container located in the Tank Farm described below.

<90-DAY HAZARDOUS WASTE ACCUMULATION AREA (HWAA)

This area is located in the northwest corner of the Warehouse. At the time of the inspection, there were four 250-gallon totes of D002 waste hypochlorite liquid, one 55-gallon drum of D001 waste ignitable liquid, one 'Starpac' fiberpack of non-hazardous waste corrosive solids, and two 55-gallon drums of non-hazardous waste empty sample jars in the area (Photo 2). All the containers were closed, properly labeled and had been accumulating for less than 90 days. There was adequate emergency equipment in the HWAA and a No Smoking sign was posted in the area.

HAZARDOUS WASTE TRANSFER AREA

Prior to the end of 2023, the facility received hazardous waste that was being transported by Univar Solutions USA The Woodlands (Univar Woodlands, TXR000084869) while it was in transit. The facility did not operate as a Hazardous Waste Transfer Facility and only stored the waste inside the Warehouse for less than 24-hours until it was shipped to the next transporter or disposal facility. Ms. Randall stated that the facility ceased holding hazardous waste during Univar transfer operations at the end of 2023 so this former area is now used for product storage/staging.

STORAGE YARD

The Storage Yard is located outside and to the north of the Warehouse. The Storage Yard is an open bay area used to store some types of products and empty containers to be used for products shipped to customers. There were several pallets of drums and totes of product waiting to be shipped to customers. There were also empty drums and totes stored in this area that will be filled with product or sent for reconditioning. No hazardous waste is generated in this area.

TANK FARM

The main Tank Farm is located outside and to the north of the Warehouse within an open bay warehouse (Photo 3). The Tank Farm warehouse holds 35 aboveground, single-walled tanks, separated into two bays, and a truck loading bay. Flammable products are stored in Bay 1, and corrosive products are stored in Bay 2. Each

Inspection Date: 07/30/2024

tank is located within secondary containment; the majority of the tanks, including four bulk tanks located outside the Tank Farm, are empty and no longer in use. Satellite accumulation areas (SAA) are located within the main aisle between the bays where containers are filled and are used for waste liquids and debris typically generated during line flushes for the tanks. At the time of the inspection, there was one 55-gallon D002 hazardous waste satellite drum and one 55-gallon D001 hazardous waste satellite drum in the area. The drums were closed and properly labeled, and staged at different SAA locations adjacent to the respective tanks within the bay. In this same area were two 55-gallon non-hazardous waste drums that are used to collect the empty retain sample jars, and two 55-gallon non-hazardous waste drums for oily waste debris. There was adequate emergency equipment in the SAAs and a No Smoking sign was posted.

RAIL CAR AREA

This area is located to the northeast of the main Warehouse and east of the Tank Farm warehouse. Products arrive on rail cars that are parked in this area until the product is offloaded to tanker trucks. During offload, the operators place 5-gallon buckets underneath the hose connections to collect any drips when the hoses are disconnected. Any waste that is collected is transferred to the appropriate SAA container in the Tank Farm based on the type of product in the rail car. At the time of the inspection, several rail cars were parked in this area. No waste was observed in the area, and no stained soils or evidence of spills were observed at the time of the inspection.

RECORDS REVIEW

Univar transports its wastes under the generic Univar Woodlands ID#TXR000084869. Facility-generated hazardous wastes and non-hazardous wastes are primarily shipped to US Ecology Tampa (FLD981932494) or Tradebe Treatment and Recycling (TND000772186). Used oil and used oil filters are primarily shipped to VLS Environmental Solutions (GAD109263467).

A review of the facility's records included disposal manifests, hazardous waste logs, used oil and used oil filter logs and annual reports, the certificate of liability insurance, Contingency Plan, Quick Reference Guide, emergency arrangements, employee training, and weekly container inspection logs. Univar's registration certificates were posted at the facility. All records reviewed appeared to be in order.

PHOTO ATTACHMENTS:

Photo 1



Photo 2



Photo 3



Photo 4



Inspection Date: 07/30/2024

1.0: Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)			✓
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11			✓

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Cheryl L Mitchell
Principal Investigator Name



Principal Investigator Signature

Inspector
Principal Investigator Title

DEP	10/07/2024
Organization	Date

Rachel Randall
Representative Name

Operations Supervisor I
Representative Title

Univar Solutions
Organization

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

Report Approvers:

Approver:	Cheryl L Mitchell	Inspection Approval Date:	10/07/2024
-----------	-------------------	---------------------------	------------