

From: Curtis, Jeffery S
To: [Russell, Merlin](#)
Subject: RE: SK Tampa question-updated info
Date: Tuesday, November 15, 2016 10:03:14 AM

Hi Merlin,

I checked all of my electronic files, and also checked files at the Tampa branch while I was there this week. I could not find any documentation that the EPA responded to the RFI workplan regarding the old dumping ground.

Jeff

From: Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]
Sent: Thursday, October 27, 2016 12:39 PM
To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Subject: RE: SK Tampa question-updated info

Don't spend a lot of time. Just focus on the time between the application and permit issuance.

I see that I had asked EPA to see if they had anything in their files, back when the septic tank issue came up. I don't see that EPA ever found documentation. I'm inclined to simply reference the 2002 permit as the basis for the NFA. Having said that, if you find a letter, please send a copy.

merlin

From: Curtis, Jeffery S [<mailto:Jeff.Curtis@safety-kleen.com>]
Sent: Thursday, October 27, 2016 12:35 PM
To: Russell, Merlin <Merlin.Russell@dep.state.fl.us>
Subject: RE: SK Tampa question-updated info

Merlin,

I will begin checking for anything on my end regarding SWMU-11. Let you know if I find any documentation for NFA.

Thanks,

Jeff

From: Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]
Sent: Wednesday, October 26, 2016 10:38 AM
To: Curtis, Jeffery S <Jeff.Curtis@safety-kleen.com>
Subject: RE: SK Tampa question-updated info

Jeff,

I have an update (attached). It looks like when the permit was issued for your May 2001 Application, SWMU-11 was placed on the NFA Table. So, it looks like a decision was made sometime between May 2001 and March 2002 that moved SWMU-11 from awaiting EPA comments to an NFA. This narrows the timeframe for looking for any missing documentation on SWMU-11. If you cannot find any additional documentation, I'll reference the permit as the document memorializing the NFA.

BTW, I now seem to recall this issue coming up when we first started working on SWMU-21 (septic tank) because SWMU-21 was located on top of an existing SWMU. I'll see if I have any notes from that time.

merlin

From: Russell, Merlin

Sent: Tuesday, October 25, 2016 4:17 PM

To: Curtis, Jeff <Jeff.Curtis@safety-kleen.com>

Subject: SK Tampa question

Jeff,

While awaiting internal discussions on your response to our CUP comments, I have started drafting the permit. Just trying to get ahead. Because my Plan A is to retire in about three years, I am trying to get everything in order with all of my facilities and wrap up as many loose ends and closures as possible. Having said that, I need your help on SWMU-11 Old Dumping Grounds. Attached is the last documentation I can find in OCULUS. Admittedly, OCULUS does not have every document in it that should be there.

According to SK's May 2001 renewal (attached) EPA had not yet commented on the RFI Workplan ECT had submitted in September 1994! What I am looking for is an EPA (or maybe DEP) letter moving SWMU-11 to an NFA. Any chance you can check through your operating records and see if you can find out what happened? If you have the document(s), I'd like electronic copies so that I can enter them into OCULUS. No *immediate* rush because but I'd like to clean that up and get the documentation into the permit this time. However, I hope we can have a draft permit to you next month to review.

Call if you wish to discuss.

Thanks,

merlin

Merlin D. Russell Jr.

Professional Geologist III

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