From: Yuri Turovsky
To: Breland, Jabe; whiting.paula@epa.gov;
cc: Patel, Ashwin; Ed Jesus;
Subject: RE: LES Plant Inspection
Date: Wednesday, October 24, 2012 10:37:09 AM
Attachments: image001.png
image004.png
Corrective Action Response.docx
Fire Extinguisher Inspection - Sep Oct 2012.pdf
Fire Extingusher Inspection Checklist.xlsx
Jacksonville-Bucket at Tk 16.jpg
Jacksonville-Cleanup.jpg
Jacksonville-Containment at Tk 10.jpg
Jacksonville-Drum Bungs.jpg
Jacksonville-Drum Labels.jpg
Jacksonville-Lab Samples.jpg
Jacksonville-Sand Bags.jpg
Jacksonville-Spent Fluorescent Bulbs.jpg

Jabe and Paula,

All items of concern identified during the plant inspection on October 15, 2012 have been corrected. Attached is my corrective action report.

Thank you again for your guidance and cooperation.

Please feel free to call or email to me if you require any additional information.

Thank you,

Yuri Turovsky
Liquid Environmental Solutions
1640 Talleyrand Ave
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From: Breland, Jabe [mailto:Jabe.Breland@dep.state.fl.us]
Sent: Wednesday, October 17, 2012 3:24 PM
To: Yuri Turovsky; whiting.paula@epa.gov
Cc: Patel, Ashwin
Subject: RE: LES Plant Inspection

After leaving your facility I realized the same thing. CESQGs do not have to comply with satellite requirements, so you are good there. regarding the mixing I will have to get back with you on that. There are exemptions for CESQGs to mix HW with their used oil. Since you are a permitted facility there may be something in your permit that requires you to operate in a certain way. I will have to go back through the permit and UOP rules to make sure. This would also be a decision that I would want Ashwin's opinion on and he is currently out of the office. I will get with him as soon as he returns.

Thanks Yuri.

Please take a few minutes to share your comments on the service you received from the department by clicking on this link DEP Customer Survey.

From: Yuri Turovsky [mailto:yuri.turovsky@liquidenviro.com]
Sent: Tuesday, October 16, 2012 12:51 PM
To: Breland, Jabe; whiting.paula@epa.gov
Cc: Patel, Ashwin
Subject: LES Plant Inspection

Good morning to you all -

First of all, thank you for your time and insight yesterday. We have already started correcting and implementing your recommendations, and I am hoping to be able to report to you soon.

Second, in doing my research on CESQG, I have found no satellite accumulation requirements applicable to CESQG. I need your help in determining if we are subject to any regulations in regard to keeping the drums in two or three locations

throughout the lab area. Additionally, I found a language in 261.5(h) and 261.5(j) that I interpreted as an opportunity to mix my haz waste with used oil and manage it under part 279. Please provide your guidance.

Thank you,
YT

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