



FINAL CONTAMINATION SCREENING EVALUATION REPORT

Florida Department of Transportation
District Five

PROJECT DEVELOPMENT AND ENVIRONMENT STUDY
I-75 (SR 93) at NW 49 Street

Marion County, Florida
Financial Management Number: 435209-1-22-01
ETDM Number: 14242

OCTOBER 2020

The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by the Florida Department of Transportation (FDOT) pursuant to 23 U.S.C. §327 and a Memorandum of Understanding dated December 14, 2016, and executed by the Federal Highway Administration and FDOT.

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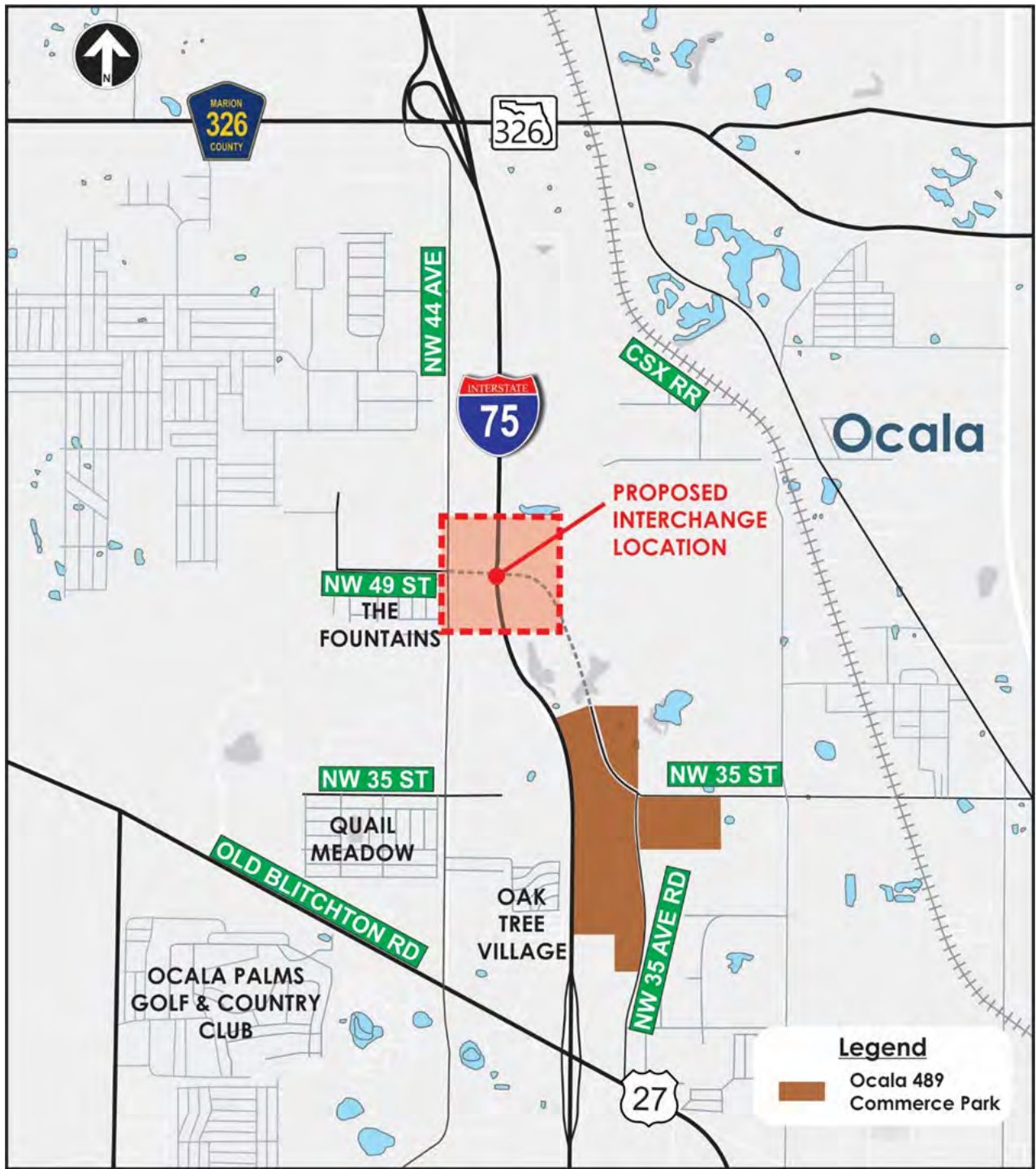
18 APPENDIX B: PHOTOGRAPHS AND SITE INFORMATION (MEDIUM- AND HIGH-RISK SITES)

1.0 INTRODUCTION

The Florida Department of Transportation (FDOT) in conjunction with Marion County is conducting a Project Development and Environment (PD&E) Study for a new interchange on Interstate 75 (I-75) at NW 49 Street, located just west of the City of Ocala in Marion County, Florida. The proposed interchange is needed to support the economic viability of the Ocala 489, a 489-acre industrial and commercial development, which is intended to serve as an economic engine for job creation in the region. This Contamination Screening Evaluation Report (CSER) has been prepared in accordance with the FDOT's *PD&E Manual, Part 2, Chapter 20 (Contamination Impacts)*, updated July 1, 2020, which incorporates the requirements of the National Environmental Policy Act (NEPA), and related federal and state laws. Using database reviews and field investigations, this report identifies and evaluates potential contamination issues and provides risk ratings in relation to the proposed project.

Within the project area, I-75 generally borders the City of Ocala, seat of Marion County in north central Florida. The greater Ocala area has recently experienced one of the highest growth rates in the country for a city its size, and the Marion County Comprehensive Plan outlines a vision to enhance the livability of its residents and promote economic growth in the region. In this vein, the County has designated approximately 3000 acres adjacent to I-75 as a future commerce park. The Ocala 489, located in this area has been established as a "Florida Enterprise Zone" and is composed of a recently constructed FedEx Ground Distribution Hub, Chewy distribution center, an AutoZone distribution center designated as a CSX Select Site, the Florida Crossroads Logistics Center, a Red Rock Development, and the remaining undeveloped sites. Development in this area will result in traffic volume increases along I-75 and the entire local roadway network.

Figure 1-1 depicts the project vicinity. There are two existing I-75 interchanges within the project vicinity. The I-75/US 27 interchange is located approximately 2 miles south of the proposed interchange, and the I-75/SR 326 interchange, approximately 2 miles to the north. A recently completed Interchange Justification Report (IJR) (October 2020) concluded that the existing I-75 interchange ramp movements and intersections at US 27 and at SR 326 are expected to operate at failing levels of service in 2035. A new I-75 interchange at NW 49 Street (approximately midway between the two existing interchanges) is proposed to relieve congestion on the adjacent interchanges. The western limit of this project is NW 44 Avenue (west of I-75) and the eastern limit is the future NW 35 Street extension to the northern end of limerock pit, just southeast of the new proposed interchange (Phase 2B). It should be noted that this proposed NW 35 Street extension (Phase 2B) will be constructed by the County and is funded for construction in 2021, so it will be completed prior to the interchange being constructed.



1
2

Figure 1-1 Location Map

1 **2.0 PROJECT PURPOSE AND NEED**

2 **PURPOSE**

3 The purpose of a new I-75 interchange at NW 49/35 Street is to relieve congestion on adjacent
4 interchanges by providing an alternate access to I-75 for the projected increase in truck
5 volumes resulting from the future commerce district.

6 **NEED**

7 The overall study was initiated with a detailed, comprehensive analysis of existing/projected
8 substandard conditions. In general terms, some of the most critical potential needs include:
9

10 ***Economic Viability and Job Creation***

11 The proposed interchange is needed to support the economic viability of the Ocala 489, a 489
12 acre industrial and commercial development, which is intended to serve as an economic engine
13 for job creation in the region and is envisioned as a strategic central inland hub for freight-
14 related traffic. The Ocala 489 has been established as a Florida Enterprise Zone, a designation
15 which provides numerous tax credits to businesses located within the Commerce Park. In
16 addition, this commerce park includes a site, recently developed by AutoZone, that was
17 designated as a CSX Select Site (the first in Florida). Select Sites are properties identified and
18 vetted as capable locations for future manufacturing facilities along the CSX rail network. FedEx
19 Ground, Florida Crossroads Logistics Center, and Chewy also completed new facilities within the
20 Ocala 489. Marion County has already made infrastructure improvements within the Park with
21 the extension of NW 35 Street as a divided four lane facility.
22

23 It should be noted that the Ocala 489 is zoned M-1/M-2 or Light/Heavy Industrial and the
24 businesses that are intended to occupy the commerce park will depend heavily on interstate
25 and regional movement to transport raw materials and finished goods, around the State and
26 beyond. In summary, due to its strategic location and incentives, the Ocala 489 and the
27 commerce district/employment center will provide needed jobs in the area.
28

29 ***Improve Interstate and Regional Mobility***

30 The proposed interchange will provide a more direct and efficient access to I-75 thus facilitating
31 interstate and regional mobility. As previously stated, I-75 is a vital north-south interstate
32 facility connecting six different states. From a regional perspective Marion County is
33 approximately midway between Miami and Atlanta and occupies a strategic location due to its
34 relative proximity to other important metropolitan areas such as Jacksonville, Orlando, and
35 Tampa. This strategic location coupled with the presence of a major interstate facility such as I-
36 75 makes this area a key potential hub for commercial industry. The proposed interchange is
37 thus needed to support the efficient movements of goods.
38

39 ***Address Locally Supported Long Term Regional Needs***

40 The proposed project is needed to provide important access to I-75 as part of a locally
41 supported long range vision to provide a future east-west corridor parallel to US 27 and SR 326.

1 This east-west corridor begins at NE 36 Avenue east of I-75 and Downtown Ocala and
2 terminates at NW 70 Avenue west of the proposed I-75 interchange. In conjunction with this
3 new east-west corridor is a connection to US 27 at NW 35 Avenue Road and at NW 60 Avenue.
4

5 The proposed I-75 interchange is currently listed as the number one (1) priority project on the
6 Ocala/Marion Transportation Planning Organization (TPO) FY 2025 Priority Projects List. The
7 County has completed a number of improvements in the area in support of the proposed
8 interchange and the Ocala 489, including extension of NW 35 Avenue Road. Phase 2A of the
9 NW 35 Avenue Road extension was recently completed by the County, Phase 2B is a Marion
10 County project currently in Final Design and programmed for construction in 2021, and Phase
11 2C is the connection between the proposed interchange and the future NW 35 Avenue Road
12 (Phase 2B) that will be completed as part of the proposed interchange.
13

14 ***Accommodate Future Traffic Growth***

15 As previously stated, one of the primary justifications for the new interchange is to
16 accommodate projected future year traffic volumes. Marion County has experienced a
17 significant and sustained growth in population since 1970. This significant growth rate is
18 expected to continue in the future. According to the currently adopted Central Florida Regional
19 Planning Model (CFRPM Version 6.1) socio-economic data for 2010 and 2040, the projected
20 population for Marion County is expected to grow from approximately 325,199 to over 490,204
21 in population by 2040. As a result of this population growth, traffic volumes are increasing and
22 will continue to increase in the future. As shown on **Table 2-1**, the proposed interchange will
23 result in a reduction in the design year (2045) traffic volumes on US 27 and SR 326, the two
24 contiguous I-75 interchange locations, as well as NW 35 Avenue Road, generally resulting in
25 reduced delays and improved levels of service.
26

27 It should be noted that the existing SR 326 interchange located north of the proposed
28 interchange would be a rather indirect option for trucks serving the Ocala 489, and therefore
29 most of the truck traffic associated with the Commerce Park would likely utilize the US 27
30 interchange, severely degrading operations and safety at the interchange throughout the day.
31 The need for the new interchange is based on projected traffic volumes in design year 2045
32 from build-out of not only the Ocala 489 but also the adjacent commerce district/employment
33 center totaling 5,000 +/- acres. It is projected from the CFRPM 6.1 model that build-out in
34 design year 2045 will add 25,000 daily trips to the roadway network with approximately 12%, or
35 3,000 vehicles, of which are projected to be trucks. As a result of this projected population
36 growth, traffic volumes are increasing and will continue to increase in the future.
37
38
39

1

Table 2-1 Projected Traffic Effects of the Proposed Interchange (Year 2045)

LOCATION	% of Traffic Impact Reduction (AADT)		
	No-Build (2045)	Build (2045)	% Change
US 27 W of I-75	51,100	49,300	-3.52%
US 27 E of I-75	51,100	49,700	-2.74%
I 75 NB Off Ramp at US 27	14,600	12,800	-12.32%
I 75 SB On Ramp at US 27	15,200	13,500	-11.18%
I 75 NB On Ramp at US 27	2,700	3,600	25.00%
I 75 SB Off Ramp at US 27	2,900	4,300	32.56%
NW 35 Ave N of US 27	24,700	21,600	-12.55%
SR 326 W of I-75	12,500	12,200	-2.40%
SR 326 E of I-75	38,200	37,700	-1.31%
NW 49 St East of I75	14,800	17,600	15.61%
NW 49 St West of I75	14,600	21,500	32.09%

2

3.0 PROJECT ALTERNATIVES

NO-BUILD

The “No Build” alternative assumes the retainment of existing conditions. It is used as a benchmark condition in order to compare the costs and benefits of implementing the proposed improvements to those incurred by continuing to use the existing facilities.

PREFERRED ALTERNATIVE

After a comprehensive evaluation process, one alternative was selected as being the most effective option. This alternative is illustrated on **Figures 3-1 and 3-2**. The preferred alternative, diverging diamond interchange (Alternative 3), consists of a diamond interchange in which the two directions of traffic on the minor road (NW 49 Street) crossover, or diverge, to the opposite side between the signalized crossover intersections at the on/off ramps (shown on **Figure 3-2**). This eliminates the need for left-turning vehicles to cross the paths of approaching through vehicles, facilitating operational maneuvers and increasing safety. This allows for a simple two-phase operation at the two signalized intersections within the interchange (no left turns), thus improving efficiency. The preferred alternative also includes the extension of NW 49 Street from NW 44 Avenue to Marion County’s future NW 35 Street extension (currently in final design). NW 49 Street (shown on **Figure 3-1**) will feature four 12-foot travel lanes with 7-foot bicycle lanes, a 28-foot raised median, and 6-foot sidewalk. The proposed right-of-way for NW 49 Street is 122 feet. NW 49 Street will curve towards the south east of I-75 to connect to Marion County’s future NW 35 Street extension (Phase 2B) connection through the Magnum Materials Mine which is funded for construction in 2021 by the County. Four stormwater treatment and attenuation ponds are shown on Figure 3-2 to meet water management district and FDOT drainage requirements.

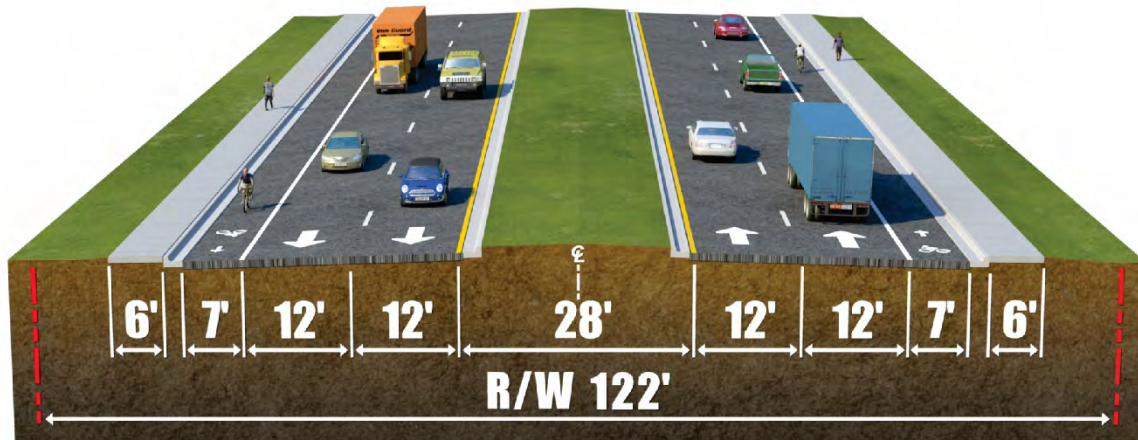
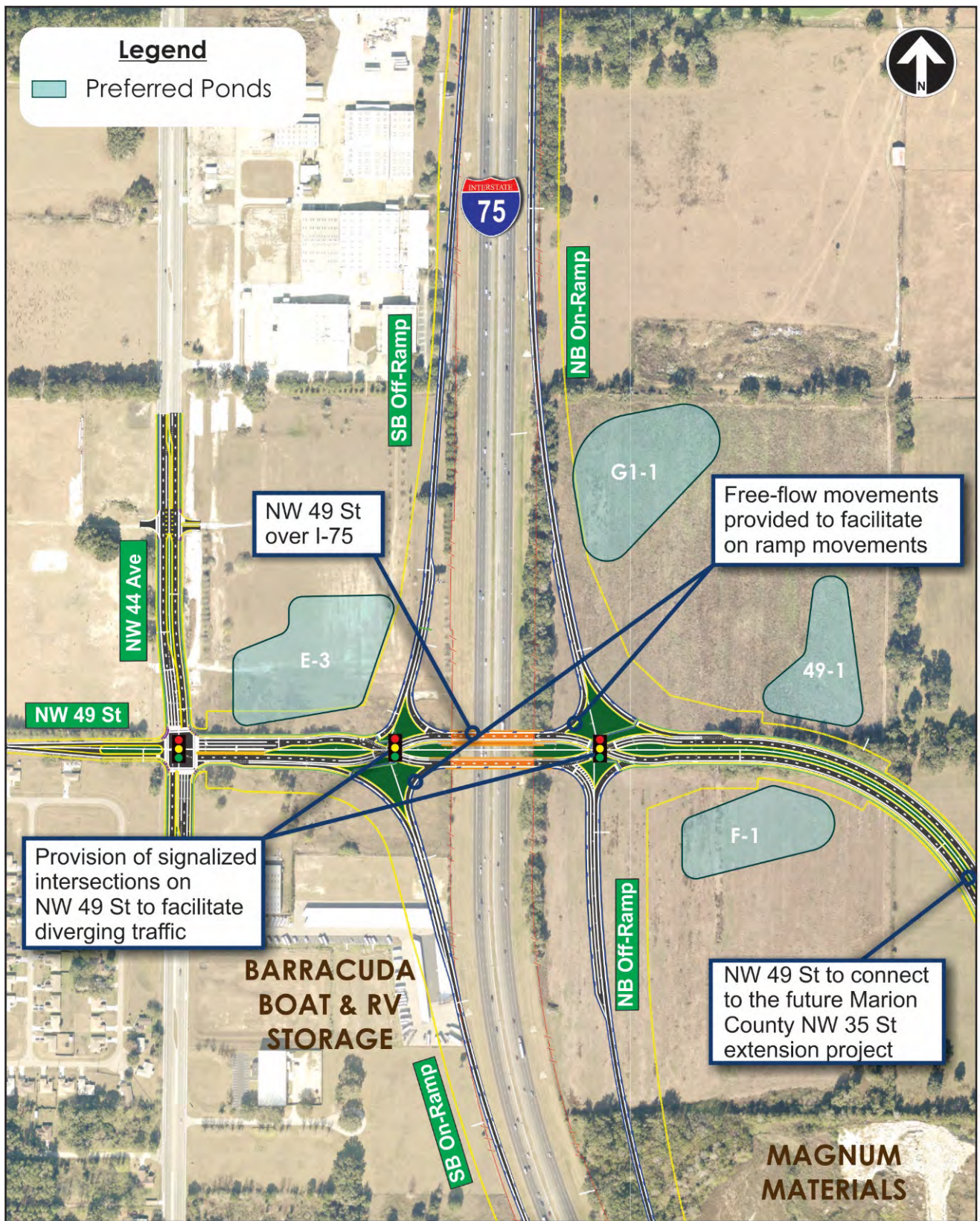


Figure 3-1 NW 49 Street Preferred Typical Section



1
 2

Figure 3-2 Preferred Alternative

4.0 PROJECT AREA DESCRIPTION

The project occurs in Marion County, northwest of the City of Ocala. The term “project corridor” is used in this document to represent the footprint of the preferred alternative. The term “project area” represents a larger expanse that encompasses the project corridor as well as all land within 500 feet.

The project area is bisected by I-75. On the west side of I-75, NW 44 Avenue parallels I-75 and provides a north-south route between the nearest adjacent interstate exit/entrance ramps. To the west of NW 44 Avenue and immediately south of NW 49 Street is a small residential area. Several businesses and complexes of warehouses, some currently unused, are located between NW 44 Avenue and I-75. These include Barracuda Boat and RV Storage, Hickory Springs Manufacturing Company, Quality Bedding, Scorpion Performance Anodize Inc., Just in Time Machining, and All-In Removal waste disposal.

To the east of I-75, most of the project area is under agricultural use and owned by the Baldwin Angus Ranch. Southeast of the project is the Magnum Materials limestone mine. The project will require right-of-way from both the Baldwin Angus Ranch, a small area in the northwest corner of the mine, and parcels west of I-75. South of the mine, and east of I-75, is a recently-developed regional shipping hub, the Ocala 489. This area currently includes major distribution centers for Federal Express, Chewy and Auto Zone.

LAND USE

Major land uses in the project area include small, undeveloped natural areas, large pastures used for livestock, residential areas, and large industrial parks. Land use cover descriptions provided for both uplands and wetlands are classified utilizing the *Florida Land Use Cover and Forms Classifications System* (FLUCCS) designations. Existing land use in the project area was initially determined utilizing U.S. Geological Survey (USGS) maps, historical images, aerial photographs, and land use mapping from the St. Johns River Water Management District (SJRWMD) (2012). Land use categories reported by SJRWMD were verified in the field.

The most recent FLUCCS data for land use in the project area were downloaded from the SJRWMD website and are mapped on **Figure 4-1**. The predominant land use types in the project area west of I-75 are Other Light Industrial (FLUCCS 1550) and Rural Land in Transition (FLUCCS 7410). East of I-75, the predominant land types are Improved Pastures (FLUCCS 2110) with a smaller area of Field Crops (FLUCCS 2150), both of which are part of the Baldwin Angus Ranch. The Magnum Materials mine in the southeastern part of the project area is mapped as Reclaimed Lands (FLUCCS 1650) and Limerock or Dolomite (FLUCCS 1632).

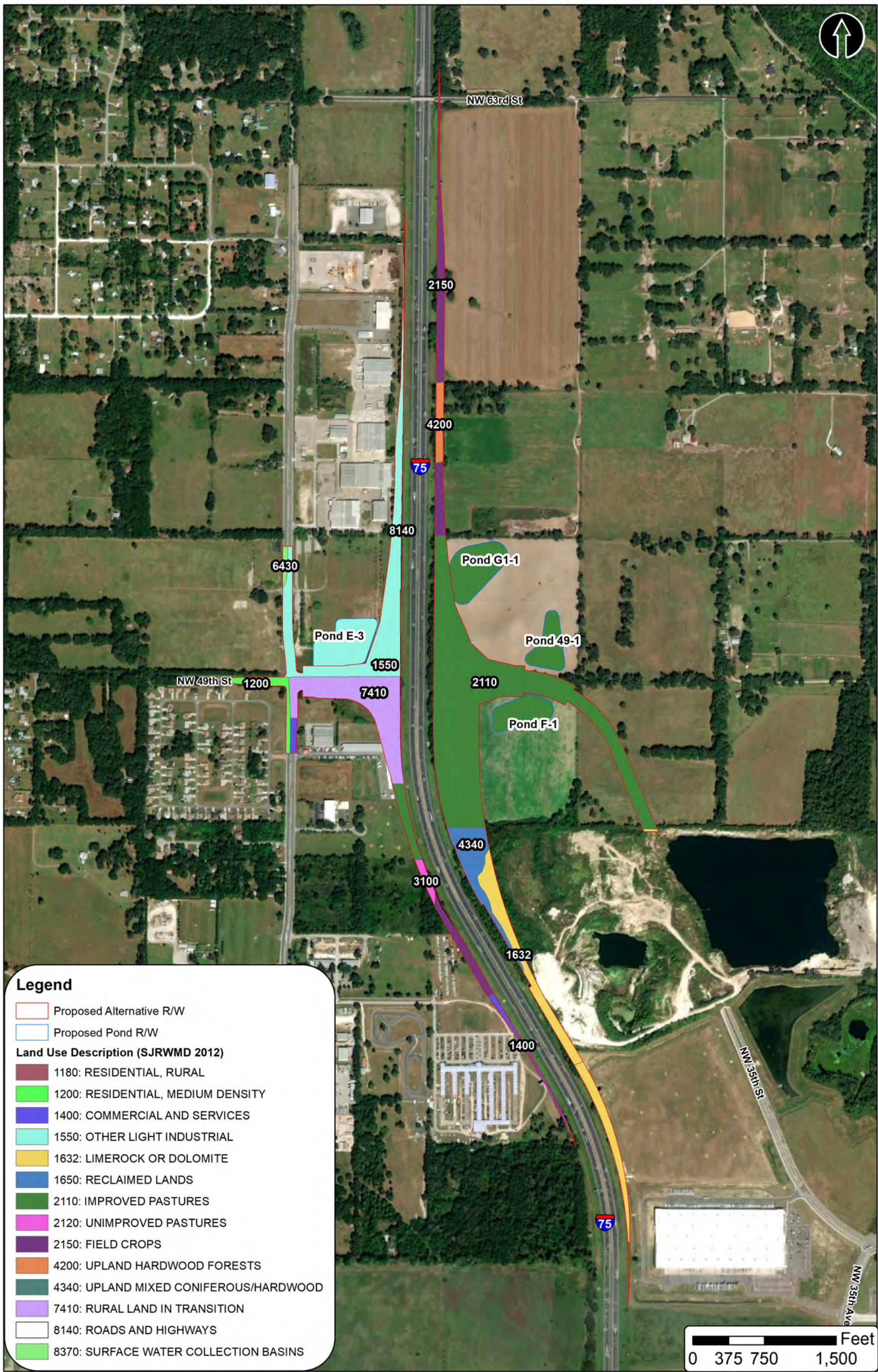


Figure 4-1 Land Use in the Project Area

1 ***Residential, Rural (FLUCCS – 1180) and Residential, Medium Density (FLUCCS – 1200)***

2 Residential, Rural (FLUCCS 1180) and Residential, Medium Density (FLUCCS 1200) land covers
3 are for areas with one dwelling on two or more acres, or two to five dwellings per acre,
4 respectively. A small sliver of land east of I-75, at the northern project terminus, is mapped as
5 Residential, Rural (FLUCCS- 1180). One location in the project area is mapped as Residential,
6 Medium Density (FLUCCS 1200). It is a residential community located to the west of the NW 44
7 Avenue and immediately south of NW 49 Street. No residences are located within the project
8 corridor.

9 ***Commercial and Services (FLUCCS – 1400)***

10 Commercial and Services (FLUCCS 1400) land uses in the project area are described as light
11 manufacturing facilities or small equipment shops. This land use type occurs in two locations in
12 the project area, both of which are located between NW 44 Avenue and I-75, south of NW 49
13 Street.

14 ***Other Light Industrial (FLUCCS – 1550)***

15 This classification in the project area is primarily vacant industrial land, aside from the active
16 manufacturing plant located at the northwestern limits of the project area. This land use type
17 occurs in one large patch in the project area, between NW 44 Avenue and I-75. This land use
18 type comprises most of the northwest quadrant of the proposed interchange. This area
19 contains a mixture of industrial buildings, some of which are in active use, others are vacant
20 and in disrepair.

21 ***Limestone or Dolomite (FLUCCS – 1632)***

22 This classification is used for extraction or mining operations and in the project area includes
23 the Magnum Materials mine. This mine is located in the southern portion of the project, east of
24 I-75.

25 ***Reclaimed Lands (FLUCCS – 1650)***

26 This class is for mining sites that have been or are being restored to approximate a natural state
27 or converted into other types of land use, such as pasture, recreational uses, or development.
28 It does not include portions of active mining areas that are temporarily inactive or abandoned
29 mining lands. This land use type occurs in one location in the project area, immediately
30 adjacent to northbound I-75, on the Magnum Materials mine. This area now contains
31 secondary growth upland forest.

32 ***Improved Pastures (FLUCCS – 2110)***

33 Improved Pastures are the most intensively managed of the pastureland use classes. The
34 largest portion of this land use within the project area is the Baldwin Angus Ranch, which
35 comprises the majority of the project area east of I-75. This land use class is also found to the

1 west of I-75, southwest of the proposed interchange. The pastures west of I-75 do not appear
2 to be under agricultural use.

3 ***Unimproved Pastures (FLUCCS – 2120)***

4 This category includes cleared land within the project area where native grasses and brush have
5 been allowed to develop. This land use type is found in one location in the project area,
6 southwest of the proposed interchange on I-75, near the southwestern limits.

7 ***Field Crops (FLUCCS – 2150)***

8 Wheat, oats, hay, and grasses are the primary crop types identified as Field Crops. Field Crops
9 are mapped in three locations in the project area. Two of these locations are on the Baldwin
10 Angus Ranch, east of I-75. A third area is mapped as field crops west of I-75, near the southern
11 project limits; however, this area does not appear to be under active agricultural use.

12 ***Upland Hardwood Forests (FLUCCS – 4200)***

13 This class is for upland hardwoods that do not fit into one of the two subclasses of 4210 Xeric
14 Oak or 4280 Cabbage Palms. The Upland Hardwoods Forests class may include forest
15 communities such as oak-pine-hickory, Brazilian pepper, live oak, wax myrtle-willow (not
16 hydric), mixed temperate or tropical hardwoods, and beech-magnolia. Xeric oak and cabbage
17 palm forests must be broken out separately. However, almost all forests are subject to human
18 influence, and the composition of the forests is, to a large or small degree, determined by
19 management factors. This land use type occurs in one location in the project area, east of I-75,
20 at the northern project limits.

21 ***Upland Mixed Coniferous/Hardwood (FLUCCS – 4340)***

22 This class is used for those forested areas in which neither upland conifers nor hardwoods
23 achieve a 67 percent crown canopy dominance. This land use type occurs in a small sliver
24 immediately west of I-75, at the southern project terminus.

25 ***Rural Land in Transition (FLUCCS – 7410)***

26 This class is used for areas that have been cleared with no positive indicators of the intended
27 land use. This category of land use is mapped in a large patch southwest of the proposed
28 interchange. It contains part of Barracuda Boat and RV Storage and adjacent undeveloped
29 lands.

30 ***Roads and Highways (FLUCCS – 8140)***

31 This class includes all four lane highways with "substantial" median strips. In general, these are
32 specified as the U.S. and State Routes identified as such on USGS 7.5' topo maps. In the project
33 corridor, some areas along the margin of existing roads are mapped as Roads and Highways.

34

1 **Surface Water Collection Basins (FLUCCS – 8370)**

2 This code classifies excavated open spaces, situated within residential sub-divisions or
3 communities and along freeway corridors, for temporary collection and holding of surface
4 water runoff. This land use is mapped at the location of an excavated, rectangular drainage
5 feature located immediately west of NW 44 Avenue, approximately 1100 feet north of NW 49
6 Street. It is an Other Surface Water. The area mapped as Surface Water Collection Basins also
7 includes large portions of the existing NW 44 avenue, and only a small sliver of new right-of-
8 way would be necessary.

9 **ELEVATION AND HYDROLOGY**

10 Elevations in the project area range from approximately 64 feet to 130 feet above sea level. The
11 lowest elevation occurs in the northeastern limits of the project area within Improved Pastures.
12 There are also areas of low elevation near the northern and western termini of the project
13 corridor. The area of highest elevation occurs near the southern and southeastern limits of the
14 project area, east of I-75, near the Magnum Materials mine. **Figure 4-2** shows an elevation map
15 created with data collected by the National Oceanic and Atmospheric Administration (NOAA)
16 and the U.S. Department of Commerce in 2007 using Light Detection and Ranging (LIDAR) in
17 North American Datum 1983 (NAD 83).

18
19 West of I-75, the project lies within the Southwest Florida Water Management District
20 (SWFWMD) jurisdiction. The remaining portion of the project, east of I-75, lies within SJRWMD
21 jurisdiction. The project area also spans the Silver Springs and Rainbow Springs springsheds,
22 which are designated Outstanding Florida Waters (OFW) that have been verified as impaired by
23 excessive nutrient loads.

24
25 The project area is considered a sensitive karst area due to the occurrence of limestone within
26 20 feet of the surface that comprises the barrier above the Floridan Aquifer. Areas in Florida
27 most vulnerable to aquifer contamination from land surface activities have been determined
28 based on the statewide GIS model Florida Aquifer Vulnerability Assessment (FAVA). The project
29 area is mapped by FAVA as being of the highest vulnerability to aquifer contamination. Portions
30 of the project area have subsurface connections to Rainbow Springs, while other portions of the
31 project area have subsurface connections to Silver Springs. Major hydrologic surface-features in
32 the vicinity of the project are shown on **Figure 4-3**. The area mapped as a Freshwater Pond,
33 immediately north of Pond G1-1, is actually a borrow-pit related to nearby road construction.
34 The small area mapped as Freshwater Emergent Wetland in the southern portion of the project
35 corridor, on the mining property east of I-75, has been cleared and graded by mining activities
36 and is not a wetland.

37 There are no major water features within the project corridor. The closest major water features
38 are the Silver River, located approximately 9 miles southeast of the project, and Silver Springs,
39 located approximately 8.2 miles to the east. Rainbow Springs is approximately 18 miles to the
40 southwest.

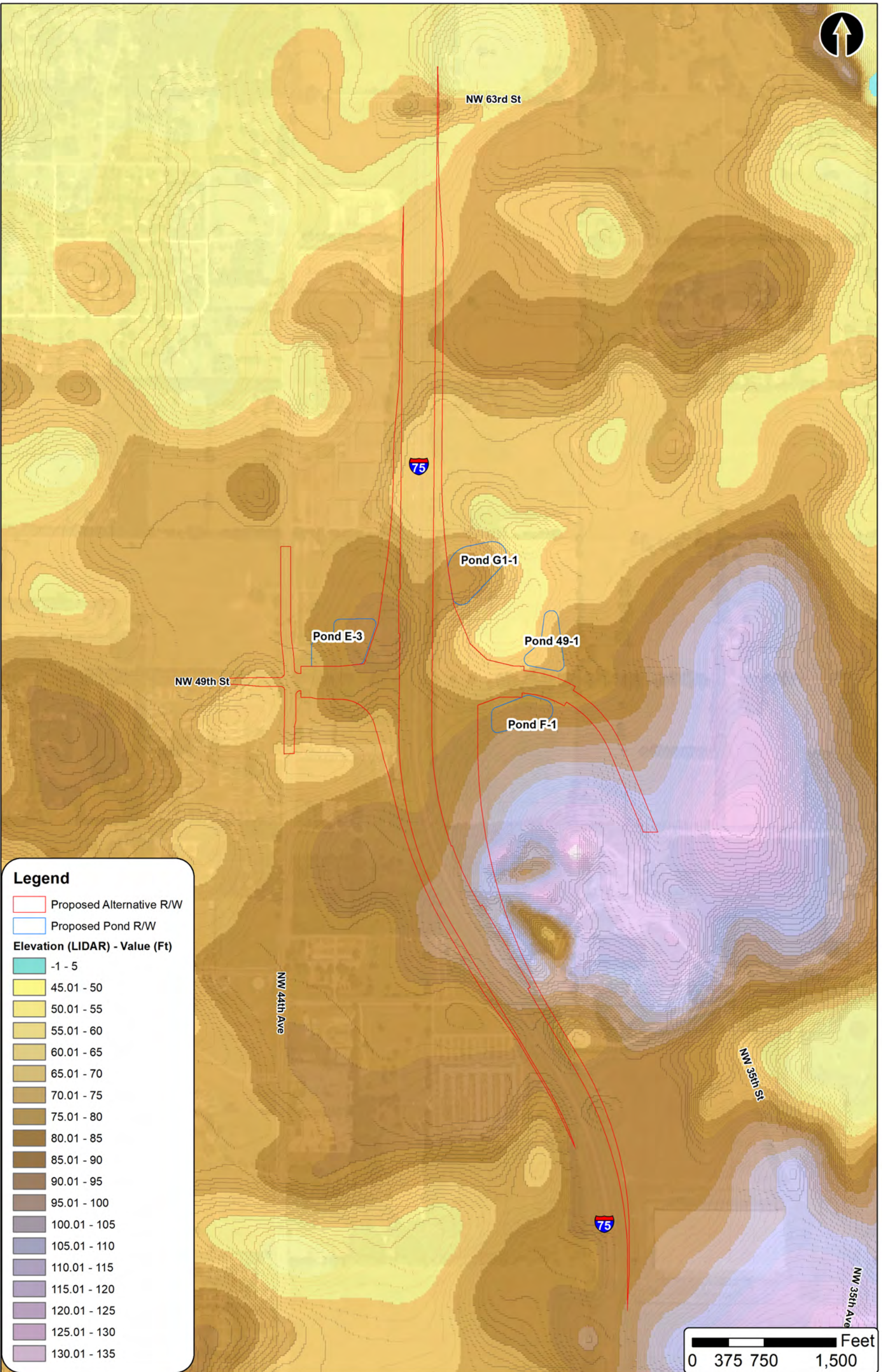
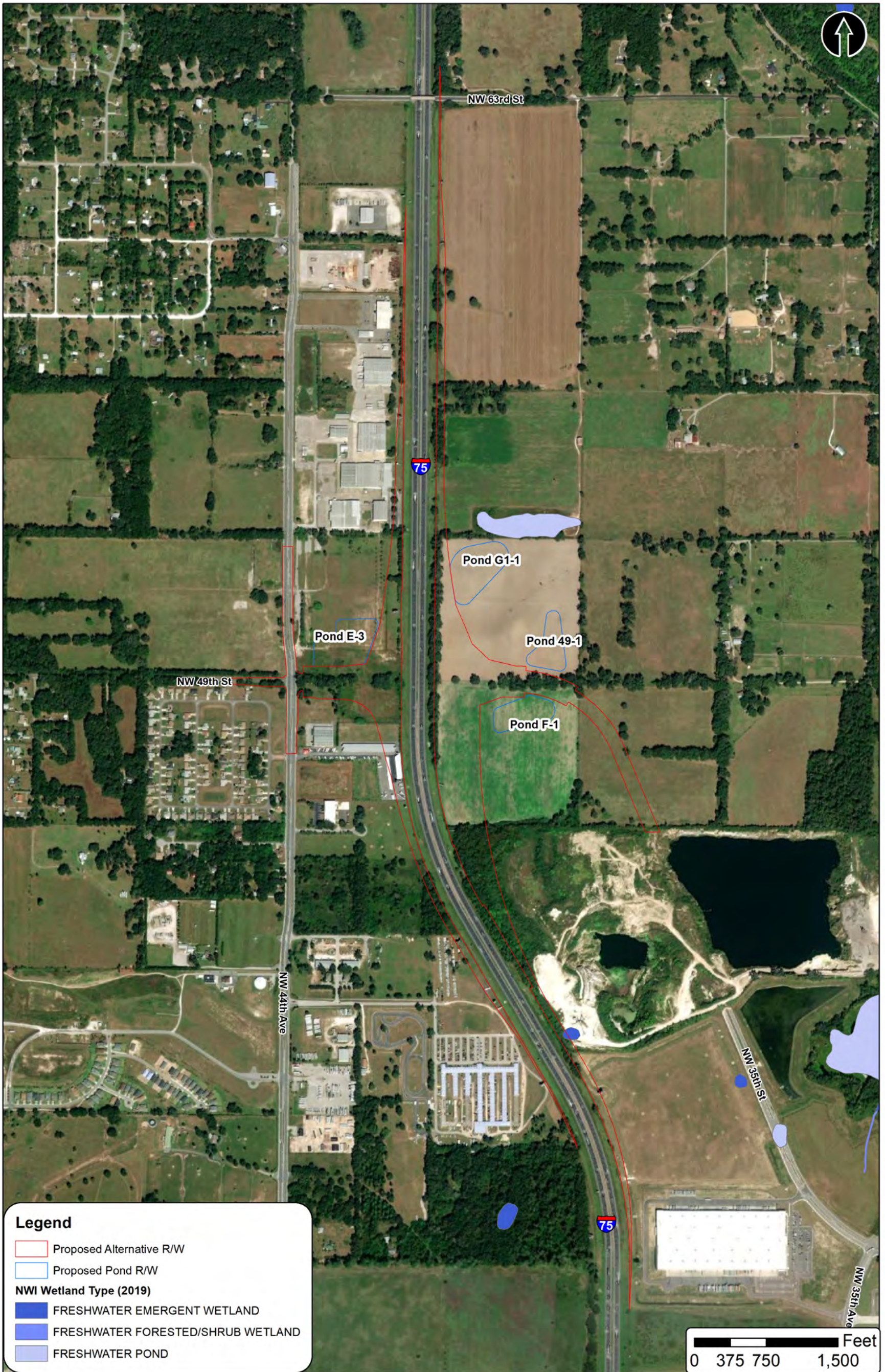


Figure 4-2 Elevation in Project Area



1
2

Figure 4-3 Surface Hydrology of Project Area

1 **SOILS**

2 The Natural Resources Conservation Service (NRCS) (2017) maps six soil types occurring in the
3 project area (**Table 4-1** and **Figure 4-4**). No hydric soils are mapped in the project area.
4 Farmland Soils of Local Importance occur in the project area and include Blichton, Gainesville,
5 Hague, and Kendrick soil series.

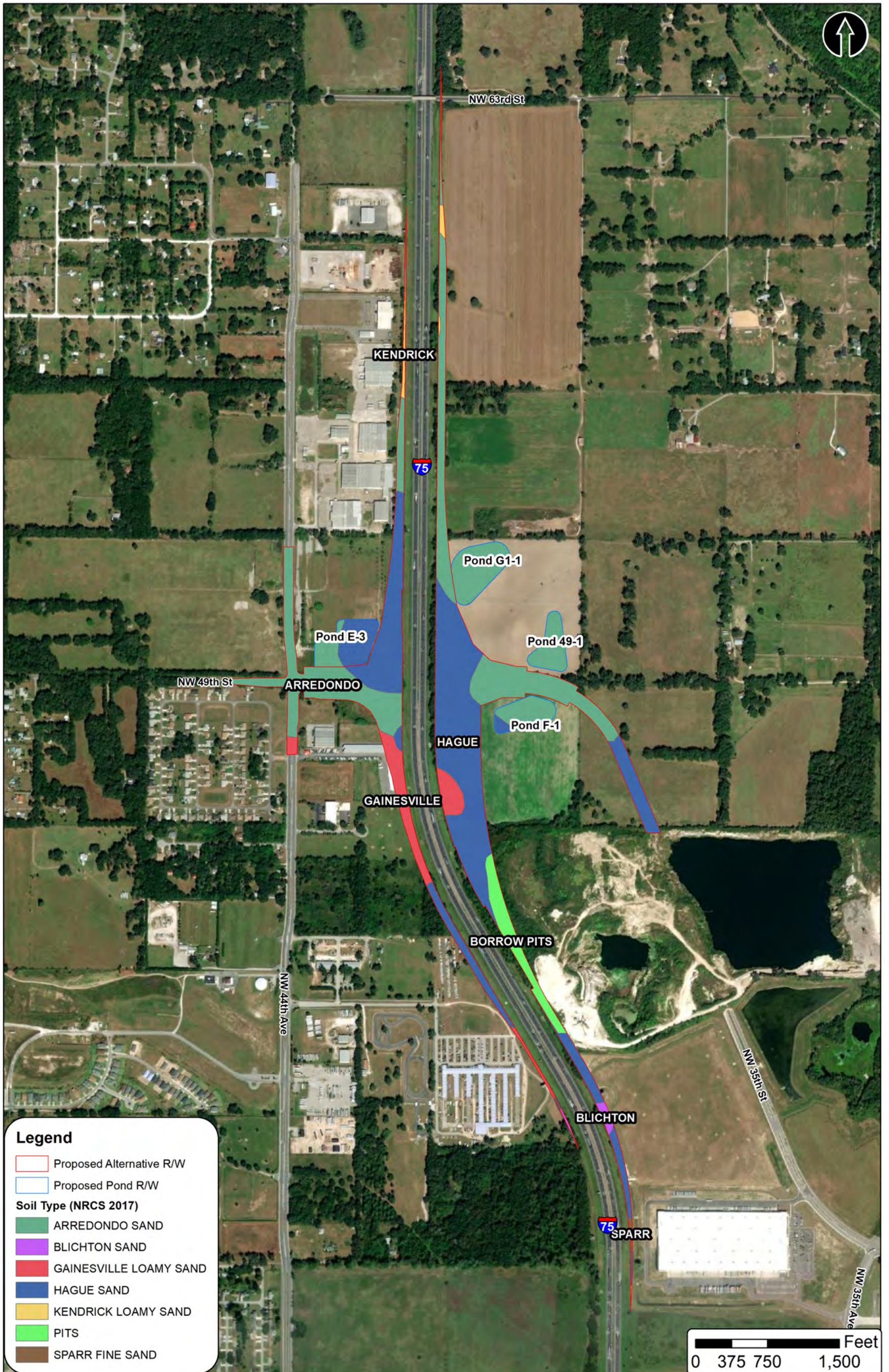
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Table 4-1 Soils in Project Corridor

Soil Type	Environmental Association
Arredondo Sand	0-5% slopes; Arredondo soils are on nearly level to strongly sloping uplands in the Lower Coastal Plain. The Arredondo series consists of well drained soils that are rapidly permeable in the thick, sandy surface and subsurface layers and moderate to very slow in the subsoil. They form in sandy and loamy marine deposits on the Ocala uplift. This is not a hydric soil. This is a suitable soil for sand skink habitat .
Blichton Sand	0-8% slopes; The Blichton series consists of very deep, very poorly drained, moderately slow or slowly permeable soils on uplands in central Florida. They formed in thick beds of loamy and sandy marine sediments. This is not a hydric soil. This is a Farmland Soil of Local Importance.
Gainesville Loamy Sand	0-15% slopes; Gainesville series consists of well drained, rapidly permeable soils formed in thick beds of sandy marine deposits. They are on nearly level to strongly sloping uplands in the lower Coastal Plain. This is not a hydric soil. This is a suitable soil for sand skink habitat . This is a Farmland Soil of Local Importance.
Hague Sand	2-5% slopes; The Hague series consists of very deep, well drained soils that formed in sandy and loamy marine deposits. This is not a hydric soil. This is a suitable soil for sand skink habitat . This is a Farmland Soil of Local Importance.
Kendrick Loamy Sand	0-8% slopes; The Kendrick series consists of well drained, slowly to moderately slowly permeable soils formed in thick beds of loamy marine sediments on nearly level to sloping areas in the Coastal Plain. This is not a hydric soil. This is a suitable soil for sand skink habitat . This is a Farmland Soil of Local Importance.
Sparr Fine Sand	0-8% slopes; The Sparr series consists of very deep, somewhat poorly drained, moderately slowly to slowly permeable soils on uplands of the coastal plain. They formed in thick beds of sandy and loamy marine sediments. This is not a hydric soil.
Borrow Pits	These are excavated areas associated with the Magnum Materials mine.

2

Source: NRCS 2012; USDA 1987: 22–23, 25, 28, 31–34, 36, 45, 55



1
2

Figure 4-4 Soils in Project Corridor

5.0 METHODOLOGY

In accordance with Part 2, Chapter 20 (revised July 1, 2020) of the *PD&E Manual*, this Contamination Screening Evaluation (Level 1) was conducted to evaluate potential contamination concerns associated with project alternatives. In addition to sites discovered during field assessments, this report identifies and evaluates known landfills, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, also known as Superfund) sites, and National Priorities List (NPL) sites within one half-mile of the project corridor. Known sites of petroleum contamination, drycleaners, and non-petroleum contamination within 500 feet of the project corridor were identified and investigated, as were non-landfill solid waste sites within 1,000 feet of the project corridor. A buffer of one-half mile was used for any CERCLA, NPL and Landfill sites. This evaluation includes the following:

- A review of Efficient Transportation Decision Making (ETDM) Summary Report Number 14242 and the FDOT Environmental Screening Tool (EST) contamination data;
- A review of the Florida Department of Environmental Protection (FDEP) OCULUS database and USEPA Resource Conservation and Recovery Act (RCRA) databases;
- A review of the most up-to-date GIS layers downloaded from the Florida Geographic Data Library (FGDL) involving contamination related information;
- Field review of project corridor, neighboring properties, and known potential contamination sites;
- Ownership history information of each potential contamination site; and
- Historic aerial image review.

Recommendations regarding contamination concerns are based on reasonably ascertainable information obtained from the data collection activities identified above.

DATA GATHERING

Government Databases Search

Information regarding potential contamination sites was obtained from the ETDM GIS Analysis Results Tool (EST – contamination layer), which includes information on Biomedical Waste, Brownfield Location Boundaries, Dry Cleaners, Gasoline Stations, Petroleum Tanks, Hazardous Waste Sites, NPL Superfund Sites, Nuclear Site Locations, On-site Sewage (septic tanks), State Underground Petroleum Environmental Response Act (SUPER Act) Risk Sources, Solid Waste Facilities, Tanks 2007, Toxic Release Inventory Sites, and Resource Conservation and Recovery Act (RCRA) Regulated Facilities. The FGDL database was also used to locate GIS files and identify facility IDs.

1 **Regulatory File Review**

2 File reviews were conducted online using the FDEP OCULUS database and USEPA RCRA
3 websites.

4

5 **Historical Aerial Photograph Review**

6 A review of historical aerial photographs of the project area using Google Earth historic aerial
7 imagery was performed. The aerial images were reviewed for potential contamination
8 concerns, including, but not limited to, mounds, depressions, storage areas, or drastic changes
9 in landscaping or geographic features. Some historic aerial photographs that clearly show the
10 project area are included in **Appendix A** and a brief discussion of the review of historic aerial
11 photographs is provided below.

12 • 1995- The I-75 corridor and Magnum Materials mine are apparent. The project area east of
13 I-75 is in a similar condition to the present. The general layout and major buildings in the
14 project area west of I-75 are present. The residential area south of NW 49 Street is absent,
15 and Barracuda Boat and RV storage is also absent. In the fields immediately north of NW 49
16 Street are approximately dozens of rows of parked vans that are stored by the nearby Mark
17 III Industries, a manufacturer of conversion vans.

18 • 1999- Few changes from the condition in 1995 are apparent. The residential area south of
19 NW 49 Street is visible vans continue to be stored in nearby fields.

20 • 2005- The vans are absent, but the residential area south of NW 49 Street has not yet been
21 developed. Barracuda Boat and RV Storage is absent.

22 • 2006- Holding ponds on the mine are present and residential development has begun south
23 of NW 49 Street.

24 • 2008- The project area appears close to its current conditions, but without Barracuda Boat
25 and RV Storage.

26 • 2015- Barracuda Boat and RV Storage is present.

27

28 **Field Reviews**

29 On April 24, 2018, environmental scientists performed driving and walking surveys throughout
30 the project area west of I-75. The entire project area (except the Magnum Materials mine) was
31 assessed during driving and walking surveys on June 13, 2018. Additional field investigations in
32 the project area were conducted on October 23 and December 5, 2018. The proposed impact
33 area on the Magnum Materials mine property was surveyed on December 5, 2018. Barracuda
34 Boat and RV Storage and the property immediately to the north were fenced and entry was not
35 possible. These properties were inspected from outside the perimeter fence. The actual
36 location of the potentially contaminated sites and the current occupancy and operations at
37 each site were verified during the field reviews whenever possible. Sites were inspected for
38 presence of storage tanks, chemical containers, ground-staining, monitoring wells, or other

1 signs of potential contamination. Interviews were conducted with local residents and
2 employees whenever possible.

3 **RISK RATING DEFINITIONS**

4 Based on the compilation of data collection activities described above, each site was assigned a
5 risk rating based on the methods in Chapter 20 of the *PD&E Manual*. The ratings system
6 expresses the degree of concern for a potential contamination impact to the project via cost
7 and schedule. Each site was assigned a contamination risk rating of No, Low, Medium, or High
8 based on the following criteria:

- 9 1. No - A review of available information on the property and a review of the conceptual or
10 design plans indicates there is no potential contamination impact to the project. It is
11 possible that contaminants have been handled on the property. However, findings from
12 the Level I evaluation indicate that contamination impacts are not expected.

- 13 2. Low - A review of available information indicates that past or current activities on the
14 property have an ongoing contamination issue; the site has a hazardous waste
15 generator identification (ID) number, or the site stores, handles, or manufactures
16 hazardous materials. However, based on the review of conceptual or design plans
17 and/or findings from the Level I evaluation, it is not likely that there would be any
18 contamination impacts to the project.

- 19 3. Medium - After a review of conceptual or design plans and findings from a Level I
20 evaluation, a potential contamination impact to the project has been identified. If there
21 is insufficient information (such as regulatory records or site historical documents) to
22 make a determination as to the potential for contamination impact, and there is
23 reasonable suspicion that contamination may exist, the property should be rated at
24 least as a "Medium". Properties used historically as gasoline stations and which have
25 not been evaluated or assessed by regulatory agencies, sites with abandoned in place
26 underground petroleum storage tanks or currently operating gasoline stations should
27 receive this rating.

- 28 4. High - After a review of all available information and conceptual or design plans, there is
29 appropriate analytical data that shows contamination will substantially impact
30 construction activities, have implications to ROW acquisition or have other potential
31 transfer of contamination related liability to the FDOT.

6.0 POTENTIAL PROJECT IMPACTS

Eleven known or potential contamination sources were identified during this study and are presented in **Table 6-1** and on **Figure 6-1**. One site was assigned a risk rating of High, four sites were assigned a risk rating of Medium, and six sites were assigned a risk rating of Low. Much of the project area east of I-75 is used for agriculture and therefore is considered a Medium contamination risk due to the potential use of fertilizers, insecticides, herbicides, and other agricultural chemicals. West of I-75 there is a complex (Site Numbers 1 through 6) of light industrial facilities with multiple metal buildings, some of which appear abandoned or not in active use. Multiple aboveground storage tanks (ASTs) were identified in the industrial areas. No CERCLA, NPL sites, or landfills were identified within one half-mile of the project corridor. The “No Build” and TSM&O Alternatives are not anticipated to cause potential contamination impacts. A description of each site is provided in Section 7.0. Information and photographs related to sites that were rated as High- or Medium-Risk are provided in **Appendix B**.

ETDM COMMENTS

The following comments on potential contamination impacts were received during the ETDM process.

USEPA COMMENTS

Contamination Degree of Effect: Minimal

Reviewed By: Kim Gates, USEPA

Coordination Document: PD&E Support Document As Per *PD&E Manual*

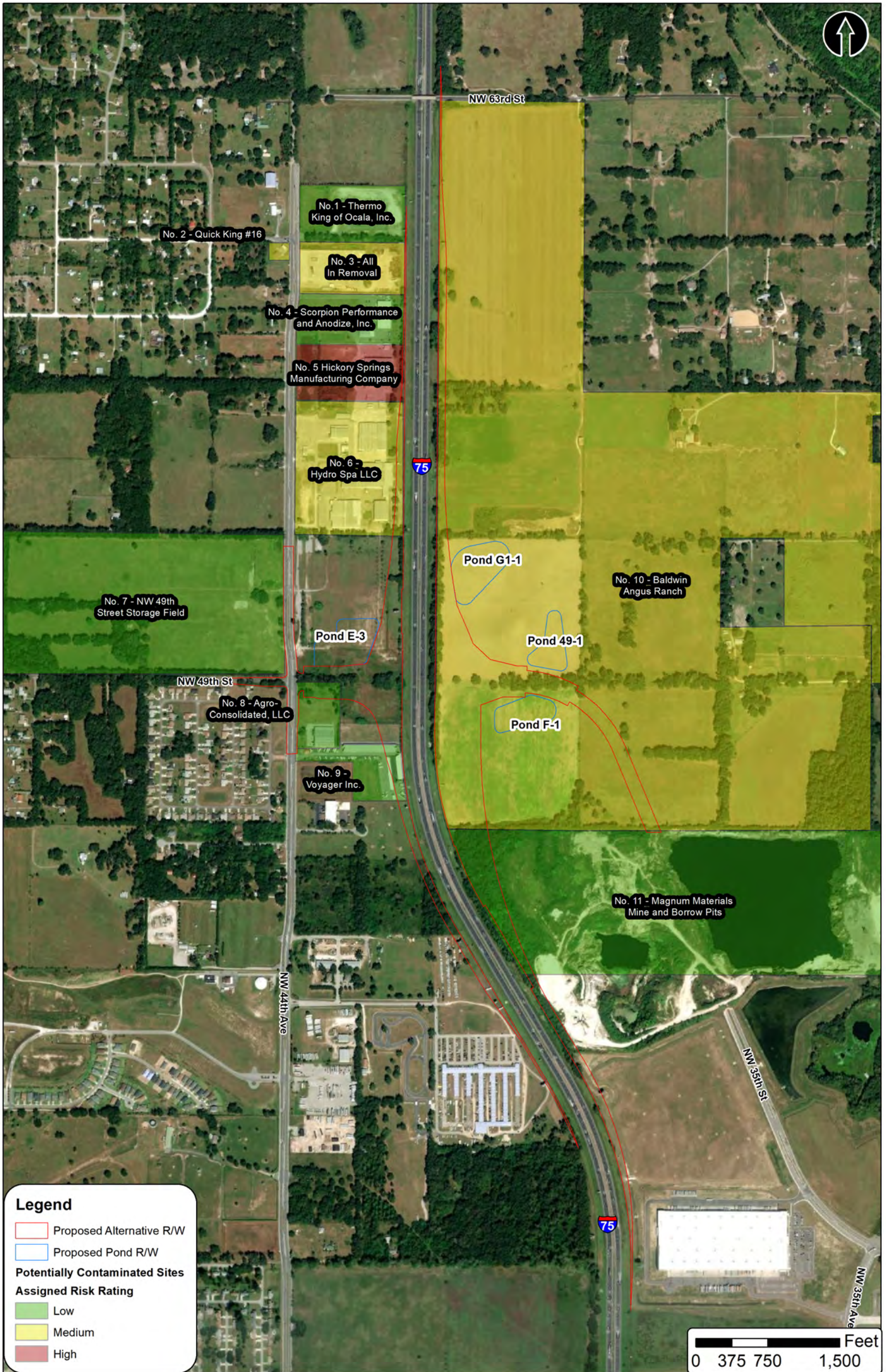
Identified Resources and Level of Importance: Potential contamination and risks posed to human health and the environment.

Comments on Effects To Resources: “Based on information in the EST, there are no USEPA-designated Brownfields or National Priorities List (Superfund) sites within one mile of the project. One RCRA-regulated facility, Voyager Inc. (EPA ID #: FLD 984 184 226), is located within 500 feet. Two other RCRA-regulated facilities are located within 1/4 mile of the project: Hydro Spa LLC (EPA ID #: FLD 982 107 229) and Hickory Springs Manufacturing Company (EPA ID #: FLR 000 112 649).

According to the USEPA's RCRA Info database, Voyager was a small quantity generator of spent nonhalogenated solvents (e.g., benzene, toluene, methyl ethyl ketone, isobutanol, etc.) until May 2010. There is no record of onsite corrective action for releases of hazardous substances, but the State of North Carolina cited the facility in 1991 and 1992 for violating RCRA hazardous waste determination requirements. The USEPA does not have information about current solvent use at the facility and encourages coordination with the North Carolina Department of Environment Quality if the project will impact the facility. Voyager is listed online as an integrated steel fabricator.

Table 6-1 Site Information

Site #	Facility Name	Parcel Numbers	Address/ Location	Facility ID (FDEP/RCRA)	Databases	Concern	Approximate Distance to Project	Risk Rating
1	Thermo King of Ocala, Inc.	13531-000-02	6015 NW 44 Avenue	None	None	Refrigerants, petroleum products	Co-located	Low
2	Quick King #16	13535-013-00	5882 NW 44 Avenue	8511206	STCM	Fuel, petroleum products	1,000+ feet	Medium
3	All in Removal	13530-000-00	5877 NW 44 Avenue	9814828	STCM	Storage Tank	Co-located	Medium
4	Scorpion Performance and Anodize, Inc.	13538-002-02	5817 NW 44 Avenue	None	None	Cleaners, Solvents	Co-located	Low
5	Hickory Springs Manufacturing Company	13538-002-01	5407 NW 44 Avenue	FLR 000 112 649	Hazardous Waste	Storage Tank	Co-located	High
6	Hydro Spa LLC (Quality Bedding)	13538-002-00	5345 NW 44 Avenue	FLD 982 107 229	Hazardous Waste	Storage Tank	Co-located	Medium
7	NW 49 Street Storage Field	13539-001-00	North of NW 49 Street	None	None	Storage of unidentified objects	Co-located	Low
8	AgroConsolidated, LLC	13689-001-00	4134 SW 47 th Ct	None	None	55 Gallon Drums	Co-located	Low
9	Voyager Inc. (Barracuda Truck and RV Storage)	13689-000-00	4707 NW 44 Avenue	FLD 984 184 226	Hazardous Waste	Petroleum products	Co-located	Low
10	Baldwin Angus Ranch	13462-000-00, 13495-000-00	3660 NW 56 th Street	8511217, 8737114	STCM	Storage tanks, used motor oil, fertilizers, herbicides, pesticides, anhydrous ammonia, diesel fuel, unleaded fuel	Co-located	Medium
11	Magnum Materials Mine and Borrow Pits	13715-000-00, 13698-000-00	3669-3711 NW 27 th Avenue	None	None	Mining waste water, petroleum products	Co-located	Low



1
2

Figure 6-1 Potentially Contaminated Sites

1 Hydro Spa is a hot tub manufacturer that was a large quantity generator of hazardous
2 waste (namely spent nonhalogenated solvents, including acetone, benzene, methyl
3 ethyl ketone, tetrachloroethylene, and trichloroethylene) until July 2007. There is no
4 record of onsite corrective action for releases of hazardous substances, but the facility
5 has received citations from the State of North Carolina for various RCRA violations.

6 The Hickory Springs Manufacturing Company (rebranded as HSM in May 2013) facility in
7 Ocala makes foam components for the furniture, bedding, and transportation markets.
8 According to RCRA Info, it was a small quantity generator of hazardous waste (i.e.,
9 various spent nonhalogenated solvents) until January 2013. The facility has no history of
10 enforcement violations or releases requiring corrective action.

11 Although not specifically mentioned in the Preliminary Environmental Discussion (PED)
12 Comments Report, the FDOT could encounter abandoned underground storage tanks
13 during project construction. Agriculture has been the foundation of Marion County's
14 economy since the mid-1850s, and storage tanks for vehicle fuel and heating oil are
15 common on farms and rural residences nationwide.”

16 **Response to Agency Comments:** Thank you for your feedback and comments. During
17 the PD&E study, FDOT will conduct a Level 1 Contamination Assessment that will be
18 documented in a Contamination Screening Evaluation Report.

19
20 ***FDEP ETDM COMMENTS***

21 **Contamination Degree of Effect:** N/A / No Involvement

22 **Reviewed By:** Suzanne Ray, FDEP

23 **Coordination Document:** PD&E Support Document As Per *PD&E Manual*

24 **Identified Resources and Level of Importance:** N/A

25 **Comments on Effects To Resources:** N/A

26 **Response to Agency Comments:** Thank you for your review.

27 ***SJRWMD ETDM COMMENTS***

28 **Contamination Degree of Effect:** N/A / No Involvement

29 **Reviewed By:** Marc von Canal, SJRWMD

30 **Coordination Document:** No Involvement

31 **Identified Resources and Level of Importance:** “Unless the surface water management
32 system is located in an area with contaminated soil or water, the SJRWMD has no

1 regulatory involvement. The GIS analysis did not identify any contaminated sites within
2 500 feet of project boundaries. “

3 **Comments on Effects To Resources:** “No effects expected”

4 **Response to Agency Comments:** Thank you for your review.

5 **SWFWMD ETDM COMMENTS**

6 **Contamination Degree of Effect:** Minimal

7 **Reviewed By:** Monte Ritter, SWFWMD

8 **Coordination Document:** To Be Determined: Further Coordination Required

9 **Identified Resources and Level of Importance:** “From the FDOT’s EST, the project area is
10 characterized by a one-aquifer system that includes the Florida Aquifer. Within a 200-
11 foot buffer of the proposed interchange project, the pollution potential of the Floridan
12 Aquifer is high as indicated by DRASTIC weighted indexes between 186 and 207.
13 According to the FAVA Florida Aquifer System: Classified as More Vulnerable for 100
14 percent of the project area within a 200-foot buffer. “

15 **Comments on Effects To Resources:** “If encountered and disturbed during construction
16 along the proposed route, any contaminated site could result in surface and / or
17 groundwater water pollution. While the interchange footprint may not directly impact
18 contaminated sites, proposed stormwater management systems and other project
19 construction activities should avoid these areas.”

20 **Response to Agency Comments:** Thank you for your feedback and comments. During
21 the PD&E study, FDOT will conduct a Level 1 Contamination Assessment that will be
22 documented in a Contamination Screening Evaluation Report.

7.0 REGULATORY STATUS OF SITES

Site descriptions and their regulatory status are provided below. No CERCLA, NPL Superfund Sites, or landfills were identified within one half-mile of the project corridor.

SITE NUMBER 1- THERMO KING OF OCALA, INC.

Address: 6015 NW 44 Avenue

Facility ID: None

This site performs maintenance and repairs to temperature control systems for trucks, trailers and buses. It is located adjacent to the northern end of the project, between NW 44 Avenue and I-75. This site was not identified in any contamination databases. An interview with an employee on January 4, 2019 confirmed the type of work performed and revealed there are ASTs for fuel on-site. Because of ASTs and the likely presence of refrigerants and petroleum products, but because there is no history of release of any contaminants, this site is assigned a risk rating of **Low**.

SITE NUMBER 2- QUICK KING #16

Address: 5882 NW 44 Avenue

Facility ID: 8511206

The Quick King gas station is located in the southwest quadrant of the intersection of NW 44 Avenue and NW 60th Street, slightly more than 1,000 feet from the project. The site contains two fuel islands and a building. Because this site is operating as a gas station and has Underground Storage Tanks (USTs), it is assigned a risk rating of **Medium**.

SITE NUMBER 3- ALL IN REMOVAL

Address: 5877 NW 44 Avenue

Facility ID: 9814828

All In Removal is located adjacent to the northern limits of the project, between NW 44 Avenue and I-75, immediately south of NW 60th Street. It was identified in the Storage Tank Contamination Monitoring (STCM) database. During a routine compliance site inspection in 2018, All in Removal was cited for not conducting monthly release detection inspection of tank systems or monitored sumps.

An interview with an employee on January 4, 2019 revealed that this business collects and delivers shavings for use in horse and cattle ranching. They also provide containers and handle disposal of manure from ranching operations. Because of the presence of a storage tank and the handling of agricultural waste, this site is assigned a risk rating of **Medium**.

1 **SITE NUMBER 4- SCORPION PERFORMANCE AND ANODIZE, INC.**

2 Address: 5817 NW 44 Avenue

3 Facility ID: None

4 This site is located between NW 44 Avenue and I-75, south of Site Number. Scorpion
5 Performance and Anodize, Inc. manufactures high-performance parts for automotive and boat
6 racing, as well as other automotive parts. They anodize, laser etch, polish, and perform other
7 treatments to metal products at this location. In 2015, the company filed for Chapter 11
8 bankruptcy protection, but has since been purchased and continues to operate. This site was
9 not identified in any contamination databases and there is no known history of release of any
10 contaminants. However, due to the likely presence of cleaners, solvents, and other chemicals,
11 this site is assigned a risk rating of **Low**.

12 **SITE NUMBER 5- HICKORY SPRINGS MANUFACTURING COMPANY**

13 Address: 5407 NW 44 Avenue

14 Facility ID: FLR 000 112 649

15 Hickory Springs Manufacturing Company is now closed and was a maker of foam components
16 for furniture, bedding, and transportation. It was a small-quantity generator of hazardous waste
17 (i.e. nonhalogenated solvents, adhesives) until January 2013. This property contains multiple
18 metal buildings and large concrete loading pads. Multiple tractor trailers were stored on site
19 and multiple hoses in one area suggest it is used to wash down trucks. Three ASTs were
20 discovered behind the largest building, adjacent to I-75 right-of-way. A grassy area in the
21 central part of the site contained a small, round pool of standing water at ground level. The
22 shape and size suggested it was a round pipe missing a manhole cover. There were also with
23 several PVC pipes sticking out of the ground. This area was ringed by high-visibility bollards and
24 is approximately 575 feet from the nearest proposed FDOT right-of-way. The origin or purpose
25 of this feature is unknown. Photographs are included in **Appendix A**. Because of the AST's and
26 undetermined water feature, this site is assigned a risk rating of **High**.

27 **SITE NUMBER 6- HYDRO SPA LLC (QUALITY BEDDING)**

28 Address: 5345 NW 44 Avenue

29 Facility ID: FLD 982 107 229

30 This site consists of a complex of multiple large, metal buildings and currently appears to
31 operate under the business name Quality Bedding. The site was formerly Hydro Spa LLC, a
32 manufacturer of hot tubs and a large quantity generator of hazardous waste (namely spent
33 nonhalogenated solvents, including acetone, benzene, methyl ethyl ketone,
34 tetrachloroethylene, and trichloroethylene). Near the southern edge of the property, south of
35 the southeastern-most building, is a large AST. Beside the AST were two open, 50-gallon drums
36 in cinder block secondary containment. The drums were full of what appeared to be water and
37 were open and exposed to the elements. Because of the presence of an AST and drums in
38 secondary containment, this site is assigned a risk rating of **Medium**.

1 **SITE NUMBER 7- NW 49 STREET STORAGE FIELD**

2 Address: Field Immediately north of NW 49 Street

3 Facility ID: None

4 This site was not identified in any contamination database or GIS layers. No indications of
5 contamination were encountered at this site during field investigations. Historic aerial imagery
6 from 1995 and 1999 showed hundreds of large objects stored in rows in this field. Interviews
7 with local residents revealed that those objects are vans being stored by the nearby Mark III
8 industries, which was once the nation’s leading manufacturer of conversion vans. All of the
9 vans being stored on Site 7 were new and had not yet been converted. An interview with a
10 former Vice President of Mark III revealed that in the early 1990’s, as many as 17,000 new vans
11 were stored in surrounding fields like Site 7. Mark III was sold in 1996 and declared bankruptcy
12 in 2001. The property is currently fenced with chain link that has exclusionary wire at the top
13 and signs warning trespassers of video surveillance. Because there is no record or release of
14 contaminants and all vans stored on site were new this site is assigned a risk rating of **Low**.

15 **SITE NUMBER 8- AGROCONSOLIDATED, LLC**

16 Address: 4775 NW 44 Avenue

17 Facility ID: None

18 This site was identified during field inspections and was not represented in any available
19 databases. The address was previously associated with Gladiator Custom Trailers and GTO
20 Airboats. It is located between 44 Avenue and I-75, south of NW 49 Avenue. Proposed project
21 improvements would expand 44 avenue into this west side of this parcel. The property contains
22 a large building that is surrounded by chain link fence topped with barbed wire. Vehicles enter
23 through a security gate with a key pad. The site appeared to be in operation, but there was no
24 response to the “call” button on the security gate and obvious way to gain entry. An inspection
25 from outside the fence revealed a workshop area with dozens of 55-gallon drums. The contents
26 of these drums was not identified as the site could not be accessed. Because of the presence of
27 55-gallon drums, this site was assigned a risk rating of **Low**.

28 **SITE NUMBER 8- VOYAGER INC. (BARRACUDA TRUCK AND RV STORAGE)**

29 Address: 4707 NW 44 Avenue

30 Facility ID: FLD 984 184 226

31 This site is located at the east end of NW 47th Street and currently operates as Barracuda Truck
32 and RV Storage. This site was formerly Voyager Inc., an integrated steel fabricator. It was a
33 small quantity generator of spent nonhalogenated solvents until May 2010. There was no
34 record of release of hazardous substances. During field inspections, the majority of the site was
35 behind a locked security gate and no personnel were on site to provide access. This facility is
36 currently used to store trucks, RVs, and boats. The grounds appear clean and well maintained
37 and there was no indication of release of any contaminants. This site is proposed for relocation
38 under the preferred alternative. Because the entire site could not be inspected and
39 contaminants were once generated on site, this site is assigned a risk rating of **Low**.

1 **SITE NUMBER 9- BALDWIN ANGUS RANCH**

2 Address: 3660 NW 56th Street

3 Facility ID: 8511217, 8737114

4 The majority of the project corridor east of I-75 is located on the Baldwin Angus Ranch, which
5 has been in continuous use for cattle ranching for many decades. The agricultural lands
6 adjacent to I-75, where additional right-of-way is required, are predominantly mapped as field
7 crops or improved cattle pastures. Ponds G1-1, 49-1 and F-1 all are all located in fields and
8 pastures on the Baldwin Angus Ranch.

9
10 Approximately 250 feet east of the proposed right-of-way on the Baldwin Angus Ranch is a
11 borrow pit where fill material was excavated during the 1964 construction of the bridge for NW
12 63rd Street over I-75. During a field inspection the borrow pit contained wood, construction
13 debris, trash and a 55-gallon drum. An AST is adjacent to that borrow pit and apparently
14 powers a pump used for irrigation. The AST and borrow pit are outside the project area and
15 would not be impacted by the preferred alternative.

16
17 The main ranch house and barns for the Baldwin Angus Ranch are approximately 2,000 feet
18 east of the project. The area of barns and sheds adjacent to the main ranch house contained
19 three ASTs, one marked “diesel”, one marked “unleaded”, and a third that was unmarked.
20 None of the ASTs were in secondary containment. Adjacent barns and sheds contained a metal
21 fabrication shop, a welding rig, and multiple open, five-gallon buckets full of used oil
22 (photographs are included in **Appendix B**).

23
24 Interviews with multiple members of the Baldwin family revealed that these are the only ASTs
25 for fuel on the property. One person reported that “anhydrous” (anhydrous ammonia) was
26 previously used on the property but that its application had been discontinued for many years.
27 The project corridor does not appear to directly impact any part of the Baldwin Angus Ranch
28 that contains structures, equipment storage areas, or cattle pens. Because of the potential
29 previous use of pesticides, herbicides, and fertilizers and the known presence of ASTs, the
30 Baldwin Angus Ranch is assigned a risk rating of **Medium**.

31 **SITE NUMBER 10- MAGNUM MATERIALS MINE AND BORROW PITS**

32 Address: 3669-3711 NW 27th Avenue

33 Facility ID: None

34 This site was assessed in the field and through interview with mine staff and analysis of historic
35 images. Historic photographs show major ground disturbance associated with this mine as
36 early as 1995. There are multiple borrow pits associated with this site, some of which are full of
37 water. The Magnum Materials mine did not appear in any contamination databases and there is
38 no known history of a release of contamination. Interviews revealed they mine and crush
39 limestone on site. Field investigations showed signs of significant earth moving and soil
40 disturbance. Most of the northwest corner of the site, which would be impacted by the project,

- 1 is wooded. Because of no documented presence or release of contaminants, a risk rating of
- 2 **Low** is assigned to this site.

8.0 RECOMMENDATIONS

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12

Information was obtained for this report through interviews, observations during on-site visits and database information from the FDEP and USEPA. A total of 11 sites were identified for potential contamination risk. One site was assigned a risk rating of High, four sites were assigned a risk rating of Medium, and six sites were assigned a risk rating of Low.

Level II Contamination Assessments are recommended for any High- or Medium-Risk sites. West of I-75, additional contamination assessments will be primarily for petroleum and east of I-75 additional contamination assessments will be primarily for contaminants associated with agriculture (i.e. pesticides, herbicides, and heavy metals). If contaminants are identified by the Level II contamination assessments and are determined to result in impacts to construction, the District 5 Districtwide Contamination Assessment and Remediation (C.A.R.) contractor will be tasked with providing construction support to mitigate and obviate those impacts.

1

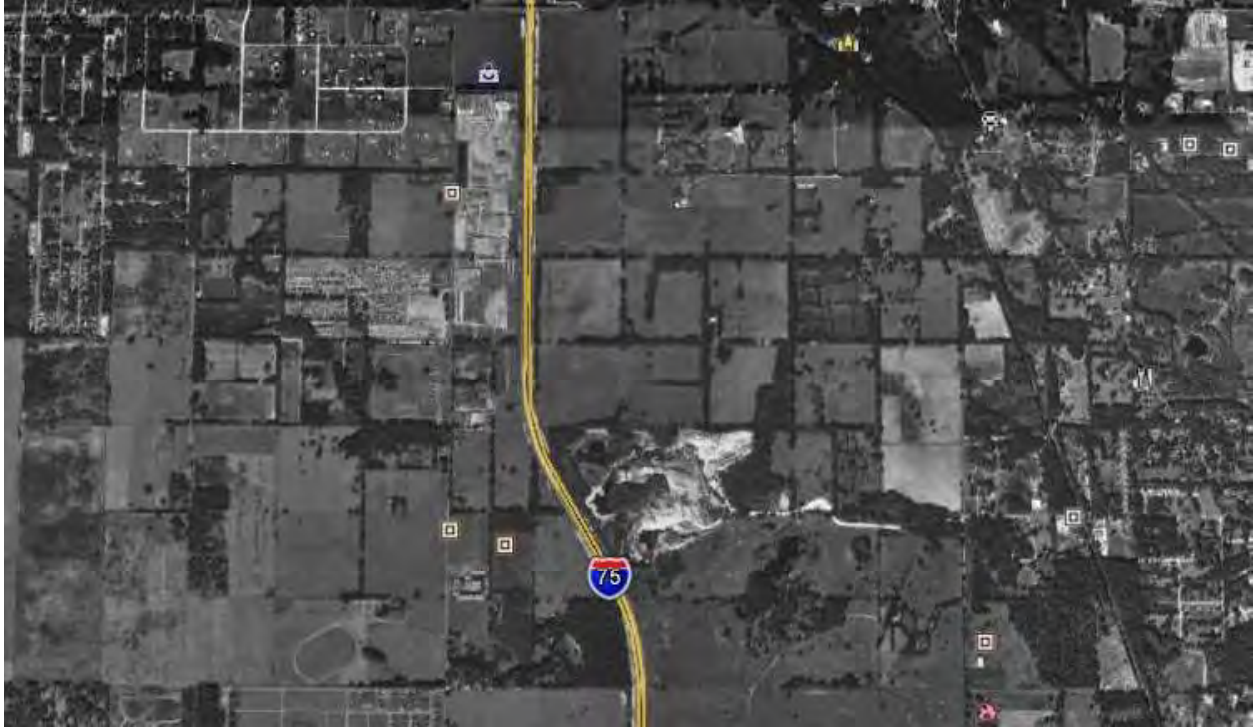
9.0 REFERENCES

- 2 Natural Resources Conservation Service. 2014. Web Soil Survey. Online tool provided by U.S.
3 Department of Agriculture. Available at:
4 <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>. Last accessed 2016.

1
2

**APPENDIX A
HISTORIC PHOTOGRAPHS**

HISTORIC AERIAL IMAGERY



1995



1995 Zoom onto NW 49th Street



1999



1999 Zoom onto NW 49th Street



2005



2006



2008



2015

1
2
3

APPENDIX B
PHOTOGRAPHS AND SITE INFORMATION (MEDIUM- RISK AND HIGH-RISK SITES)

SITE NUMBER 2- QUICK KING #16



Fuel Islands, Facing Southwest



Rear of Building, Facing Northeast



Side of Building, Facing North



Tanks at Rear of Building



Florida Department of Environmental Protection
 Twin Towers Office Bldg. 2600 Blair Stone Road, Tallahassee, Florida, 32399-2400
 Division of Waste Management
 Petroleum Storage Systems
 Storage Tank Facility Routine Compliance Site Inspection Report

Facility Information:

Facility ID:	8511206	County:	MARION	Inspection Date:	10/09/2018
Facility Type:	A - Retail Station				
Facility Name:	QUICK KING #16			# of Inspected ASTs:	0
	5880 NW 44TH AVE			USTs:	1
	Ocala, FL 34482			Mineral Acid Tanks:	0
Latitude:	29° 14' 55.1512"				
Longitude:	82° 11' 37.9102"				
LL Method:	DPHO				

Inspection Result:

Result: In Compliance

Signatures:

TKALEP - ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT (352) 264-6843

Storage Tank Program Office and Phone Number

Michael J Keim

Austin Dendler

Inspector Name

Michael Keim

Representative Name

Austin Dendler

Inspector Signature

Principal Inspector

**ALACHUA COUNTY ENVIRONMENTAL
 PROTECTION DEPARTMENT**

Representative Signature

Tech

Southeastern Petroleum

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J, requires Operator Training at all facilities by October 13, 2018. For further information please visit: <https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training>

Financial Responsibility:

Financial Responsibility: INSURANCE

Insurance Carrier: COMMERCE & INDUSTRY

Effective Date: 01/15/2018

Expiration Date: 01/15/2019

Findings:

No training certificates are present.

Completed System Tests

Type	Date Completed	Results	Reviewed	Next Due Date	Comment
Breach of Integrity Test	10/17/2013	Passed	02/24/2015	10/17/2018	Tested and passed by Southeastern Petro - PCC.
Annual Operability Test	10/08/2018	Passed	10/25/2018	10/08/2019	ATG sens, overfill (flappers) Tested by Southeastern Petroleum
Annual Inline Leak Detector Test	10/08/2018	Passed	10/25/2018	10/08/2019	Tested by Southeastern Petroleum
Breach of Integrity Test	10/08/2018	Passed	10/25/2018	10/08/2021	D/W S/B's Vac Tested by Southeastern Petroleum

Reviewed Records

Record Category	Record Type	From Date	To Date	Reviewed Record Comment
Two Years	Certificate of Financial Responsibility	10/09/2018	10/09/2018	Reviewed with current insurance
Two Years	Monthly Maint. Visual Examinations and Results	01/27/2016	09/24/2018	Reviewed with ATG printouts and maint. records

Site Visit Comments

10/09/2018

Routine storage tank compliance inspection: This facility has (1) 20K gallon double wall UST with (3) compartments for Diesel, Premium (PUL) and Regular (RUL) unleaded gasoline products. Release detection is monitored electronically for the tank secondary, product levels and piping sumps. Visually for the sumps, dispenser liners and spill buckets.

Facility ID: 8511206

Piping Sumps: (3) Diesel, (PUL) and (RUL) sumps appeared clean and dry, The gasoline sumps were treated and painted for corrosion since the last inspection. All piping entry boots and properly placed (ATG) sensors were secure with open piping secondary's for release detection.

Fill ports: The double wall spill buckets were clean with inspected empty secondary's. The diesel, (PUL) and (RUL) spill buckets contained drop tubes with positive shut off valves (flappers) installed for overfill prevention.

Dispenser liners: The (3) dispenser liners were relatively clean and dry, all piping entry boots and shear valves were secure with open piping secondary's for release detection.

Records Reviewed:

Current posted placard

Current CFR and insurance - reviewed on site

Monthly visual inspections

Annual testing

Inspection Comments

10/25/2018

Storage tank compliance inspection report and compliance letter sent via e-mail to Bob Wood, bobwoodspci@cloud.com The authorized regulatory contractor for for this site.

Reminder: The initial hydro-static integrity testing of the piping sumps and dispenser liners also Operator B,C training for site staff is due by 10/13/2018.

Compliance assist with Austin Dendler of Southeastern Petroleum

Please update the registration regarding overfill prevention from ball float valves to positive shut off valves (flappers). Both are listed and only one can be installed.

Inspection Photos

Facility ID: 8511206

Added Date 10/25/2018

2018-10-09 - site photo



Added Date 10/25/2018

2018-10-09 - site photo





Florida Department of Environmental Protection
Twin Towers Office Bldg • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

DATA ENTERED
Form Title: Storage Tank Registration Form
Effective Date: AUG 23 2010
DLI Applied: _____
(File as Ly DLI)

Storage Tank Facility Registration Form

Submit a completed form for the facility when registration of storage tanks or compression vessels is required by Chapter 37B, Florida Statutes.

Please review Registration Instructions before completing the form.

Please check all that apply	<input type="checkbox"/> New Registration	<input type="checkbox"/> New Owner	<input checked="" type="checkbox"/> New Tanks
	<input type="checkbox"/> Facility Info Update/Correction	<input type="checkbox"/> Owner Info Update/Correction	<input type="checkbox"/> Tank Info Update/Correction

A. FACILITY INFORMATION

County	<u>MACON</u>	DEP Facility ID	<u>8511206</u>
--------	--------------	-----------------	----------------

Facility Name Quick King #E16
 Facility Address 5870 NW 14TH AVE City DEALA Zip 34482
 Facility Contact JOHN MILLS Business Phone _____
 Facility Type(s) A NAICS Code 447110 Financial Responsibility _____

24 Hour Emergency Contact JOHN MILLS Emergency Phone (352) 402-9191

D. RESPONSIBLE PERSON INFORMATION - Identify individual(s) or Business(es) responsible for storage tank management, fueling operation, and/or cleanup activities at the facility location named above. Provide additional information in an attachment if necessary.

Name	<u>Bucks 44th Ave 2 LLC</u>	Facility Responsible Person Relation Type	Effective Date
Mail address	<u>4031 SE 20th St.</u>	<input checked="" type="checkbox"/> Facility Account Owner (pays fees)	
City/ST/Zip	<u>DEALA FL 34471</u>	Facility Account Owner Information must be provided when the facility contains active or out of service storage tanks on site	
Contact	<u>John Mills</u>	STCM Account Number (if known)	
Telephone	<u>352-402-9191</u>		

Identify other appropriate facility relationships for this party: Facility Owner/Operator Property Owner Storage Tank Owner

Name	Other owner relationship type(s)	Effective Date
Mail address	<input type="checkbox"/> Facility Owner/Operator	
City/ST/Zip	<input type="checkbox"/> Property Owner	
Contact	<input type="checkbox"/> Storage Tank Owner	
Telephone	<input type="checkbox"/> Other	

C. TANK/VESSEL INFORMATION - Complete one row for each storage tank or compression vessel system located at this facility.

Tank ID	TN	AV	Capacity	Installed	Content	Status/Effective Date	Construction	Piping	Monitoring
1	T	LL	8,000	10-1-1983	R	B 10-23-2009			
2	T	LL	8,000	10-1-1983	B	B 10-23-2009			
3	T	LL	20,000	10-23-2009	B, D	B 10-23-2009	FR, ML, EN	CF, FB	FR, H, B

Contracted Contractor (performing tank installation or removal) _____ DBPR License No PCC056094

Registration Certification To the best of my knowledge and belief, all information submitted on this form is true, accurate and complete.
Michael E Clark Signature _____ Date 11/27/10
 Printed Name & Title _____

DEP 82 701 00v(2)

Northwest District 160 Governmental Center Blvd Panama City, FL 32401 904 869-9360	Northwest District 7028 Baywoodway Way Suite B100 Jacksonville, FL 32256 904-444-4300	Central District 3319 Maguire Blvd Suite 232 Orlando, FL 32803 407 894 7655	Southwest District 3804 Coconut Palm Drive Tampa, FL 33610 813 744 6100	Southeast District 408 North Congress Ave. W Palm Beach, FL 33410 561 921-0000	South District 2205 Victoria Ave Suite 384 Fort Myers, FL 33901 941 332 8978	Marathon Branch Office 2700 Overleaf Hwy Suite 221 Marathon, FL 33950 305-269-2310
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E-MAILED
12/07/10
Hitwa



Florida Department of Environmental Protection
 Two Towers Office Bldg • 2600 Blair Stone Road • Tallahassee, Florida 32399 2400

DEP Form # 62-761 (2001S)
 Form Title UST Contractor Form
 Effective Date July 13, 1998

Underground Storage System Installation and Removal Form for Certified Contractors

Pollutant Storage Systems Contractor as defined in Section 489.113, Florida Statutes (certified contractors as defined in Section 62-761.200, Florida Administrative Code) shall use this form to certify that the installation, replacement or removal of the underground storage tank system(s) located at the address listed below was performed in accordance with Department Reference Standards. This includes system components such as dispenser liners, piping, wraps, and overflow protection devices.

General Facility Information

Facility Name <u>Quick King #16</u>	DTP Facility Identification No <u>8511206</u>
Street Address (physical location) <u>5880 NW 44th Ave</u>	
County <u>Marion</u>	Telephone # <u>(352) 622-2610</u>
Owner Name <u>Bucks 44th Ave 2 LLC</u>	Telephone # <u>(352) 402-9191</u>
Owner Address <u>4031 SE 20th St Ocala FL 34471</u>	

Storage Tank System Information

Number of Tanks Installed <u>1</u>	Number of Tanks Removed <u>2</u>
Date Work Initiated _____	Date Work Completed _____
Tank(s) Manufactured by <u>Metal Products Co.</u>	
Description of work Completed <u>Removed two (2) underground fuel storage tanks. Installed one (1) new double wall underground fuel storage tank.</u>	

Certification

I hereby certify and attest that I am familiar with the facility, that is registered with the Florida Department of Environmental Protection, that to the best of my knowledge and belief, the storage tank system installation, replacement or removal at this facility was conducted in accordance with Chapter 489, Florida Statutes, Section 376.303, Florida Statutes, and Chapter 62-761, Florida Administrative Code, and its adopted reference standards and documents for underground storage tank systems.

Michael E Clark
 (Type or Print)
 Certified Pollutant Tank Contractor Name

[Signature]
 Certified Tank Contractor Signature

Jim Roy
 Field Supervisor Name

PCC056694
 FSSC Number
 Pollutant Storage Systems
 Contractor License Number

11 27 09
 Date

11 27 09
 Date

The owner or operator of the facility must register the tanks with the Department upon completion of the installation. The installer must submit this form to the County no more than 30 days after the completion of installation, replacement, or removal of a storage tank.

Bolen, Erin

From Kraeft, Nancy
Sent Friday, August 20, 2010 10 38 AM
To tankregistration
Cc cmpatel4u@yahoo.com
Subject FW Storage Tank Registration Form
Attachments 20100819143602.pdf

Follow Up Flag Follow up
Flag Status Flagged

Categories Erin's Email To-Do Response Category

Tank Registrations for processing

Thank you! ☺

From: Chirag Patel [mailto:cmpatel4u@yahoo.com]
Sent: Thursday, August 19, 2010 2 31 PM
To: Kraeft, Nancy
Subject: Storage Tank Registration Form

With Regards,

Charlie Patel
Quick King Food Stores
303 SW 8th Street Suite# 1
Ocala, Florida 34471
Office# 352-402-9191
Fax# 352-402-9192

--- On Fri, 8/13/10, Kraeft, Nancy <Nancy.Kraeft@dep.state.fl.us> wrote

From Kraeft, Nancy <Nancy.Kraeft@dep.state.fl.us>
Subject Request for Storage Tank Registration Form
To "cmpatel4u@yahoo.com" <cmpatel4u@yahoo.com>
Cc "Kraeft, Nancy" <Nancy.Kraeft@dep.state.fl.us>
Date Friday, August 13, 2010, 11 23 AM



Hello,

Per our telephone conversation, please see attached Storage Tank Registration Form After you com,



Florida Department of Environmental Protection
Twin Towers Office Bldg • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Division of Waste Management
Storage Tank Facility Registration Form

#16

DEP Form # 17-761-900(7)
Form Title Storage Tank Registration Form
Effective Date _____
DEP Application No. _____ (Filled in)

Submit a completed form for the facility when registration of on-site storage tanks or compression vessels is required by Chapter 376.303, Florida Statutes and/or site operates as a petroleum retail/distribution facility and must comply with EPCRA, Section 312 Chemical Inventory reporting requirements.

By: AEB Please review Registration Instructions before completing the form.

Please check all that apply: New Registration Facility Info Update/Correction New Owner Owner Info Update/Correction New Tanks Tank Info Update/Correction

A. FACILITY INFORMATION County: Marion DEP Facility ID: 8511206

Facility Name: Quick King # 16 EPCRA (Y/N): 8511206
Location Address: 5880 N.W 44th Ave City: Ocala Zip: 34482
Facility Type(s): Retailer SIC Code: _____ Financial Responsibility: Insurance
On-Site Manager/Contact: Yogi R. Patel Business Phone: (352) 622-2010

24 Hour Emergency Contact: Yogi R. Patel Emergency Phone: 239-243-4647

B. RESPONSIBLE PARTY INFORMATION - Identify individual(s) or Business(es) responsible for storage tank management, fueling operations, and/or activities at the facility location named above. Provide additional information in an attachment if necessary.

Name: Shreeji Bapu Gupta 16 Inc Facility - Party Relationship Type: _____ Effective Date: _____
Mail address: 303 S.W 8th St Suite # 1 Facility Account Owner (pays fees) 1/16/10
City, ST, Zip: Ocala - FL - 34471 This information must be provided when the facility contains active (in-use) storage tanks on site.
Contact: Uisay Patel
Telephone: 352-402-9191 STCM Account Number (if known): 62221
Identify other appropriate facility relationships for this party: Facility Owner/Operator Property Owner Storage Tank Owner

Name: Yogi R. Patel Identify other "ownership" participants of this facility.
Mail address: 303 S.W 8th St Suite # 1 Choose appropriate relationship type(s): _____ Effective Date: _____
City, ST, Zip: Ocala - FL - 34471 Facility Owner/Operator
Contact: Yogi R. Patel Property Owner
Telephone: 239-243-4647 Storage Tank Owner

C. TANK/VESSEL INFORMATION - Complete one row for each storage tank or compression vessel system located at this facility.

Tank ID	TV	AU	Capacity	Installed	Content	Status/Effective Date	Construction	Piping	Monitoring	Hazards

Certified Contractor (performing tank installation or removal): _____ DBPR License No.: _____

Registration Certification: To the best of my knowledge and belief, all information submitted on this form is true, accurate, and complete.
Uisay Patel / owner Uisay Patel
Printed Name & Title Signature Date 3/10/08



Storage Tank Registration Form

Please Print or Type - Review Instructions Before Completing Form

1. DER Facility ID Number: 4285112061 2. Facility Type: A
 3. New Registration New Owner Data Facility Revision Tank(s) Revision
 4. County and Code of tank(s) location: MARION 42 1

5. Facility Name: KWIK KING # 27
 Tank(s) Address: 5880 NW 44th AVE
 City/State/Zip: Ocala, Fl. 34482
 Contact Person: _____ Telephone: (352) 622-2010
 6. Financial Responsibility Type: A

7a. Tank(s) Owner: KWIK KING FOOD STORES INC
 Owner Mailing Address: 101 NE 16th AVE.
 City/State/Zip: Ocala, Fl 34470
 Contact Person: JOHN PANGBORN Telephone: (352) 732-4464

7b. New Owner Signature/Change Date: _____ / ____ / ____

8. Location (optional) Latitude: 29° 14' 53" Longitude: 82° 11' 39" Section _____ Township 9B Range _____

Complete One Line For Each Tank At This Facility (Use Codes - See Instructions)

Complete 9 - 16 for tanks in use; 9 - 19 for tanks out of use

9	10	11	12	13	14	15	16	17	18	19
1	8000	B	10/83	U	ACHM	BESK	BH	U		
2	8000	B	10/83	U	ACHM	BESK	BH	U		

20. _____ Certified Contractor* DPR# _____ Department of Professional Regulation License Number*

*For new tank installation or tank removal

To the best of my knowledge and belief all information submitted on this form is true, accurate and complete.

JOHN W PANGBORN - MKTB [Signature] 4/28/98
 Print name & title of owner or authorized person Signature Date

DEPARTMENT OF ENVIRONMENTAL REGULATION
STATIONARY TANK INVENTORY SYSTEM
FACILITY/OWNER/TANK INFORMATION REPORT

CNTY/FAC # FACILITY DATA

42/8511209 KWIK KING FOOD STORE #24
3511 NE 36TH AVE
OCALA FL 32670-2255
(904)732-4464
OPER: KWIK KING FOOD STORES, INC.
SECTION: 034 TOWNSHIP: 14S RANGE: 22E

OWNER DATA

DINKINS, G-L-JR KWIK KING FOOD STORES, INC
101 NE 16TH AVE
OCALA FL 34470
(904)732-4464
CONTACT: BRAD-DINKENS TRACY RAINS

STATUS: OPEN REGULATED
ENTERED:
TYPE: A
LAT/LONG: 29:12:59 / 82:20:04
FINANCIAL RESPONSIBLE PARTY:

TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	10000	09/81	B	U	ACHMO	CJKM	BHOM	U			
2	10000	09/81	B	U	ACHMOH	CJKM	BHOM	U			
3	10000	09/81	B	U	ACHMOH	CJKM	BHOM	U			

42/8511205 KWIK KING FOOD STORE #25
5790 NE 7TH ST
OCALA FL 32671-1128
(904)732-4464
OPER: KWIK KING FOOD STORES, INC.
SECTION: 013 TOWNSHIP: 15S RANGE: 22E

DINKINS, G-L-JR KWIK KING FOOD STORES, INC
101 NE 16TH AVE
OCALA FL 34470
(904)732-4464
CONTACT: BRAD-DINKENS TRACY RAINS

STATUS: OPEN REGULATED
ENTERED:
TYPE: A
LAT/LONG: 29:11:64 / 82:03:08
FINANCIAL RESPONSIBLE PARTY:

CNTY/FAC # FACILITY DATA

42/8511198 KWIK KING FOOD STORE #26
8820 SW SR 200
OCALA FL 32671
()
OPER: KWIK KING FOOD STORES, INC.
SECTION: 025 TOWNSHIP: 16S RANGE: 20E

OWNER DATA

DINKINS, G-L-JR KWIK KING FOOD STORES, INC
101 NE 16TH AVE
OCALA FL 34470
(904)732-4464
CONTACT: BRAD-DINKENS TRACY RAINS

STATUS: OPEN REGULATED
ENTERED:
TYPE: A
LAT/LONG: 29:04:22 / 82:15:51
FINANCIAL RESPONSIBLE PARTY:

CNTY/FAC # FACILITY DATA

42/8511206 KWIK KING FOOD STORE #27
5880 NW 44TH AVE
OCALA FL 32671
(904)732-4464
OPER: KWIK KING FOOD STORES, INC.
SECTION: 027 TOWNSHIP: 14S RANGE: 21E

OWNER DATA

DINKINS, G-L-JR KWIK KING FOOD STORES, INC
101 NE 16TH AVE
OCALA FL 34470
(904)732-4464
CONTACT: BRAD-DINKENS TRACY RAINS

STATUS: OPEN REGULATED
ENTERED:
TYPE: A
LAT/LONG: 29:14:59 / 82:11:56
FINANCIAL RESPONSIBLE PARTY:

TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	8000	10/83	B	U	ACHMO	BEJ	BHOM	U			
2	8000	10/83	B	U	ACHMO	BEJ	BHOM	U			

DATA ENTERED

MAP 24
BY 



STATE OF FLORIDA
 Department of Environmental Regulation
 STORAGE TANK NOTIFICATION FORM
 Form 17-51.090 (3)

RECEIVED
 D.E.R.

88 APR 14 PM 1:33

PLEASE PRINT OR TYPE

BUREAU OF
 WASTE MANAGEMENT
 (2) County Code
DATA ENTERED

MAY 19 1988

LAURIE GINGER

Tank (s)
 Location

- (1) DER facility number (if known) 428511206
 (3) Original registration 11-16-84 data revision 4-12-88
 (4) Facility type (see code list (4) on back) concrete Sta

(5) Facility name Kwik King Food Store# 27
 Street address/city/state/zip 5880 NW 44th Ave Ocala Fla
 Mailing address/city/state/zip 101 N.E. 16th Ave Ocala, Fla. 32670

(6) Operator Kwik King Food Stores Inc. Telephone # (904) 732-4464
 New operator date (only for change of operator) / /

(7) Company/person owning tank(s) and piping Kwik King Food Stores Inc.
 Company address/city/state/zip 101 N.E. 16th Ave. Ocala, Fla. 32670

Contact person Henry Heilig Telephone # (904) 732-4464
 New owner date (only for change of owner) / /

(8) Location (if available): Latitude 52° 11' 39" Longitude 79° 14' 51"
 Section 27 Township 14S Range 21E

PLEASE FILL OUT ONE LINE FOR EACH TANK WITH CODES LISTED ON BACK

Fill out columns (9) through (16) for tanks in use, and (17) through (19) for tanks out of use

(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)
1	8000	A	10/83	U	AC	B	B	17, 18, 19 for tanks retrofitted, removed abandoned, etc.		
2	8000	B	10/83	U	AC	B	B			

(20) Pollutant Storage System Specialty
 Contractor Name
 For new tank installation or tank removal

DPR #
 Department of Professional Regulation
 Certificate Number

To the best of my knowledge and belief all information submitted on this form is true, accurate and complete.

Henry Heilig Gasoline Operations
 Print name and title of owner, operator
 or authorized person

[Signature]
 Signature

4-12-88
 Date



A WHOLLY-OWNED SUBSIDIARY OF
INTERNATIONAL TECHNOLOGY CORPORATION

BRIDGEPORT, CT
203 / 366-9699

ROBBINSVILLE, NJ
609 / 259-3333

AVENEL, NJ
201 / 396-1600

BATAVIA, NY
716 / 343-6444

SHREWSBURY, MA
617 / 842-5643

DEERFIELD BEACH, FL
305 / 429-9905

REMIT TO: ~~300 LONG BEACH BOULEVARD, SUITE 400, LONG BEACH, CA 90801-1018 X~~

NEPCCO/IT

2140 N.E. 36th Avenue, Suite 300
Ocala, FL 32670

BILL TO: Kwik King Food Stores #27
101 N.E. 16th Avenue
Ocala, FL 32670

ATTN: Henry Heilig

INVOICE #: 55350

INVOICE DATE: 1-26-88

JOB LOCATION: 5880 N.W. 44th Ave., Ocala

BILLING DATE: 1-23-88

CUSTOMER PO #: VERBAL

TERMS: PAYABLE UPON RECEIPT

Installation of 2" Monitor Wells
with PVC Caps

4 wells @ \$225/well \$ 900.00

TOTAL INVOICE \$ 900.00

Stationary Tank Registration/Notification Form

Form 17-1.218(2)

KWIK KING FOOD STORE #27
2532 SE 17TH ST
OCALA

FL 32671

FACILITY LOCATION

ADDRESS: 5880 NW 44TH AV
CITY: Ocala

FL 32671

(Make corrections to name and addresses here)

1. Facility/Addressee name _____

Facility address _____

Mailing address _____

Use this form to comply with the following requirements of the Stationary Tank Rule Chapter 17-61, Florida Administrative Code.

- Each owner or operator shall register the following with the department:
 - All existing facilities by December 31, 1984. (Questions 1-19)
 - All new storage systems or facilities at least 10 days prior to the start of installation of tanks except in the cases of emergency replacement. (Questions 1-19)
 - A non-pollutant containing installation which is to be converted to a facility at least 10 days prior to the placement of pollutants in such a facility. (Questions 1-19)
- Each owner or operator shall notify the department of the following:
 - All storage systems within 10 days of abandonment. (Questions 1, 12, 16, 20)
 - Facility sale within 10 days of sale. Notice shall be made by the seller. (Answer questions 1, 7, and 11. Question 7 about the new owner.)
 - Retrofitting within 10 days of completion. (Questions 1-19)
- You may notify the department of a change of operator. (Questions 1-6)

09575 Agency Use Only

AGR210450000

PLEASE PRINT OR TYPE

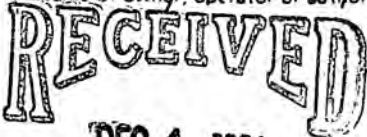
- 2 Facility number (DER will provide this number) 428511204 3 Date 11-16-84
- 4 Federal Employment Identification (number used to file IRS forms) 59-1144213
- 5 County Code (see enclosed letter) 42
- 6 Operator of facility Kwik King Food Stores Inc. Telephone number 1
- Effective date (only for change of operator): _____
- 7 Company/Person owning tanks and piping Kwik King Food Stores Inc.
- Address 2532 S.E. 17th St. Ocala, Fla 32671
- Contact person BOB AINKINS Telephone number: 904 132-4464
- Effective date (only for change of owner): _____
- 8 How many tanks at this location have an individual storage capacity of greater than 550 gallons and store vehicular fuel made from petroleum?
2 Underground _____ Aboveground _____
- 9 Facility location Latitude 82° 11' 39" Longitude 29° 14' 51" Section 27 Township 14S Range 21E
- This information is listed on property deeds, and in the offices of the property appraiser and tax assessor.
10. Sketch the facility on a separate page showing the APPROXIMATE location of buildings, tanks, and dispensers.
 A. Draw a line from tank to dispenser to show which are connected by piping.
 B. Label each tank as Tank 1, Tank 2, etc.
 C. Write the date and your facility number, if known, or name and address exactly as it appears above.
 D. Keep a copy of your sketch.

REFER TO TANKS BY THESE LABELS IN ANY COMMUNICATION WITH THE DEPARTMENT. DESCRIBE PIPING BY THE NUMBER OF THE TANK IT IS ATTACHED TO.

11 TO THE BEST OF MY KNOWLEDGE AND BELIEF ALL INFORMATION SUBMITTED ON THIS FORM IS TRUE, ACCURATE, AND COMPLETE

Herman Heilig
Name of owner, operator or authorized representative

[Signature]
Signature of owner, operator or authorized representative



DEC 4 1984

KEEP A COPY OF THIS FORM FOR YOUR RECORDS

MAIL TO: DER Stationary Tank Registration
2600 Blair Stone Road
Room 603
Tallahassee, Florida 32301

INSTRUCTIONS: Use one row across for each tank counted in question 8. The tank number must agree with the number on the sketch of your facility. A new tank installed where a registered tank was removed should be given the number of the removed tank with an R and a number added. Example: Tank 3R1 is first replacement for tank 3. It is in the same place where tank 3 was. Tank 3R2 is the second replacement for tank 3. Attach extra pages if necessary. Write your facility number, if known, or name and address, exactly as it appears on the front of the form, on all extra pages.

(12) Tank Number	(13) Tank Size in Gallons	(14) Tank Contents (see List 14 below)	(15) Tank Installation Date, Month/Year (put X if unknown)	(16) Underground or Aboveground Tank (write U or A)	(17) Tank Construction Specifics (see List 17U or 17A below)	(18) Integral Piping System Construction Specifics (see List 18 below)	(19) Monitoring System Type (see List 19)	(20) Tank Disposal Method (see List 20)
1	8000	A	10/83	U	C	B	A	
2	8000	B	10/83	U	C	B	A	

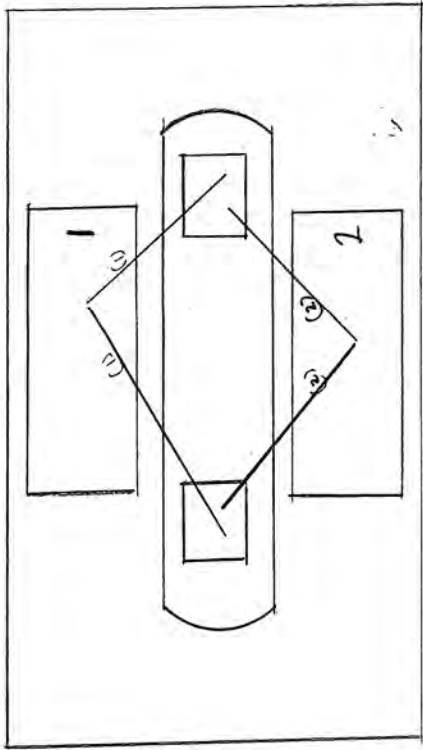
ENTER THE LETTERS WHICH APPLY TO EACH TANK IN THE BOXES ABOVE. WRITE ALL THAT APPLY.

List 14	List 17A ABOVEground Tanks	List 17U UNDERground Tanks	List 18 Integral Piping System has:	List 19 Monitoring system is:	List 20 Tank disposal method.
<p>Tank contents are:</p> <p>A. leaded gasoline. B. unleaded gasoline. C. Alcohol enriched gasoline. D. diesel fuel. E. aviation fuel. Z. other.</p>	<p>Aboveground tank:</p> <p>O. has overfill protection. P. is surrounded by impervious dike. Q. is surrounded by earth dike. R. rests on an impervious base. S. rests on a earth/gravel base. T. has interior lined bottom. U. is cathodically protected. V. is built of/coated with corrosion resistant materials. W. is supported above the soil. Z. is or has none of the above.</p>	<p>Underground tank:</p> <p>A. has overfill protection. B. is interior lined. C. is painted/asphalted steel. D. is of unknown type. E. is fiberglass type. F. is fiberglass-clad steel. G. is sacrificial anode type. H. is impressed current type. I. is double walled. J. is concrete. K. is in secondary containment. N. is or has none of the above.</p>	<p>Integral Piping System has:</p> <p>A. no parts in contact with the soil. Parts contacting the soil which are: B. unprotected metal. C. built of corrosion resistant materials. D. corrosion resistant coated. E. cathodically protected. F. double-walled. G. within a secondary containment. H. interior lined. M. none of the above.</p>	<p>Monitoring system is:</p> <p>A. automatically sampled well(s). B. manually sampled well(s). C. groundwater monitoring plan. D. SPCC plan. E. well/detector in secondary containment. F. in-ground detector. G. within walls of double-walled tank. H. continuous in piping. I. not required. N. none of the above.</p>	<p>Tank disposal method.</p> <p>A. Filling. B. Removal. C. Retrofitting. F. Other.</p>

Kwik King #27

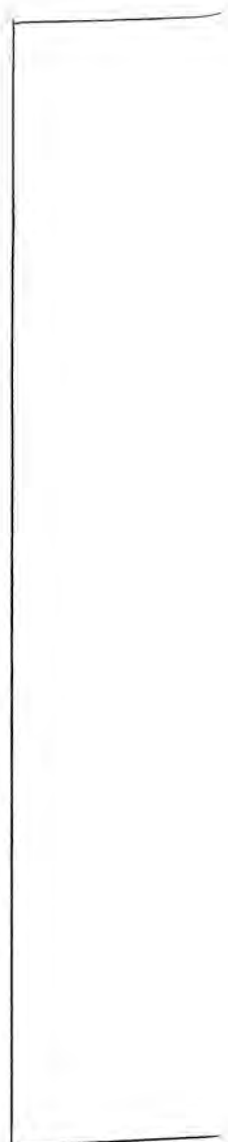
5880 N.W. 44th Ave

Ocala, Fla



1- Regular

2- Unleaded



CNTY/FAC # FACILITY DATA ***** OWNER DATA *****
***** TANK DATA CONTINUED FROM PREVIOUS PAGE** # 428511209 *****

TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	10000	09/81	B	U	ACMCH	CJKM	BHO	U			
2	10000	09/81	B	U	ACMCH	CJKM	BHO	U			
3	10000	09/81	B	U	ACMCH	CJKM	BHO	U			
42/8511205 KWIK KING FOOD STORE #25 5790 NE 7TH ST OCALA FL 32671-1128 (904)732-4464 OPER: KWIK KING FOOD STORES, INC. CONTACT: TRACY RAINS											
BANKINS - CLOR Kwik King Food Stores, Inc. 101 NE 16TH AVE OCALA FL 32670-6904											

TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	10000	03/83	B	U	ACMCH	BJE	BHO	U			
2	10000	03/83	B	U	ACMCH	BJE	BHO	U			
42/8511198 KWIK KING FOOD STORE #26 8820 SW SR 200 OCALA FL 32671 () OPER: KWIK KING FOOD STORES, INC. CONTACT: TRACY RAINS											
BANKINS - CLOR Kwik King Food Stores, Inc. 101 NE 16TH AVE OCALA FL 32670-6904											

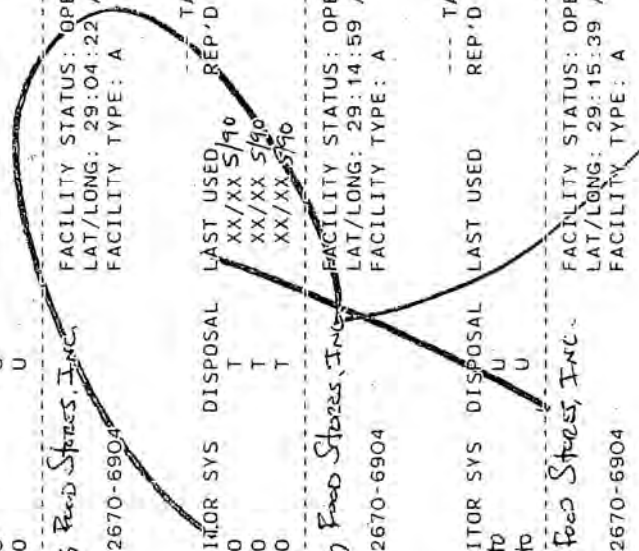
TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	10000	11/82	B	U	CMO	BU	BHO	T	XX/XX 5/90		
2	10000	11/82	B	U	CMO	BU	BHO	T	XX/XX 5/90		
3	10000	11/82	B	U	CMO	BU	BHO	T	XX/XX 5/90		
42/8511206 KWIK KING FOOD STORE #27 5880 NW 44TH AVE OCALA FL 32671 (904)732-4464 OPER: KWIK KING FOOD STORES, INC. CONTACT: TRACY RAINS											
BANKINS - CLOR Kwik King Food Stores, Inc. 101 NE 16TH AVE OCALA FL 32670-6904											

TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	8000	10/83	B	U	ACMCH	BJE	BHO	U			
2	8000	10/83	B	U	ACMCH	BJE	BHO	U			
42/8511207 KWIK KING FOOD STORE #28 7000 JACKSONVILLE RD OCALA FL 32671 (904)732-4464 OPER: KWIK KING FOOD STORES, INC. CONTACT: TRACY RAINS											
BANKINS - CLOR Kwik King Food Stores, Inc. 101 NE 16TH AVE OCALA FL 32670-6904											

TANK #	GALLONS	INSTALLED	CONTENTS	POSITION	CONSTRUCTION	PIPING SYS	MONITOR SYS	DISPOSAL	LAST USED	REP'D BY	REPLACES
1	10000	05/84	B	U	ACMCH	BJE	BHO	U			
2	8000	05/84	B	U	ACMCH	BJE	BHO	U			
3	4000	05/84	B	U	ACMCH	BJE	BHO	U			
42/8511208 KWIK KING FOOD STORE #29 8820 SW SR 200 OCALA FL 32671 () OPER: KWIK KING FOOD STORES, INC. CONTACT: TRACY RAINS											
BANKINS - CLOR Kwik King Food Stores, Inc. 101 NE 16TH AVE OCALA FL 32670-6904											

DATA ENTERED

SEP 28



SITE NUMBER 3- ALL IN REMOVAL



Front of All In Removal, Facing East From 44th Avenue



Aerial View of All In Removal



Florida Department of Environmental Protection
 Twin Towers Office Bldg. 2600 Blair Stone Road. Tallahassee, Florida 32399-
 Division of Waste Management
 Bureau of Petroleum Storage Systems

Storage Tank Facility Installation Site Inspection Report

Facility Information:

Facility ID: 9814828 County: MARION Inspection Date: 03/01/2016
 Facility Type: C -Fuel user/Non-retail
 Facility Name: ALL IN REMOVAL # Of Inspected ASTs: 1
 5877 NW 44TH AVE USTs: 0
 Ocala, FL 34482 Mineral Acid Tanks: 0
 Latitude: 26° 53' 6.0"
 Longitude: 84° 12' 6.0"
 LL Method: UNVR

Inspection Result:

Result : In Compliance
 Description: Facility is In Compliance.

Financial Responsibility

Financial Responsibility: INSURANCE
 Insurance Carrier: COMMERCE & INDUSTRY INSURANCE CO
 Effective Date: 09/12/2015 Expiration Date: 09/12/2016

Signatures:

TKALEP - ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT

Storage Tank Program Office

(352) 264-6843

Storage Tank Program Office Phone Number

Michael J Keim
 INSPECTOR NAME

Don Emrick
 REPRESENTATIVE NAME

Michael K

E. MAIL

INSPECTOR SIGNATURE

REPRESENTATIVE SIGNATURE

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J, requires Operator Training at all facilities by October 15, 2018. For further information please visit: http://www.dep.state.fl.us/waste/categories/tanks/pages/op_train.htm

Reviewed Records

Record Category	Record Type	From Date	To Date	Reviewed Record Comment
Two Years	Monthly Maint. Visual Examinations and Results	03/01/2016	03/01/2016	Monthly visual inspections will start as of today.

Site Visit Comments

03/01/2016

This facility has (1) 2000k gallon Double wall AST Fireguard by Metal products E.Q. #342. There is a Morrison spill bucket E.Q. #345 and an OPW fill port adapter. There is a Morrison clock gauge next to the fill port for convenience for overflow protection. The interstice is checked by manually sticking it monthly by the maintenance technician also observed at the time of inspection. There is a fill rite model #310 pump with a fill rite series 900 meter installed with a Fail Safe breakaway, model 1403-1 on the fueling hose. The tank has been freshly painted and all single wall steel piping has been coated as well. There is an anti-siphon check and ball valve installed on the feed line and no piping is touching the ground.

Inspection Comments

03/01/2016

Tank compliance report will be e-mailed to: Don Emrick, 352-529-0800, Don@All-InRemoval.com

03/03/2016

GPS Coordinates: N 29* ,14.898' W 082* ,11.495'

Inspection Photos

Added Date 03/02/2016

2016-03-01 - front of tank



Added Date 03/02/2016

2016-03-01 - site photo





Facility Information:

Facility ID:	9814828	County:	MARION	Inspection Date:	01/29/2018
Facility Type:	C - Fuel user/Non-retail				
Facility Name:	ALL IN REMOVAL			# of Inspected ASTs:	1
	5877 NW 44TH AVE			USTs:	0
	OCALA, FL 34482			Mineral Acid Tanks:	0
Latitude:	29° 14' 53.541"				
Longitude:	82° 11' 29.3284"				
LL Method:	DPHO				

Inspection Result:

Result: Major Out of Compliance

Signatures:

TKALEP - ALACHUA COUNTY ENVIRONMENTAL PROTECTION DEPARTMENT (352) 264-6843

Storage Tank Program Office and Phone Number

Michael J Keim

Robert Serrano

Inspector Name

Representative Name

Inspector Signature
Principal Inspector
ALACHUA COUNTY ENVIRONMENTAL
PROTECTION DEPARTMENT

Representative Signature
Logistic Supervisor
All In Removal

Owners of UST facilities are reminded that the Federal Energy Policy Act of 2005 and 40 CFR 280 Subpart J, requires Operator Training at all facilities by October 13, 2018. For further information please visit: <https://floridadep.gov/waste/permitting-compliance-assistance/content/underground-storage-tank-operator-training>

Financial Responsibility:

Financial Responsibility: INSURANCE
 Insurance Carrier: COMMERCE & INDUSTRY INSURANCE CO
 Effective Date: 09/12/2016 Expiration Date: 09/12/2018

Completed System Tests

Type	Date Completed	Results	Reviewed	Next Due Date	Comment
Annual Operability Test	03/13/2017	Passed	02/27/2018	03/13/2018	Tested by Quality One Petroleum
Annual Operability Test	04/07/2016	Passed	02/27/2018	04/07/2017	Tested by Quality One Petroleum

Reviewed Records

Record Category	Record Type	From Date	To Date	Reviewed Record Comment
Two Years	Certificate of Financial Responsibility	01/29/2018	01/29/2018	Reviewed
Two Years	Monthly Maint. Visual Examinations and Results	08/01/2017	01/03/2018	Reviewed

New Violations

Type: Violation

Significance: SNC-B

Rule: 62-762.601(1)(d), 62-762.601(1)(e)

Violation Text: Release detection, including visual inspections not being conducted monthly (not to exceed 35 days) for shop fabricated tank systems. For electronically monitored sumps, visual inspections not conducted every 6 months.

Explanation: Monthly visual inspection documentation from 04/2016 through 07/2017 was not available for review at the time of inspection.

Corrective Action: Monthly visual inspection documentation must be kept on site or available for review within 5 days of inspection. Please maintain (3) years of monthly visual records.

Site Visit Comments

01/29/2018

Tank Compliance Inspection: This facility has (1) 2K gallon double wall AST, registered as tank # 1, installed 03/2016 for diesel products. Release detection is monitored visually, tank interstice and daily tank level readings.

Facility ID: 9814828

This tank has a Morrison spill bucket with Morrison clock gauge within view of the fill port. All piping is above ground to a suction system Tut Hill, Fill Rite tank mounted dispenser. Anti siphon and isolation valve are present within the piping. The dispenser hose has a break away installed and all components are maintained. This is a rented / leased tank from the fuel vendor Tri County Oil Williston FI. The financial responsibility and annual testing is maintained by the vendor. Monthly visual inspections and fuel re-ordering are conducted and maintained by the facility operator. Monthly visual inspections were conducted (daily tank readings and call out to fuel vendor) but not documented from 04/2016 through 07/2017. Documentation was observed from 08/2017 through 01/2018. Compliance assistance was given to the new operator during this inspection, this is the first inspection conducted since the installation. Records reviewed were Registration Placard (fees are paid, facility must obtain a copy and post). Financial Responsibility, release detection, and Annual Operability testing.

Inspection Comments

02/27/2018

Tank compliance inspection report sent via e-mail to Barry Wood, barry.wood@all-inremoval.com and Todd Tucker, todd@tricountyoil.com

Compliance assist with Barry Wood

Signatures of rep and inspector on report are switched

Inspection Photos

Added Date 02/27/2018

2017-01-29 - tank photo

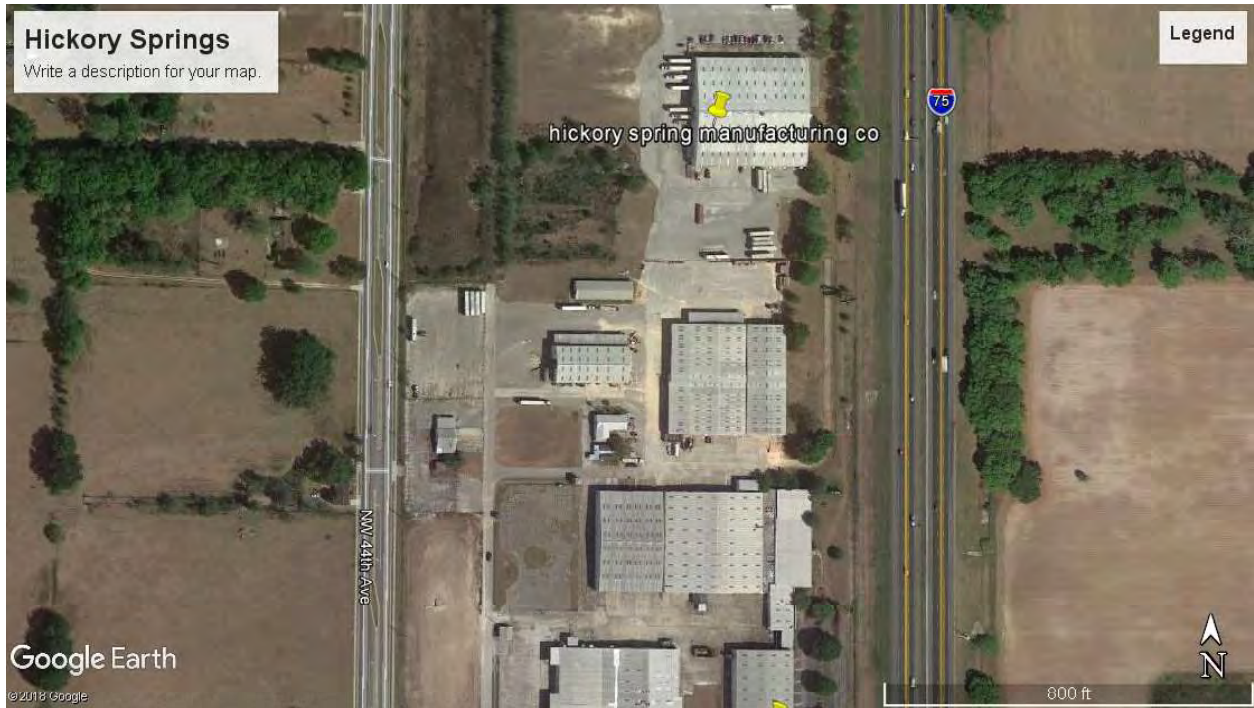


Added Date 02/27/2018

2017-01-29 - tank photo



SITE NUMBER 5- HICKORY SPRINGS



Aerial View of Hickory Springs



Possible Truck Wash Down Area, Facing Southwest



Barriers around water feature, facing north



Water Filled Hole Surrounded by Barriers

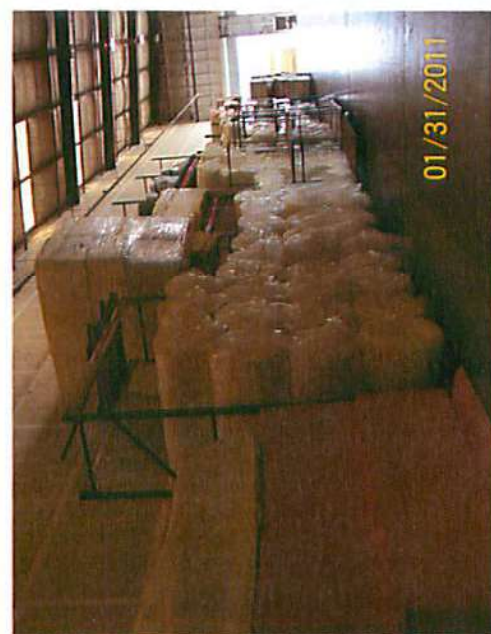
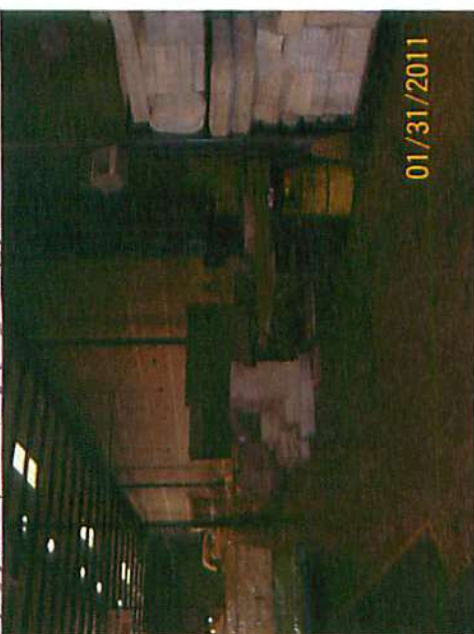
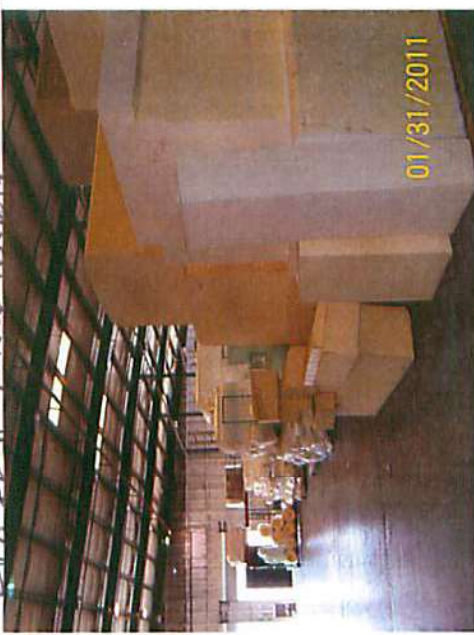


Hickory Springs Facing South



ASTs on East Side of Hickory Springs Buildings, Facing South

Hickory Springs Manufacturing Inspection Date: 1/31/11
EPA ID #: PR00112648
Inspector: R. Soich





UPACO Adhesives

UPACO Adhesives
WORTHEN INDUSTRIES, INC.
4105 Castlewood Road
Richmond, VA 23234
PHONE (804) 275-9231
(800) 446-9984
FAX (804) 743-8366

August 28, 2007

Dave McNeil
Hickory Springs Manufacturing Company
PO Box 128
Hickory, NC 28603

Reference: UPACO 3663-1 Solvent Content

Dear Mr. McNeil,

This letter is to disclose the composition of the solvents in our 3663-1 adhesive, per your request.

The solvents used in the manufacture of 3663-1 are Acetone, CAS# 67-64-1, 25.5% by weight, and Heptane, CAS # 142-82-5, 38.2% by weight. There is a slight variation in the final composition due to evaporation of the solvents during the mixing and packaging of this product.

The weight per gallon of this product is 7.0 lbs/gal.

Please contact me should you need any further information.

I can be reached at 800-446-9984, extension 113.

Sincerely,

Steven E. Adams
Adhesive Formulator

Cc: Dick Sirmons

MATERIAL SAFETY DATA SHEET

PAGE 2 OF

4
3663-0=====
SECTION III - PHYSICAL / CHEMICAL CHARACTERISTICS
=====

BOILING RANGE: 133 - 205°F SPECIFIC GRAVITY: 0.840
VAPOR DENSITY: HEAVIER THAN AIR
EVAPORATION RATE: FASTER THAN n-BUTYL ACETATE
SOLUBILITY IN WATER: NONE
APPEARANCE AND ODOR: TRANSPARENT LIGHT COLORED LIQUID WITH A
SOLVENT ODOR.
FREEZING POINT: N/A
pH: N/A
COEFFICIENT OF WATER/OIL DIST.: N/A
ODOR THRESHOLD: N/A

=====
SECTION IV - FIRE AND EXPLOSION HAZARD DATA
=====

FLASH POINT: 4°F METHOD USED: TCC
FLAMMABLE LIMITS IN AIR BY VOLUME - LOWER: 1.0% UPPER:
13.0%

EXTINGUISHING MEDIA: CO2, DRY CHEMICAL

SPECIAL FIREFIGHTING PROCEDURES:

WATER SHOULD NOT BE USED EXCEPT TO COOL CONTAINERS EXPOSED TO FLAMES OR HIGH HEAT. RESPIRATORY EQUIPMENT SHOULD BE WORN TO AVOID INHALATION OF CONCENTRATED FUMES.

UNUSUAL FIRE AND EXPLOSION HAZARDS:

HANDLE AS A FLAMMABLE LIQUID. VAPORS FORM AN EXPLOSIVE MIXTURE IN AIR BETWEEN THE UPPER AND LOWER EXPLOSIVE LIMIT WHICH CAN BE IGNITED BY MANY SOURCES, SUCH AS PILOT LIGHTS, OPEN FLAMES, ELECTRICAL MOTORS AND SWITCHES. STORE IN COOL, WELL VENTILATED AREAS.

=====
SECTION V - REACTIVITY DATA
=====

STABILITY: STABLE
CONDITIONS TO AVOID: EXCESSIVE HEAT, POOR VENTILATION, CORROSIVE
ATMOSPHERES, EXCESSIVE AGING.

INCOMPATIBILITY (MATERIALS TO AVOID): ALKALINE MATERIALS, STRONG ACIDS, AND OXIDIZING MATERIALS.
HAZARDOUS DECOMPOSITION OR BYPRODUCTS: CARBON MONOXIDE, CARBON DIOXIDE, OXIDES OF NITROGEN AND POSSIBLY ACROLEIN.
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

MATERIAL SAFETY DATA SHEET PAGE

3 OF 4
 3663-0

===== SECTION VI - HEALTH HAZARD DATA =====

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE: INHALATION: PROLONGED INHALATION OF HIGH VAPOR CONCENTRATIONS MAY RESULT IN A NARCOTIC EFFECT RANGING FROM DIZZINESS, NAUSEA AND HEADACHES, TO UNCONSCIOUSNESS.

SKIN AND EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE: EYES: SEVERE IRRITATION, TEARING, REDNESS, BURNING SENSATION AND BLURRED VISION.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE: SKIN: CAN DRY AND DEFAT SKIN, CAUSING CRACKING, IRRITATION AND DERMATITIS.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE: INGESTION: CAN CAUSE GASTROINTESTINAL IRRITATION, VOMITING, NAUSEA AND DIARRHEA.

HEALTH HAZARDS (ACUTE AND CHRONIC):
 INHALATION: DIZZINESS, BREATHING DIFFICULTY, HEADACHES AND LOSS OF COORDINATION. EYE CONTACT: SEVERE IRRITATION, REDNESS, TEARING AND BLURRED VISION. SKIN CONTACT: CAN DRY AND DEFAT SKIN CAUSING CRACKS, IRRITATION AND DERMATITIS. INGESTION: CAN CAUSE GASTROINTESTINAL IRRITATION, VOMITING, NAUSEA AND DIARRHEA. NO CHRONIC HEALTH EFFECTS.

CARCINOGENICITY: NTP? NO IARC MONOGRAPHS? NO OSHA REGULATED? YES

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE: ANESTHESIA, RESPIRATORY TRACT IRRITATION, DERMATITIS, NAUSEA AND VOMITING.

EMERGENCY AND FIRST AID PROCEDURES: INHALATION OVEREXPOSURE: MOVE PERSON TO FRESH AIR. IF BREATHING STOPS, APPLY ARTIFICIAL RESPIRATION AND SEEK MEDICAL ATTENTION IMMEDIATELY. EYE CONTACT: FLUSH WITH LARGE QUANTITIES OF WATER FOR 15 MINUTES, GET MEDICAL ATTENTION IF PROBLEM PERSISTS. SKIN CONTACT: WASH THOROUGHLY WITH WATER AND CONSULT A DOCTOR. INGESTION: DO NOT INDUCE VOMITING, THIS CAN CAUSE PNEUMONITIS AND PULMONARY EDEMA...CONTACT A PHYSICIAN IMMEDIATELY.

===== SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE =====

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: ELIMINATE IGNITION SOURCES, PROVIDE VENTILATION, DIKE THE SPILL AREA, AND

ADD ABSORBENT EARTH OR SAWDUST TO SPILLED MATERIAL. CLEAN-UP PERSONNEL SHOULD WEAR RUBBER GLOVES AND RESPIRATORY PROTECTION.

WASTE DISPOSAL: COLLECT ABSORBENT MATERIAL INTO METAL WASTE CONTAINERS AND DISPOSE OF IN ACCORDANCE WITH ALL LOCAL, STATE AND FEDERAL HAZARDOUS WASTE REGULATIONS PERTAINING TO THE LISTED HAZARDOUS CHEMICALS.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: STORE IN A WELL VENTILATED AREA, AWAY FROM HEAT, SPARKS, OPEN FLAME. USE NON-SPARKING UTENSILS WHEN HANDLING LIQUID MIXTURES.

OTHER PRECAUTIONS: SMOKING IN AREA THIS MATERIAL IS STORED SHOULD BE STRICTLY PROHIBITED. TOOLS USED WITH THIS MATERIAL SHOULD BE MADE FROM BRASS, ALUMINUM OR COPPER. PLASTIC UTENSILS SHOULD BE NOT USED BECAUSE THEY MAY GENERATE SPARKS. NOTE: THIS INFORMATION IS ACCURATE TO THE BEST KNOWLEDGE OF WORTHEN INDUSTRIES, BUT IS FURNISHED WITHOUT ANY EXPRESSED OR IMPLIED WARRANTIES.

MATERIAL SAFETY DATA SHEET

PAGE 4 OF 4

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===== SECTION VIII - CONTROL MEASURES =====

RESPIRATORY PROTECTION: IF SPRAYING THIS MATERIAL, USE A NIOSH APPROVED CARTRIDGE RESPIRATOR OR GAS MASK SUITABLE TO KEEP AIRBORNE MISTS AND VAPOR CONCENTRATIONS BELOW THE TIME WEIGHED THRESHOLD LIMIT VALUES. WHEN USING IN POORLY VENTILATED AND CONFINED SPACE USE A FRESH AIR SUPPLYING RESPIRATOR OR A SELF-CONTAINED BREATHING APPARATUS.

VENTILATION: GENERAL MECHANICAL VENTILATION OR LOCAL EXHAUST SHOULD BE SUITABLE TO KEEP VAPOR CONCENTRATIONS BELOW THE TLV. VENTILATION EQUIPMENT SHOULD BE EXPLOSION PROOF.

PROTECTIVE GLOVES: IMPERMEABLE CHEMICAL HANDLING GLOVES FOR SKIN PROTECTION.

EYE PROTECTION: USE CHEMICAL SAFETY GLASSES, GOGGLES, OR FACE SHIELDS FOR PROTECTION. EYE WASH STATIONS SHOULD BE IN WORKING AREAS.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT: USE IMPERMEABLE CLOTHING WHENEVER POSSIBLE TO PREVENT SKIN CONTACT. SAFETY SHOWERS AND EYE BATHS SHOULD BE IN WORKING AREA.

WORK/HYGIENIC PRACTICES: HANDLE ALL CHEMICALS WITH CAUTION AND CARE.

=====
SECTION IX - REGULATORY INFORMATION
=====

TOXIC SUBSTANCES CONTROL ACT (TSCA): ALL COMPONENTS OF THIS PRODUCT ARE ON THE PUBLIC INVENTORY AND THEREFORE ARE IN COMPLIANCE WITH THIS LEGISLATION.

SARA TITLE III: SECTION 313: THIS PRODUCT DOES NOT CONTAIN ANY TOXIC CHEMICALS SUBJECT TO THE REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF THE SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986 (SARA) AND 40 CFR PART 372.

CERCLA (COMPREHENSIVE EMERGENCY RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980:
40 CFR PART 302, TABLE 302.4

REPORTABLE QUANTITY = 5000 LBS. (ACETONE).

=====
SECTION X - DISCLAIMER
=====

DISCLAIMER: THE DATA SET FORTH IN THESE SHEETS ARE BASED ON INFORMATION PROVIDED BY THE SUPPLIERS OF THE RAW MATERIALS AND CHEMICALS USED IN THE MANUFACTURE OF THE AFOREMENTIONED PRODUCT. WORTHEN INDUSTRIES MAKES NO WARRANTY WITH RESPECT TO THE ACCURACY OF THE INFORMATION PROVIDED BY THEIR SUPPLIERS, AND DISCLAIMS ALL LIABILITY OF RELIANCE THEREON.

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Florida Department of
Environmental Protection
Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Hickory Springs Manufacturing Co
On-Site Inspection Start Date: 01/31/2011 **On-Site Inspection End Date:** 01/31/2011
ME ID#: 62157 **EPA ID#:** FLR000112649
Facility Street Address: 5407 NW 44th Ave, Ocala, Florida 34482-2814
Contact Mailing Address: 5411 NW 44th Ave, Ocala, Florida 34482-2814
County Name: Marion **Contact Phone:** (352) 732-5425

NOTIFIED AS:

SQG (100-1000 kg/month)

INSPECTION TYPE:

Routine Inspection for CESQG (<100 kg/month) facility

INSPECTION PARTICIPANTS:

Principal Inspector: Robert Soich, Inspector
Other Participants: Glenn Cordrey, Service Center Manager

LATITUDE / LONGITUDE: Lat 29° 14' 35.3054" / Long 82° 11' 39.654"

SIC CODE: 2512 - Manufacturing - upholstered household furniture

TYPE OF OWNERSHIP: Private

Introduction:

Hickory Springs Manufacturing Company (Hickory Springs) was inspected on January 31, 2011 to verify the facility's compliance with State and Federal hazardous waste regulations. Hickory Springs now occupies the former FAAO Manufacturing facility. FAAO Manufacturing was a registered fictitious name for Mannheim Remarketing, LP. and notified as a small quantity generator on September 4, 2004. Hickory Springs has been at this location since 2004. The inspection verified that Hickory Springs is a conditionally exempt small quantity generator of hazardous waste. Mr. Glenn Cordrey, the Service Center Manager, accompanied the inspector throughout the inspection.

Process Description:

Hickory Springs facility consists of a large building with offices, warehouse, distribution center, and five foam gluing stations. The business has 22 employees at this location and the facility is on City of Ocala water and sewer.

Hickory Springs makes furniture foam padding, springs, metal bases, recliner systems, and furniture associated hardware. At the northwest corner of the warehouse, a pallet contained an empty drum that once stored adhesive and a 55-gallon product drum of Worthen UPACO Adhesive that contains acetone and heptane. The empty drum was stored there for recycling. The empty drum is sent back to the Worthen UPACO Adhesive Division located in Richmond, Virginia. According to Mr. Cordrey, residual adhesive is recycled out of the drum and the drum is also recycled. The 55-gallon drum was RCRA empty at the time of the inspection having less than one inch of residue or three percent by weight of the total capacity of the container.

The facility receives blocks and rolls of foam cushioning which are stored in the warehouse. The different types of cushioning are glued together in layers and cut to size at five gluing stations located at the southeast side of the warehouse. The glue is sprayed on the foam using glue guns. The satellite accumulation area for hazardous waste adhesive generated from the cleaning of the lines supplying the glue guns and the glue gun nozzles is located at the end of the first gluing station. One 55-gallon drum is filled every three years from this cleaning. A hazardous waste label

Inspection Date: 01/31/2011

was on the drum and a May 13, 2008 in service date was placed on the label. The drum had approximately 50-gallons of waste in it and five gallons left of free space before it is full. Mr. Cordrey stated that in the past the satellite drum filled up faster because it was also receiving adhesive residual from the product drums that the old pump could not pump out. Now, most of the adhesive can be pumped out of the product drum for use. The rollers, conveyors, and saws at the gluing stations are lubricated with a water based silicone lubricant (Enviro Systems Silicone Lubricant 805).

Located next to the east wall of the warehouse was a 55-gallon drum on a secondary containment pallet. The drum was used for receiving compressor blow down water that had some oil mixed in. The drum was labeled "Used Oil" and is pumped out by their used oil company once it becomes full. The last time this oily water was picked up was by Atlantic Industrial Services, Inc. on January 16, 2008.

Universal waste lamps were not stored on site. Mr. Cordrey stated that the landlord has an electrical company change lamps out in the office and in the warehouse. Mr. Cordrey stated that he would obtain a universal waste container from Waste Management in case spent lamps are generated that may be stored on site. Two Toyota forklifts are operated inside the warehouse. They are serviced by Southern States Toyota Lift located in Ocala. They take the used oil and spent batteries with them after servicing the lifts. Trucks, tractors, and trailers are not serviced at this facility.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

Hickory Springs Manufacturing Company was found in compliance with the regulations governing conditionally exempt small quantity generators of hazardous waste.



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

FACILITY INFORMATION:

Facility Name: Hickory Springs Manufacturing Co

On-Site Inspection Start Date: 01/11/2013 **On-Site Inspection End Date:** 01/11/2013

ME ID#: 62157

EPA ID#: FLR000112649

Facility Street Address: 5407 NW 44th Ave, Ocala, Florida 34482-2814

Contact Mailing Address: 5411 NW 44th Ave, Ocala, Florida 34482-2814

County Name: Marion

Contact Phone: (352) 732-5425

NOTIFIED AS:

SQG (100-1000 kg/month)

INSPECTION TYPE:

Site Visit Inspection for Closed facility

INSPECTION PARTICIPANTS:

Principal Inspector: John White, Inspector

Other Participants: Day M. Goldsmith, Environmental Specialist; N/A

LATITUDE / LONGITUDE: Lat 29° 14' 35.3054" / Long 82° 11' 39.654"

SIC CODE: 2512 - Manufacturing - upholstered household furniture

TYPE OF OWNERSHIP: Private

Introduction:

On January 11, 2013, John White and Day M. Goldsmith, Florida Department of Environmental Protection (FDEP), inspected Hickory Springs Manufacturing Company, located at 5407 NW 44th Avenue, Ocala, Florida. The facility is no longer in operation at this location. The facility was closed and signs indicated the site was for lease.

Hickory Springs Manufacturing Company was last inspected by FDEP on January 31, 2011, as a conditionally exempt small quantity generator of hazardous waste and was in compliance at that time.

Process Description:

The hazardous waste notifier at this location is no longer in operation.

Inspection Date: 01/11/2013

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. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

John White
PRINCIPAL INSPECTOR NAME

Inspector
PRINCIPAL INSPECTOR TITLE

FDEP
ORGANIZATION

Supervisor: Janine Kraemer

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.

SITE NUMBER 6- Hydro Spa LLC (Quality Bedding)



Hydro Spa/Quality Bedding Aerial View



AST on South Side of Quality Bedding Building, Facing East



Open Drums Beside AST



View of Quality Bedding, Facing West From I-75

Memorandum

Environmental Protection

To: Deborah A. Getzoff *2/16/11/6/02*
Through: William Kutash *W*
From: Bob Sellers
Date: January 15, 2002
Subject: Mark III Luxury Vans. Project # 247985

The above referenced facility has been foreclosed by its chief lender. It ceased operations in June 2001, and operated with a minimal staff for a short time thereafter. All violations cited in the warning letter dated May 22, 2001 were corrected. The case remained open while the company removed all hazardous wastes from the facility. Final hazardous waste manifests were not forwarded to the Department, but were obtained through Freehold Cartage and verify that all hazardous wastes have been removed from the property. The facility is now closed and the \$2,850 in penalties and \$100 Department costs cited in the warning letter are not likely to be collectable. I recommend that this case be closed due to the circumstances involved. As I mentioned, all violations were corrected and all hazardous wastes removed, but no consent order was issued due to the financial status of the Company at the time.

Comp.



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347
Lawton Chiles, Governor • 813-623-5561 • Carol M. Browner, Secretary

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 4 1991

Mark III Industries, Inc.
5401 N.W. 44th Avenue
Ocala, Florida 32675

Attn: Roy T. Boyd

Re: Notice of Violation
OGC Case #91-1997

Dear Mr. Boyd:

Attached is a Notice of Violation and Orders for Corrective Action which addresses violations of 40 CFR 261 through 266 and Florida Administrative Code Rule 17-730. These violations were noted during an inspection on March 27-28, 1991, which was conducted by Department personnel at your facility. A copy of the inspection report is attached to the Notice of Violation as Exhibit "I".

In accordance with the cooperative agreement between the Department and U.S.E.P.A. to implement the Resource Conservation and Recovery Act of 1976, all Notice of Violation and Orders for Corrective Action must be settled through the signing of a Department Consent Order within sixty (60) days of the date of service of this Notice or the matter must be referred for civil litigation and imposition of civil penalties. As required in the cooperative agreement, a cash settlement must be incorporated into the Consent Order in accordance with the Federal RCRA Civil Penalty policy. The recommended settlement figure for the violations described in the Notice of Violations is \$15,250.00. Penalties have been determined in accordance with the RCRA Civil Penalty Policy of May 8, 1984, and the Memorandum of Agreement between the Department and the United States Environmental Protection Agency.

This matter may be resolved informally by sending a written request for informal conference within ten (10) days to Jeff Schoenbacher of the District Hazardous Waste Section. You may also wish to note other specific rights you may have as defined in the Notice of Rights portion of the Notice of Violation. Please be advised that Department policy requires referral of this matter for civil litigation if it cannot be resolved in a mutually acceptable fashion within sixty (60) days of the date of service of this Notice.



DEC 4 1991

Mr. Roy T. Boyd
Mark III Industries, Inc.

Page Two

If you have questions, please contact Jeff Schoenbacher, at (813) 623-5561, ext. 387.

Sincerely,



Richard D. Garrity, Ph.D.
Director of District Management
Southwest District

RDG/jsr

cc: David Schwartz, OGC
James H. Scarbrough, USEPA-Region IV
Donald Trussell, BWP&R
Compliance File

BEFORE THE STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION,

Complainant,

v.

MARK III INDUSTRIES, INC.,

Respondent.

IN THE OFFICE OF THE
SOUTHWEST DISTRICT

OGC FILE NO.: 91-1997

NOTICE OF VIOLATION AND
ORDERS FOR CORRECTIVE ACTION

TO:

Roy T. Boyd, Jr., Registered Agent
Mark III Industries, Inc.
5401 N.W. 44th Avenue
Ocala, Florida 32675

Certified Mail Number P 149 930 823

Pursuant to the authority Section 403.121(2), Florida Statutes (F.S.), and Florida Administrative Code (F.A.C.) Rule 17-103.110, the State of Florida Department of Environmental Regulation ("Department") gives notice to Mark III Industries, Inc. ("Respondent") of the following findings of fact and conclusions of law with respect to violations of Chapter 403, F.S.:

FINDINGS OF FACT

PARAGRAPHS APPLICABLE TO ALL COUNTS

1. The Department is the administrative agency of the State of Florida which has the authority to administer and enforce the provisions of Chapter 403, F.S., and rules promulgated thereunder in F.A.C. Title 17.

2. Respondent is a domestic corporation registered to do business in the State of Florida. Respondent owns and operates a van conversion facility located at 5401 N.W. 44th Avenue, Ocala, Florida 32675.

3. The nature of Respondent's operations is described in a Hazardous Waste Inspection Report dated March 27-28, 1991, a copy of which is attached and incorporated as Exhibit I.

COUNT I

4. Respondent has violated rules regarding hazardous waste management contained in F.A.C. Chapter 17-730 as set forth in the "Summary of Violations" section of Exhibit I.

COUNT II

5. Prior to March 27, 1991, Respondent disposed of wastewater from a van washing and detail shop to a retention pond on Respondent's property during Respondent's operation.

6. Respondent's activities as described in paragraph five constitute operation of a stationary installation reasonably expected to be a source of pollution. Respondent has never applied for nor received a permit from the Department for the disposal of waste or discharge to the ground water.

COUNT III

7. The Department has incurred expenses to date while investigating this matter in the amount of not less than \$300.00.

CONCLUSIONS OF LAW

The Department has evaluated the Findings of Fact with regard to the requirements of Chapter 403, Parts I and IV, F.S.; F.A.C. Chapter 17-730; 40 Code of Federal Regulations (C.F.R.) 260.10; and

40 C.F.R. Parts 261 through 266 and 268. Based on the foregoing facts the Department has made the following conclusions of law:

8. Respondent is a person within the meaning of Sections 403.031 and 403.703, F.S.

9. The provisions of 40 C.F.R. 260.10 and 40 C.F.R. Parts 261 through 265 are adopted by reference in F.A.C. Rules 17-730.020, 17-730.030, 17-730.160, 17-730.170, 17-730.180, 17-730.181.

10. Respondent's operation is a hazardous waste facility as defined in Section 403.703(22), F.S., F.A.C. Rule 17-730.020, and 40 C.F.R. 260.10.

11. The facts related in Count I constitute a violation of Section 403.727, F.S., which makes it a violation of the Florida Resource Recovery and Management Act for a hazardous waste generator, transporter, or facility owner or operator to fail to comply with the provisions of the Act or Department rules concerning hazardous waste management.

12. The facts described in Count II constitute a violation of Section 403.087(1)(b), F.S., which provides that no stationary installation which shall reasonably be expected to be a source of air or water pollution shall be operated or maintained without an appropriate Department permit.

13. The facts described in Count II constitute a violation of Section 403.708(1)(a), F.S., which prohibits the placement or deposit of any solid waste in or on the land or waters located in the state except in a manner approved by the Department.

14. The costs and expenses related to Count III are reasonable costs and expenses incurred by the state while investigating this matter which, are recoverable pursuant to Section 403.141(1) F.S.

ORDERS FOR CORRECTIVE ACTION

The Department has alleged that the activities related in the Findings of Fact constitute violations of Florida law. The Orders for Corrective Action state what you, Respondent, must do in order to correct and redress the violations alleged in this Notice.

The Department will adopt the Orders for Corrective Action as part of its Final Order in this case unless Respondent files a timely petition for a formal hearing or informal proceeding, pursuant to Section 403.121, F.S., and F.A.C. Rule 17-103.110. (See Notice of Rights.) If Respondent fails to comply with the corrective actions ordered by the Final Order, the Department is authorized to file suit seeking judicial enforcement of the Department's order pursuant to Sections 120.69 and 403.131, F.S.

Pursuant to the authority of Sections 403.061(8) and 403.121, F.S., and F.A.C. Rule 17-103.110, the Department proposes to adopt in its Final Order in this case the following specific corrective actions which will redress the alleged violations:

15. Respondent shall forthwith comply with all Department rules regarding hazardous waste management. Within 30 days of the date of receipt of these Orders or such other time as is stated in the Recommended Corrective Actions Section of Exhibit I, Respondent shall correct and redress all violations listed in Recommended Corrective Actions in Exhibit I, and shall comply with all applicable sections in F.A.C. Chapter 17-730 and 40 C.F.R. Parts 260-266.

16. Within 45 days, Respondent shall submit to the Department a detailed itemized report describing and certifying compliance with paragraph 15 of this Notice.

17. Within 30 days, Respondent shall make payment to the Department for costs and expenses in the amount of \$300.00. Payment specifying OGC Case Number shall be made by cashier's check or money order payable to the "State of Florida Department of Environmental Regulation" and shall be sent to Department of Environmental Regulation, Southwest District, 4520 Oak Fair Boulevard, Tampa, Florida 33610-7347.

18. Respondent shall immediately cease all discharges from its facility to the ground and/or surface waters of the state where such discharges are reasonably likely to cause a violation of water quality minimum criteria and standards as set forth in F.A.C. Chapter 17-3.

19. Respondent shall implement the study as set forth in the Preliminary Contaminant Assessment Actions attached hereto as Exhibit II in the manner and within the time frames specified therein.

20. In the event the Preliminary Assessment described in Exhibit II reveals the presence of contaminants in the soil, sediment, surface water and/or ground water in violation of water quality standards minimum criteria set forth in F.A.C. Chapter 17-3; or reveals the presence of contaminants which may reasonably be expected to cause pollution of the surface and/or ground water of the State in excess of such standards or criteria, Respondent shall implement the corrective actions in the manner and within the time frames set forth in the document entitled "Corrective Actions for Ground Water Contamination Cases" attached as Exhibit III. Such time frames shall begin upon notification by the Department that the presence of contaminants has been confirmed and that such corrective actions are necessary.

NOTICE OF RIGHTS

1. Respondent has the right to a formal administrative hearing pursuant to Section 120.57(1), F.S., if Respondent disputes issues of material fact raised by this Notice of Violation and Orders for Corrective Action ("Notice"). At a formal hearing, Respondent will have the opportunity to be represented by counsel, to present evidence and argument on all issues involved, to conduct cross-examination and submit rebuttal evidence, to submit proposed findings of fact and orders, and to file exceptions to any order or hearing officer's recommended order.

2. Respondent has the right to an informal administrative proceeding pursuant to Section 120.57(2), F.S., if Respondent does not dispute issues of material fact raised by this Notice. If an informal proceeding is held, Respondent will have the opportunity to be represented by counsel, to present to the agency written or oral evidence in opposition to the Department's proposed action, or to present a written statement challenging the grounds upon which the Department is justifying its proposed action.

3. Respondent may request an informal conference with the Department pursuant to F.A.C. Rule 17-103.090 in order to resolve this matter promptly and amicably. Respondent's rights will not be adjudicated at an informal conference, and the right to a formal hearing or informal proceeding will not be affected by requesting or participating in an informal conference.

4. If Respondent desires a formal hearing or an informal proceeding, Respondent must file a written responsive pleading entitled "Petition for Administrative Proceeding" within 21 days of receipt of this Notice or within 10 days of any timely requested

informal conference held pursuant to paragraph 5. below. The petition must be in the form required by F.A.C. Chapter 17-103 and by F.A.C. Rule 28-5.201. A petition is filed when it is received by the Department's Office of General Counsel, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.

5. If Respondent desires an informal conference, Respondent must file a written "Request for Informal Conference" within ten days of receipt of this Notice. The request must be made to the person indicated on the last page of this Notice. The request is filed when it is received by the office of the person indicated on the last page of this Notice. If no resolution of this matter results from the informal conference, Respondent has the right to file a petition for a formal hearing or informal proceeding within 10 days of the date the conference is held.

6. Respondent will waive the right to a formal hearing or an informal proceeding if a petition is not filed with the Department within 21 days of receipt of this Notice or within 10 days of the date of an informal conference if one is held. These time limits may be varied only by written consent of the Department.

7. The allegations of this Notice together with the Orders for Corrective Action will be adopted by the Department in a Final Order if Respondent fails to timely file a petition for a formal hearing or informal proceeding, pursuant to Section 403.121, F.S., and F.A.C. Rule 17-103.103. A Final Order will constitute a full and final adjudication of the matters alleged in the Notice of Villation and Orders for Corrective Action.

8. If Respondent fails to comply with the Final Order, the Department is authorized to file suit in circuit court seeking a mandatory injunction to compel compliance with the Order, pursuant to Sections 120.69, 403.131, and 403.727, F.S. The Department may also seek to recover damages, all costs of litigation including reasonable attorney's fees and expert witness fees, and civil penalties of not more than \$50,000 per day for each day that Respondent has failed to comply with the Final Order.

9. This matter may be resolved if the Department and Respondent enter into a Consent Order, in accordance with F.A.C. Rule 17-103.110(3), upon such terms and conditions as may be mutually agreeable. In this regard, the Department has entered into an agreement with the United States Environmental Protection Agency ("EPA") regarding cases involving violations of hazardous waste rules. The agreement obligates the Department either to seek civil penalties in such cases or to refer them to EPA to collect penalties. The agreement requires the penalties to be computed consistent with the EPA Resource Conservation and Recovery Act Civil Penalty Policy, a copy of which is available upon request from the Department. Any settlement between the Department and the Respondent concerning the violations set forth herein must include the payment of penalties consistent with this Policy. Should the parties not be able to settle this action, the Department may voluntarily dismiss this Notice and seek judicial imposition of penalties in circuit court, file a separate and independent action in court for imposition of civil penalties, or refer the violation to EPA.

10. The Department is not barred by the issuance of this Notice from maintaining an independent action in circuit court with respect to the alleged violations. If such action is warranted, the Department may seek injunctive relief, damages, civil penalties of not more than \$50,000 per day, and all costs of litigation.

11. Copies of Department rules referenced in this Notice may be examined at any Department Office or may be obtained by written request to the person listed on the last page of this Notice.

DATED this 3 day of Dec, 1991.

FILING AND ACKNOWLEDGEMENT

FILED, on this date, pursuant to S120.52 Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.

Betty Rodgers 12-4-91
Clerk Date

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL REGULATION

Richard D. Garrity, Ph.D
Director of District Management
Southwest District

Copies furnished to:

Office of General Counsel
David K. Thulman, Esquire
Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

A petition for hearing must be filed with:

Office of General Counsel
State of Florida Department
Of Environmental Regulation
2600 Blair Stone Road
Tallahassee, Florida 32399-2400
Telephone: 904/488-9730

A request for an informal conference must be made to:

Richard D. Garrity, Ph.D
Director of District Management
Southwest District
State of Florida Department
of Environmental Regulation
4520 Oak Fair Boulevard
Tampa, Florida 33610-7347
Telephone: 813/623-5561



Exhibit I

Florida Department of Environmental Regulation

Southwest District
Lawton Chiles, Governor

4520 Oak Fair Boulevard
813-623-5561

Tampa, Florida 33610-7347
Carol M. Browner, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT ROUTINE FOLLOW-UP PERMITTING
FACILITY NAME Mark III Industries DER/EPA ID FLD 982 107 229
ADDRESS 5401 N.W. 44th Avenue, Ocala, Florida 32675
COUNTY Marion Phone (904) 732-5878 DATE 3/27/91 TIME 6:00 p.m.
3/28/91

TYPE OF FACILITY:

Generator	Storage	Treatment
<input type="checkbox"/> Small Quantity	<input type="checkbox"/> Container	<input type="checkbox"/> Tank
<input checked="" type="checkbox"/> Generator	<input type="checkbox"/> Tank	<input type="checkbox"/> Land Treatment
	<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Thermal
Transporter	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Chem/Phys/Bio.
<input type="checkbox"/> Transporter		<input type="checkbox"/> Incinerator
	Disposal	<input type="checkbox"/> Surface Impdmt.
	<input type="checkbox"/> Landfill	
	<input type="checkbox"/> Surface Impoundment	
	<input type="checkbox"/> Waste Pile	

2. Applicable Regulations:

40 CFR 262 40 CFR 263 40 CFR 264 40 CFR 265

3. Responsible Official: (Name & Title)

Thad Boyd II, Owner

4. Survey Participants & Principal Inspector

Michelle Holton - FDER
David Gaboardi - Mark III
Katheryn Elkins - Marion County
Neal Schobert - FDER

5. Facility Latitude:

29°11'00"

Longitude:

82°15'24"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: NA Date Issued: _____ Expiration Date: _____

8) PROCESS DESCRIPTION:

Mark III Industries is a high-volume facility for conversion of stock vans to custom vehicles with upgraded interior furnishings and exterior paint patterns.

Stock vans are brought in and inspected at the P.D.I. Building D, then they are taken to the cut station, Building E. At building E holes are cut in the sides of the vans for windows, and in the roofs for sport tops. Moldings around the sport tops and windows are then screwed into place. The electrical wiring is also done in this building. No hazardous waste is generated in this process.

From the cut station the vans go the Production Building, Building P. In this area, the inside of the vans are finished off. Plywood flooring is glued and screwed to the floor. Carpet is then glued to the flooring. Styrofoam insulation is glued to the walls and ceiling. Wall paneling is then screwed over the insulation. The seats, the wood molding cabinets, and the electronics are also screwed into place. The wood cabinets and moldings are manufactured in the cabinet shop, Building C. The seats are also put together in the cabinet shop.

In the Production Building, the carpet and foam are glued down with Parabond glue. Parabond 1342 contains 1,1,1-Trichloroethane. The glue is applied with spray guns which are cleaned by immersing them in buckets of lacquer thinner. A non-hazardous white wood glue, Mastergrip 95, is used on the plywood. Body solvent is used to remove unwanted glue from the fabric or metal. About three or four 55 gallon drums of body solvent are used a year in this department. The body solvent has a flash point of 80°F and contains about 80% xylene. Silicon is also used here along with touch up paints and stains. A drum service picks up the empty Parabond glue drums. Parabond glue solids are treated as a solid waste. Lacquer thinner is collected in a satellite drum.

From the Production Building, the vans go the Paint Shop A to be touched-up or painted. This is also where the sport tops are painted. There are 10 totally enclosed down draft booths for the painting and curing of the vehicles. At the time of the inspection, booths 9 and 10a were being used for the painting of the van tops, the rest were not being used. A Dupont Chromabase paint is used followed by a base coat-clear coat. The paint booth filters are landfilled.

In Paint Shop A, there is a satellite accumulation drum for waste paint related material. The employees use a 5 gallon black bucket with a loose lid to store their acrylic lacquer thinner waste, then they transfer it to the satellite drum about 20 feet away from the work station. Both of the satellite drums are labelled correctly.

8) PROCESS DESCRIPTION: (Cont'd)

Paint filters, sanding paper, empty thinner cans, and solvent rags were found in the garbage cans in this shop. Near the paint booths there is a second 55 gallon drum properly labelled (F003/F005).

From Paint Shop A the vans go to Paint Shop B for application of graphics (stickers). Acetone and lacquer thinner are used with cloth rags to wipe the sides of the vans down, then the graphics are applied.

Outside Paint Shop B, there was a solid waste dumpster (Paul's Container Service) which was full of garbage bags which contained solvent rags. David Gaboardi had all of the solvent rags removed from the dumpster and placed in a container in Building F - hazardous waste Storage area. Industrial Services out of Plant City is the laundry service for Mark III, although very few rags receive laundering.

From the Paint Shop B the vans go to the tire bay. Here the running boards, tires, ladder, and aluminum running boards are mounted on the vans. Spray bottles of thinner and rags are used in this area for touch-up cleaning.

The last two areas before final inspection and shipping are final detail, cleanup and the wash bay. Here the vans are thoroughly cleaned and made ready for shipment. Whitewall cleaner concentrate (Ph=12) and an acid detergent (acid fallout cleaner, primarily oxalic acid), are used in the wash bay. The wash water goes through drains to a retention pond on the property.

The cabinet Shop, Building C, is where the seats are put together, the wall panels are made, and the wood pieces are cut and stained. Upstairs in the cabinet shop is the sewing room, no hazardous waste is generated here. Downstairs, foam is sprayed with Parabond, then cloth is attached to form seat cushions. The Parabond guns are cleaned with lacquer thinner. There is a 55 gallon satellite accumulation station for lacquer thinner wastes. A silicon spray adhesive is also used to ease the fabric onto the foam. Body solvent is used (with cloths) to remove dirt from the product.

In the woodworking area of the cabinet shop a conveyer station is used. The wood pieces are placed on corrugated cardboard trays and put on the conveyer line. As the line moves along, a stain/wood sealer is applied, then a UV sealer, then a top coat. The employees spraying the sealer were using Tyvek suits and supplied air. Then the wood goes through the UV "oven" to cure. The stain/wood sealer is an Aqueous elm stain which is a water soluble stain and sealer compound. Once the cardboard trays have too much overspray buildup on them, they are run through the UV oven, then disposed of in the dumpster. These trays have never been tested, they have used product knowledge to determine the disposal method. MEK is also used as a cleanup solvent, about 55 gallons are used per month in this area.

8) PROCESS DESCRIPTION: (Cont'd)

There is a hazardous waste storage area behind the cabinet shop. This areas is also used for product storage. Upon inspection, one 55 gallon drum of waste paint related material was found (F003/F005/D035), dated 3/20/91.

Outside this storage area were about thirty-six 55 gallon drums, it was not clear if the majority of the drums were waste or product. The following were found on 3/27/91:

- 1 - 55 gallon red drum labelled "Elm Stain for Lilly don't use"
- 1 - 55 gallon red drum labelled "bad UV sealer don't use"
- 2 - 55 gallon black drums labelled "glue bad"
- 1 - 55 gallon red drum labelled "Lite Red corrected stain 6/30/89" (David Gaboardi stated that this was from product testing and Lilly should pick it up).
- 1 - 55 gallon red drum labelled "UV top coat do not use".
- 1 - 55 gallon red drum labelled "Waste Oil"
- 1 - 55 gallon drum not labelled (claimed to be diesel)
- 2 - 55 gallon black drums not labelled.
- 2 - 5 gallon open buckets containing silicone and water.
- 11 - 55 gallon drums labelled "thinner"
- 1 - 55 gallon red drum labelled "Solid Waste cans"
- 3 - 55 gallon red drums labelled "MEK chain cleaner" (They claim to be using this to dip chains in).

On March 28, 1991, eighteen of these drums were in Building F, the main hazardous waste storage area, labelled hazardous waste with start dates of 3/27/91.

On March 27, 1991, there were 2 drums labelled waste paint related material (F005, F003, D035) and dated 3/25/91 and 3/6/91 inside Building F.

Their solvent still and 2 can crushers are in a containment area next to Building F. The solvent that has been recycled is used as cleanup thinners and the still bottoms are manifested off as hazardous waste.

On March 28th, one waste drum had a missing bung (F003, F005, D035) dated 3/27/91. The container (small dumpster) that contained the solvent rags (moved from Paint Shop B's dumpster) was open and unlabelled.

The December 18, 1989, FDER hazardous waste inspection performed by David Herbster, Mike Camardese, and Bill Kappler, stated that Mark III began to handle the acetone solvent rags as hazardous waste in 1989.

Paperwork inspected on March 28, 1991, included manifests, annual report, training records, weekly drum inspection logs, and the contingency plan. The solvent recycling logs were also reviewed. The following deficiencies were noted:

8) PROCESS DESCRIPTION: (Cont'd)

- Mark III did not have a current list of people in each job, job titles, job descriptions, and amount of introductory and continuing training each individual received. This violation was also cited in the December 18, 1989 inspection report.
- Mark III did not have an adequate contingency plan. There were no dates or revision dates for the plan, the emergency equipment was not listed, the location of the plan was not given, proper safety and emergency numbers were not listed, building evacuation plans were inadequate, information pertaining to cleaning emergency equipment, proper management of waste - and amendment of plan were not included. On the December 18, 1989 inspection, there were also problems with the contingency plan.

Refer to Section #9 of this report for the Summary of Violations.

9) SUMMARY OF VIOLATIONS:

- | | |
|---------------------|---|
| 40 CFR 262.11 | Failure to determine if acrylic enamel paint filter waste is hazardous waste. |
| * 40 CFR 262.11 | Failure to determine if paint/sealer waste is hazardous waste under the TCLP rules. |
| 40 CFR 262.34(a)(2) | Failure to clearly mark the date of accumulation on each container. |
| 40 CFR 262.34(a)(3) | Failure to mark or label container with the words "Hazardous Waste" while being accumulated. |
| 40 CFR 265.16(d) | Failure to provide a current list job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job. |
| 40 CFR 265.31 | Failure to maintain and operate facility in order to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste that could threaten human health or the environment. |
| 40 CFR 265.52(a) | Failure to outline actions that facility personnel must take in response to spills in the contingency plan,. |
| 40 CFR 265.52(e) | Failure to include in the contingency plan a list of all emergency equipment at the facility and the location and physical description of each item on the list, and a brief outline of its capabilities. |

9) SUMMARY OF VIOLATIONS: (Cont'd)

- 40 CFR 265.52(f) Failure to provide a complete evacuation plan for facility personnel in the contingency plan.
- 40 CFR 265.173(a) Failure to keep hazardous waste containers closed during storage, except when necessary to add or remove waste.
- F.S. 403.161(1)(b) Discharge of industrial wastewaters to a retention pond without a permit.
- F.S. 403.727 Failure to dispose of hazardous waste solvent contaminated rags in a hazardous waste facility which has a current and valid permit pursuant to F.S. 403.722.

* Referred to EPA Region IV for evaluation.

Inspected: *Michelle Holton*
Michelle Holton
Environmental Specialist I

Approved: *Elizabeth Knauss*
Elizabeth Knauss
Environmental Specialist III

Date: 6/6/91

Mark III Industries, Inc.
FLD 982 107 229

10) RECOMMENDED CORRECTIVE ACTIONS:

- 40 CFR 262.11 Respondent has determined if acrylic paint contaminated paint filters do not meet the definition of a hazardous waste.
- 40 CFR 262.34(a)(2) All hazardous waste containers must be marked with the day the waste is first accumulated in the container. This procedure has been implemented.
- 40 CFR 262.34(a)(3) All containers holding hazardous waste must be marked with the words "Hazardous Waste". This procedure has been implemented.
- 40 CFR 265.16(d) Respondent must have personnel training records for all employees managing hazardous waste in accordance with 40 CFR 265, Subpart B. The training records shall include documentation of job titles, job descriptions, minimum job requirements and description of employee's training. This has been implemented.
- 40 CFR 265.31 Respondent must submit to the Department a PCAP in accordance with Exhibit II, within 30 days of the effective date of this Order.

Mark III Industries, Inc.
FLD 982 107 229

10) RECOMMENDED CORRECTIVE ACTIONS: (Cont'd)

40 CFR 265.52(a, e + f)

A revised contingency plan prepared in accordance with 40 CFR 265 Subpart D has been submitted to the Department.

40 CFR 265.173(a)

All hazardous waste containers must be closed during storage except when it is necessary to add or remove waste. This procedure has been implemented.

403.161(1)(b)

Respondent must immediately cease discharge of industrial wastewaters until a permit is obtained from the Department. Respondent must prepare and submit a PCAP in accordance with Exhibit II of this Order.

403.727 F.S.

Respondent must conduct a hazardous waste determination on spent solvent contaminated rags destined for disposal. Respondent may continue to use a laundry service to clean contaminated rags for re-use.

**RCRA INSPECTION REPORT
GENERATOR'S CHECKLIST**

Note: On multiple part questions, check those not in compliance.

Section A - Site Identification No. _____

1. Site Name: Mark III Industries

Section B - Hazardous Waste Determination (262.11)

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? Yes No

a. If yes, list wastes, EPA numbers & quantities.

FCO3/FOCS

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste.) Yes No

a. If yes, list wastes, EPA numbers, and quantities.

DC35 / DCC1

b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge?

(1) If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? Yes No

(2) If equivalent test methods used, attach copy of equivalent methods used.

3. Is generator subject to full regulation under Part 262? Yes No
(If no, check appropriate exemptions)

Small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices & checklist)

Produce non-hazardous waste at this time (261.4 - Exclusions)

Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.)

Being a farmer disposing of waste pesticides for his own use on his own property (262.51 - Farmers)

Burns hazardous waste as a fuel for the purpose of recovering waste energy (261.1(c)(2))

Date 3-27-91
Inspector Helfer
Facility ID: FLD982107239

Some time we are not tested & we have disposed of as solid waste.
- paint & ink
- sanding paper
- cardboard (crush)
- also rags (soak) to go to the landfill.

Ignitable & MEK
Hazardous & ignitable
non-hazardous & ignitable

Section C - Manifest (262.20-.23)

1. Has generator shipped hazardous waste off-site since Nov. 19, 1980? Yes No
(Subpart B - The Manifest)

- a. If no, do not fill out Section C and D.
- b. If yes, identify primary off-site facilities.
List facilities in narrative report.

2. Does generator use manifest? (262.20 - General requirements) Yes No

If yes, inspect manifests at random. Do all manifests reviewed include the following information?
(262.21 - Required information) (Check items not on manifest.)

- a. Manifest Document No. Yes No
- b. Generator's Name, Mailing Address, Tel. No. Yes No
- c. Generator EPA I.D. No. Yes No
- d. Transporter(s) Name and EPA I.D. No. Yes No
- e. Facility Name, Address and EPA I.D. No. Yes No
- f. DOT description of the waste Yes No
- g. (1) Quantity (weight or volume) Yes No
(2) Containers (type and number) Yes No
- h. Emergency Information (optional)
(special handling instructions, Phone No.) Yes No
- i. Is the following certification on each manifest form? Yes No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

j. Signatures and dates

- (1) Generator Yes No
- (2) Transporter Yes No
- (3) Disposer (returned copy) Yes No

k. Indicates number of manifests inspected and number of violations.
Note type of violation in report.

22
0

1. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting)

NA
___ Yes ___ No

If yes, did it contain the following information?
Legible copy of manifest

___ Yes ___ No

AND

Cover letter explaining generators efforts to locate waste.

___ Yes ___ No

m. Does (will) generator retain copies for 3 years?

Yes ___ No

Section D - Pre-Transport Requirements (262.30-34)

_____ N/A

1. Does generator package waste for transport?

Yes ___ No

If no, skip to question 8.
If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30 - Packaging)

Yes ___ No

3. Inspect containers to be shipped.

a. Are containers to be shipped in good condition? (Describe containers and condition; i.e., leaking or corroding or bulging.)

Yes ___ No

b. Is there evidence of heat generation from incompatible wastes in the containers?

No ___ Yes

4. Before shipping, does the generator use DOT labeling requirements in accordance with 49 CFR 172? (262.31 - Labeling)

Yes ___ No

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking)

Yes ___ No

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking)

Yes ___ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

_____ Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading hazardous ^{No.} wastes, inspect for presence of placards. Note this instance on narrative explanation sheet. (262.33 - Placarding)

a. Does the generator have the appropriate placards to offer the initial transporter? Yes No

b. If no, who provides placards? _____

8. Accumulation Time (262.34 - Accumulation Time)

a. Is facility a permitted storage facility? Yes No
If yes, skip to question #9.

If no, answer rest of question #8.

b. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) Yes No
If no, has the generator been granted a 30-day extension? (262.34(b)) Yes No
If yes, explain the unforeseen/uncontrollable circumstances in the narrative.

c. Are containers used to store wastes? (262.34(a)(1)) Yes No

If yes, complete Containers Storage Checklist for Generators.

Is the beginning date of accumulation time clearly indicated? (262.34(a)(2)) Yes No

d. Are tanks used to store wastes? (262.34(a)(1)) Yes No

If yes, complete Tanks Checklist for Generators

e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3)) Yes No

NOTE: If generator accumulates waste on site but is not a storage facility, fill out Appendix A to Generators Checklist.

9. Describe storage area. Use photos and narrative.

Section E - Recordkeeping and Records (262.40-43) N/A Explain _____

1. Is generator keeping the following reports? (262.40 - Record keeping)
(Note: The following must be kept for a minimum of three years.)

a. Annual reports (not applicable until January 1983). Yes No

b. Test results where applicable. Yes No

*Corrected on 3/28/91.
(Drums from Cabinet shop storage area).
They were not labeled as waste on 3/27 but on 3/28 they were in the haz. waste storage area properly label since 8/81.*

2. Where are records kept (at facility or elsewhere)? facility.

3. Who is in charge of keeping the records?

Name David Gaboardi Title Safety Director

4. Any additional reporting? (262.43 - Additional Reporting) Yes No

Section F - Special Condition (262.50 - International Shipments)

N/A

Explain _____

1. Has generator received from, or transported to a foreign source any hazardous waste? No Yes

a. If yes, has he filed a notice with the Regional Administrator? Yes No

b. Is this waste manifested and signed by foreign consignee? Yes No

c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? Yes No

Date 3/27/91 + 3/28/91
Inspector Holtm
Facility ID# FLD 922/07229

-6g-

Appendix A
To Generator Checklist

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training? Yes No
- a. Is training on-the-job? Yes No
- b. Is training in the classroom? Yes No
2. Do laborers who handle hazardous waste complete training? Yes No
- a. Is training on-the job? Yes No
- b. Is training in the classroom? Yes No
3. Does training include:
- a. Emergency response procedures? Yes No
- b. Inspection procedures? Yes No
- c. Operation of hazardous waste handling equipment? Yes No
4. How often is training reviewed? Once every 3-4 mos.
5. Does the facility have personnel training records including
- a. Job title and description of position? Yes No
- b. Description of employee's training? Yes No
6. Are records maintained for three years? Yes No

no list of empl. in jobs, desc., training

Section B - Preparedness and Prevention (265.30-37)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) No Yes
- If yes, use narrative explanation.
2. Is the facility equipped with (265.32 - Required equipment)
- a. Internal communications or alarm system?
Is it easily accessible in case of emergency? Yes No
- b. Telephone or two-way radio to call emergency response personnel? Yes No
- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?
Is this equipment tested to assure its proper operation? Yes No

Sm. paint area on ground by solvent spill.

intercom.

How frequently? Inspected annually.

d. Water of adequate volume for hoses, sprinklers or water spray system?

Yes No

(1) Describe source of water well

(2) Indicate flow rate and/or pressure and storage capacity, if applicable. dc

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Spaces)

Yes No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities)

N/A Yes No

If N/A, explain _____

*Verbal
No proof.
described in
contingency
plan*

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements With Local Authorities)

N/A Yes No

If yes, indicate primary authority Mason Co. Sheriff's, West Marion Vol. Fire Dept.

Is the fire department a city or volunteer fire department?

6. Does the owner/operator have phone numbers of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements With Local Authorities)

Yes No

Are they readily available to the emergency coordinator? Yes No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements With Local Authorities)

Yes No

If no, has the owner/operator attempted to do this? Yes No

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operating record? (265.37 - Arrangements With Local Authorities)

Yes No NA

Section C - Contingency Plan and Emergency Procedures (265.50-56)

1. Does the facility have a contingency plan?
(265.51 - Purpose and Implementation of Contingency Plan)

Yes No (copy)

2. Is it maintained at the facility?
(265.53 - Copies of Contingency Plan.)

Yes No In David's office.

3. Is the contingency plan a revised SPCC Plan?
(265.52 - Content of Contingency Plan)

Yes No

a. Does the plan include:

(1) Action personnel will take?

Yes No Not assigned.
 Yes No not in boldog, just
 Yes No roads.

(2) Evacuation routes?

(3) Emergency equipment?

(4) Is the emergency equipment properly
inspected and maintained?

Yes No not labeled.

4. Is there an emergency coordinator on site or within
short driving distance of the plant at all times?
(265.55 - Emergency Coordinator)

Yes No

5. Who is the emergency coordinator?

David Gaboardi

6. Has the facility supplied local police and fire
departments with a copy of the contingency plan?
(265.52 - Content of Contingency Plan.)

Yes No B. no proof - verbal.

Date 3-27-91
3-28-91
Inspector Holtan
Facility ID# FLD 932107229

CONTAINERS STORAGE CHECKLIST FOR GENERATORS

(Subpart I - Use and Management of Containers 265.170)

1. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.) Yes No *Some lids rusty, violent*
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Yes No *Yellow containers w/ absorbents are overpack → rust labeled*
3. Is the waste compatible with the containers and/or its liner (265.172)? Yes No
4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)
 No Yes *Some containers were opened - rag container solvents, etc. waste drum in Bldg F.*
If yes, explain using narrative. . .
5. Are each of the containers inspected at least weekly (265.174)? Yes No *Checked logs for 90+91.*
If no, explain using narrative concerning the frequency of inspection.
6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line (265.176)? N/A Yes No
If no, explain using narrative and document with photograph.
7. Are incompatible wastes stored in the same containers? No Yes *all paint waste.*
If yes, explain using narrative.
8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? Yes No
If no, explain using narrative.

RCRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FLD982107229 Date of Inspection: 3/27/91 + 3/28/91

Facility Name: Mark III Industries

Facility Address: 5401 N.W. 44th Ave., Ocala, FL 32675

Facility Phone #: 904732-5878 Facility Contact: David Gabcaudi

Contact's Title: Safety / Training Director

Persons present for Inspection: David Gabcaudi - Mark III

Michelle Holton - FDER

(Kathrine Ellis - Marion Co. 3/27/91)
(Neal Schobert - FDER 3/28/91)

Date and Time Inspection Began: 3/27/91 10:00 am - 4:30 pm

Date and Time Inspection Ended: 3/28/91 11:30 am - 5:30 pm

I. (a) Describe the generator's restricted waste streams (use the LDR Treatment Standards list) and the destination of each:

① Spent solvents (halogenated and non-halogenated)
FC03 / FC05 (lacquer thinners, MEK paint waste)
D035 (acetone, toluene, xylene, MEK)

② Solid hazardous waste

D001 (Solvent rags)
filters, etc.
paint solids

Note: many of these solvent rags were found in the solid waste dumpster to go to the landfill. This was noted in inspt report

* ③ Some items were being disposed of without being tested:
- paint filter
- sanding paper
- cardboard - w/overspray of uv coatings

Revision # 1
Date 3-12-91

This waste is going to the Marion Co. landfill as solid waste.

(b) Are the wastes correctly identified? (You may need to review TOC, TSS, HOC, TCLP, PFLT, 3rd Thirds WW, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Thirds includes variance until 8-8-90: Minimum Technology]

Yes, all but #3

(c) Is the generator storing restricted waste on site?

Yes

Is the generator complying with 268.50?

Is the generator complying with 262.34 as required by 268.50(a)(1)?

No. 40 CFR 262.34(a)(2) Failure to clearly mark accum. dates on each container (drums stored outside Bldg. C)
40 CFR 262.34(a)(3) Failure to mark or label each container w/ the words "Haz. waste". (drums stored outside Bldg. C)

Are the wastes identified correctly?

A waste determination (TCLP) has not been done on the UV sealer contaminated cardboard or the paint filters and sandpaper. They are being treated as solid waste.

Solvent rags were also found in the dumpster. (In the past, these rags were treated as haz. waste).

Revision #1
Date 3-12-91

LDR CHECKLIST

Have LDR wastes been stored over 90 days (generator)?

(-20)
Unknown. (accum. dates were not on drums outside
bdg. C). These drums were not labeled on 3/27/91 but
were in the haz. waste storage area, labelled as haz. waste
w/ accum. start dates of 3/27/91 on 3/28/91.

If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal?

NA.

(d) Does the generator have a case-by-case extension or a variance? (specify)

no.

II. Waste with Treatment Standards

(a) Do the Notifications required by 268.7 include:

EPA Hazardous Waste #: yes

Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule):

yes

Manifest Document #'s: yes

Waste Analysis Data, where available: product knowledge

Certification Statement if Generator is Claiming to meet Treatment Standards: yes

Date Waste is Subject to Prohibitions if Subject to a Case-By-Case Extension or Variance: —

Revision # 1
Date 3-12-91

LDR CHECKLIST

III. Does the generator maintain the above records on-site for five (5) years?

C/Geo.

IV. Additional Notes and Comments:

(Check for soft hammer compliance prior to May 8, 1990.)

Twenty-two manifests were inspected and found to be in order.

There is still a question of a waste determination on the UV Sealer contaminated cardboard and paint contaminated filters and sandpaper.

The solvent rags that were found on the dumpster and garbage cans throughout the facility on 3/27/91 were in the hazardous waste storage area on 3/28/91. On past inspections, these rags were treated as hazardous waste.

The drums (~20) stored behind Bldg. C on 3/27/91 that were unlabelled w/no accum. start dates were found in the haz. waste storage area on 3/28/91 with haz. waste labels and accum. start dates of 3/27/91. Waste codes: F003 F005, D035 and D001

Revision # 1
Date 3-12-91

FIELD SHEET CODES

Waste Codes:

- S - listed solvent
- D - dioxins-F020 F021 F022 F023 F026 F027 F028
- pH - acids pH \leq 2
- PCB - hazardous wastes with PCB $>$ 50 ppm
- HOC - liquids/solids with Part 268 Appendix III HOCs \geq 1000 mg/l (mg/kg)
- CN - free liquids with CN \geq 1000 mg/l
- metal-free liquids
 - As \geq 500 mg/l
 - Cd \geq 100 mg/l
 - Cr VI $>$ 500 mg/l
 - Pb \geq 500 mg/l
 - Hg \geq 20 mg/l
 - Ni \geq 134 mg/l
 - Se \geq 100 mg/l
 - Tl \geq 130 mg/l

- X
3 - first, second or third waste

Notice Defect:

1. Incorrect or no EPA waste number;
2. Incorrect notice or determination of treatability group;
3. Incorrect or no notice of all treatment standards;
4. Failure to correctly identify all applicable prohibitions (ex. soft hammer vs. California list);
5. Incorrect or no manifest document number;
6. Insufficient supporting waste analysis data;
7. No signed certification statement for wastes meeting standards or otherwise exempt;
8. Other - see narrative or comments.

Demonstration Type:

1. Good faith effort has been made and no alternate has been found. Certification that there is no practical treatment must be made to EPA;
2. Generator has certified that the specified treatment yields the greatest environmental benefit;
3. Generator certifies that he has personally examined the treatment technology so that it complies with the demonstration.

HAZARDOUS WASTE INSPECTION
EXIT INTERVIEW

FACILITY: Mark III Industries, Inc.

I.D. NUMBER: FLD 982 107 229 DATE: 3/27/91 / 3/28/91 TIME: _____

INTERVIEW PARTICIPANTS: Michelle Holtz, David Gebardi, Katherine Ellens,
Neal Schobert

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-30, which adopts Federal Regulations 40 CFR Parts 260-266 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- 1. Hazardous Waste Determination (262.11). ^{part} filters, sand, paper, cardboard, etc.
- 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11).
- 3. Manifest Deficiencies or Recordkeeping and Reporting (263 Subpart B or 264/263 Subpart E).
- 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16].
- 5. Contingency Plan [265 Subpart D (262.34(c) for SQG) or 264 Subpart D)
- 6. Preparedness and prevention (265 Subpart C or 264 Subpart C).
- 7. Container Requirements (265.34 or 264/265 Subpart I).
- 8. Tank Requirements (262.34 or 264/265 Subpart J).
- 9. Operating a treatment, storage or disposal facility without a permit (403.722 F.S., F.A.C. 17-30, Section IV).
- 10. Security Requirements (264/265 .14).
- 11. Groundwater Monitoring (264/265 Subpart F).
- 12. Closure/Post-closure (264/265 Subpart G).
- 13. Failure to comply with the provisions of a Department issued permit or with the provisions of the Consent Order.
- 14. Other Solvent rags in dumpster, etc., open containers.

COMMENTS: _____

DER INSPECTOR SIGNATURE: Michelle Holtz

FACILITY PARTICIPANT SIGNATURE: David Gebardi

NOTE: BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.

PENALTY COMPUTATION WORKSHEET

Violator's Name: Marle III Industries

Identify Violator's Facility: _____

Date: 5/30/91

PART I - Class B (no penalty) Determination

Rationale for Class B determination: _____

PART II - Class A Penalty Determinations

Violation Type	Potential for Harm	Extent of Dev. <i>min</i>	Matrix Amount	Multi-day	Adjustments	Total
1. <u>262.34(a)(2)</u>	<u>Mod.</u>	<u>Major</u>	} <u>8,000</u>	_____	_____	<u>4,000</u> <u>8,000</u>
2. <u>262.34(a)(3)</u>	<u>Mod.</u>	<u>Major</u>		_____	_____	_____
3. <u>265.173(a)</u>	<u>minor</u>	<u>mod Major</u>	<u>1,000</u>	_____	_____	<u>1,000</u>
4. <u>403.161(b) and 265.31</u>	<u>Mod.</u>	<u>Mod.</u>	<u>5,000</u>	_____	_____	<u>5,000</u>
5. <u>265.16(d)</u>	<u>Minor</u>	<u>minor</u>	<u>250</u>	_____	_____	<u>250</u>
6. <u>265.52(f)</u>	_____	_____	_____	_____	_____	<u>1,000</u>
7. <u>265.52(a)</u>	} <u>min</u>	<u>mod.</u>	<u>1,000</u>	_____	_____	_____
8. <u>265.52(e)</u>				_____	_____	_____
9. <u>F.S. 403.727</u>	<u>Mod</u>	<u>Major</u>	<u>8,000</u>	_____	_____	<u>8,000</u>

Total Penalties for all Violations: \$ 23,250

19,250

(Attach Part III for each violation for which an adjustment on multi-day penalty is determined.)

includes satellite container management for spray gun clean

WORKING SYSTEM FOR POTENTIAL OR HARM

Facility Name: Mark III

Rule(s) Violated: F.S. 403.727 Solvent rags in dumpster

NATURE OF WASTE: 4

Category A = 8
Category B = 4

VOLUME OF WASTE: 8 ? unknown

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

RECEPTORS: 4 + 2 = 6

Discharge/
Potential = 4
No Potential = 1

>1000 people = 4
100-1000 people = 3
10-100 people = 2
<10 people = 1

TOTAL SCORE: 18

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

major extent of diversion

ASSIGNED BY: Mittelman

DATE: 5/30/91

WORKING SYSTEM FOR POTENTIAL OR HARM

Facility Name: Mark III

Rule(s) Violated: 265.173(a)
open drum. + open rag container

NATURE OF WASTE: 4

Category A = 8
Category B = 4

VOLUME OF WASTE: 2

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

RECEPTORS: 4 + 2 = 6

Discharge/
Potential = 4
No Potential = 1

>1000 people = 4
100-1000 people = 3
10-100 people = 2
<10 people = 1

TOTAL SCORE: 11

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: ~~8-12~~

major extent of deviation.

ASSIGNED BY: M. Horton

DATE: 5/30/91

WORKING SYSTEM FOR POTENTIAL FOR HARM

Facility Name: Marie III

Rule(s) Violated: 262.34(a)(3) (no labeling on drums)
262.34(a)(2) (no accum. dates)

NATURE OF WASTE: 4

Category A = 8
Category B = 4

VOLUME OF WASTE: 5

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

RECEPTORS: 1 + 3 = 4

Discharge/
Potential = 4
No Potential = 1
>1000 people = 4
100-1000 people = 3 ← 600 employees
10-100 people = 2
<10 people = 1

TOTAL SCORE: 13

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18 ←
MINOR POTENTIAL FOR HARM: 8-12

extent of diversion = major

ASSIGNED BY: Michelle Holt

DATE: 5/30/91

LINKING SYSTEM FOR POTENTIAL OR HARM

Facility Name: Mark III

Rule(s) Violated: 265.31 failure to maintain facility.

NATURE OF WASTE: 4

Category A = 8
Category B = 4

VOLUME OF WASTE: 5

>26 drums = 8
6-25 drums = 5
1-5 drums = 2

RECEPTORS: 1 + 3 = 4

Discharge/
Potential = 4
No Potential = 1

>1000 people = 4
100-1000 people = 3
10-100 people = 2
<10 people = 1

TOTAL SCORE: 13

MAJOR POTENTIAL FOR HARM: 19-24
MODERATE POTENTIAL FOR HARM: 13-18
MINOR POTENTIAL FOR HARM: 8-12

extr of deviation = moderate

ASSIGNED BY: M. Hoffman

DATE: 5/30/91



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347

Lawton Chiles, Governor

Carol M. Browner, Secretary

JUN 12 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark III Industries
5401 N.W. 44th Avenue
Ocala, Florida 32675

Attn: Thad Boyd II, Owner

WARNING NOTICE #WN91-0038HW42SWD
FLD #982 107 229

RE: Class I Hazardous Waste Violations
Mark III Industries, Marion County

Dear Mr. Boyd:

A hazardous waste compliance inspection was conducted at your facility on March 27 through March 28, 1991. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 Code of Federal Regulations Parts 260 to 268, adopted in Chapter 17-730, Florida Administrative Code.

During the inspection violations of rules regarding hazardous waste management were noted. These violations are set forth in the "Summary of Violations" section of the attached inspection report.

You are advised to immediately cease all operations contributing to violations of the cited statutes and regulations. You are further advised that you may be held liable for any damages occurring to the resources of the State and for the restoration of those resources to their original condition.

This matter may be resolved through the entry of a Consent Order which includes a compliance schedule and an appropriate penalty. Under the Department's agreement with the United States Environmental Protection Agency (EPA), a formal administrative complaint or "Notice of Violation" (NOV) must be issued within 120 days of the date of the attached inspection report. In order to avoid the issuance of an NOV a Consent Order must be entered into well in advance of that date.

Mark III Industries
Warning Notice #WN91-0038HW42SWD

JUN 12 1991

Page Two

In accordance with the RCRA Civil Penalty Policy of May 8, 1984, the penalties assessed in this case are \$23,250.00. Please contact Michelle Holton of this office within 10 calendar days of receipt of this Notice to discuss a resolution of this matter.

Sincerely,



Richard D. Garrity, Ph.D.
Deputy Assistant Secretary
Southwest District

RDG/mhr
Attachment

cc: Wanda Parker, BWP&R
James Scarbrough, USEPA, Region IV
Compliance File



Florida Department of Environmental Regulation

Southwest District • 4520 Oak Fair Boulevard • Tampa, Florida 33610-7347
Lawton Chiles, Governor 813-623-5561 Carol M. Browner, Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION REPORT COMPLAINT ROUTINE FOLLOW-UP PERMITTING
FACILITY NAME Mark III Industries DER/EPA ID FLD 982 107 229
ADDRESS 5401 N.W. 44th Avenue, Ocala, Florida 32675
COUNTY Marion Phone(904) 732-5878 DATE 3/27/91 TIME 6:00 p.m.
3/28/91

TYPE OF FACILITY:

Generator	Storage	Treatment
<input type="checkbox"/> Small Quantity	<input type="checkbox"/> Container	<input type="checkbox"/> Tank
<input checked="" type="checkbox"/> Generator	<input type="checkbox"/> Tank	<input type="checkbox"/> Land Treatment
	<input type="checkbox"/> Waste Pile	<input type="checkbox"/> Thermal
Transporter	<input type="checkbox"/> Surface Impoundment	<input type="checkbox"/> Chem/Phys/Bio.
<input type="checkbox"/> Transporter		<input type="checkbox"/> Incinerator
	Disposal	<input type="checkbox"/> Surface Impdmt.
	<input type="checkbox"/> Landfill	
	<input type="checkbox"/> Surface Impoundment	
	<input type="checkbox"/> Waste Pile	

2. Applicable Regulations:

40 CFR 262 40 CFR 263 40 CFR 264 40 CFR 265

3. Responsible Official: (Name & Title)

Thad Boyd II, Owner

4. Survey Participants & Principal Inspector

Michelle Holton - FDER
David Gaboardi - Mark III
Katheryn Elkins - Marion County
Neal Schobert - FDER

5. Facility Latitude:

29°11'00"

Longitude:

82°15'24"

6. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL PRIVATE

7. Permit No.: NA Date Issued: _____ Expiration Date: _____

8) PROCESS DESCRIPTION:

Mark III Industries is a high-volume facility for conversion of stock vans to custom vehicles with upgraded interior furnishings and exterior paint patterns.

Stock vans are brought in and inspected at the P.D.I. Building D, then they are taken to the cut station, Building E. At building E holes are cut in the sides of the vans for windows, and in the roofs for sport tops. Moldings around the sport tops and windows are then screwed into place. The electrical wiring is also done in this building. No hazardous waste is generated in this process.

From the cut station the vans go the Production Building, Building P. In this area, the inside of the vans are finished off. Plywood flooring is glued and screwed to the floor. Carpet is then glued to the flooring. Styrofoam insulation is glued to the walls and ceiling. Wall paneling is then screwed over the insulation. The seats, the wood molding cabinets, and the electronics are also screwed into place. The wood cabinets and moldings are manufactured in the cabinet shop, Building C. The seats are also put together in the cabinet shop.

In the Production Building, the carpet and foam are glued down with Parabond glue. Parabond 1342 contains 1,1,1-Trichloroethane. The glue is applied with spray guns which are cleaned by immersing them in buckets of lacquer thinner. A non-hazardous white wood glue, Mastergrip 95, is used on the plywood. Body solvent is used to remove unwanted glue from the fabric or metal. About three or four 55 gallon drums of body solvent are used a year in this department. The body solvent has a flash point of 80°F and contains about 80% xylene. Silicon is also used here along with touch up paints and stains. A drum service picks up the empty Parabond glue drums. Parabond glue solids are treated as a solid waste. Lacquer thinner is collected in a satellite drum.

From the Production Building, the vans go the Paint Shop A to be touched-up or painted. This is also where the sport tops are painted. There are 10 totally enclosed down draft booths for the painting and curing of the vehicles. At the time of the inspection, booths 9 and 10a were being used for the painting of the van tops, the rest were not being used. A Dupont Chromabase paint is used followed by a base coat-clear coat. The paint booth filters are landfilled.

In Paint Shop A, there is a satellite accumulation drum for waste paint related material. The employees use a 5 gallon black bucket with a loose lid to store their acrylic lacquer thinner waste, then they transfer it to the satellite drum about 20 feet away from the work station. Both of the satellite drums are labelled correctly.

8) PROCESS DESCRIPTION: (Cont'd)

Paint filters, sanding paper, empty thinner cans, and solvent rags were found in the garbage cans in this shop. Near the paint booths there is a second 55 gallon drum properly labelled (F003/F005).

From Paint Shop A the vans go to Paint Shop B for application of graphics (stickers). Acetone and lacquer thinner are used with cloth rags to wipe the sides of the vans down, then the graphics are applied.

Outside Paint Shop B, there was a solid waste dumpster (Paul's Container Service) which was full of garbage bags which contained solvent rags. David Gaboardi had all of the solvent rags removed from the dumpster and placed in a container in Building F - hazardous waste Storage area. Industrial Services out of Plant City is the laundry service for Mark III, although very few rags receive laundering.

From the Paint Shop B the vans go to the tire bay. Here the running boards, tires, ladder, and aluminum running boards are mounted on the vans. Spray bottles of thinner and rags are used in this area for touch-up cleaning.

The last two areas before final inspection and shipping are final detail, cleanup and the wash bay. Here the vans are thoroughly cleaned and made ready for shipment. Whitewall cleaner concentrate (Ph=12) and an acid detergent (acid fallout cleaner, primarily oxalic acid), are used in the wash bay. The wash water goes through drains to a retention pond on the property.

The cabinet Shop, Building C, is where the seats are put together, the wall panels are made, and the wood pieces are cut and stained. Upstairs in the cabinet shop is the sewing room, no hazardous waste is generated here. Downstairs, foam is sprayed with Parabond, then cloth is attached to form seat cushions. The Parabond guns are cleaned with lacquer thinner. There is a 55 gallon satellite accumulation station for lacquer thinner wastes. A silicon spray adhesive is also used to ease the fabric onto the foam. Body solvent is used (with cloths) to remove dirt from the product.

In the woodworking area of the cabinet shop a conveyer station is used. The wood pieces are placed on corrugated cardboard trays and put on the conveyer line. As the line moves along, a stain/wood sealer is applied, then a UV sealer, then a top coat. The employees spraying the sealer were using Tyvek suits and supplied air. Then the wood goes through the UV "oven" to cure. The stain/wood sealer is an Aqueous elm stain which is a water soluble stain and sealer compound. Once the cardboard trays have too much overspray buildup on them, they are run through the UV oven, then disposed of in the dumpster. These trays have never been tested, they have used product knowledge to determine the disposal method. MEK is also used as a cleanup solvent, about 55 gallons are used per month in this area.

8) PROCESS DESCRIPTION: (Cont'd)

There is a hazardous waste storage area behind the cabinet shop. This area is also used for product storage. Upon inspection, one 55 gallon drum of waste paint related material was found (F003/F005/D035), dated 3/20/91.

Outside this storage area were about thirty-six 55 gallon drums, it was not clear if the majority of the drums were waste or product. The following were found on 3/27/91:

- 1 - 55 gallon red drum labelled "Elm Stain for Lilly don't use"
- 1 - 55 gallon red drum labelled "bad UV sealer don't use"
- 2 - 55 gallon black drums labelled "glue bad"
- 1 - 55 gallon red drum labelled "Lite Red corrected stain 6/30/89" (David Gaboardi stated that this was from product testing and Lilly should pick it up).
- 1 - 55 gallon red drum labelled "UV top coat do not use".
- 1 - 55 gallon red drum labelled "Waste Oil"
- 1 - 55 gallon drum not labelled (claimed to be diesel)
- 2 - 55 gallon black drums not labelled.
- 2 - 5 gallon open buckets containing silicone and water.
- 11 - 55 gallon drums labelled "thinner"
- 1 - 55 gallon red drum labelled "Solid Waste cans"
- 3 - 55 gallon red drums labelled "MEK chain cleaner" (They claim to be using this to dip chains in).

On March 28, 1991, eighteen of these drums were in Building F, the main hazardous waste storage area, labelled hazardous waste with start dates of 3/27/91.

On March 27, 1991, there were 2 drums labelled waste paint related material (F005, F003, D035) and dated 3/25/91 and 3/6/91 inside Building F.

Their solvent still and 2 can crushers are in a containment area next to Building F. The solvent that has been recycled is used as cleanup thinners and the still bottoms are manifested off as hazardous waste.

On March 28th, one waste drum had a missing bung (F003, F005, D035) dated 3/27/91. The container (small dumpster) that contained the solvent rags (moved from Paint Shop B's dumpster) was open and unlabelled.

The December 18, 1989, FDER hazardous waste inspection performed by David Herbster, Mike Camardese, and Bill Kappler, stated that Mark III began to handle the acetone solvent rags as hazardous waste in 1989.

Paperwork inspected on March 28, 1991, included manifests, annual report, training records, weekly drum inspection logs, and the contingency plan. The solvent recycling logs were also reviewed. The following deficiencies were noted:

8) PROCESS DESCRIPTION: (Cont'd)

- Mark III did not have a current list of people in each job, job titles, job descriptions, and amount of introductory and continuing training each individual received. This violation was also cited in the December 18, 1989 inspection report.
- Mark III did not have an adequate contingency plan. There were no dates or revision dates for the plan, the emergency equipment was not listed, the location of the plan was not given, proper safety and emergency numbers were not listed, building evacuation plans were inadequate, information pertaining to cleaning emergency equipment, proper management of waste - and amendment of plan were not included. On the December 18, 1989 inspection, there were also problems with the contingency plan.

Refer to Section #9 of this report for the Summary of Violations.

9) SUMMARY OF VIOLATIONS:

- | | |
|---------------------|---|
| 40 CFR 262.11 | Failure to determine if acrylic enamel paint filter waste is hazardous waste. |
| * 40 CFR 262.11 | Failure to determine if paint/sealer waste is hazardous waste under the TCLP rules. |
| 40 CFR 262.34(a)(2) | Failure to clearly mark the date of accumulation on each container. |
| 40 CFR 262.34(a)(3) | Failure to mark or label container with the words "Hazardous Waste" while being accumulated. |
| 40 CFR 265.16(d) | Failure to provide a current list job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job. |
| 40 CFR 265.31 | Failure to maintain and operate facility in order to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste that could threaten human health or the environment. |
| 40 CFR 265.52(a) | Failure to outline actions that facility personnel must take in response to spills in the contingency plan,. |
| 40 CFR 265.52(e) | Failure to include in the contingency plan a list of all emergency equipment at the facility and the location and physical description of each item on the list, and a brief outline of its capabilities. |

9) SUMMARY OF VIOLATIONS: (Cont'd)

- 40 CFR 265.52(f) Failure to provide a complete evacuation plan for facility personnel in the contingency plan.
- 40 CFR 265.173(a) Failure to keep hazardous waste containers closed during storage, except when necessary to add or remove waste.
- F.S. 403.161(1)(b) Discharge of industrial wastewaters to a retention pond without a permit.
- F.S. 403.727 Failure to dispose of hazardous waste solvent contaminated rags in a hazardous waste facility which has a current and valid permit pursuant to F.S. 403.722.

* Referred to EPA Region IV for evaluation.

Inspected: Michelle Holton
Michelle Holton
Environmental Specialist I

Approved: Elizabeth Knauss
Elizabeth Knauss
Environmental Specialist III

Date: 6/6/91

Date 3-27-91 *
3-28-91
Inspector Holtor
Facility ID# FLD 982/07229

RCRA INSPECTION REPORT
GENERATOR'S CHECKLIST

Note: On multiple part questions, check those not in compliance.

Section A - Site Identification No.

1. Site Name: Mark III Industries

Section B - Hazardous Waste Determination (262.11)

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? Yes No

a. If yes, list wastes, EPA numbers & quantities.

F003/F005

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste.) Yes No

a. If yes, list wastes, EPA numbers, and quantities.

D035/D001

b. Does generator determine characteristics by testing, by product knowledge, or by applying process knowledge? _____

(1) If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? Yes No

(2) If equivalent test methods used, attach copy of equivalent methods used.

3. Is generator subject to full regulation under Part 262? (If no, check appropriate exemptions) Yes No

Small quantity generator (261.5 - Special requirements) (Describe small quantity disposal practices & checklist) _____

OR
Produces non-hazardous waste at this time (261.4 - Exclusions) _____

OR
Recycles, reclaims, uses or reuses hazardous waste at this time (261.6 - Exclusions) (Describe how this is achieved.) _____

OR
Being a farmer disposing of waste pesticides for his own use on his own property (262.51 - Farmers) _____

OR
Burns hazardous waste as a fuel for the purpose of recovering usable energy (261.1(c)(2)) _____

halogenated + non-halogenated solvents.

ignitable + MEK

Some items were not tested & were being disposed of as solid waste.

*- paint filters
- sanding paper
- cardboard (overpack)*

- also rags (solvent) were in dumpster to go to the landfill.

Section C - Manifest (262.20-.23)

1. Has generator shipped hazardous waste off-site since Nov. 19, 1980?
(Subpart B - The Manifest) Yes No

- a. If no, do not fill out Section C and D.
- b. If yes, identify primary off-site facilities.
List facilities in narrative report.

2. Does generator use manifest? (262.20 - General requirements) Yes No

If yes, inspect manifests at random. Do all manifests reviewed include the following information?
(262.21 - Required information) (Check items not on manifest.)

- a. Manifest Document No. Yes No
- b. Generator's Name, Mailing Address, Tel. No. Yes No
- c. Generator EPA I.D. No. Yes No
- d. Transporter(s) Name and EPA I.D. No. Yes No
- e. Facility Name, Address and EPA I.D. No. Yes No
- f. DOT description of the waste Yes No
- g. (1) Quantity (weight or volume) Yes No
(2) Containers (type and number) Yes No
- h. Emergency Information (optional)
(special handling instructions, Phone No.) Yes No
- i. Is the following certification on each manifest form? Yes No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

- j. Signatures and dates
 - (1) Generator Yes No
 - (2) Transporter Yes No
 - (3) Disposer (returned copy) Yes No

k. Indicate number of manifests inspected and number of violations. 22
Note type of violation in report. 0

1. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting)

NA
__ Yes __ No

If yes, did it contain the following information?
Legible copy of manifest

__ Yes __ No

AND

Cover letter explaining generators efforts to locate waste.

__ Yes __ No

m. Does (will) generator retain copies for 3 years?

Yes __ No

Section D - Pre-Transport Requirements(262.30-34)

N/A

1. Does generator package waste for transport?

Yes __ No

If no, skip to question 8.

If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179 (DOT requirements)? (262.30 - Packaging)

Yes __ No

3. Inspect containers to be shipped.

a. Are containers to be shipped in good condition? (Describe containers and condition; i.e., leaking or corroding or bulging.)

Yes __ No

b. Is there evidence of heat generation from incompatible wastes in the containers?

No __ Yes

4. Before shipping, does the generator use DOT labeling requirements in accordance with 49 CFR 172? (263.31 - Labeling)

Yes __ No

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking)

Yes __ No

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking)

Yes __ No

Label saying: HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet. (262.33 - Placarding) *No.*

a. Does the generator have the appropriate placards to offer the initial transporter? Yes No

b. If no, who provides placards? _____

8. Accumulation Time (262.34 - Accumulation Time)

a. Is facility a permitted storage facility? Yes No
If yes, skip to question #9.

If no, answer rest of question #8.

b. Does the facility comply with the 90-day accumulation time limit? (262.34(a)) Yes No

If no, has the generator been granted a 30-day extension? (262.34(b))

Yes No

If yes, explain the unforeseen/uncontrollable circumstances in the narrative.

c. Are containers used to store wastes? (262.34(a)(1)) Yes No

If yes, complete Containers Storage Checklist for Generators.

Is the beginning date of accumulation time clearly indicated? (262.34(a)(2))

Yes No

d. Are tanks used to store wastes? (262.34(a)(1))

Yes No

If yes, complete Tanks Checklist for Generators

e. While being accumulated, is each container or tank clearly marked "Hazardous Waste"? (262.34(a)(3))

Yes No

NOTE: If generator accumulates waste on site but is not a storage facility, fill out Appendix A to Generators Checklist.

9. Describe storage area. Use photos and narrative.

Section E - Recordkeeping and Records (262.40-43) N/A Explain _____

1. Is generator keeping the following reports? (262.40 - Record keeping)
(Note: The following must be kept for a minimum of three years.)

a. Annual reports (not applicable until January 1983). Yes No

b. Test results where applicable. Yes No

*Corrected on 3/28/91.
(Drums from Cab in shop storage area).
They were not labelled as waste on 3/27 but on 3/28 they were in the haz. waste storage area properly labelled since 86.*

2. Where are records kept (at facility or elsewhere)? facility

3. Who is in charge of keeping the records?

Name David Gaboardi Title Safety Director

4. Any additional reporting? (262.43 - Additional Reporting) Yes No

Section F - Special Condition (262.50 - International Shipments)

N/A

Explain _____

1. Has generator received from, or transported to a foreign source any hazardous waste? No Yes

a. If yes, has he filed a notice with the Regional Administrator? Yes No

b. Is this waste manifested and signed by Foreign consignee? Yes No

c. If generator transported wastes out of the country, has he received confirmation of delivered shipment? Yes No

Date 3/27/91 + 3/28/91
Inspector Holtm
Facility ID# FLD 942107229

-6g-

Appendix A
To Generator Checklist

Section A - Personnel Training (265.16)

1. Do management personnel complete hazardous waste training? Yes No
a. Is training on-the-job? Yes No
b. Is training in the classroom? Yes No
2. Do laborers who handle hazardous waste complete training? Yes No
a. Is training on-the job? Yes No
b. Is training in the classroom? Yes No
3. Does training include:
a. Emergency response procedures? Yes No
b. Inspection procedures? Yes No
c. Operation of hazardous waste handling equipment? Yes No
4. How often is training reviewed? Once every 3-4 mos.
5. Does the facility have personnel training records including
a. Job title and description of position? Yes No
b. Description of employee's training? Yes No
6. Are records maintained for three years? Yes No

no list of empl. in jobs, desc., training

Section B - Preparedness and Prevention (265.30-37)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and Operation of Facility) No Yes
If yes, use narrative explanation.
2. Is the facility equipped with (265.32 - Required equipment)
a. Internal communications or alarm system? Yes No
Is it easily accessible in case of emergency? Yes No
b. Telephone or two-way radio to call emergency response personnel? Yes No
c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes No
Is this equipment tested to assure its proper operation? Yes No
How frequently? Inspected annually.

Sm. paint area on ground by solvent still.

intercom.

d. Water of adequate volume for hoses, sprinklers or water spray system? Yes No

(1) Describe source of water well

(2) Indicate flow rate and/or pressure and storage capacity, if applicable. etc

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g., adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required Aisle Space) Yes No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (Layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements With Local Authorities) N/A Yes No

*Verbal
No proof
described in
contingency
plan*

If N/A, explain _____

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements With Local Authorities) N/A Yes No

If yes, indicate primary authority Maion Co. Sherrifs, West Marion Vol. Fire Dept.

Is the fire department a city or volunteer fire department?

6. Does the owner/operator have phone numbers of and agreements with state emergency response teams, emergency response contractors and equipment suppliers? (265.37 - Arrangements With Local Authorities) Yes No

Are they readily available to the emergency coordinator? Yes No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? (265.37 - Arrangements With Local Authorities) Yes No

If no, has the owner/operator attempted to do this? Yes No

8. If the State, or local authorities decline to enter into the above referenced agreements, has this been documented in the operating record? (265.37 - Arrangements With Local Authorities) Yes No NA

Section C - Contingency Plan and Emergency Procedures (265.50-56)

1. Does the facility have a contingency plan?
(265.51 - Purpose and Implementation of Contingency Plan)

Yes No (copy)

2. Is it maintained at the facility?
(265.53 - Copies of Contingency Plan.)

Yes No In David's office.

3. Is the contingency plan a revised SPCC Plan?
(265.52 - Content of Contingency Plan)

Yes No

a. Does the plan include:

- (1) Action personnel will take?
- (2) Evacuation routes?
- (3) Emergency equipment?
- (4) Is the emergency equipment properly inspected and maintained?

Yes No Not adequate.
 Yes No not in bldg, just
 Yes No roads.
 Yes No not labeled.

4. Is there an emergency coordinator on site or within
short driving distance of the plant at all times?
(265.55 - Emergency Coordinator)

Yes No

5. Who is the emergency coordinator? David Gaboardi

6. Has the facility supplied local police and fire
departments with a copy of the contingency plan?
(265.52 - Content of Contingency Plan.)

Yes No no proof - verbal.

Date 3-27-91
3-28-91
Inspector Holtan
Facility ID# FLD 982/07229

CONTAINERS STORAGE CHECKLIST FOR GENERATORS

(Subpart I - Use and Management of Containers 265.170)

1. Are the containers in good condition (265.171)? (check for leaks, corrosion, bulges, etc.) Yes No
2. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? Yes No
3. Is the waste compatible with the containers and/or its liner (265.172)? Yes No
4. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? (265.173)?
 No Yes
If yes, explain using narrative.
5. Are each of the containers inspected at least weekly (265.174)? Yes No
If no, explain using narrative concerning the frequency of inspection.
6. Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility property line (265.176)? N/A Yes No
If no, explain using narrative and document with photograph.
7. Are incompatible wastes stored in the same containers? No Yes
If yes, explain using narrative.
8. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? Yes No
If no, explain using narrative.

Some lids rusty, no leaks

yellow containers w/ absorbents are one pack → not labeled

Some containers were opened - rag container, solvents, etc. waste drum in Bldg. F.

Checked logs for 90+91

all paint waste.



RCRA INSPECTION REPORT
LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility ID#: FLD 982107229 Date of Inspection: 3/27/91 + 3/28/91

Facility Name: Mark III Industries

Facility Address: 5401 N.W. 44TH Ave., Ocala, FL 32675

Facility Phone #: 904 732-5878 Facility Contact: David Gaboardi

Contact's Title: Safety / Training Director

Persons present for Inspection: David Gaboardi - Mark III

Michelle Holton - FDER

(Katherine Elkins - Marion Co. 3/27/91)

(Neal Schobert - FDER 3/28/91)

Date and Time Inspection Began: 3/27/91 10:00 am - 4:30 pm

Date and Time Inspection Ended: 3/28/91 11:30 am - 5:30 pm

I. (a) Describe the generator's restricted waste streams (use the LDR Treatment Standards list) and the destination of each:

① Spent solvents (halogenated and non-halogenated)
F003 / F005 (laquer thinner, MEK, paint waste)
D035 (acetone, toluene, xylene, MEK)

② Solid hazardous waste

D001 (Solvent rags)

filters, etc.
paint solids

note: many of these solvent rags were found in the solid waste dumpster to go to the landfill. This was noted in inspt. report.

* ③ Some items were being disposed of without being tested:
- paint filters
- sanding paper
- cardboard - w/overspray of uv coatings

Revision # 1
Date 3-12-91

This waste is going to the Marion Co. landfill as solid waste.

(b) Are the wastes correctly identified? (You may need to review TOC, TSS, HOC, TCLP, PFLT, 3rd Thirds WW, NWW, Technology Acronyms, Tables 268.41, 268.42 & 268.43.) [268.7 Notices for 3rd Thirds includes variance until 8-8-90: Minimum Technology]

Yes, all but #3.

(c) Is the generator storing restricted waste on site?

Yes.

Is the generator complying with 268.50?

Is the generator complying with 262.34 as required by 268.50(a)(1)?

No. 40 CFR 262.34(a)(2) Failure to clearly mark accum. dates on each container (ⁿ²⁰ drums stored outside Bldg. C)

40 CFR 262.34(a)(3) Failure to mark or label each container w/ the words "Haz. waste". (ⁿ²⁰ drums stored outside Bldg. C)

Are the wastes identified correctly?

A waste determination (TCLP) has not been done on the UV sealer contaminated cardboard or the paint filters and sandpaper. They are being treated as solid waste.

Solvent rags were also found in the dumpster. (In the past, these rags were treated as haz. waste).

Revision # 1
Date 3-12-91

LDR CHECKLIST

Have LDR wastes been stored over 90 days (generator)?

Unknown, (accum. dates were not on drums outside (~20) bldg. C). These drums were not labeled on 3/27/91 but were in the haz. waste storage area, labeled as haz. waste w/ accum. start dates of 3/27/91 on 3/28/91.

If the facility is a TSD and has been storing LDR wastes for over a year, can the TSD prove (if challenged) that the reason for such storage is solely for the purpose of accumulation of such quantities of hazardous waste as are necessary to facilitate proper recovery, treatment, or disposal?

NA

(d) Does the generator have a case-by-case extension or a variance? (specify)

no

II. Waste with Treatment Standards

(a) Do the Notifications required by 268.7 include:

EPA Hazardous Waste #: yes

Applicable Treatment Standards or proper reference for wastes other than F001-F005, F020-F023, F026-F028, and California List (3rd Third Rule):

yes

Manifest Document #'s: yes

Waste Analysis Data, where available: product knowledge

Certification Statement if Generator is Claiming to meet Treatment Standards: yes

Date Waste is Subject to Prohibitions if Subject to a Case-By-Case Extension or Variance: —

Revision # 1
Date 3-12-91

LDR CHECKLIST

III. Does the generator maintain the above records on-site for five (5) years?

Yes.

IV. Additional Notes and Comments:
(Check for soft hammer compliance prior to May 8, 1990.)

Twenty-two manifests were inspected and found to be in order.

There is still a question of a waste determination on the US Sealers contaminated cardboard and paint contaminated filters and sandpaper.

The solvent rags that were found on the dumpster and garbage cans throughout the facility on 3/27/91 were in the hazardous waste storage area on 3/28/91. On past inspections, these rags were treated as hazardous waste.

The drums (~20) stored behind bldg. C on 3/27/91 that were unlabelled w/no accum. start dates were found in the haz. waste storage area on 3/28/91 with haz. waste labels and accum. start dates of 3/27/91. Waste codes: F003 F005, D035 and D001

Revision # 1
Date 3-12-91

FIELD SHEET CODES

Waste Codes:

- S - listed solvent
- D - dioxins-F020 F021 F022 F023 F026 F027 F028
- pH - acids pH \leq 2
- PCB - hazardous wastes with PCB $>$ 50 ppm
- HOC - liquids/solids with Part 268 Appendix III HOCs \geq 1000 mg/l (mg/kg).
- CN - free liquids with CN \geq 1000 mg/l
- metal-free liquids
 - As \geq 500 mg/l
 - Cd \geq 100 mg/l
 - Cr VI $>$ 500 mg/l
 - Pb \geq 500 mg/l
 - Hg \geq 20 mg/l
 - Ni \geq 134 mg/l
 - Se \geq 100 mg/l
 - Tl \geq 130 mg/l
- \underline{X}
3 - first, second or third waste

Notice Defect:

1. Incorrect or no EPA waste number;
2. Incorrect notice or determination of treatability group;
3. Incorrect or no notice of all treatment standards;
4. Failure to correctly identify all applicable prohibitions (ex. soft hammer vs. California list);
5. Incorrect or no manifest document number;
6. Insufficient supporting waste analysis data;
7. No signed certification statement for wastes meeting standards or otherwise exempt;
8. Other - see narrative or comments.

Demonstration Type:

1. Good faith effort has been made and no alternate has been found. Certification that there is no practical treatment must be made to EPA;
2. Generator has certified that the specified treatment yields the greatest environmental benefit;
3. Generator certifies that he has personally examined the treatment technology so that it complies with the demonstration.

HAZARDOUS WASTE INSPECTION
EXIT INTERVIEW

FACILITY: Mark III Industries, Inc.

I.D. NUMBER: FLD 982 107 229 DATE: 3/27/91 / 3/28/91 TIME: _____

INTERVIEW PARTICIPANTS: Michelle Holtz, David Ceboardi, Katherine Elkins, Neal Schobert

This exit interview is the Department's procedure to advise you early in the process of possible violations of Florida Administrative Code Chapter 17-30, which adopts Federal Regulations 40 CFR Parts 260-266 by reference. It is possible that the violations noted and checked are incomplete. After a complete internal file review by the Department, an inspection report will be finalized. In most cases the violations noted below by the inspector will not change in the final report, therefore, you are advised to immediately begin correcting these violations. The Department will forward the complete inspection checklist along with the finalized inspection report within 45 days. Be advised that the Department has signed an enforcement agreement with the U.S. Environmental Protection Agency which calls for the assessment and collection of monetary penalties for violations. While your quick response in correcting the violations may not reduce the calculated penalties, continued non-compliance may result in greater penalty liability.

The following violations have been tentatively identified:

- 1. Hazardous Waste Determination (262.11). *paint filters, sandpaper, caulkboard, etc.*
- 2. Hazardous Waste Notification (262.12 or 263.11 or 264/265.11).
- 3. Manifest Deficiencies or Recordkeeping and Reporting (263 Subpart B or 264/263 Subpart E).
- 4. Personnel Training [265.16 (262.34(d) for SQG) or 264.16].
- 5. Contingency Plan [265 Subpart D (262.34(d) for SQG) or 264 Subpart D)
- 6. Preparedness and prevention (265 Subpart C or 264 Subpart C).
- 7. Container Requirements (265.34 or 264/265 Subpart I).
- 8. Tank Requirements (262.34 or 264/265 Subpart J).
- 9. Operating a treatment, storage or disposal facility without a permit (403.722 F.S., F.A.C. 17-30, Section IV).
- 10. Security Requirements (264/265 .14).
- 11. Groundwater Monitoring (264/265 Subpart F).
- 12. Closure/Post-closure (264/265 Subpart G).
- 13. Failure to comply with the provisions of a Department issued permit or with the provisions of the Consent Order.
- 14. Other Solvent rags in dumpster, etc., open containers.

COMMENTS: _____

DER INSPECTOR SIGNATURE: Michelle Holtz

FACILITY PARTICIPANT SIGNATURE: David Ceboardi

NOTE: BY SIGNING THIS FORM THE FACILITY PARTICIPANT IS ONLY INDICATING THAT THIS FORM HAS BEEN RECEIVED. THIS IS NOT AN ADMISSION THAT THE CITED PROVISIONS HAVE BEEN VIOLATED.

1. EPA I.D. # FLD98217229

2. HANDLER NAME: Mark III Industries

3. ADDRESS: 5401 N.W. 44th Ave.
Ocala, FL 32675

3a. COUNTY: Marion

4. DATA ENTRY: (Circle One) NEW UPDATE

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS OF THIS REPORT 3/28/91

5a. AGENCY RESPONSIBLE FOR EVALUATION: (Circle One) EPA State Other Contractor/State Oversight

2a. Type Facility: (Circle One)
Treat/Store/Dispose
Non-Handler
Transporter
Generator
Small Quan. Generator
Cond. Exempt S.Q.G.
Exempt

2b. Type Ownership: (Circle One)
Federal
County
Private
State
Municipal

6. TYPE OF EVALUATION COVERED BY THIS REPORT: *

- 1 = Compliance Eval. Inspection (CEI)
 - 2 = Sampling Inspection
 - 3 = Record Review
 - 4 = Comprehensive GWM Evaluation (CME)
 - 5 = Compliance Schedule Evaluation
 - 6 = Other (Citizen Complaint)
 - 7 = Other - Part B Call-in
 - 8 = Other - Withdrawal Candidate
 - 9 = Other - Closed Facility
 - 10 = Other - General
 - 11 = Case Development Inspection
 - 12 = O & M Inspection
 - 13 = CA Oversight Inspection
 - 80 = Informal Meeting
- (Put Code in Box) 1

7. DATE OF EVALUATION COVERED BY THIS REPORT (Enter Only if Different from 5): / /

7a. EVALUATION COMMENTS: _____

8. CLASS AND VIOLATIONS: Key

X = Violation; O = No Violation; Z = Pending
B = Viol. & Specialty; S = Same Viol./Spec.

Specialties

I = No Insurance only; C = CA Sched. Viol.
H = HPV Violations Present * Class I only

Class of Violation	Violation/Releases							
	GWM/RLSE	C/PC	Fin. Res	Pt. B	Cmpl. Sch	Manifest	Other	Land-Ban
I					O	O	X	Z
II							X	
Acceptable codes	X S Z O H	X S Z O H	X S Z O I* B* H	X S Z O H	X S Z O C B H	X S Z O H	X S Z O H	X S Z O H

8a. Violation Comment: _____

9. ENFORCEMENT ACTIONS: (Area of Viol./Rlse. = GW, CP, FR, PB, CS, MA, OT, LB, or AA)

Class	Area of Viol./Rlse	Rule	Type (code)	Date Action Taken	Compliance Dates		Penalty		Resp. Ag. (use code)
					Scheduled	Actual	Assessed	Collected	
I	Other	262.11	A						A
I	Other	262.34(a)(2)	A						A
I	Other	262.34(a)(3)	A						A
II	Other	265.16(d)	A						A
I	Other	265.31	A						A
I	Other	265.52(a)	A						A

Codes for Types of Enforcement Actions: *
03 = Warning Letter
04 = NOV
EPA Warn. NOV Ltr.
NOV
EPA Admin. Compl.

05 = CO
10 = Informal
11 = Filed Civil Action
EPA Final Admin. Order
18 = Civil Referral to AG/DOJ
19 = Final Judicial Order

12 = Filed Criminal Action
14 = NOV to EPA
18 = Civil Referral to AG/DOJ
19 = Final Judicial Order

Codes for Resp. Agency:
E = EPA
S = State
X = EPA - Oversight

* See Instructions for Additional Codes

10. Enforcement Comment: _____

Inspectors Name: Michelle Hatten

1. EPA I.D. # FLD98217229

2. HANDLER NAME: Mark III Industries

3. ADDRESS: 5401 N.W. 44th Ave.
Ocala, FL 32675

3a. COUNTY: Marion

4. DATA ENTRY: (Circle One) NEW UPDATE

5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS OF THIS REPORT 3, 28, 91

5a. AGENCY RESPONSIBLE FOR EVALUATION: (Circle One) EPA State Other Contractor/State Oversight

2a. Type Facility: (Circle One)
Treat/Store/Disposal
Non-Handler
Transporter
Generator
Small Quan. Generator
Cond. Exempt S.Q.G.
Exempt

2b. Type Ownership: (Circle One)
Federal
State
Municipal
Private

6. TYPE OF EVALUATION COVERED BY THIS REPORT: *

1 = Compliance Eval. Inspection (CEI)	8 = Other - Withdrawal Candidate	(Put Code in Box)
2 = Sampling Inspection	9 = Other - Closed Facility	
3 = Record Review	10 = Other - General	
4 = Comprehensive GWM Evaluation (CME)	11 = Case Development Inspection	
5 = Compliance Schedule Evaluation	12 = O & M Inspection	
6 = Other (Citizen Complaint)	13 = CA Oversight Inspection	
7 = Other - Part B Call-in	80 = Informal Meeting	

1

7. DATE OF EVALUATION COVERED BY THIS REPORT (Enter Only if Different from 5): ___/___/___

7a. EVALUATION COMMENTS: _____

8. CLASS AND VIOLATIONS: Key

Class of Violation	Violation/Releases							
	GWM/RLSE	C/PC	Fin. Res	Pt. 8	Cmpl. Sch	Manifest	Other	Land-Ban
I								
II								
Acceptable codes	X S Z O H	X S Z O H	X S Z O I* B* H	X S Z O H	X S Z O C B H	X S Z O H	X S Z O H	X S Z O H

X = Violation; O = No Violation; Z = Pending
B = Viol. & Specialty; S = Same Viol./Spec.

Specialties

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Class	Area of Viol./Rlse	Rule	Type (code)	Date Action Taken	Compliance Dates		Penalty		Resp. Ag. (use code)
					Scheduled	Actual	Assessed	Collected	
II	Other	265.52(e)	↑	↑					
II	Other	265.52(f)	↑	↑					
I	Other	265.173(a)	↑	↑					
I	Other	B. 403.727	↑	↑					
			03	6/91					S

Codes for Types of Enforcement Actions: *
 03 = Warning Letter
 EPA Warn. NOV Ltr.
 04 = NOV
 EPA Admin. Compl.

05 = CO
 EPA Final Admin. Order
 10 = Informal
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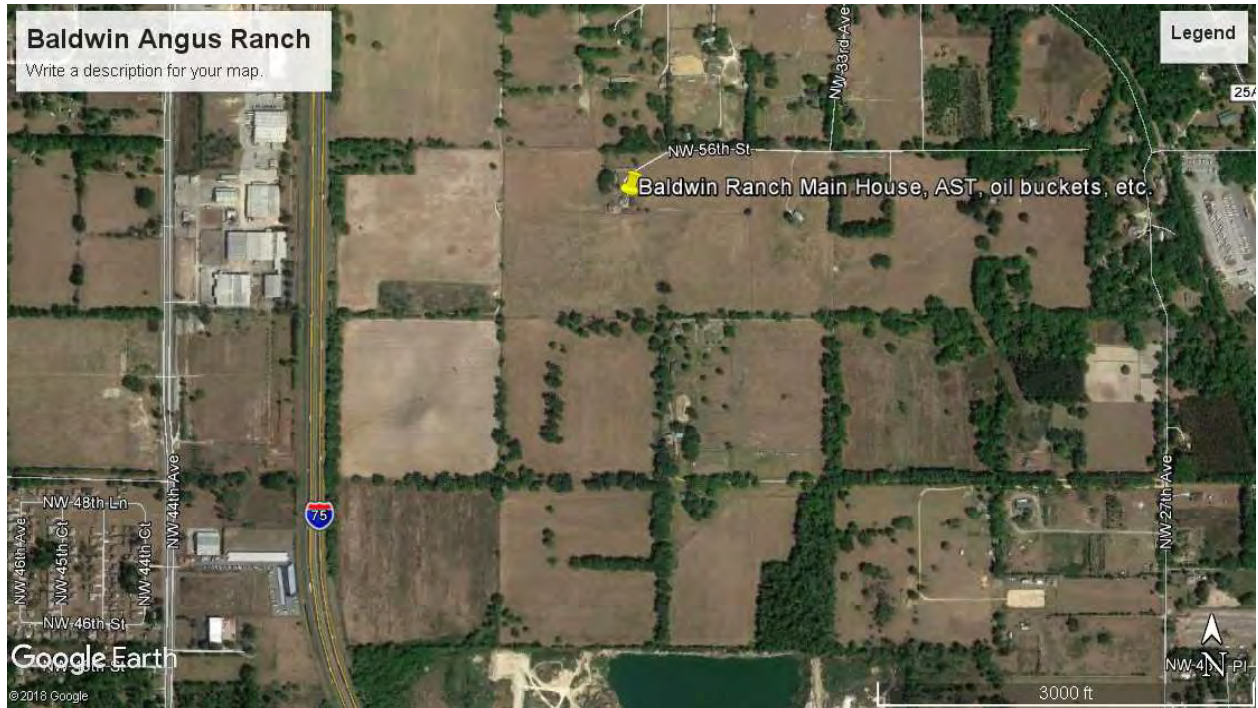
* See Instructions for Additional Codes

Codes for Resp. Agency:
 E = EPA
 S = State
 X = EPA - Oversight

10. Enforcement Comment: _____

Inspectors Name: Mitchell Walton

SITE NUMBER 10- BALDWIN ANGUS RANCH



Aerial View of Baldwin Angus Ranch



ASTs, Outside Project Area, Facing East



ASTs, Outside Project Area, Facing South



Open Buckets of Oil, Outside Project Area



Borrow Pit, Outside Project Area, Facing North



Borrow Pit, Outside Project Area, Facing East



Borrow Pit, Outside Project Area, Facing West



Aboveground Storage Tank, Outside Project Area, Likely Fuel for Irrigation Pump



Agricultural Field Adjacent to I-75, Within Project Area, Facing South



Field On Southern End of Baldwin Ranch, Within Project Area, Facing East



Field Where Baldwin Angus Ranch Adjoins Magnum Materials Mine Property, Within Project Area, Facing East.