

From: [Jim Hollingsworth](#)
To: [Evans, Coral A](#); [Lynch, Sean C](#)
Cc: [SWD_HW](#); [McNeil, Anne](#); [Megan Skeen](#); [Matthew Ashmore](#)
Subject: RE: Self-Disclosure & Guidance
Date: Tuesday, March 4, 2025 11:54:40 AM
Attachments: [image001.png](#)

EXTERNAL MESSAGE

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Status Update

Coral:

Thank for your assistance in dealing effectively and responsibly with this matter. I am copying Sean Lynch as an FYI as well, given that he made a follow up inquiry after we had spoken on this.

As an update, we have collected and containerized wastewater and impacted soils and are close to finalizing approval for disposal at the Cedar Trail Landfill in Bartow and plan to begin shipping this week. As indicated, liquids will be managed by elementary neutralization and processed through the POTW permitted wastewater system. Supporting of this plan is that sampling and analysis of the release materials did not identify any additional hazardous RCRA characteristics. The waste will therefore be managed as we have indicated prior. The gravel area affected will be backfilled with suitable stone fill and compacted. The adjacent soil area will be backfilled with suitable fill and amended with ag based amendments as needed to promote vegetative growth and seeded.

On completion of the response and follow-up, we will follow up with a formal report.

Thanks again for the assistance of your team. If you have additional questions or concerns, please reach out.

Regards, Jim

From: Jim Hollingsworth
Sent: Monday, February 24, 2025 7:02 PM
To: coral.a.evans@floridadep.gov
Cc: swd_hw@floridadep.gov; McNeil, Anne <AMcneil@republicservices.com>; Megan Skeen <mskeen@shamrockenviro.com>
Subject: Self-Disclosure & Guidance
Importance: High

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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