From: Perry, Jenna D.
To: "John Anderson";
Subject: RE: FDEP inspection of ERS on 2/8/11
Date: Monday, February 14, 2011 9:46:00 AM

Thanks for the quick response John. Please see my response, in **bold blue**, to your comments below.

Regards,
Jenna Perry
Environmental Specialist III - Hazardous Waste
Florida Department of Environmental Protection
office: 904-256-1674 | fax: 904-448-4362

From: John Anderson [mailto:j.anderson@ersfl.com]
Sent: Thursday, February 10, 2011 5:16 PM
To: Perry, Jenna D.
Cc: 'Louis Renteria'
Subject: RE: FDEP inspection of ERS on 2/8/11

Jenna,
We will review these findings with our staff and make adjustments to correct these issues.
See ERS reply below in RED.
Have a safe weekend.

Thanks,

John Anderson
Vice President/Operations

Environmental Remediation Services, Inc.
760 Talleyrand Avenue
Jacksonville, Florida 32202

Phone: (904) 791-9992 Fax: (904) 791-9992
Email - j.anderson@ersfl.com
Web - www.ersfl.com

From: Perry, Jenna D. [mailto:Jenna.D.Perry@dep.state.fl.us]
Sent: Thursday, February 10, 2011 2:55 PM
To: j.anderson@ersfl.com
Subject: FDEP inspection of ERS on 2/8/11

Mr. Anderson,
Thanks again for your help during my inspection on Tuesday. As promised, here is a re-cap of the action items needed as I know them right now:

1. The spent fluorescent tubes near the storage room need to all be containerized, closed, and labeled "Used Mercury Lamps" or something similar. These were repacked on 2/8/2010 and shipped today. **No further action required.**

2. Three used oil records did not have the EPA ID number for the receiving facility (record numbers 10272, 10271, and 10280). One of those same records did not have ERS's EPA ID number on it either (record 10271). This Information has been added to the manifests. **Please be sure that this information is on all future used oil records.**

3. Used oil records did not have the used oil type code designation or the end use code (see table below for the full list of choices). According to Section 62-710.510, FAC, transporters should maintain used oil records on DEP Form 62-710.901(2) (form instructions link) or on a substantially equivalent form which contains at least the same information as the Department form. The equivalent form could be the records you guys use, they just need these two codes included. Jenna, I was confessed about this during our inspection, but we have a separate log book call used oil record where we keep the state forms and they generally show TYPE CODE "I" and END USE CODE "N". Are you saying that we should also have these codes placed on the manifest? **If it is already on another form, then no you do not have to place the codes on the manifest as well. Since I didn't see the log book during the inspection, I assumed that the disposal records were the only log you were keeping for used oil transportation. If that were the case, the codes would have to go on the manifests. I will be in the area this week, so if it's ok I'd like to stop by and take a look at your log book. I'm not sure when I'll be out yet, maybe Wednesday afternoon or Thursday, but I'll try to give you a little notice.**

TYPE CODE
A - Automotive: Includes spent engine oil from cars, trucks, trains, boats, planes, farm equipment and other off-road automotive engines as well as such related automotive lubricants as transmission fluids, brake fluids, and gear lubricants. **I - Industrial:** Includes spent oils from industrial operations such as compressor turbine and bearing oils, hydraulic oils, metalworking oils, gear oils, electrical oils, refrigeration oils, tank bottoms, industrial process oils, and oil from ships. **M - Mixed:** means a mixture of industrial and automotive oils. This term should be used only when it is impossible to determine the type of oil when its source is considered

END USE CODE
N - Not an end use. Shipment transferred to another facility **O** - Marketed as an on-specification used oil fuel. **F** - Marketed as an off-specification used oil fuel. **B** - Burned as an off-specification used oil fuel. **I** - Marketed for an industrial process (includes processing into asphalt, use in phosphate mining beneficiation, processing lube base stocks by re-refining, and use a form or chain oil. **D** - Disposal, including bottom sediments, water or other oily wastes and oils taken to a disposal site, or disposed of on-site.

Other questions:

1. You stated that your SOP for used oil is to collect a sample of the oil, take it to LES for approval, then you pick it up from the customer. Do you keep a copy of the LES test/approval paper? We don't generally request a copy of any test results but we are usually issued an approval number. We will request a copy of the paper work in the further and try to keep it along with the manifest. **Thanks, these test results are required to be kept as part of the rebuttable presumption provision of 40 CFR 279.44.**

2. Can you get a copy of the profile for the petroleum impacted soils from LES? This profile is for oily waste water/solids and we also use for materials we washed out of our truck that may have previously be shipped to LES. The profile number " IWS # 015391" we use for this has been around for some time, back to the IWS days, but we will be updating it soon. **I would still be interested in seeing the profile for this waste stream if you can get your hands on it.**

Also, a reminder about PCW containers – if you bring containers back to your facility be sure to keep them labeled, dated, and inspect them on a weekly basis (written inspection checking for leaks and deterioration) [Rule 62-740.200(4), FAC]. We will review this procedure with our crew as well. **Thanks**.

Please respond to me, in writing, regarding each of the above items. If you have any questions, please let me know.

Thanks again,

Jenna Perry
Environmental Specialist III - Hazardous Waste
Florida Department of Environmental Protection
office: 904-256-1674 | fax: 904-448-4362

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