From: Kothur, Bheem
To: Mayberry, Eric;
Subject: FW: 9122-34-1 LES Tank Inspection Requirement Question
Date: Monday, January 28, 2013 1:25:13 PM
Attachments: image001.png
Appendix C - Tank Inspection Plan 1-28-13.pdf

Hi Eric,
Please insert the attached documents including the e-mail into OCULUS under permit application related documents.
Facility I.D. for this documents: FLR 000 031 393

If you have any questions, please let me know.
Thanks.
Bheem

From: Melissa West [mailto:MWest@mittauer.com]
Sent: Monday, January 28, 2013 11:49 AM
To: Kothur, Bheem
Cc: Yuri Turovsky
Subject: FW: 9122-34-1 LES Tank Inspection Requirement Question

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Mr. Kothur,

Please find attached the revised Tank Inspection Plan for Liquid Environmental Solutions of Florida, LLC per yours/DEP's comments last Thursday, January 24, 2013.

Let us know if you have any questions or comments.

Sincerely,

Kellen A. Lindsey, E.I.
Project Engineer
Mittauer & Associates, Inc.
580-1 Wells Road
Orange Park, FL 32073
Office: (904) 278-0030
Direct: (904) 644-0646
Fax: (904) 278-0840
admin@mittauer.com

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Friday, January 25, 2013 8:02 AM
To: 'Yuri Turovsky'; Melissa West
Cc: Tripp, Anthony; Breland, Jabe
Subject: RE: 9122-34-1 LES Tank Inspection Requirement Question

Hello Yuri,
That is correct and we will address the completion schedules in the renewal draft permit.
I am looking forward to see the revised plan on Monday, January 28, 2013.
Thanks.

Bheem

From: Yuri Turovsky [mailto:yuri.turovsky@liquidenviro.com]
Sent: Thursday, January 24, 2013 4:55 PM
To: Kothur, Bheem; Melissa West
Cc: Tripp, Anthony; Breland, Jabe
Subject: RE: 9122-34-1 LES Tank Inspection Requirement Question

Bheem,

Based on our discussion, we will revise the Tank Inspection Plan to address these items:
1. Include Tk 101 in the list of tanks for inspection.
2. Include a sentence stating that Tanks 4A and 4b are planned for closure and thus not covered by the plan.
3. Move the final completion date for all certified tank inspections from June 30 to May 31.

We will resubmit the revised plan on Monday.

Thank you,

Yuri Turovsky
Liquid Environmental Solutions
1640 Talleyrand Ave
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904-265-2109 direct
904-509-2032 cell

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From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Thursday, January 24, 2013 4:11 PM
To: Yuri Turovsky; Melissa West
Cc: Tripp, Anthony; Breland, Jabe
Subject: FW: 9122-34-1 LES Tank Inspection Requirement Question

Hello Yuri,
As I discussed with you to make to include all appropriate tanks.
Also revise the schedule to submit the final certified tank inspection reports.

If you have any questions, please let me know.

Bheem

From: Melissa West [mailto:MWest@mittauer.com]
Sent: Thursday, January 24, 2013 1:22 PM
To: Kothur, Bheem
Cc: Yuri Turovsky
Subject: FW: 9122-34-1 LES Tank Inspection Requirement Question

Mr. Kothur,

As discussed last week, LES has developed the attached Tank Inspection & Integrity Test Plan for all of its petroleum storage tanks, per DEP request and for the completion of the Used Oil Processing Facility Permit Renewal. The attached Plan details the schedule and type of inspections that will be performed on the various tanks. Page 2/2 specifically indicates the timeline requested for the initial

inspections performed by certified SPI/API Inspectors. The formal External Inspections will be performed on all the listed tanks by March 31, 2013, and the formal Internal Inspection of the field-erected Tank 53 will be performed by June 30, 2013.

We hope that the Plan is found satisfactory by DEP and should you have any questions or comments, please do not hesitate to contact us at any time.

Sincerely,

Kellen A. Lindsey, E.I.
Project Engineer
Mittauer & Associates, Inc.
580-1 Wells Road
Orange Park, FL 32073
Office: (904) 278-0030
Direct: (904) 644-0646
Fax: (904) 278-0840
admin@mittauer.com

From: Melissa West
Sent: Thursday, January 17, 2013 1:21 PM
To: Bheem Kothur (Bheem.Kothur@dep.state.fl.us)
Cc: Yuri Turovsky
Subject: 9122-34-1 LES Tank Inspection Requirement Question

Mr. Kothur,

Based on our discussions regarding the RAI Comment No. 19, LES understands the necessity and the requests to provide documentation of each individual tank's detailed inspection and certification. Since the implementation of these detailed inspections will likely incur a significant cost to LES, we request DEP allows LES and Mittauer & Associates, Inc. one week to submit a detailed Plan of Action Schedule for the tank inspections. This Schedule will include a timeline as to when the inspections will occur – which we understand must occur within the next several months. Should you have any specific items or information that must be included in the Schedule, please let us know as soon as possible.

If you have any questions or concerns, please do not hesitate to contact us at any time.

Sincerely,

Kellen A. Lindsey, E.I.
Project Engineer
Mittauer & Associates, Inc.
580-1 Wells Road
Orange Park, FL 32073
Office: (904) 278-0030
Direct: (904) 644-0646
Fax: (904) 278-0840
admin@mittauer.com

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Thursday, January 17, 2013 11:05 AM
To: 'Yuri Turovsky'; Melissa West
Cc: Tripp, Anthony; Breland, Jabe
Subject: RE: 9122-34-1 LES Tank Inspection Requirement Question

Hello Yuri,
As I discussed and explained to you this morning about the tank inspection reports and requirements.
I need a revised response to RAI comment item No.19 from you and a schedule for plan of action as soon as possible.

If you have any further question, please let me know.

Thanks.
Bheem

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: Wednesday, January 16, 2013 11:31 AM

To: Melissa West; Kothur, Bheem
Subject: RE: 9122-34-1 LES Tank Inspection Requirement Question

Bheem,

In addition to the below questions, as per 62-762.301(2)(a) any storage tank system regulated under Subtitle C of the RCRA is exempt from the requirements of this chapter. I have reviewed the DEP Rule 62-710 and 40 CFR 279.54 but could not find any requirement for tank inspections. Please provide some clarification on this.

Thank you,

Yuri Turovsky
Liquid Environmental Solutions
1640 Talleyrand Ave
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904-265-2109 direct
904-509-2032 cell
904-353-4033 fax
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From: Melissa West [mailto:MWest@mittauer.com]
Sent: Wednesday, January 16, 2013 10:19 AM
To: Bheem Kothur (Bheem.Kothur@dep.state.fl.us)
Cc: Yuri Turovsky
Subject: 9122-34-1 LES Tank Inspection Requirement Question

Bheem,

After looking over the DEP Rule 62-762 further, it still appears that only field-

erected tanks are subject to the required API 653 Standard inspection, per 62-762.501(2)(b)3. Is there somewhere else in this rule that describes the requirement for all tanks to be inspected?

Additionally, since this requirement did not appear to be enforced/implemented during the last permit renewal period, we were curious when this requirement came into effect? If it has come into effect sometime after LES's last permit renewal (after late 2007), is LES required to complete the inspections within a certain timeframe from the time the rule came into effect, or does it just have to occur during the new permit timeframe? We want to determine what kind of time LES may have to complete these inspections, as these will likely cost a significant amount to complete.

Also, not sure if this plays into the requirements, but all LES tanks are completely contained and are already inspected daily/weekly by staff personnel.

Please let me know when you get the opportunity.

Sincerely,

Kellen A. Lindsey, E.I.
Project Engineer
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Direct: (904) 644-0646
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