

## Thursby, Kim

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**From:** Ditter, Phillip <phillip.ditter@veolia.com>  
**Sent:** Sunday, May 01, 2016 12:46 PM  
**To:** Epost HWRS (Shared Mailbox)  
**Subject:** Re: 04-29-16 First Request for Additional Information (RAI); Leon County – Hazardous Waste; Veolia ES Technical Solutions, L.L.C.

Confirming receipt of electronic document.

On 29 April 2016 at 14:29, Epost HWRS (Shared Mailbox) <[EpostHWRS@dep.state.fl.us](mailto:EpostHWRS@dep.state.fl.us)> wrote:

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.

Environmental Administrator

Hazardous Waste Program & Permitting



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Phillip Ditter, CHMM  
*Environmental, Health and Safety Manager*  
*Industrial Business*  
**VEOLIA NORTH AMERICA**

tel

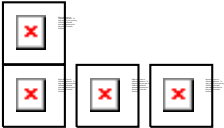
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# Florida Department of Environmental Protection

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2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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Jonathan P. Steverson  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

April 29, 2016

Phillip Ditter, EHS Manager  
342 Marpan Lane,  
Tallahassee, Florida 32305  
[Phillip.ditter@veolia.com](mailto:Phillip.ditter@veolia.com)

Re: First Request for Additional Information (RAI)  
Leon County – Hazardous Waste  
Facility Name: Veolia ES Technical Solutions, L.L.C.  
Facility ID: FL0 000 207 449  
DEP Application No.: 0071455-HO-013

Dear Mr. Ditter:

Thank you for your application for renewal permit for the above referenced Facility. The Department has assigned DEP Application No. 0071455-HO-013 to the application. A Department staff review of the application and supporting documentation submitted on March 28, 2016, indicates the application is incomplete. Pursuant to the provisions of Rule 62-730.220 F.A.C. and Rule 62-730.220(6), F.A.C., please provide the information in the attached document and refer to this correspondence in your response. The response to this correspondence must be signed, sealed, and dated by a registered Florida Professional Engineer.

In order for the Department to continue processing your application, please submit the requested information as soon as possible. The Department must receive a response within 30 days of the date of this letter, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application. You are encouraged to contact this office to discuss the items requested to assist you in developing a complete and adequate response.

Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us) with a copy to [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us). If the file is very large, you may post it to a folder on this office's ftp site at: [ftp://ftp.dep.state.fl.us/pub/incoming/DWM/\[name of folder\]](ftp://ftp.dep.state.fl.us/pub/incoming/DWM/[name of folder]). After posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to

Phillip Ditter, EHS Manager

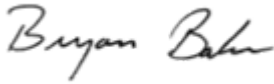
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April 29, 2016

[Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us), alerting us that it has been posted.

If you have any questions, please contact b by telephone at 850-254-8781 or by e-mail at [Bheem.kothur@dep.state.fl.us](mailto:Bheem.kothur@dep.state.fl.us).

Sincerely,

A handwritten signature in cursive script that reads "Bryan Baker".

Bryan Baker, P.G.  
Environmental Administrator  
Florida Department of Environmental Protection

cc:

*Mathew Melott, Veolia ES Technical Solutions, L.L.C. [Mathew.melott@veolia.com](mailto:Mathew.melott@veolia.com)*

*Aaron Mitchell, FDEP Northwest District, [aaron.mitchell@dep.state.fl.us](mailto:aaron.mitchell@dep.state.fl.us)*

*Ashanti McBride, OGC Tallahassee, [Ashanti.mcbride@dep.state.fl.us](mailto:Ashanti.mcbride@dep.state.fl.us)*

*Dawn Cinquino, FDEP Tallahassee, [dawn.cinquino@dep.state.fl.us](mailto:dawn.cinquino@dep.state.fl.us)*

*Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)*

Attached: List of Requested Information

### **Attachment: List of Requested Information**

Facility Name: Veolia ES Technical Solutions, L.L.C.

Facility ID: FL0 000 207 449

DEP Application No.: 0071455-HO-013

#### **General Comments:**

1. Editorial Note: the Permit Renewal Application contains numerous spelling and grammatical errors.
2. Attachments D5 through D8 contain multiple subsections which can be confusing. We recommend adding a Table of Contents to each of these Attachments for ease of referral.

#### **Specific Comments:**

##### **Part I – General Permit Application**

###### **A – General Information:**

3. Page 11, #2: Type of application indicates that this is a modification to the existing permit. The submitted application is a renewal, not a modification. Please note for future submittals that the modification box should not be checked for renewals.
4. Page 11, #3: Revision number left blank. As this submittal was the first application submitted during this renewal, “Revision” number should be “00”.
5. Page 12, #12: Facility owner’s name is cut off. Please provide the complete name.

###### **B – Site Information:**

6. Page 14, #3: Please attach a topographic map drawn to scale (1:2000) that shows the required items noted in the permit application instructions.
7. Site Plans Figure 1, 2, 7, and 8 do not indicate the location of the Satellite Accumulation Area for punctured Aerosol can waste that was observed during the recent facility inspection conducted by the FDEP and EPA. Please identify the Satellite Accumulation Area for punctured Aerosol on all site plans.

###### **Attachment D-5 - Operations Plan:**

8. Page 15 of 43, 5.4.2.2 Automated Recycling Systems, paragraph 2: Please correct the following in-complete sentence, “Where this activity does not alter the mercury containing portion of the lamp and is done at either the staging point for the in-feed conveyor or adjacent to the HID processing area.”
9. Figure 5.5: The descriptive text for Storage Area #4 on page 29 of 43 was changed in this renewal to state that the northern two rows of pallets store only four pallets instead of five. Figure 5.5 does not show this recent change in the number of pallets stored in the northern two rows of Storage Area #4. Please update Figure 5.5 to reflect changes in the text.
10. Page 16 of 43, 5.4.3.1. Manual Processing: The abbreviation CFL is not explained in the text. The location of the CFL Processing Area is also not identified on a figure. Please

clarify in the text what this abbreviation means and illustrate on a figure the location of the CFL Processing Area.

11. Page 25 of 43, 5.5.5. Internal Mercury Vapor Monitoring: A sample Mercury Vapor Monitoring Form was to be included in Appendix D-5-II. The form is missing. Please include the form.
12. Page 28-30, 5.6.1 through 5.6.5 Storage Areas: The descriptions and provided calculations for the Storage Areas are confusing. The descriptions discuss total number of pallets; however, the calculations use pallet spaces which include two pallets per space. The calculations do not indicate that pallet spaces are being used. Please identify in the calculations that you are using pallet spaces in the last line, not pallets.

Attachment D-6 – Contingency Plan:

13. Page 2 of 19, 6.5.3 Reporting Procedures Emergency for Personal: In section 3, Mercury Reclamation/Recovery & Storage Areas, why is the break room, office, and locker room/shower listed under this section? It is not clear if you are listing all the areas within your facility or only certain areas. Please clarify.
14. Page 9 of 19, 6.8 Emergency Equipment: According to Figure 6.3, there are no fire extinguishers in the South Building. In the previous application for this facility, fire extinguishers were identified in this building. Per 40 CFR 264.52(e), the location of emergency equipment, such as fire extinguishers, should be identified. Please clearly show the locations of all fire extinguishers in the South Building.

Attachment D-8 – Quality Control Plan:

15. Page 1 of 15, 8.1 Introduction, paragraph 2: The Air Monitoring Plan is not contained in Section 4. Perhaps, you meant Attachment D-5, Operations Plan. Please review and revise as appropriate.
16. Pages 1-8, 8.2 Incoming Waste Analysis Plan: Large portions of this section of Attachment D-8 contains the same information as found in Attachment D-5, Operations Plan, page 6 through 12. Although the language between these two sections is very similar, there are some discrepancies. For example, MC-LABPACK is listed as a code in Attachment D-5, but crossed through in Attachment D-8. Also, "Date(s) accumulation began" is listed in Attachment D-5, but crossed through in Attachment D-8. Further, Rejection Procedures for incoming waste are included in Attachment D-5 but not provided in Attachment D-8. Please review these two sections so that the application clearly reflects accurate information.
17. Page 9 of 15, 8.3.3. Testing Frequency – Mercury Recover Operations: The average total mercury concentration for materials generated at this facility is less than 4mg/kg. Per Rule 62-737.840(3)(a), F.A.C., a facility shall ensure that processed materials have less than 3 parts per million (ppm or mg/kg) of "average mercury" during each consecutive 12 week time period of operations, and less than 5 ppm of total mercury as reported in the

- “weekly composite sample of process operations.” Please explain if the average total mercury concentration reported is an “average mercury” or “weekly composite sample”.
18. Page 9 of 15, 8.3.3. Testing Frequency – Mercury Recover Operations: Please explain how you arrived at a TCLP for mercury of 0.2 mg/L.
  19. Page 9 of 15, 8.3.3 Testing Frequency – Mercury Recover Operations, Table: In Table 8.1, Plastics is footnoted for total mercury testing but is not footnoted for TCLP testing. Please explain.
  20. Page 14 of 15, 8.6 Sampling Equipment Decontamination (Cleaning): Cleaning procedures listed in this section are missing several steps, including nitric acid solution rinse and deionized water rinse. Please refer to page 11 of the “Standard Operating Procedures for Sampling at Facilities Permitted Under Chapter 62-737, F.A.C., November 14, 1997 Revision” found in Appendix D-8-II of the application. Please review the referenced document and revise this section to include the missing steps.

Attachment D-9 – Closure Plan:

21. Table 9.3, Closure Cost Estimates: Closure cost estimates decreased from “\$298,696.86” in the current permit to “\$261,820.80” in this renewal application. Details that were provided showed increases or decreases in the Maximum Inventory for several items. Please explain why these inventory changes occurred. Additionally, in Decontamination Activities - Phase III, air sampling for mercury decreased from a total cost of \$9,012 to a total cost of \$325. Please explain the reduction in this cost.

Attachment D-12-Inspection Plans

22. The Weekly Inspection Checklist for the Storage areas does not have a space for the number of containers in storage. Please add this to the checklist.