

## Thursby, Kim

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**Subject:** FW: LES, NOD Comments Conference Call  
**Location:** BMC, Room 320A  
**Start:** Mon 11/5/2012 10:00 AM  
**End:** Mon 11/5/2012 12:00 PM  
**Show Time As:** Tentative  
**Recurrence:** (none)  
**Meeting Status:** Not yet responded  
**Organizer:** Kothur, Bheem

Kim,  
For your information. Please see below e-mail.  
Bheem

-----Original Appointment-----

**From:** Kothur, Bheem  
**Sent:** Tuesday, October 30, 2012 3:29 PM  
**To:** Kothur, Bheem; Tripp, Anthony; Breland, Jabe; 'klindsey@mittauer.com'; Patel, Ashwin  
**Cc:** Yuri Turovsky; Valade, Vicky  
**Subject:** LES, NOD Comments Conference Call  
**When:** Monday, November 05, 2012 10:00 AM-12:00 PM (GMT-05:00) Eastern Time (US & Canada).  
**Where:** BMC, Room 320A



Hi All:

A conference call is setup to discuss the above subject facility NOD.  
For those who cannot attend in person they can join by a conference calling number and as follows:

Calling Number: 1-888-670-3525  
Participant Pass Code: 8135053297#

Please forward this request to other appropriate parties.

If you have any question, please let me know.

Bheem

## Thursby, Kim

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**From:** Epost HWRS  
**Sent:** Friday, October 19, 2012 2:04 PM  
**To:** 'Patrick.Reilly@liquidenviro.com'  
**Cc:** Bahr, Tim; Goddard, Charles; Patel, Ashwin; Breland, Jabe; 'yuri.turovsky@liquidenviro.com'; Miller, Randy J.; Eldredge, Susan F.; Bejnar, Tor; 'tomdudley44@gmail.com'; Kothur, Bheem; Tripp, Anthony  
**Subject:** Liquid Environmental Solutions of Florida, LLC;FLD 981 928 484;Request for Additional Information  
**Attachments:** 10-19-12-Liquid Environmental Services of Florida, for RAI.Receipt.pdf  
**Tracking:**

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)



# 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

October 19, 2012

**SENT VIA E-MAIL**

[Patrick.reilly@liquidenviro.com](mailto:Patrick.reilly@liquidenviro.com)

Mr. Patrick Reilly, Vice President  
Liquid Environmental Solutions of Florida, LLC  
1640 Talleyrand Ave  
Jacksonville, Florida 32206

RE: Liquid Environmental Solutions of Florida, LLC  
EPA I.D. No. FLD 981 928 484  
Permit Number: 0072815-HO-012/0072815-SO-013  
Used Oil and Material Processing Facility Permit  
Request for Additional Information

Dear Mr. Reilly:

The Florida Department of Environmental Protection (the Department) has reviewed your permit application dated September 19, 2012 and received on September 21, 2012 to operate a Used Oil Processing facility in Jacksonville, Florida.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed Attachment. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.


The Department will be contacting you to schedule a meeting or conference call to discuss these comments. Additional communications will be scheduled as needed prior to your submittal of an official response to minimize the time and effort required to formulate adequate replies to the comments. This exchange of ideas will assist you in developing a complete and adequate response that should eliminate the need for additional official responses and therefore accelerate the permit renewal process.

Mr. Patrick Reilly, Vice President  
October 19, 2012  
Page Two

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit two hard copies of your written response (one copy to the Tallahassee Solid and Hazardous Waste Regulation Section, and one to the Northeast District Office) and one electronic copy to Tallahassee. If you cannot submit all this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Should you like to arrange a meeting or if you have any questions, please contact me at (850) 245-8781 or e-mail: [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us)

Sincerely,

  
Bheem Kothur, P.E. III  
Hazardous Waste Regulation

BK/bk

Enclosure: Attachment

cc: Ashwin Patel, DEP/Northeast District, [ahswin.patel@dep.state.fl.us](mailto:ahswin.patel@dep.state.fl.us)  
Jabe Breland, DEP/Northeast District, [jabe.breland@dep.state.fl.us](mailto:jabe.breland@dep.state.fl.us)  
Yuri Turovsky, LES/Jacksonville, [yuri.turovsky@liquidenviro.com](mailto:yuri.turovsky@liquidenviro.com)  
Randy Miller, OGC/Tallahassee, [randy.j.miller@dep.state.fl.us](mailto:randy.j.miller@dep.state.fl.us)  
Susan Eldredge, DEP/Tallahassee, [susan.eldredge@dep.state.fl.us](mailto:susan.eldredge@dep.state.fl.us)  
Tor Bejnar, FDEP/Tallahassee, [tor.bejnar@dep.state.fl.us](mailto:tor.bejnar@dep.state.fl.us)  
Tom Dudley, [tomdudley44@gmail.com](mailto:tomdudley44@gmail.com)

## **ATTACHMENT**

**Liquid Environmental Solutions of Florida, LLC**

**EPA I.D. No. FLD 981 928 484**

**Permit No. 72815-HO-012; 72815-SO-013**

**Request for Additional Information**

**October 19, 2012**

### **General Comments:**

1. Please provide the Table of Contents for the permit application.
2. Submittal Summary & Five-Year Modification Plan, Submittal Summary, Used Oil Permit renewal, Items 1, 2, and 3: Please provide the closure dates and reports for these items. Also, please paginate the submittal summary & five-year modification plan.
3. Five Year Plant Modification Plan: Please provide the schedule for such modifications in this renewal. Also provide the revised closure cost estimates and financial assurance documents to these modifications to be implemented. The permit renewal cannot be issued until all required financial assurance is in place.

Also on this Modification Plan (#1) it says the facility is going to close hazardous waste tanks 6 and 81-87. Facility should provide the notification and closure (conversion) schedule to the department at least seven (7) days prior to closing the tanks.

4. DEP Form 62-710.901(6), A. General Information, Item 2, Page 8: Please indicate the revision number.
5. Attachment B.3, C.4, C.6 &7, and C.9 (Maps B-3C, B-3d, C-4a, C-9a, and C-9b), Section C- Oil Storage Tank List, Page 9: Please review the tank storage capacities and be consistent throughout the document.
6. Attachment C.3, Operating Information, Last Paragraph, Page 1: If you have any other permits Please provide for our records.
7. Attachment C.5, Analysis plan, 1.0 Introduction, Third Paragraph, Last but one Sentence, Page 1: The halogen test for Used Oil (UO) to determine if it is on-spec or off-spec (Halogens over 1000 PPM) is not acceptable for Petroleum Contact Water (PCW). A hazardous waste determination must be made for PCW.
8. Attachment C.5, Analysis Plan, Section 2.0 Acceptance Protocol, Last Paragraph, Last Sentence, Page 5: Please clarify that LES Laboratory is NELAC certified Lab?.

9. Please clarify if UO and PCW will be picked up from generators in one truck or separate trucks.
10. UO: LES intends to test load upon arriving at the facility. How does it intend to keep each generator's waste separate if it picks up waste from multiple generators in one truck? The citation in 40 CFR 279.44(a) requires to make determination on each load.
11. PCW: Finger printing analysis for PCW should be modified to include pH and halogen testing.
12. LES has provided information for incoming waste instead of outgoing waste.
13. Item 2 – Attachment 4: Every quarter complete TCLP and EPA methods 8240 and 8260 analysis should be conducted on at least two loads of sludges being sent for disposal.
14. Attachment C.6, and 7, Section 4. Certification review and Amendments, Page 4: please review this page, sign and certify.
15. Attachment C.6, and 7, section 6.0 Facility Description, Second Paragraph, Last two Sentences, Page 8: Please review the total storage capacities and revise as appropriate.
16. Attachment C.9, Closure Plan: The closure plan should be modified to address the following items:
  - a. All of the waste must be properly characterized, including hazardous waste determination, prior to shipping it off-site.
  - b. Submit a map showing monitoring wells on a map. Also, include their construction details.
  - c. Soil sampling plan should be revised to collect adequate soil samples from all around the permitted tanks and container storage areas. The plan should also list the parameters for analysis and justification for their selection. Additional soil samples should be done near sumps, rack 1 and 3.
  - d. Explain how completion of decontamination will be determined for tanks, pipes and secondary containment, specifically, list parameters for analysis and justification for their selection.
  - e. Does the term "residue" include the rinse waters used in the closure process? The rinse waters from cleaning of the secondary containment and the tanks/piping/etc. should be tested to determine that are non-hazardous.
  - f. LES should state that if all contaminated soils cannot be practically removed or decontaminated, at the time of closure, then it will close the tank system and perform post-closure care requirements that apply to hazardous waste landfills in 40 CFR 265.310, in accordance with 40 CFR 179.54(h)(ii).

- g. LES shall provide a written notice seven days prior to initiating closure.
  - h. There is inconsistent information in the closure plan regarding closure process, sampling and analytical parameters. The plan should be revised to provide consistent information.
17. Please revise the closure cost estimates to address the proposed future tanks (102 through 109) oily water and soil sampling and decontamination process comments for the closure plan above.
18. Attachment C.10, used Oil Training, Page 1: This section need to be expanded to include the actual content of the training. Also state that writer training records including name of the employee, date, and type of training will be kept at the site.
19. Tanks Inspection: LES (f.k.a IWS) facility is in operation since 1986. The facility must provide the documentation of each Tank's last detailed inspection and certification to the Department.
20. Facility need to submit a site map in an electronic format (pdf preferred) so that this map can inserted into the permit.
21. Facility needs to submit a tank table in an electronic format (pdf preferred) so that this table can be inserted in to the permit.
22. Solid Waste Renewal Permit Application, DEP Form 62-701.900(1): Please delete this Form in its entirety and re-submit the DEP Form 62-701.900(4), found at [http://www.dep.state.fl.us/waste/quick\\_topics/forms/documents/62-701/62-701.900\(4\).pdf](http://www.dep.state.fl.us/waste/quick_topics/forms/documents/62-701/62-701.900(4).pdf)
23. Please identify non-hazardous and solid waste activities conducted at the site and address the quantities of solid waste stored on site at any given time per day and per month.