

## Kothur, Bheem

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**From:** Byer, James  
**Sent:** Monday, December 15, 2003 4:27 PM  
**To:** Price, John L.  
**Cc:** Posner, Augusta; Kellenberger, Bill; Parker, Bill; Kothur, Bheem  
**Subject:** RE: ONYX What next?

Jack,

Bill and I were asking ourselves a few questions concerning this issue last week.

Is Onyx (retort) using a technology that is amenable to modifications that could achieve the 99 percent recovery required by rule?

Is there an industry sector information source we can "tap in to" to get smarter on "current" technology and possible solutions?

We are looking to open up this discussion to ALL options and possible solutions.

Jim

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

**From:** Posner, Augusta  
**Sent:** Monday, December 15, 2003 2:50 PM  
**To:** Kellenberger, Bill; Parker, Bill; Kothur, Bheem; Price, John L.  
**Cc:** Byer, James  
**Subject:** RE: ONYX What next?

Thanks for the message. Bill Parker has looked at Onyx's reports and we all need to talk together. We need to specifically evaluate how Onyx performed in response to the Variance ORder requirements as listed below. Bill P. is going to set up a telecon. I am available Tues and Thurs afternoon, all day Wednesday and not on Fri. Next week: available Mon Tues and Weds. Week after: Available Mon and Tues.

b. Superior Special Services, Inc. shall demonstrate an effective reclamation rate of the mercury introduced into the process with a two-part reclamation schedule based on the original concentration of mercury contained in the material to be processed. When the original concentration of mercury is greater than or equal to 1000 mg/kg the minimum reclamation rate shall be 99 percent. When the original concentration of mercury is less than 1000 mg/kg the maximum mercury concentration in the resulting processed material shall be 10 mg/kg.

c. Superior Special Services, Inc. shall generate data regarding the efficiency of the retort when operated with an increased residence time at peak temperatures. Superior Special Services, Inc., shall process one batch per week with an increased retention time. The length of time that each batch is held at the peak temperature will be increased by two hours. Subsequent tests will be conducted with an increase of four hours and an increase of six hours. A minimum of six batches will be processed for each time increase series. Upon completion of these tests, Superior Special Services, Inc. will submit a test evaluation report to the Department for review.

d. Superior Special Services, Inc. shall research and subsequently test a minimum of two additional technology alternatives to increase the reclamation rate for low-level mercury-containing devices. Upon completion of these tests, Superior Special Services, Inc. will submit a test evaluation report to the Department for review.

EXEMPT FROM PUBLIC DISCLOSURE PURSUANT TO  
§119.07(3)(1), F.S.

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

From: Kellenberger, Bill  
Sent: Friday, December 12, 2003 3:15 PM  
To: Posner, Augusta; Byers, Andreka  
Cc: Byer, James  
Subject: ONYX What next?

Happy Friday. Jim and I have discussed and propose the following strawman comments: Allow for a 1 year extension of the variance to further test the retort AND qualify, verify and investigate the laboratory analyses since they are skewed to a point that is incomprehensible. I would even recommend that an independent consultant come on board and perform all system analysis, sampling and analyses results. At the same time have Jack Price(have called but no response yet) do some research to discover nationwide what equipment is available for mercury distillation. At the end of 1 year, we either approve the existing equipment or if the conditions of the variance are still not met, require Onyx to stop processing until necessary modifications to the existing equipment are accomplished or new state-of-the-art equipment is installed.

We will probably need a strategy meeting with all concerned in Tally to brainstorm the above.

I am forwarding their Oct. 27 letter hard copy to you today. Hit thru the ball.

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

From: Posner, Augusta  
Sent: Friday, December 12, 2003 12:05 PM  
To: Kellenberger, Bill; Byers, Andreka  
Subject: FW: INTERNET PUBLICATION APPROVAL  
Importance: High

Mission accomplished (step 1). Now we have to review the request and decide.

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

From: Chisolm, Jack  
Sent: Friday, December 12, 2003 1:02 PM  
To: Kinsey, Cynthia  
Cc: Carter, Kathy; Posner, Augusta; Light, Lisa  
Subject: FW: INTERNET PUBLICATION APPROVAL  
Importance: High

Please publish.

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

From: Posner, Augusta  
Sent: Thursday, December 11, 2003 3:40 PM  
To: Chisolm, Jack  
Cc: Light, Lisa; Buzick, Gita  
Subject: INTERNET PUBLICATION APPROVAL  
Importance: High

Please approve publication of the attached notice. Has been approved by Dick Fancher on behalf of NWD. THANKS!

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