

## Kothur, Bheem

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**From:** Kellenberger, Bill  
**Sent:** Wednesday, December 24, 2003 7:36 AM  
**To:** Posner, Augusta; Price, John L.; Parker, Bill; Kothur, Bheem; Tenace, Laurie; Buchanan, David  
**Subject:** Onyx RFI REQUEST FOR INFORMATION (RFI)



REQUEST FOR  
INFORMATION.doc

I will have this finalized today and sent. I have added Augusta's comments, changing only "oven" to retort. Merry Christmas. Hit thru the ball.

## **REQUEST FOR INFORMATION (RFI)**

Mr. Jeff Kirk  
General Manager  
Onyx Special Services, Inc.  
342 Marpan Lane  
Tallahassee, Florida 32305

Dear Mr. Kirk:

This is in response to your letter dated October 27, 2003, which was received by the Department on December 3. This letter enclosed information and requested an extension to the variance that was issued on January 4, 2002.

The following items require clarification and or explanation:

1. It appears from the sampling and analyses data that the information required by the variance was not acted upon in a timely manner. A year passed before Onyx began the trials related to increased retention time at peak temperature, as required by sub-paragraph c. of the variance.
2. The anomalous results of sampling and analysis, and your proposal to investigate, have not been explained satisfactorily. Even if "the overall time the material spends in the retort" is reduced because "programming is lost in the system," how does that result in a "negative percent recovery?"
3. No information was provided in accordance with sub-paragraph d. of the variance, which requires research and testing of at least two technological alternatives.
4. Has Onyx contacted the equipment supplier for recommendations about increasing the efficiency of their present equipment?
5. Is there better/more efficient equipment on the market?
6. Has Onyx tried operational alternatives such as agitating the drums; providing a center perforated core for volatile mercury to escape from the drums, etc.?
7. Has Onyx considered the use of an independent consultant to take and transport samples, and then analyze the sampling results? Have split samples been considered?
8. Some sampling results have no values and are shown to be "regular;" for example #'s 756-769. Please show the values for all of these runs.

Please provide the above information to the Department by January 15, 2004. Upon receipt and review of the information we will request a meeting with you to discuss your request.

If you have any questions, please call Bill Kellenberger at (850) 595-8360, ext: 1264.

Sincerely, Charlie Goddard