

From: [Yuri Turovsky](#)
To: [Buselli, Bradley](#)
Cc: [Baker, Bryan](#); [Fellabaum, Pamela](#)
Subject: RE: FLD 981-928-484 Tank Closure Notification
Date: Thursday, December 21, 2017 2:01:20 PM
Attachments: [image001.png](#)
[image002.png](#)
[Tank Closure Schedule 2017 - Revised 12-20-17.doc](#)

Mr. Buselli,

We appreciate the detailed response that you provided. Attached please find a revised scope of work and schedule.

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

This e-mail is confidential and is intended for the use of the addressee(s) only. If you are not its intended recipient you are hereby notified that you must not use, copy, disclose or otherwise disseminate or take any action based on this e-mail or any information herein. If you receive this e-mail in error, please notify the sender immediately by reply e-mail or by using the contact details above and then delete this e-mail.



From: Buselli, Bradley [mailto:Bradley.Buselli@dep.state.fl.us]
Sent: Friday, December 15, 2017 3:39 PM
To: Yuri Turovsky
Cc: Baker, Bryan; Fellabaum, Pamela
Subject: RE: FLD 981-928-484 Tank Closure Notification

Good Afternoon Mr. Turovsky,

The request for your tank closure project was received by our Environmental Administrator (Bryan Baker) as of Wednesday December 13, 2017. The notification provided on November 2, 2017 should have also been sent directly to the Administrator, as opposed to Bheem Kothur (on extended leave since August 2017). I do apologize for any delay this has caused in processing your request.

Per your current permit, "the Permittee shall submit documents related to renewal permit and/or modifications to the addresses in the General and Standard Condition 17 (a) and (b) of this permit."

The initial email and attached scope of work is sufficient notification to the Department to

commence with your project. However, please note that PART V – CLOSURE CONDITIONS (paragraph 1, section a) of your current permit states that the “testing of residue in the tanks *including UO and PCW*” must occur; all residue must be characterized so that hazardous residues can be properly disposed of according to the approved closure plan. Without testing, there is no way to determine if they are hazardous or non-hazardous. Additionally, the comingling of residues for analysis is not permitted; if the results were to determine the presence of a hazardous residue, you would have no way to differentiate which associated tank, equipment, and residues needed alternative disposal methods.

It may be helpful to reference the approved LES Closure Plan – Schedule of Analytical Methods (see Permit Application submittal) for more details on performing the analysis of tank residues. Attachment C.9 page 4 states that “tank residues will be analyzed according to the nature of the material. If the residue contains significant amounts of recoverable oil, analysis may be limited to EPA 8023.” Note that this EPA testing method was revised to state EPA 9023 in the 2017 Permit Application submittal documents.

The attached Tank Closure Schedule indicates that residue in Tanks 4A and 4B will be tested, but does not address the testing of residue in Tanks 3A and 3B. Please submit an updated schedule and scope of work that addresses testing methods for Tanks 3A, 3B, 4A, & 4B and provide new dates for closure activities. In addition, please submit a formal request for minor permit modification along with the closure report submittal; which includes an updated Site Map and Tank Table to be inserted into the permit. Note that there is no fee associated with this minor permit modification request. Please refer to PART V – CLOSURE CONDITIONS (paragraph 1, section e) of your permit for specific documentation requirements needed for the closure report submission.

Respectfully,



Bradley Buselli
Environmental Specialist III
Hazardous Waste Program & Permitting
Florida Department of Environmental Protection
2600 Blair Stone Road, MS 4560
Tallahassee, FL 32399
Bradley.Buselli@floridadep.gov
Office: 850.245.8989

From: Yuri Turovsky [<mailto:yuri.turovsky@liquidenviro.com>]
Sent: Friday, December 15, 2017 10:26 AM
To: Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>
Cc: Baker, Bryan <Bryan.Baker@dep.state.fl.us>
Subject: RE: FLD 981-928-484 Tank Closure Notification

Brad,

Please give me direction for my tank closure project. I have to move forward ASAP.

Thanks,

YT

From: Yuri Turovsky
Sent: Wednesday, December 13, 2017 11:45 AM
To: Buselli, Bradley
Subject: RE: FLD 981-928-484 Tank Closure Notification

Brad,

Please go over my questions below and give me direction. I really have to complete this project before the end of the year and I need your regulatory input.

Please let me know if you want me to call you to discuss it.

Thanks,
YT

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

This e-mail is confidential and is intended for the use of the addressee(s) only. If you are not its intended recipient you are hereby notified that you must not use, copy, disclose or otherwise disseminate or take any action based on this e-mail or any information herein. If you receive this e-mail in error, please notify the sender immediately by reply e-mail or by using the contact details above and then delete this e-mail.



From: Yuri Turovsky
Sent: Tuesday, November 28, 2017 11:03 AM
To: Kothur, Bheem
Subject: FW: FLD 981-928-484 Tank Closure Notification

Bheem,

I hope you are doing well.

Below is a notification for tank closure that I submitted to you earlier. We are in process of cleaning the tanks and should be ready to start on demolition within a week.

I have reviewed the regulations and our closure plan again, and I need a clarification from you on the following questions..

1. We are planning to only close the tanks listed below and continue with the plant operations. So we are processing the tank residues internally as we do routinely with periodic tank cleaning. Since we are not sending anything offsite, do we have to run the TCLP analysis? If so, each tank separately or commingled?
2. The scrap metal will be sent offsite after the tanks are triple rinsed. The rinsate will be processed internally. Do we have to collect samples of rinsate and run TCLP again? If so, each tank separately or commingled?

The lab analysis cost is significant and I want to make sure we only do what is necessary to meet the regulatory requirements. Please let me know and we will do whatever we have to do.

Thank you so much for your help.

YT

From: Yuri Turovsky
Sent: Thursday, November 02, 2017 11:26 AM
To: Kothur, Bheem
Subject: FLD 981-928-484 Tank Closure Notification

Dear Mr. Kothur,

According to the requirements of Used Oil Permit 72815-HO-012, LES is providing this notification and the attached scope and schedule of the closure and removal of Tanks 3A, 3B, 4A, and 4B. These tanks and associated piping will be removed from the site and the location will be made available for the drum handling and additional processing units to be determined in the future.

Please let me know if this is acceptable and we will proceed with the closure.

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

This e-mail is confidential and is intended for the use of the addressee(s) only. If you are not its intended recipient you are hereby notified that you must not use, copy, disclose or otherwise disseminate or take any action based on this e-mail or any information herein. If you receive this e-mail in error, please notify the sender immediately by reply e-mail or by using the contact details above and then delete this e-mail.



		
		
		