

## Thursby, Kim

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**From:** Linda Dunwoody [linda.dunwoody@veoliaes.com]  
**Sent:** Tuesday, June 28, 2011 10:21 AM  
**To:** Epost HWRS  
**Subject:** RE: Veolia ES Technical Solutions - Tallahassee FL0000207449 Request for Additional Information

Message has been received.

Linda Dunwoody  
Operations Manager  
Veolia ES Technical Solutions, L.L.C.  
342 Marpan Lane  
Tallahassee, FL 32305  
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For prepaid recycling of lamps, ballast, batteries and more visit [www.prepaidrecycling.com](http://www.prepaidrecycling.com)

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**From:** Epost HWRS [<mailto:EpostHWRS@dep.state.fl.us>]  
**Sent:** Tuesday, June 14, 2011 5:40 PM  
**To:** Linda Dunwoody  
**Cc:** Bahr, Tim; Goddard, Charles; Byer, James; Echevarria, Edgar; [knight.karen@epamail.epa.gov](mailto:knight.karen@epamail.epa.gov); Phillip G Ditter; Wayne R Bulsiewicz; Mitchell, Aaron; Kothur, Bheem; Tripp, Anthony  
**Subject:** Veolia ES Technical Solutions - Tallahassee FL0000207449 Request for Additional Information

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.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

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).

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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)

*The Department of Environmental Protection values your feedback as a customer. DEP Secretary Herschel T. Vinyard Jr. is committed to continuously assessing and improving the level and quality of services provided to you. Please take a few minutes to comment on the quality of service you received. Simply click on [this link to the DEP Customer Survey](#). Thank you in advance for completing the survey.*



# Florida Department of Environmental Protection

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

Rick Scott  
Governor

Jennifer Carroll  
Lt. Governor

Herschel T. Vinyard Jr.  
Secretary

June 14, 2011

## SENT VIA E-MAIL

[Linda.Dunwoody@veoliaes.com](mailto:Linda.Dunwoody@veoliaes.com)

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

Subject: Veolia ES Technical Solutions, LLC; FL0000207449, Operating Permit No.  
0071455-011-HO  
**First Notice of Deficiencies**

Dear Ms. Dunwoody:

Your application for a Mercury Recovery and Reclamation Facility Permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.) Rule 62-737.800 and Chapter 403.722, Florida Statutes (F.S.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

Ms. Linda Dunwoody, Operations Manager

June 14, 2011

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You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or have any questions, please call me at 850-245-8781 or [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us).

Sincerely,



Bheem R. Kothur  
Professional Engineer III  
Hazardous Waste Regulation

BK/bk

Enclosure

cc via e-mail w/enclosure:

Jim Byer, FDEP/Pensacola, [James.Byer@dep.state.fl.us](mailto:James.Byer@dep.state.fl.us)

Edgar Echevarria, FDEP Tallahassee, [Edgar.Echevarria@dep.state.fl.us](mailto:Edgar.Echevarria@dep.state.fl.us)

Karen Knight, EPA/Region 4, [Knight.Karen@epamail.epa.gov](mailto:Knight.Karen@epamail.epa.gov)

Aaron Mitchell, DEP/Pensacola, [aaron.mitchell@dep.state.fl.us](mailto:aaron.mitchell@dep.state.fl.us)

Phillip Ditter, Veolia/Wisconsin, [phillip.ditter@veoliaes.com](mailto:phillip.ditter@veoliaes.com)

Wayne Bulsiewicz, Veolia/Tallahassee, [wayne.bulsiewicz@veoliaes.com](mailto:wayne.bulsiewicz@veoliaes.com)

**Notice of Deficiencies**  
**June 14, 2011**

**General Comments:**

1. Table of Contents: Please update your Table of Contents to accurately reflect what has been provided. Numerous items throughout are either missing or have been improperly labeled. Please review, verify, revise and re-submit as appropriate.
2. Permit Application, Page 12: For Facility Owner please replace Kim Williams with John P. McShane and provide contact information.
3. Please provide a facility site map with an electronic format of jpeg, so that the map can be easily inserted into the draft permit.

**Specific Comments:**

1. **Attachment D-3 Daily Design Capacity:** More explanation is needed regarding the increased storage area for mercury containing lamps (MCLs), mercury containing manufactured articles (MCMA), and Mercury containing Phosphor Powder. It appears that the facility added 24 twice to the total amount of drums. 108 is the number given, but 84 looks like the number intended based upon the changes illustrated in the application. Please review and revise as appropriate.
2. **Attachment D-4 Max Storage Capacity:** Container storage areas seems that the number needed to correctly account for the number of drums is 21 instead of 27 or more explanation is needed as to why the increase to 27 pallets. **Inbound Universal Waste Storage Area** an explanation is needed regarding the square footage and the pallet number. Please review and revise as appropriate.
3. **Operations plan; 5.3.5.1 Generator Self Transport and common carrier transport, Page 8 of 33:** Need to explain in more detail the acceptance procedures for FED EX deliveries.
4. **Operations plan; 5.4.1 Material Handling, Page 12 of 33:** Need to add verbiage that specifies that all activities are conducted internal to the building.
5. **Operations plan; 5.6.4 Container Storage Areas, and Page 23 of 33: Container Storage Area #2:** Need to explain the number of rows that this area will contain (1 or 2 deep). Also need to ensure there is enough aisle space that can facilitate inspection of the area.

6. **Operations plan; 5.6.4 Universal Waste Storage Area:** Highlight the last two paragraphs under this section, this is a change from the previous permit. Also revise numbering scheme for Section 5.6.4 to differentiate from other 5.6.4 items.
7. **Operations plan; 5.6.6 Hazardous Waste 10-Day Transit Material:** This area is not explained clearly enough and needs a map to better illustrate the meaning.
8. **Operations plan; 5.6.7 North Yard, Page 26 of 33:** Second paragraph, second sentence, change the word subsequently to immediately in regards to handling of FEDEX deliveries to northern yard.
9. **Attachment 6; 6.7.5.1, 6.7.5.2 and 6.7.5.4 Liquid Mercury Spill Clean-Up Procedures:** The text defines the difference between routine and non-routine spills. In 6.7.5.1 the text states “A routine spill is defined as a small spill of less than one pound that occurs during normal work operations.” In 6.7.5.2 the definition is “A non-routine spill is defined as a spill involving greater than one pound of mercury and/or where personal injury or outside contamination (I.e. soil water, drains) occur as a part of the spill or as a result of the spill.” In 6.7.5.4 the definition is “A non-routine spill is defined as a spill involving greater than one pound of mercury and/or where personal injury or outside contamination occur as a part of the spill or as a result of the spill.” While the Department recognizes the one pound requirement for federal reporting requirements it also recognizes that one pound of mercury can represent a large amount of mercury containing material (e.g. phosphor powder). The volume of one pound of elemental mercury is a little greater than approximately one fluid ounce. Therefore the Department would prefer to see the guidelines for differentiating between routine and non-routing spills as given on a volumetric, rather than mass, basis. Along these lines the Department would be willing to accept one fluid ounce as a reporting requirement for elemental mercury but not for the mercury containing material. Rather than dictate a reporting volume for the mercury containing material, the Department would prefer that the facility suggest a reporting volume based on their normal operating conditions. It is not the desire of the Department to make these reporting requirements arbitrary and capricious, but recognize that a more representative measure, or measures, is required when addressing non-elemental mercury. The Department also suggests the removal of the “and/or” portion of the definition and the replacement with “or” as a more logical connecting phrase.
10. **Attachment 6; 6.7.5.2 and 6.7.5.4:** For non-routine spills the facility is to “Notify applicable government agencies per Section 4.0” Section 4.0 does not appear to be in this application. Please explain the reference to Section 4.0.

11. **Attachment 6;6.10.3 Other State Requirements:** In the second paragraph change the reporting number from “850-595-8300 ext 1100” to “850-595-8300 ext 0619”. And change “850-595-8360 ext 1253” to “850-595-0573 or 850-595-0643”.
12. **Attachment B-3 Site Maps:** The designation for the Container Storage Area is too vague. The label needs to be more specific in what is being stored in each area. The label needs to denote whether hazardous or non-hazardous waste is stored in each area or a combination of the two. Please review all the maps and revise as appropriate.
13. **Appendix 7-2 Respiratory Protection Program, page 7:** The licensed physician for this facility resides in Massachusetts. Is this correct?
14. **Appendix 12-2 Inspection Forms:** Need to change the name of the weekly inspection checklist for the 90-day HW storage area to match the changes in the application. Also an inspection procedure along with a corresponding form needs to be added to ensure that materials are in and out of the 10-day HW Transfer Area on time. Also need to determine if an internal tracking system like the one used with their universal waste materials can be applied to materials that are in the transfer area. (A potential solution to the HW Transfer procedure could be the addition of the 10-day HW transfer area to the Daily Inspection Checklist of the HW Storage Area.) The checklist should include but not be limited to the time of the inspection, the condition of the containers, and aisle space...etc. This checklist should be a daily requirement given the time constraints applied to a HW Transfer area.
15. **Attachment 9, Closure Plan, Table D-9.1, and Table 9.3, Closure Cost Estimates:** HID Lamps in Table D-9.1, maximum inventory of waste shows 26,208 lamps, whereas in Table 9.3, the inventory removal estimates shows 9,000 HID Lamps. Similar disparities occur throughout these two tables. Please review and revise the tables to be consistent and revise the closure cost estimate as appropriate.