



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 08, 2010

SENT VIA E-MAIL

linda.dunwoody@veoliaes.com

Ms. Linda Dunwoody, Operations Manager
Veolia ES Technical Solutions, L.L.C.
342 Marpan Lane
Tallahassee, Florida 32305

SUBJECT: Meeting minutes from January 28, 2010.
EPA ID No. FL0 000 207 449
Operating Permit Number: 71455-HO-010
Leon County

Dear Ms. Dunwoody:

A meeting was held 28 January, 2010 to discuss the difficulties the Veolia of Tallahassee facility is experiencing in meeting the 99% recovery requirements of 62-737.860(4) and potential options and suggestions to aid in meeting that recovery goal. A presentation was given by the Veolia personnel present regarding the difficulties currently being experienced meeting the 99% recovery goal. The current recovery fluctuates around 99% and may be a factor of reduced concentrations of mercury in the reclaimed material, changing compositions of the phosphor powders and amalgams used in the lamps, other unaccountable reasons, or a combination of several factors. The largest variability in recovery rates was evident in the phosphor powder. The recovery from the arc-tubes was consistently above the 99% recovery level.

At this point in time the Department is not willing to grant a variance to the 99% recovery rate. Since the facility indicated that they were able to meet a 99% recovery level if allowed to combine the recovery of the mass of mercury from the powder and arc-tube waste streams, it was decided to accept that solution for the time being. This solution is in agreement with Florida Administrative Code subsections 62-737.200(12) and 62-737.860(4), where the 99% reclamation rate is measured relative to the mercury introduced into the process. For this solution Veolia will have to demonstrate, at least on a semi-annual basis, that they can achieve a 99% recovery of the total mass of mercury introduced into their process during that period. They should also continue to monitor the recovery rate for the various individual waste streams to determine if future trends will require further evaluation of the 99% recovery goal.

If you have any questions please contact me at 850-245-8766 or Anthony.tripp@dep.state.fl.us

Sincerely,

A handwritten signature in black ink that reads "Anthony R. Tripp". The signature is written in a cursive style with a large, stylized 'A' and 'T'.

Anthony R. Tripp, Ph.D., P.E.
Hazardous Waste Regulation Section

cc: (with attachment)

James Byer, DEP/Pensacola, james.byer@dep.state.fl.us

Agusta Posner, OGC/Tallahassee, agusta.posner@dep.state.fl.us

Laurie Tenace, DEP/Tallahassee, Laurie.tenace@dep.state.fl.us

Melissa Woehle, DEP/Pensacola, Melissa.woehle@dep.state.fl.us

Phil Ditter, Veolia, phillip.ditter@veoliaes.com

Bheem Kothur, DEP/Tallahassee, Bheem.kothur@dep.state.fl.us

January 28, 2010
Association

Veolia Recovery Meeting.

Name

Association

Contact Info.

- | Name | Association | Contact Info. |
|----------------------|------------------|--|
| ① Tony Tripp | FDEP Tallahassee | 850-245-8766 |
| ② T.M. Chandrasekhar | FDEP Tallahassee | 850-245-8097 |
| ③ Randy Williams | Veolia | 850-877-8299 |
| ④ Wayne Bubiawia | Veolia | 602-415-3023 |
| ⑤ Phillip Dittler | Veolia | 262-243-8908 |
| ⑥ Linda Dunwoody | Veolia | 850.877.8299 |
| ⑦ Tim Bahr | DEPHWA | 850.245-8790 |
| ⑧ Melissa Woehle | FDEP Pensacola | 850.595-8360 x1251 |
| ⑨ Aaron Mitchell | " | " x1256 |
| ⑩ Augusto Posner | FDEP/OGC (atty) | (850) 245-2282 |
| ⑪ Lavie Tenace | FDEP Tally | 850.245-8759 |
| Jim Byer | FDEP Pensacola | <u>Via teleconference</u> 850-595-8360 x1253 |