

Perry, Jenna D.

From: Perry, Jenna D.
Sent: Tuesday, May 31, 2011 12:44 PM
To: 'Dave.Strickland@RingPower.com'
Subject: RE: Question

Dave,

Q1: Satellite drum dating policy

Per 40 CFR 262.34(c), a 55-gallon satellite drum does not require a date until an excess of 55 gallons has been generated. When a generator accumulates more than 55 gallons, the generator must mark the container with the date on which 55 gallons is exceeded. That being said, I think it's a good idea to mark the satellite drum with the date the waste was first placed into the drum. It is not required and it does not trip the 180-day accumulation time limit for SQGs, but it's helpful in determining generation rates.

Q2: Drum recycling

Who to contact would really depend on what the drum recycling company wants to do. It would most likely be hazardous waste, but without more information I couldn't say definitively.

Sorry this took so long, I've been out of the office almost every day this month. Hope you enjoyed your Memorial Day.

Regards,

Jenna Perry

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

From: Dave.Strickland@RingPower.com [<mailto:Dave.Strickland@RingPower.com>]

Sent: Tuesday, May 24, 2011 1:00 PM

To: Perry, Jenna D.

Subject: RE: Question

Thanks

▼ "Perry, Jenna D." <Jenna.D.Perry@dep.state.fl.us>

"Perry, Jenna D."
<Jenna.D.Perry@dep.state.fl.us>

05/24/2011 09:03 AM

To "Dave.Strickland@RingPower.com"
<Dave.Strickland@RingPower.com>

cc

SubjectRE: Question

Hi Dave, I didn't want you to think I was ignoring you, I'm looking into your drum recycling question. I'll get back with you this week.

Thanks for your patience.

Jenna Perry

Environmental Specialist III - Hazardous Waste

Florida Department of Environmental Protection

office: 904-256-1674| fax: 904-448-4362

From: Dave.Strickland@RingPower.com [<mailto:Dave.Strickland@RingPower.com>]

Sent: Thursday, May 19, 2011 9:52 AM

To: Perry, Jenna D.

Subject: Question

I have two questions.

Recently we had someone question our satellite drum dating policy and I need to know the proper procedure. We have always put the start date on the drum when it was put in use. When the drum was full and removed from use. It was sealed and a second date was put on the drum. It was this final date that started the accumulation clock ticking. We were told that no date is required on the drum while it is being used as collection site and that only the final date of removal from service is needed.

I have been contacted by a drum recycling company operating with in the state and I would like some information concerning their operation. Is this something that would come under your division? If not what division of the DEP would I contact to discuss this operation?