



Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

March 16, 2007

SENT VIA EMAIL

greg.newton@veoliaes.com

Greg S. Newton, EHS Manager
Veolia ES Technical Solutions, L.L.C.
342 Marpan Lane
Tallahassee, Florida 32305

SUBJECT: Veolia ES Technical Solutions, L.L.C.
Permit Renewal Application
EPA I.D. Number: FLO 000 207 449
Permit Number: 71455-HO-007

Dear Mr. Newton:

The Department of Environmental Protection (Department) has completed its review of the renewal permit application dated May 2006 and subsequent submittal dated January 17, 2007 for Veolia ES Technical Solutions, L.L.C., Tallahassee, Florida. The Department has determined that the renewal permit application is complete and the Department will proceed with the drafting of the renewal permit.

For your information, enclosed is a copy of the letter from Dr. Stephen M. Roberts, University of Florida, which recommends use of the ATSDR and USEPA action levels for mercury air samples.

Please contact Rabin Prusty at (850) 245-8780, e-mail: rabin.prusty@dep.state.fl.us or Bheem Kothur at (850) 245-8781, e-mail: bheem.kothur@dep.state.fl.us if you have any questions.

Sincerely,

Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp
Enclosure

cc: Jeff Pallas, EPA/Region 4 pallas.jeff@epamail.epa.gov
James Byer, DEP/Pensacola james.byer@dep.state.fl.us
John L. Price, DEP/Tallahassee john.l.price@dep.state.fl.us
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Center for Environment & Human Toxicology

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Hazardous Waste Regulation

PO Box 110885
Gainesville, FL 32611-0885
352-392-4700, ext. 5500
352-392-4707 Fax

February 5, 2007

Tim Bahr
Hazardous Waste Regulation
Florida Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

FEB 7 2007

Re: Veolia ES Technical Solutions, L.L.C.

BY: BSHW

Dear Mr. Bahr:

At your request, we have reviewed the *Response to FLDEP Notice of Deficiency*, provided in a letter from Greg Newton of Veolia ES Technical Solutions to Bheem Kothur of the Florida Department of Environmental Protection dated December 15, 2006. Basic elements of this response include agreement to use air sample criteria recommended in a guidance memo we wrote May 18, 2006, as part of the residential closure standards for their facility. Veolia disagrees with using the wipe sample criteria provided in the same guidance memo, however, arguing that they are more conservative than is needed for protection of human health and the environment.

As we pointed out in the May 18, 2006 memo, the principal pathway of exposure for elemental mercury contamination in a building is by inhalation. Elemental mercury readily volatilizes from contaminated surfaces, and the absorption of inhaled elemental mercury is extensive. In contrast, absorption of elemental mercury after direct contact (i.e., dermal absorption, as well as gastrointestinal absorption after hand-to-mouth activities) is negligible. In order to be protective of inhalation exposure, we continue to recommend use of the ATSDR and USEPA action levels of $1.0 \mu\text{g}/\text{m}^3$ for a residence and $3.0 \mu\text{g}/\text{m}^3$ for an occupational setting. We see little value in imposing additional criteria based on surface wipes. In addition to representing minor routes of exposure (dermal and ingestion), surface wipe criteria have technical limitations discussed in the May 18 memo, including a high degree of uncertainty in estimating intake from hand-to-mouth activity. These limitations make regulatory use of the surface wipe criteria tenuous. Application of air criteria alone should be fully adequate to insure health protective closure of buildings.

Please let us know if you have any questions regarding our recommendations.

Sincerely,

Stephen M. Roberts, Ph.D.

Leah D. Stuchal, Ph.D.

cc: Ligia Mora-Applegate, FDEP

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