From: Kothur, Bheem
To: Mayberry, Eric
Subject: FW: LES - Permitting Question; Facility I.D: FLD 981 928 484
Date: Wednesday, October 09, 2013 1:53:38 PM
Attachments: image001.png

Hi Eric,
Please insert into OCULUS this e-mail trail under permit application related document.
The facility I.D No: FLD 981 928 484
Subject: Permitting Question (Oily Water; and Oil water Separators)

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

From: Kothur, Bheem
Sent: Wednesday, October 09, 2013 1:49 PM
To: McDonald, Mauryn
Subject: FW: LES - Permitting Question; Facility I.D: FLD 981 928 484

Hi Mauryn,
I have difficult in sending this e-mail to Sam Elrabi and Woodrow Batchleor (Hillsborough County).
Please forward this e-mail to them.
Thank you,
Bheem

From: Kothur, Bheem
Sent: Wednesday, October 09, 2013 1:44 PM
To: 'Yuri Turovsky'
Cc: Bahr, Tim; Tripp, Anthony; Martin, Lee; Tedder, Richard; Potts, Elsa; McDonald, Mauryn; Morgan, Steve; McGinnis, Sean; Knauss, Elizabeth; Greenwell, Jeff; Breland, Jabe; Miller, Randy J.
Subject: RE: LES - Permitting Question; Facility I.D: FLD 981 928 484

Yuri,
As long as the scenario is the same, and LES complies with applicable state and local rules and regulations, the Department does not have any objections.
However, you must identify the locations and inform both the Department and appropriate county and local regulatory agencies, if any.

If you have any questions with this response, please let me know.

Sincerely,
Bheem R Kothur, P.E. III
Hazardous Waste Program and Permitting

From: Yuri Turovsky [mailto:yuri.turovsky@liquidenviro.com]
Sent: Monday, September 23, 2013 5:06 PM

To: Kothur, Bheem
Subject: RE: LES - Permitting Question; Facility I.D: FLD 981 928 484

Bheem,

Thank you very much for providing your leadership in coordinating the FDEP response to this somewhat unusual situation. I want to assure you that we are striving to provide quick and efficient service to our customers in full compliance with the state regulations.

By coincidence, we have just received another service request where LES would have to periodically pump out oil water separators at certain car dealerships in the Tampa/Orlando area. The oil water separators range in size from 500 to 1,000 gallons and will be pumped out using a LES vacuum truck. We would like to use one location in Tampa and one in Orlando for temporary storage of oily waste waters in a 6,000-gal mobile tanker trailer prior to hauling it to our Jacksonville plant.

This scenario is exactly the same as the one you have just approved, except LES will be managing the waste from pumping it at the generator site to transportation and disposal. This waste stream will NOT be mixed with the Safety-Kleen oily waste waters described below, or any other waste streams.

My thinking is that your guidance below can be applied to this scenario as well.

Please confirm that we are on the same page.

Sincerely,

Yuri Turovsky
Liquid Environmental Solutions
1640 Talleyrand Ave
Jacksonville, FL 32206
904-438-2138 main
904-265-2109 direct
904-509-2032 cell
904-353-4033 fax
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liquid
ENVIRONMENTAL SOLUTIONS

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Thursday, September 19, 2013 1:13 PM
To: Yuri Turovsky; 'Curtis, Jeff'
Cc: Bahr, Tim; Miller, Randy J.; Tripp, Anthony; Martin, Lee; Tedder, Richard; Greenwell, Jeff; Potts, Elsa; Morgan, Steve; Knauss, Elizabeth; McGinnis, Sean; McDonald, Mauryn; Breland, Jabe; Mayberry, Eric

Subject: FW: LES - Permitting Question; Facility I.D: FLD 981 928 484

Dear Turovsky:

In response to your question below and after several discussions over the last couple of months with the department's other various Divisions/Programs (Solid Waste Program, Industrial Waste Program, Hazardous Waste Program), Statewide Solid Waste conference call and with the Southwest District Compliance Staff with respect to the permitting of frank tank/mobile tankers, the following is a Summary of Issues in an attempt to memorialize these discussions.:

1. LES Jacksonville desires to use a location in Tampa, remote from their operation in Jacksonville, for temporary storage of a mobile tanker (frac tank) to consolidate oily waste water and other industrial waste waters, collected from multiple sources by a Safety Kleen, Systems, Inc. Vac truck, prior to shipment to the LES centralized waste treatment facility in Jacksonville. The waste material will be characterized and only non-hazardous oily waste waters and industrial waste waters are collected and pumped from the vac truck to the frac tank/mobile tanker (6,000 gallons capacity), no wastes will be discharged to the ground, and the frac tank will be moved /replaced at least twice a week.
2. At this point, the frac tank could be considered part of the conveyance system to get the waste materials from the source to the treatment facility and as such would not require a solid waste permit or a hazardous waste permit or an industrial waste water permit, however if the operation expanded significantly, became stationary, or created a discharge situation, the permitting issues would need to be revisited. This would also be contingent on Storm water controls, the use of best management practices to minimize any discharge to the environment and control objectionable odors, litter, dust, and other fugitive particulates.
3. DEP has some concern that when the time comes the 20,000 gallons mobile tank (frac tank), approximately 80 tons full may not able to be moved over the road, as they are intended to be moved empty, and would become more permanent but that will have to be addressed at that time.
4. LES should communicated activity details with the Hillsborough County Environmental Commission's (EPC) industrial wastewater program permits non-NPDES industrial wastewater activities in Tampa for their records and to determine if any local requirements apply.
5. Safety Kleen Systems, Inc. Industrial Vac Pre-qualification Information is as follows: pH- SW846 9040, 9045; Waste Compatible-ASTM D5058 Part C; Flashpoint- SW846 1010, 1020; Polychlorinated Biphenyls (PCBs) by Gas Chromatography – SW846 8082; Report limit target – 2 ppm; Metals by ICP (must include 8 RCRA metals – Ag,, As, Ba, Cr, Hg, Pb, and Se); Acid digestion sample preparation – SW846 3010, 3020, 3050, 3051; Instrumental analysis – SW846 6010; Report limit targets – RCRA regulatory limits; Volatile organic compounds (VOCs) by Gas Chromatography – SW846 8260; VOC target list include the compounds identified in method 8260; Reporting limit targets – as low as best available technology will allow.
6. Regarding the industrial customer vac parameters for Safety Kleen Systems, Inc. and what would qualify the sample for rejection into the program: pH – material must have pH

between 4-10; flashpoint – must have flashpoint greater than 200; metals/VOC's – must be non-hazardous analytical result.

If you any questions, please let me know.
Sincerely.

Bheem R. Kothur, P.E., DEE
Hazardous Waste Program and Permitting
2600 Blair stone Road, MS# 4560
Tallahassee Florida 32399-2400
Phone: 850-245-8781
Fax: 850-245-8810

From: Yuri Turovsky [mailto:yuri.turovsky@liquidenviro.com]
Sent: Wednesday, July 10, 2013 4:14 PM
To: Kothur, Bheem
Cc: Tripp, Anthony; Martin, Lee; Miller, Randy J.
Subject: RE: LES - Permitting Question

Gentlemen,

I am following up with the information on the proposed project that we discussed a few weeks ago.

The site in Tampa is a transportation yard located at the following address:
Dickinson Fleet
10333 Woodberry Rd Tampa, FL 33619

There will be a single customer, Safety-Kleen, bulking together small quantities of oily wastewater at this transfer station. We will initially place one of our 6,000-gal tanker trailers for them to fill up. We will swap it (pick up the full one and replace it with an empty one) approx. twice a week. My understanding is that this type of activity will not require any permitting from the Department.

Sometime later, we would like to place a 20,000-gal mobile tank (frac tank) on the site. The frac tank will have a valid registration and will be located within a portable containment. We will continue hauling wastewater from the frac tank to our Jacksonville plant approx. two times per week.

Please kindly provide your guidance.

Thank you,

Yuri Turovsky
Liquid Environmental Solutions
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Jacksonville, FL 32206
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904-265-2109 direct
904-509-2032 cell
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www.liquidenviro.com

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From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Wednesday, June 12, 2013 1:27 PM
To: Yuri Turovsky
Cc: Tripp, Anthony; Martin, Lee; Miller, Randy J.
Subject: RE: LES - Permitting Question

Yuri,
As we [Randy Miller(OGC) and I] discussed with you to understand better the proposed activities of storing "oily water" in a franc tank in Tampa area and other in Orlando area at later date.

Please provide in detail including but not limited to the location, type of tank, tank registration, capacity, frequency of transferring to LES site, your potential customers, so that we can give you proper guidance, and procedures to follow.

If you have any other questions, please let me know.

Bheem

From: Yuri Turovsky [mailto:yuri.turovsky@liquidenviro.com]
Sent: Tuesday, June 11, 2013 10:14 AM
To: Kothur, Bheem
Cc: Tripp, Anthony; Martin, Lee
Subject: RE: LES - Permitting Question

Good morning Bheem,

Just wanted to check with you and see if you had any initial direction for me.

Thanks,

YT

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Friday, June 07, 2013 4:48 PM
To: Yuri Turovsky
Cc: Tripp, Anthony; Martin, Lee
Subject: RE: LES - Permitting Question

Hi Yuri,
Let me review your request and get back to you.

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: Friday, June 07, 2013 4:23 PM
To: Kothur, Bheem
Subject: LES - Permitting Question

Good afternoon Bheem,

I have a question for you. We are planning to place frac tanks first in Tampa and later in Orlando for one of our regular customers to bulk together small quantities of oily water. The bulk quantity will be then transferred on a regular basis by LES trucks to our Jacksonville plant for processing. I would like to know what kind of permit if any would be required and if so, who will be the person to contact.

Thank you for your help,

Best Regards,

Yuri Turovsky
Liquid Environmental Solutions
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904-265-2109 direct
904-509-2032 cell
904-353-4033 fax
www.liquidenviro.com

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