

TECHNICAL SOLUTIONS NORTH AMERICA

November 7, 2008

Mr. James Byer Department of Environmental Protection Northwest District Office 160 Governmental Center Pensacola, FL 32501-5794

RE: Veolia ES Technical Solutions, L.L.C. 342 Marpan Lane
Tallahassee, FL 32305
EPA ID# FL0000207449

Dear Mr. Byer:

This letter is being submitted in response to the Non-compliance Letter issued by your office on October 17, 2008 to the Veolia ES Technical Solutions L.L.C. (Veolia) facility located in Tallahassee, FL. The non-compliance letter identified one potential violation and two areas of concern. Below are Veolias' responses to each of the items address in the non-compliance letter.

Potential Violation – Outside North Storage, at the extreme northern end of this storage area, it appeared that an open circular container holding broken glass and possibly Hg containing wastes had been turned upside down in the grass covered area.

Following your inspection of the facility, Veolia took a number of actions to clean up the glass located in the area referenced above and began an investigation to try to determine the origin of the glass. The following is a summary of those actions.

- Facility staff, using rakes and shovels cleaned up and containerized the glass. Photographs of the cleaned up area are attached.
- While cleaning up the area, a visual inspection of the material was completed. There was no evidence of aluminum end caps or other metal parts and the glass pieces were clear and did not contain any residual phosphor powder.
- The containerized glass was sampled and the sample was submitted to a State of Florida certified laboratory for total mercury testing. The results of

RECEIVED



- the analysis showed the glass to contain 0.614 mg/kg mercury. A copy of the laboratory report is attached. This concentration is consistent with the concentration of mercury found in the clean glass generated by the facility.
- Interviews were conducted with all employees. No employees had knowledge of any containers being emptied in this area. The only item that came up during this interview was that the area had at one time been used for the staging of roll-off containers of clean glass.

Based on the results of the investigation and the laboratory analysis, it is the position of Veolia that the material found in the north storage area was clean glass. As such, there was no release of a hazardous waste and no improper management of any hazardous waste containers.

Area of Concern 1 – HW Storage, at the time of the inspection, Veolia had combined the storage of HW containers from both its permitted 90-day Accumulation Area and its TSD (phosphor powder and MCD materials to be processed in the facility's retort) HW Storage Area. Both types of HW containers were being stored on the east side of the facility.

In response to this area of concern, Veolia has conducted a review of existing container storage practices and developed the following procedures to be followed.

- All on-site generated hazardous waste will be placed into the 90-day accumulation area. In the case of satellite accumulation containers, the containers will be moved from the point of generation to the accumulation area when the containers become full.
- All hazardous waste containers that are scheduled to be shipped off-site for reclamation or treatment will remain in the 90-day accumulation area until shipped.
- Hazardous waste containers that hold material to be processed in the retort will be moved from the 90-day accumulation area directly to the retort processing area or into the HW storage area.
- The hazardous waste storage area will be used solely for materials that are scheduled to be processed in the retort or lamp processing equipment onsite.

Area of Concern 2 – Loading Dock, Processed Powder Storage Maintenance, Veolia has two fire extinguishers in the facilities maintenance area that were not fully charged/operable.

The fire extinguishers that were in the maintenance area at the time of the inspection had recently been removed from service and were excess to the needs of the facility. At the time of inspection, all extinguishers identified in the contingency plan were in place, properly charged and operational. The two extinguishers that



were in the maintenance area have since been recharged and returned to the inventory of the facility as back-up extinguishers. It is the position of Veolia that these two fire extinguishers were in the maintenance area as a result of an effective inspection.

If you have any questions please call me at (850) 877-8299 or call Phillip Ditter at (262) 243-8908.

Sincerely,

Cc:

VEOLIA ES TECHNICAL SOLUTIONS, L.L.C.

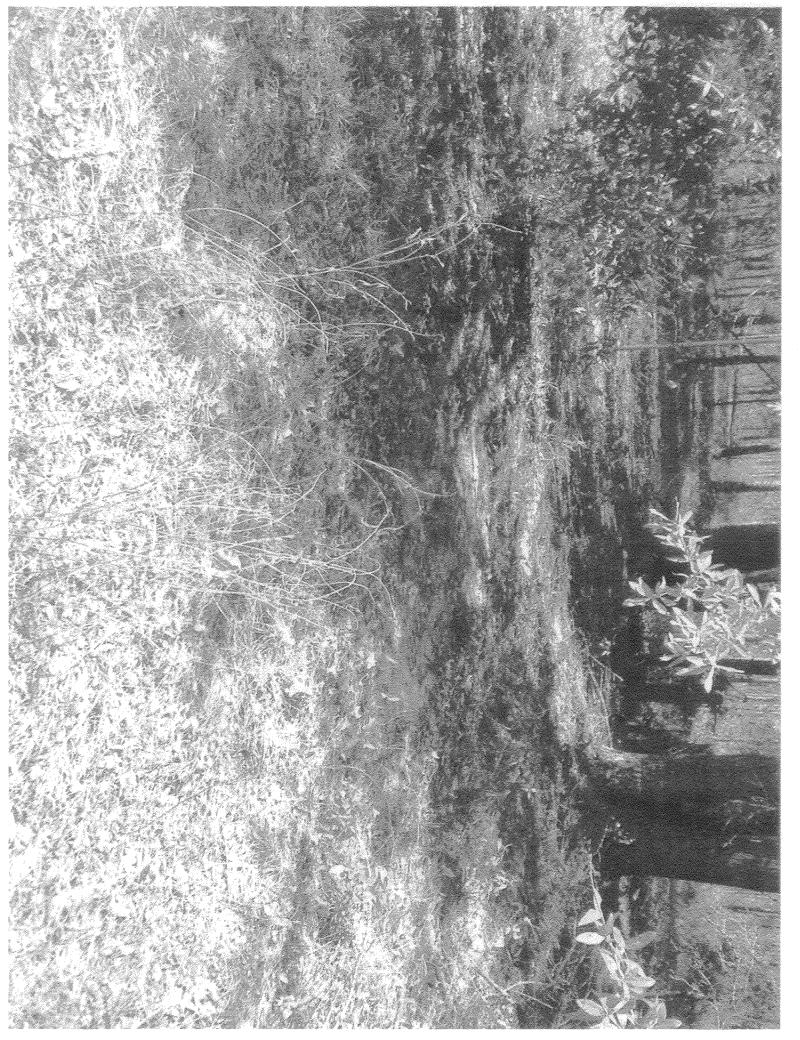
Linda Dunwoody

Operations Manager

John McShane Phillip Ditter











September 25, 2008

3:56:31PM

Client:

Veolia ES Technical Solutions, L.L.C. (14303)

342 Marpan Lane

Tallahassee, FL 32305

Attn:

Randy Williams

Work Order:

NRI1570

Project Name:

Tallahassee Operations Weekly Samples

Project Nbr:

P/O Nbr:

Date Received:

09/18/08

SAMPLE IDENTIFICATION

LAB NUMBER

COLLECTION DATE AND TIME

Soil & Glass

NRI1570-01

09/02/08 09:00

An executed copy of the chain of custody, the project quality control data, and the sample receipt form are also included as an addendum to this report. If you have any questions relating to this analytical report, please contact your Laboratory Project Manager at 1-800-765-0980. Any opinions, if expressed, are outside the scope of the Laboratory's accreditation.

This material is intended only for the use of the individual(s) or entity to whom it is addressed, and may contain information that is privileged and confidential. If you are not the intended recipient, or the employee or agent responsible for delivering this material to the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this material is strictly prohibited. If you have received this material in error, please notify us immediately at 615-726-0177.

Florida Certification Number: E87358

The Chain(s) of Custody, 2 pages, are included and are an integral part of this report.

These results relate only to the items tested. This report shall not be reproduced except in full and with permission of the laboratory.

All solids results are reported in wet weight unless specifically stated.

Estimated uncertainty is available upon request.

Kozavre L. Convor

This report has been electronically signed.

Report Approved By:

Roxanne Connor

Program Manager - Conventional Accounts





342 Marpan Lane

Tallahassee, FL 32305

Attn Randy Williams

Work Order:

NR11570

Project Name:

Tallahassee Operations

Project Number:

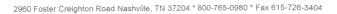
Weekly Samples

Received:

09/18/08 08:10

ANALYTICAL F	CEPORT	
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Analyte	Result	* ****	iis	MDL	MRL	Dilution Factor	Analysis Date/Time	Method	Batch
Sample ID: NRI1570-01 (Soil & Glas Mercury by EPA Methods 7470A/7471A		olid) Sampled	i: 09/(2/08 09:00					
Mercury	0.614	n	ig/kg	0.0302	0.101	yane.	09/23/08 11:44	SW846 7471A	8093372





342 Marpan Lane

Tallahassee, FL 32305

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Work Order:

NRI1570

Project Name:

Tallahassee Operations

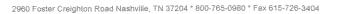
Project Number:

Weekly Samples

Received: 09/18/08 08:10

SAMPLE EXTRACTION DATA

	24 . 6	x x % y >	Wt/Vol Extracted	Extracted Vol	Date	Analyst	Extraction Method
Parameter	Batch	Lab Number					
Mercury by EPA Methods 7470A/7471A							
SW846 7471A	8093372	NR11570-01	0.60	100,00	09/22/08 09:09	JMR	EPA 7471





342 Marpan Lane

Tallahassee, FL 32305 Randy Williams

Attn

Work Order:

NR11570

Project Name:

Tallahassee Operations

Project Number:

Weekly Samples

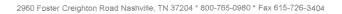
Received:

09/18/08 08:10

PROJECT QUALITY CONTROL DATA

Blank

Analyte	Blank Value	Q	Units	Q.C. Batch	Lab Number	Analyzed Date/Time
Mercury by EPA Methods 7	470A/7471A					
8093372-BLK1						
Mercury	< 0.0300		mg/kg	8093372	8093372-BLK1	09/23/08 11:40





342 Marpan Lane

Tallahassee, FL 32305

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Attn

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NR11570

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Project Number:

Weekly Samples

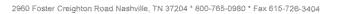
Received:

09/18/08 08:10

PROJECT QUALITY CONTROL DATA

LCS

Analyte	Known Val.	Analyzed Val	Q	Units	% Rec.	Target Range	Batch	Analyzed Date/Time
Mercury by EPA Methods 7470A/7471A								
8093372-B\$1 Mercury	0.167	0.185		mg/kg	111%	78 - 120	8093372	09/23/08 11:42





342 Marpan Lane

Attn

Tallahassee, FL 32305 Randy Williams Work Order:

NR11570

Project Name:

Tallahassee Operations

Project Number:

Weekly Samples

Received:

09/18/08 08:10

PROJECT QUALITY CONTROL DATA

Matrix Spike

						columnity in decreasing in the interest		TO CONTRACTOR OF THE PROPERTY		
Analyte	Orig, Val.	MS Val	Q	Units	Spike Conc	% Rec.	Target Range	Batch	Sample Spiked	Analyzed Date/Time
Mercury by EPA Methods 7470A/747	A									
8093372-MS1 Mercury	0.0815	0.278		mg/kg	0.168	117%	60 - 149	8093372	NR11776-04	09/23/08 12:06





Veolia ES Technical Solutions, L.L.C. (14303) Client

342 Marpan Lane

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Tallahassee, FL 32305 Randy Williams

Work Order:

NRI1570

Project Name:

Tallahassee Operations

Project Number:

Weekly Samples

Received:

09/18/08 08:10

PROJECT QUALITY CONTROL DATA

Matrix Spike Dup

Analyte	Orig, Val.	Duplicate	Q	Units	Spike Conc	% Rec.	Target Range	RPD	Limit	Batch	Sample Duplicated	Analyzed Date/Time
Mercury by EPA Methods 7470A/747 8093372-MSD1				_	0.170				24	Vona 1879	STERNS PROPERTY AND	00 #5 :00 -5 Ass
Mercury	0.0815	0.343	J4	mg/kg	0.163	160%	60 - 149	21	26	8093372	NR11776-04	09/23/08 12:08





342 Marpan Lane Tallahassee, FL 32305

Randy Williams

Work Order:

NRI1570

Project Name:

Tallahassee Operations

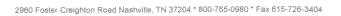
Project Number: Received: Weekly Samples 09/18/08 08:10

CERTIFICATION SUMMARY

TestAmerica Nashville

Atm

Method	Matrix	AIHA Nelac Florida	
SW846 7471A	Soil	X X	





342 Marpan Lane

Tallahassee, FL 32305

Randy Williams

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Received:

09/18/08 08:10

NELAC CERTIFICATION SUMMARY

TestAmerica Analytical - Nashville does not hold NELAC certifications for the following analytes included in this report

Method

Attn

Matrix

Analyte





342 Marpan Lane

Randy Williams

Attn

ND

Tallahassee, FL 32305

Work Order:

NRI1570

Project Name:

Tallahassee Operations

Project Number: Received: Weekly Samples 09/18/08 08:10

DATA QUALIFIERS AND DEFINITIONS

J4 The sample matrix interfered with the ability to make an accurate determination.

Not detected at the reporting limit (or method detection limit if shown)

METHOD MODIFICATION NOTES



Nashville, TN

COOLER REC



HRMSTO

Cooler Received/Opened On 09/18/2008 @ 1015	
Gooler Received/Opened On 09/18/2008 @ 1015 1. Tracking # 12 4 4 (2 8 10 3) しょう 3 いし	
Constitution of the consti	
2. Temperature of rep. sample or temp blank when opened: 21 8	
 If Item #2 temperature is 0°C or less, was the representative sample or temp blank frozen 	7 YES NOKA
Were custody seals on outside of cooler?	YES(0)NA
If yes, how many and where:	N4
5. Were the seals intact, signed, and dated correctly?	YESNO. (NA
6. Were custody papers inside cooler?	YESNONA
I certify that I opened the cooler and answered questions 1-6 (intial)	13
7. Were custody seals on containers: YES (O) and intact	YESNO.(NA
Were these signed and dated correctly?	YESNONA
8. Packing mat'l used? Bubblewrap Plastic bag Peanuts Vermiculte Foam Insert Pape	r Other None
9. Cooling process: (ce (ce-pack ice (direct contact) Dry ice	and the same of th
10. Did all containers arrive in good condition (unbroken)?	VESNONA
11. Were all container labels complete (#, date, signed, pres., etc)?	(YES:NONA
12. Did all container labels and tags agree with custody papers?	(YESNONA
13a. Were VOA vials received?	YES.(NO)NA
b. Was there any observable headspace present in any VOA vial?	YESNO NA
14. Was there a Trip Blank in this cooler? YESNONA If multiple coolers, sequence	
I certify that I unloaded the cooler and answered questions 7-14 (intial)	and the second s
15a On pres'd bottles, did pH test strips suggest preservation reached the correct pH level?	YES.NO.NA
b. Did the bottle labels indicate that the correct preservatives were used	(YES.,, NO, NA
It preservation in-house was needed, record standard ID of preservative used here	
16. Was residual chlorine present?	YESNONA
Learnify that I checked for chlorine and pH as per SOP and answered questions 15-16 (intial)	
17. Were custody papers properly filled out (ink, signed, etc)?	(ESNONA
18. Did you sign the custody papers in the appropriate place?	(YESNONA
19. Were correct containers used for the analysis requested?	YESNONA
20. Was sufficient amount of sample sent in each container?	YEŞNONA
certify that I entered this project into LIMS and answered questions 17-20 (intial)	
I cortify that I attached a label with the unique LIMS number to each container (intial)	gagalliti da daga tegata yan ananakeya isi arabar yanan ananan jang dalahi pera P
21. Were there Non-Conformance issues at login? YESNO Was a PIPE generated? YES. N	0) #
appendix.	A CALL

Client Name/Account #: Vecila E.S. Technical Solutions L.L.C.

City/State/Zip: Tallahassee, FL 32305 Address: 342 Marpan Ln

Telephone Number: (850)877-8299 Project Manager: Randy Williams

Fax No.: (850) E78-3349

TA Quote #:

さいこうごう ひいいら NR11570

State Site: Invoice To:

> Enforcement Action? Compliance Monitoring?

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Neshville, TN 37204 2560 Foster Creighton Nashville Division CHAIN OF CUSTONAY OF EPSEED 77

Toll Free: 800-765-0:380 Fax: 615-726-3404

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