

**Thursby, Kim**

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**From:** Linda.Dunwoody@veoliaes.com  
**Sent:** Tuesday, April 06, 2010 8:10 AM  
**To:** Epost HWRS  
**Cc:** Kothur, Bheem; Wayne.Bulsiewicz@veoliaes.com

The document has been recv'd

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## Thursby, Kim

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**From:** Epost HWRS  
**Sent:** Monday, March 08, 2010 12:05 PM  
**To:** 'linda.dunwoody@veoliaes.com'  
**Cc:** Byer, James; Posner, Augusta; Tenace, Laurie; Woehle, Melissa; 'phillip.ditter@veoliaes.com'; Kothur, Bheem; Bahr, Tim; Tripp, Anthony  
**Subject:** Veolia-Tallahassee;FL0 000 207 449;Meeting minutes from January 28, 2010  
**Attachments:** 3-8-10-Veolia-Meeting minutes from January 28, 2010.pdf-Receipt.pdf

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation Section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

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The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

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Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Tim Bahr  
Environmental Administrator  
Hazardous Waste Regulation  
Department of Environmental Protection  
E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)



# Florida Department of Environmental Protection

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Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

March 08, 2010

**SENT VIA E-MAIL**

[linda.dunwoody@veoliaes.com](mailto: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](mailto: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, flowing style.

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

cc: (with attachment)

James Byer, DEP/Pensacola, [james.byer@dep.state.fl.us](mailto:james.byer@dep.state.fl.us)

Agusta Posner, OGC/Tallahassee, [agusta.posner@dep.state.fl.us](mailto:agusta.posner@dep.state.fl.us)

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Melissa Woehle, DEP/Pensacola, [Melissa.woehle@dep.state.fl.us](mailto:Melissa.woehle@dep.state.fl.us)

Phil Ditter, Veolia, [phillip.ditter@veoliaes.com](mailto:phillip.ditter@veoliaes.com)

Bheem Kothur, DEP/Tallahassee, [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us)

January 28, 2010  
Association

Veolia Recovery Meeting.  
Contact Info.

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 |