

## Choi, Juchan

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**From:** Lucas Barroso-Giachetti <lucas@gleassociates.com>  
**Sent:** Thursday, March 10, 2016 4:43 PM  
**To:** Choi, Juchan  
**Cc:** hjasph  
**Subject:** RE: Notification of failure to follow up on compliance requests - H&J Asphalt Inc. FLD984205765  
**Attachments:** Comment No. 3 - Hose Leak Area with New Concrete Pad.jpg; Comment No. 7 - Oil Pans - New Disposal Drums in Garage Area.jpg; Comment No. 8 - Maintenance Area - Spill Removed.jpg; Comment No. 9 - Pipe Leak Area.jpg; Comment No. 10 - Pit Pumped Out.jpg; Comment. No. 11 - Oily Rags Removed.jpg

Hi Jay,

Thanks for your email including the photos with the different compliance areas, as these have been a useful guide in our efforts to address the deficiencies. I have been interfacing with H&J personnel on these compliance deficiency areas and have addressed them area by area. Please find the following for your consideration:

- Comment No. 3 – Tanker Hose with New Concrete Pad – In response to the Department’s comment, H&J has installed a concrete pad surrounding the tanker hose to address this compliance area and prevent spills from impacting surrounding soils. A photo of new pad at the tanker hose area is attached.
- Comment No. 4 - H&J is conducting maintenance of these pipes to prevent future oil leaks.
- Comment No. 5 - H&J is conducting maintenance of associated equipment to prevent future oil leaks.
- Comment No. 6 – The area with dirty oil dry has been cleaned and the sand placed in the newly implemented 55-gallon disposal drums.
- Comment No. 7 – As requested, the pans and buckets have been removed and the used oil properly containerized. A photo showing the area with the newly installed disposal drums is attached. In addition, oils/liquids in the parts washer have been removed. Please note that the facility does not generate a large volume of waste oil and typically conducts disposal pickups approximately every 6 months.
- Comment No. 8 – The spill area has been addressed. Please see attached photo.
- Comment No. 9 – Pipe Leak – A photo of the former leak area is attached. H&J is planning further maintenance of these pipes to prevent future oil leaks.
- Comment No. 10 – Pit Area Liquids – As requested, the paved pit area has been pumped out. A photo of the pit taken this week is attached.

- Comment No. 11 – Oily rags along fence line – As requested, the oil rags have been removed from this area and have been containerized in the newly implemented 55-gallon disposal drums pending disposal. A photo of the area with the rags removed is attached.

Please know that we are working on the 62-701.901 Form and will send you a copy next week, including disposal receipts. Thanks in advance for your patience as we prepare this paperwork for your review and approval.

Please contact me if you have any questions on the above and thanks,

Lucas  
GLE

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**From:** Choi, Juchan [mailto:[Juchan.Choi@dep.state.fl.us](mailto:Juchan.Choi@dep.state.fl.us)]  
**Sent:** Thursday, March 03, 2016 3:05 PM  
**To:** Lucas Barroso-Giachetti  
**Cc:** hjasph  
**Subject:** RE: Notification of failure to follow up on compliance requests - H&J Asphalt Inc. FLD984205765  
**Importance:** High

Good afternoon Lucas,

Thank you for contacting with us and I am glad to hear from you to resolve compliance matter for the H&J Asphalt. I have received and reviewed compliance request material H&J submitted last week. The manifest reveals that the facility had provided records for the used oil it was accepting for burning.

There's another document request that I still have not received was **established log for disposer from the parts washer being added to used oil (mechanics maintenance area). Please use "62-710.901 Used Oil and Used Oil Filter Record Keeping Form" to establish a log and send us a copy.**

I see the progress of some corrective actions made for the clean-ups from the photos H&J sent. However, I don't see all requests were made to correct deficiencies that were previously mentioned.

Let's go over with the photos your facility had provided to the Department. I will also provide my photos to direct you what deficiencies must be corrected. I would like to resolve these matter by end of next **Thursday, March 10, 2016**. If you need an extension of time please let me know. Thank you.

1. This is photos you sent to the Department for the clean-up your facility made to secondary containment used oil tank area (acceptable).



2. Another submitted photo showing that the tanker underneath is cleaned and free of spills (acceptable).



3. This photo your facility sent showed that oily buckets were removed. However, as you can see it from the photo, oil spills are still visible on the ground left of this photo below. Please clean up the soils being contaminated and properly dispose it (send to the Department picture). Another concern is whether the hose connected into tanker may cause the spill every time it's being used. (red circled area) Please explain how the faculty operates this area. If spill occurs every time it's being used, please address the deficiency and send the Department photo and explain how it is addressed.



4. These photos your facility sent showed that the pipes are newly covered with metals to avoid any extra spills. However I want to know how H&J will address area where spill actually occurs (hose connect & pipe connect). Please see the circled area below and explain how you will address the spill.



5. This is the photo your facility sent. The below photo showed that the oily buckets were removed. However, I would like to know whether the facility has fixed issue in the area where spill occurs. Please see circled area and explain how it is addressed.



Starting from here are the problems that have not resolved yet. Please carefully read the deficiencies noted below and promptly correct the issues. Send to the Department photos returned in compliance.

6. This photo below is taken by me. I saw many spots were placed with these dirty oil dry and being not picked up. Please establish a container for dirty oil dry. Pick up these dirty oil dry and send us photos returned in compliance.



7. This photo below was taken in the mechanics maintenance area. The photo shows that transfer pans and buckets for used oil were not properly labeled. Please note that used oil generators are required to label containers and tanks storing used oil with the words "Used Oil." The labeling on container and tank should be legible and clearly visible by approaching individuals. The facility should inspect their shop, maintenance areas, or any areas where used oil would be generated or stored looking for containers holding used oil to ensure that all containers, tanks, or fill pipes are properly marked. Please label any transfer pans and buckets for used oil and provide to the Department photos returned in compliance.



8. This photo below was taken in front of the mechanics maintenance area. Please see the red circled area. I spotted an antifreeze spill there. The facility must avoid spills and leaks. If spill occurs, it must be immediately collected and properly managed. Please promptly address this spill in the area and provide photos returned in compliance.



9. The photo below is area where oil leak occurs. Please fix the pipe where leak is happening and send us photo returned in compliance. Please also explain to the Department how corrections will prevent any future oil leaks.



10. The photo below is taken at the paved pit area in front of the conveyor belt. There is pit approximately 2 x 5 ft sized filled with oily liquid inside. Please pump out the oily liquid and provide photos returned in compliance.





11. The photos below was taken at the east entrance along the fence line. There was pile of oily rags left on the ground. Please pick up/remove these pile of oily rags and properly dispose them. Please provide photos returned in compliance and a copy of receipts for proper disposer.



Jay,

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**From:** Lucas Barroso-Giachetti [<mailto:lucas@gleassociates.com>]  
**Sent:** Tuesday, February 23, 2016 4:30 PM  
**To:** Choi, Juchan  
**Cc:** hjasph  
**Subject:** Notification of failure to follow up on compliance requests - H&J Asphalt Inc. FLD984205765

Mr. Choi,

Good afternoon. I wanted to introduce myself and let you know that I've been retained by H&J Asphalt to assist in their active efforts to address the compliance items identified during your most recent site visit.

Please don't hesitate to contact me at 786.877.4363 with any questions on the above.

Thanks,

Lucas

**Lucas A. Barroso-Giachetti, PE, CHMM**  
Senior Engineer



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