THE ENVIRONMENTAL QUALITY COMPANY

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October 22, 2013

Merlin D. Russell Jr.
Professional Geologist II
Hazardous Waste Program & Permitting, Room 330G
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2600

Re: Closure Certification for EQFL Filter Press

Dear Mr. Russell:

Attached is a signed certification of closure, a trip report and photographs of closure of the filter press contained in our current hazardous waste permit. This unit was never placed into operation and has sat idle for a number of years. We would like to have it certified closed and notify you that it will not be included in our upcoming submittal for renewal of the hazardous waste permit for this facility.

As noted in the attachments, EQ Florida has no plans to sell or scrap the unit at this time. Rather, it will be shipped to our Oklahoma facility for their use.

Please call me at 813-319-3410, or email me at gene.cieply@eqonline.com if I can answer any questions after you've had a chance to review this material.

Sincerely,

Gene Cieply
General Manager
EQ Florida, Inc.

KCI TECHNOLOGIES

ISO 9001:2008 CERTIFIED

ENGINEERS • PLANNERS • SCIENTISTS • CONSTRUCTION MANAGERS

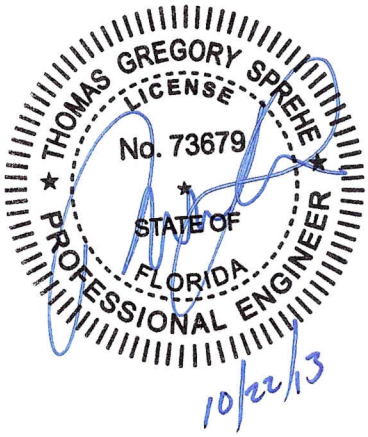
10401 Highland Manor Drive, Suite 120 • Tampa, FL 33610 • Phone 813-740-2300 • Fax 813-740-0158

Engineering Certification

I hearby certify that I have reviewed the documentation and discussed the observations with the staff conducting the investigations and that these documents were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. In my professional judgement, the closure that was accomplished for the EQFL filter press was conducted in substantial compliance with the closure plan for this unit as described in the existing permit and is consistent with commonly accepted engineering practices.

Thomas Sprehe, P.E.
Florida Registration No.73679
Florida Certificate of Authorization No. 4898

10/22/2013
Date



10/22/13

KCI TECHNOLOGIES

MEMORANDUM

TO: File/EQFL-Orient Road, Tampa, FL

FROM: Jerry E. Kubal, P.G.

DATE: 18 October 2013

SUBJECT: Inspection of Decon and Closure of Filter Press
KCI Project No.: 12123014

On Friday, October 18, 2013, I visited the EQFL site on Orient Road to observe and photo document closure activities related to the filter press (FP) which is currently included as a hazardous waste treatment unit under EQ's permit. EQ reportedly only used the FP one time, approximately 15 years ago, and it has been sitting idle since then (Figure 1). There were no plans to restart the unit at the Tampa facility and EQ decided to remove the unit in accordance with the closure plan in the hazardous waste permit.
In the permit, closure of the FP is described as "... cleaned and decontaminated by pumping a dilute muriatic acid solution followed by water through the press. The press will also be cleaned and decontaminated using a pressure wash. All collected rinsates will be managed as hazardous waste with the other facility decontamination rinsates. The press will be sold for any residual value or as scrap metal."

Because the FP was not operational, pumping a dilute muriatic solution through the press was not an option. Rather, the unit was brushed down in place to remove 15 years of accumulated dust and dirt. The pressure was released, and 13 of 14 individual plates were removed for cleaning. The one exception was the front-most plate which was lodged in place and could not be removed (Figure 2). This necessitated decontaminating this one plate while still attached to the unit and collecting the accumulated rinsate.

Upon my arrival, Curtis Merkerson and Ed Barnes had moved the 13 individual plates over to the decontamination area set up outside the waste storage building. Both were wearing appropriate PPE consisting of tyvek suits, hard hats, full face shields and chemically resistant gloves (Figure 3). Four of the plates had been decontaminated and were sitting atop a wooden pallet covered with plastic sheeting and being allowed to air dry. Four individual plates were sitting inside a round, polyethylene containment vessel sitting on plastic sheeting.

Decontamination consisted of rinsing each plate with a pressure spray bottle containing a dilute, 15 percent muriatic acid solution. One individual kept the spray bottle pressurized while the other rinsed off the individual plates. Once rinsed, each plate was rinsed with clean water through a spray nozzle attached to a hose. The plates were then turned around and the same process was conducted on the opposite side. Once the plates had been decontaminated in this fashion, they were stacked on the wooded pallet with other previously cleaned plates (Figure 4). Work continued in similar fashion on the remaining five plates.

To the extent possible, rinsate accumulating in the bottom of the containment vessel was then pumped out into a plastic drum labeled as containing caustic "Hazardous Waste" (Figures 5 and 6). The remaining liquid (approximately 2-3 gallons) was poured into a 5-gallon pail along with clean rinse water sprayed over the bottom of the containment vessel and then poured into the plastic drum. All material and any liquid captured on the underlying plastic sheeting was removed using absorbent pads. The pads, tyvek suits, gloves and sheeting were wrapped up and placed in a see through plastic bag for disposal and the decontaminated containment vessel was loaded into the bed of the pick up truck (Figures 7, 8 and 9).

After observing the decontamination of the individual plates, I visited the FP area to observe the work that had been conducted there (Figures 1 and 2). Ed Barnes described the brush down, cleaning of the plate that could not be removed and indicated the FP was to be taken over to the non-haz waste side for a pressure wash to remove the accumulated dust and dirt, with the rinse waters collected and disposed of properly.

Although the FP was not closed in exact accordance with the plan described in the permit, it was felt that the process utilized was the most practical approach available to EQ and achieved an equivalent level of decontamination of the unit before removal. It should be noted that the ultimate disposition of the unit is not to be sold or scrapped. Rather, EQ plans to ship the unit to its facility in Oklahoma for use in the process at that location.

Attachments: Photographs (9)

Figure 1. Filter Press With Plates Removed .

Figure 2. Filter Press With Plate Decontaminated in Place.

Figure 3. Decontamination Process for Filter Press Plates

Figure 4. Decontaminated Plates Stacked for Air Drying.

Figure 5. Start of Removing Rinsate from Containment Vessel

Figure 6. Drummed Filter Press Rinsate

Figure 7. Clean Up of Filter Press Decontamination Area (1).

Figure 8. Clean Up of Filter Press Decontamination Area (2)

Figure 9. Clean Up of Filter Press Decontamination Area (3).