From: Kothur, Bheem
To: Mayberry, Eric
Subject: FW: LES - Permitting Question; Facility I.D: FLD 981 928 484
Date: Friday, December 06, 2013 9:58:30 AM
Attachments: image001.png

Hi Eric,
Please insert these e-mails into OCULUS under permit related information.

The facility I.D.: FLD 981 928 484
Subject: Notification of installing 6,000-gallons tank trailer.

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

From: Yuri Turovsky [mailto:yuri.turovsky@liquidenviro.com]
Sent: Friday, December 06, 2013 9:37 AM
To: epcinfo@epchc.org
Cc: Kothur, Bheem
Subject: FW: LES - Permitting Question; Facility I.D: FLD 981 928 484

Attention:
Mr. Hooshang Boostani, P.E.
Waste Management
Hillsborough County Environmental Protection Commission

Dear Sir,

This email serves as a notification of our intention to place a 6,000-gallon tanker trailer in the Tampa area at
Dickinson Fleet
10333 Woodberry Rd Tampa, FL 33619

The LES tanker will be used to bulk small loads of non-hazardous oily wastewater from Safety-Kleen vac truck service in the area. The tanker load will be hauled to the LES Jacksonville disposal facility approximately two times per week. The operations should start in December 2013.

Below please see the detailed project description and the guidance provided by FDEP on the subject matter.

At a later time, LES intends to deploy a mobile 20,000-gal frac tank on this site that will be used on an intermittent basis for the same type of waste stream and activity.

Please let me know if you need any additional information.

Thank you,

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
www.liquidenviro.com

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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
1640 Talleyrand Ave
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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