From: Kevin Roberts
To: Knauss, Elizabeth
Subject: Re: Hazardous Waste Inspection
Date: Tuesday, February 20, 2018 11:57:02 AM
Attachments: t4460scan070232.pdf

Elizabeth,

Attached are Manifest's for 2017 & 2018, I was mistaken when I said we were using track 2 for Haz-waste-fuel. It is still on track 4 when we have a r/c to load, About one per month on average.

Thanks,

Kevin R. Roberts
Terminal Manager (TRANSFLO Division)
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"HOME SAFE TONIGHT"

From: Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>
Sent: Monday, February 19, 2018 4:38:43 PM
To: Kevin Roberts
Subject: Hazardous Waste Inspection

Hi, Kevin – I need to follow up on a couple of items from last week's inspections.

I spent so much time reviewing the transfer facility records, I neglected to ask you for your most recent hazardous waste and used oil disposal records. Can you forward me copies of the 2017 and 2018 disposal records? Or the last 4 manifests, whichever is fewer.

In addition, I needed to check an item in our transfer facility rules and my previous inspection report. I thought during the last inspection you were using track 4 for loading hazardous waste. During this inspection, you said you were using track 2 for both hazardous waste and used oil – is this correct? Track 2 is within 50 feet of your northern property line, and therefore this does not comply with 40 CFR 265.176, which was adopted by reference in our transfer facility rule, FAC Code Rule 62-730.171(4)(a).

The generator improvements rule will be providing some relief from this rule for large quantity generators, but the text in Part 265 has not changed, and therefore this will not benefit transfer facilities.

Please let me know how you want to proceed on this issue. The 50 foot setback only applies to hazardous waste, not used oil.

Thanks,

Elizabeth Knauss
Environmental Consultant
Southwest District
Florida Department of Environmental Protection
813/470-5902

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