DRAFT
ATTACHMENT
August 2, 2006
Veolia ES Technical Solutions, L.L C
EPA I D No FL0 000 207 449
Notice of Deficiency

1 Attachment D-4, Maximum Storage Capacity The facility must define and determine what is the difference between the materials listed for the "HW storage area" and the materials listed for the "90-day accumulation area" What makes these two materials different? Please explain and revise as appropriate

2 Attachment 5, page 5 of 25 The first paragraph states that FEDEX Ground will be used as a carrier to transport Universal Waste Please explain and revise as appropriate and wherever it is applicable

Page 6 of 25, Paragraph 5 3 6 Receipt of Material Into the Facility The procedure should be addressed or included is very similar or very closely the procedures passed to Jim Byer by Greg Newton of Onyx in an e-mail on May 17, 2005 (see Attachment 10-Day Trailer Log) and also Attachment 8, Page 5 of 16, Paragraph 8 2 7 needs to address the same procedure Please revise as appropriate

3 Page 9-11 of 25 To use accustom built HID lamp machine, Onyx must submit a package on the HID processing machine for review and approval Once approved, manual and automated processing will be incorporated in the permit

4 Page 9 through 11 of 25, Paragraphs 5 4 2 1 and 5 4 2 2, HID Processes The Department recommends that the Permit application should reflect both the manual and automated HID Process are authorized for implementation (remove any wording that indicates "proposing" of the automated process)

If the facility plan a machinery like you have at the Phoenix facility (Attachment 5 4 2 2) then drawings and operating procedures should already exist and could easily be incorporated into this application Please submit the package including data from another facility or the manufacturer/distributor

5 Figure(s) 5 4 1, 5 4 2 1, and 5 4 2 2 The ultimate destinations for "Retorted Phosphor Powder" and "Glass" need to be updated and consistent with data in Attachment 11 Please verify and revise accordingly

6 Table of Contents, Section 5 0, Operations, 5 11 Contingency Plan, Section 6, Contingency Plan These two Sections are confusing Please review, verify and revise as appropriate

7 Attachment, Section 6, Contingency Plan Please correct the spelling of Contingency Plan

8 Attachment D-4, Storage Area Capacities The Quantity of Aluminum in cube boxes should be "5 tons" instead 5 cubic yards Please revise as appropriate

9 Table 9 3, Inventory Removal Please add a cost item to include Mobilization/Demobilization Also add costs for Air Sampling analysis to the cost estimate and revise the cost estimates as appropriate

10 Figure 12 2 1, Figure 12 2 2 These Figures should be identified as "Forms" instead of "Figures" Please review and revise as appropriate

11 Figure 12 4 1 This is not a figure, it is a table "Table 4" Please revise and revise as appropriate

12 Attachment 9, Section 9 5 Closure Performance Standards, Page 4 Please revise this Section in accordance with the Attachment A, Mercury Criteria for Buildings, by Dr Stephen M Roberts, PhD , University of Florida, dated May 18, 2006

13 Attachment D-3, Daily Design Capacity and Annual Quantities, Mercury Containing Manufactured Articles (MCMA) and Mercury Containing Phosphor Powder Please verify the quantities and revise as appropriate

14 Figure 5 4 1, Fluorescent Lamps Processing Flow Diagram, Figure 5 4 2 1, HID Lamp Processing Flow Diagram, Figure 5 4 2 2 1, Automated HID Lamp Processing Flow Diagram, and Attachment 11, Approved Destination Facilities The ultimate destinations for "Retorted Phosphor Powder" and "Glass" need to be updated and consistent with data Please review and revise as appropriate

15 Figure 5 5 5, Air Monitoring Sampling Locations Map Please provide explanation for Sampling Point Variation of each day or exact Location of Sampling Also provide Air samples results summary for last six (6) months along with a copy of the Air Permit

16 Attachment 6, Page 6 of 18, Paragraph 6 7 2 4 1, Mercury spill clean-up Procedures, and Subparagraphs 3 and 7 The Jerome meter is not sensitive enough for cleanup confirmation purposes It may be used for high-level detection and rough screening, but it reads in mg/m^3, not ug/m^3 Therefore, in accordance with the Mercury Cleanup Guidelines, Revised July 2002 is the only acceptable method for final cleanup determination is the eight (8) hour air sample using Modified NIOSH Method 6009 Please revise as appropriate

17 Sub-Section 6 10 3, Other State Requirements, second paragraph Please revise the normal business hours call extension number is "1253" not "1264"

18 Figures 6 2, Facility Plan, Figure 6 8, Facility Key It would be nice if symbols for the mercury spill kits use a different color (like red or yellow) to make them easier

to spot The locations of the THREE spill kits on this figure do not match with the TWO spill kits on Figure 6 8 Please review and revise as appropriate

19 Attachment 9 0, Closure Pan, Paragraph 9 4 2 1, Phase I-Contamination Evaluation, Page 3, paragraph 9 4 2 3, The Decontamination Verification, page 3, Section 9 5, Closure Performance Standards, page 4 Please revise the closure performance Standards in accordance with Attachment A, Mercury Criteria for Buildings, by Dr Stephen M Roberts, PhD , University of Florida, dated May 18, 2006

20 Figure 12 2 1, Inspection Report Format, Page 4-3 It is ideal to have specific locations identified for First Aid Kits, Communications, Fire Extinguishers, Wash Stations, and Fire Alarms, so that each one can be individually inspected Also, please verify pages 4-2 is missing and include as appropriate

21 Page 4 of 5 The Hazardous Waste permitted Storage Area and the 90-day Accumulation Area need separate Weekly Inspection Reports which include all of the items listed in the Rule 62-730 160(6) F A C Please review and revise as appropriate

22 Appendix 5 4 2 2, HID Lamp Machine, paragraph 3 Air Quality Permit must be modified to include the HID Lamp Machine before the facility implements the HID Lamp Machine into the process