

Noland, Tiffany

From: Tripp, Anthony
Sent: Friday, March 27, 2009 8:31 AM
To: 'Wiedemann, Lisa'
Cc: Noland, Tiffany; Barnes, Jan
Subject: RE: FL Haz Waste Submittal of Supplemental Information for Jacksonville Transflo Terminal_FLD984253526

Ms. Wiedemann:

The revised 8700-12FL forms look good. I will go ahead and advise Tiffany Noland to process your forms. Thank you for your cooperation in implementing the updated Transfer facility rule.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

-----Original Message-----

From: Wiedemann, Lisa [mailto:lwiedemann@transflo.net]
Sent: Thursday, March 26, 2009 5:08 PM
To: Tripp, Anthony
Cc: Noland, Tiffany; Barnes, Jan
Subject: RE: FL Haz Waste Submittal of Supplemental Information for Jacksonville Transflo Terminal_FLD984253526

Mr. Tripp,

Attached are the Jacksonville and Tampa revised 8700-12FL forms. The originals will be mailed to the attention of Tiffany Noland.

Please let me know if you have any questions.

Regards,

Lisa Wiedemann
HSE & Q Specialist
TRANSFLO Terminal Services, Inc.
(904) 279-6337 (office)
(904) 245-2228 (fax)
lwiedemann@transflo.net

-----Original Message-----

From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us]
Sent: Monday, March 23, 2009 2:28 PM
To: Wiedemann, Lisa; Noland, Tiffany
Cc: Barnes, Jan
Subject: RE: FL Haz Waste Submittal of Supplemental Information for Jacksonville Transflo Terminal_FLD984253526

Ms. Wiedemann:

We did receive the original documentation sent via UPS for both the Jacksonville and the Tampa TRANSFLO Terminal Services. While you have supplied all supporting documentation for both facilities, there is still some information that must be clarified before your application can be accepted.

On the 8700-12FL form [Form 62-730.900(1)(b)], second page [part A(7)e] where the Transfer Facility box is checked there is a line where the Storage Volume should be entered. This value represents the maximum volume of hazardous material that will be stored on-site at any one time. In your Closure Plan you discuss the general facility operations and you mention that at any one time there could be from one to four tank cars holding hazardous material. You also mention that the capacity of these tank cars is 20,000 to 24,000 gallons. Using this information you would indicate that the maximum storage volume at this facility would be 92,000 gallons.

Another problem is the waste codes listed on the last page and the comments entered in the Comments section on that same page. In the Comments section you state "The waste codes listed above are representative of waste streams handled at other TRANSFLO terminals. They may vary based on actual customer business requirements." The specific waste codes must be listed for any waste that is handled at the transfer facility. Hazardous Waste that does not have a corresponding specific code on your 8700-12FL form cannot be stored at your facility. In looking through documents that district representative of DEP have generated after inspections at your facilities they have requested that you add additional waste codes to cover the waste that is stored at your facility. They have requested the addition of various metals (arsenic, cadmium, chromium) and various organic chemicals. The list of waste codes needs to be updated so that, at a minimum, all waste codes that you currently anticipate handling at each individual facility are listed. There is no rule that you cannot list more waste codes than you anticipate using, but you must list those hazardous waste codes that could potentially be stored at the hazardous waste transfer facility.

I mention these two items specifically (storage volume and waste codes) because it is with these items that you set the baseline for this facility for documentation and interpretation of the substantial modification rule of 62-730.182 Florida Administrative Code (F.A.C.). If in the future you wish to increase storage volume or add additional waste codes you must demonstrate, by the process outlined in 62-730.182 F.A.C., that the changes do not constitute a substantial modification. So it is important that you submit the storage volume and waste code information for each facility as you want it to be entered into the official record.

Please resubmit the 8700-12FL [Form 62-730.900(1)(b) F.A.C.] with the storage volume and waste codes entered as you want them entered for the official record. With the resubmittal of the 8700-12FL form your hazardous waste transfer facility application can be processed and accepted.

If you have any questions or need additional information, please let me know.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

The Department of Environmental

Protection values your feedback as a customer. DEP Secretary Michael W. Sole is committed to continuously assessing and

improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of

service you received. Copy the url below to a web browser to complete the DEP

survey:

<http://survey.dep.state.fl.us/?refemail=Anthony.Tripp@dep.state.fl.us>

Thank you in advance for completing the survey.

From: Wiedemann, Lisa [mailto:lwiedemann@transflo.net]

Sent: Friday, March 20, 2009 2:43 PM

To: Noland, Tiffaney

Cc: Tripp, Anthony; Barnes, Jan

Subject: FL Haz Waste Submittal of Supplemental Information for Jacksonville Transflo Terminal_FLD984253526

Tiffaney,

Attached are the Jacksonville TRANSFLO Terminal supplemental information documents as required by Rule 62-730.171 F.A.C.

The original documentation for the Jacksonville Terminal, along with the Tampa Terminal will be sent via UPS to your attention.

Please let us know if there are any questions or additional information is needed.

Lisa Wiedemann

HSE & Q Specialist

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