

From: [Jim Hollingsworth](#)
To: [Evans, Coral A](#)
Cc: [SWD_HW](#); [McNeil, Anne](#); [Megan Skeen](#)
Subject: Self-Disclosure & Guidance
Date: Monday, February 24, 2025 7:02:02 PM
Attachments: [image001.png](#)
Importance: High

EXTERNAL MESSAGE

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Re: Self-disclosure and Guidance
Characteristic Wastewater Release
Aqua Clean Environmental
FLR000034033

Dear Coral:

Thank you for your assistance today. As follow up to our conversation, please note the following:

Summary:

Our facility is a non-hazardous industrial solid waste and wastewater processing facility located in Polk County, FL. We also operate as a Very Small Quantity Generator (VSQG) and used oil processor under the hazardous waste rules.

On February 20, 2025, our driver picked up a customer's wastewater described as non-regulated wastewater. The load was parked at our facility in Lakeland. Subsequently on February 22, 2025, the tanker in which the wastewater was held failed and released the entire contents (approx. 5400 gallons) to the gravel parking area before the team was able to formal assess/accept and manage the shipment. The event prevented the non-conforming materials from being rejected back to the generator as would be normal practice after check-in and testing and resulted in a release and response at the facility.

An immediate response to the release was initiated by the site team to control the release which was limited to the gravel parking area and an adjacent ditch. The discharge from the ditch was secured by creating a collection area to prevent further migration and vacuum trucks were used to collect free-liquids. On inquiry with the wastewater generator, the likely presence of sodium hydroxide in the wastewater was discovered and site non-certified testing indicated a pH of 11-12 pH units in the spilled liquids. The release was reported to the National Response Center (Report 1424179) for RQ release of sodium hydroxide. Response measures included collection and containment of free liquid by vacuum truck and scraping of affected gravel and soil impacted areas and placing soil/gravel into lined roll off bins.

On February 24, 2025, a sample of the collected liquid was submitted for confirmatory analysis and the pH found to be approximately 13.3 pH units, noting that this condition would meet the definition of a D002 hazardous waste. No other potential for hazardous waste characteristics has been identified in the materials but a TCLP was also requested from the lab with results pending.

Disclosure and Action Plan:

Given the discovery of pH >12.5 pH units on confirmatory pH testing, the need for disclosure notification to Florida DEP was initiated to notify of the possession and loss of containment for the D002 wastewater. The issues at hand discussed with DEP indicated the voluntary disclosure of the incident and related determination that the waste met the D002 characteristic waste determination. In addition to the disclosure, clarification and concurrence was established that elementary neutralization would be an acceptable de-characterization/waste management practice and can be performed by the generator in Florida without any additional permit or authorization. This decision was based on the knowledge and belief that the materials would not present any hazardous waste characteristic code except for D002 characteristic and would also not contain any regulated level of UHCs requiring additional treatment. Therefore, the plan is that the collected wastewaters, and any remediation wastewaters will therefore be treated by elementary neutralization as needed to remove the characteristic and discharged through the POTW permitted wastewater system. Spill cleanup soils/solids, which as solids do not meet the characteristic definition will be managed in a solid waste landfill. Given no off-site shipments of hazardous waste are anticipated to manage a hazardous waste, it was agreed that no need for VSQG notification of episodic generation to DEP and subsequent management of the waste under an episodic event would be necessary or appropriate.

We thank you for the timely assistance with helping us to resolve this matter in an environmentally sound and responsive manner. Trust that we will work to fully understand the causes and contributing factors to establish a plan to prevent future such incidents. If you have additional questions or needs, please feel free to reach out.

Regards, Jim

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