

Honey, Kelly

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**From:** Honey, Kelly  
**Sent:** Thursday, December 24, 2009 4:14 PM  
**To:** 'Randall\_Strauss@doh.state.fl.us'  
**Cc:** Dregne, James; 'Joseph\_Sowers@doh.state.fl.us'; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Hi Randy,

The sludge drying area / solid waste processing pad is designated as a containment area, but in the application it says the volume is "N/A" because there are no regulated storage tanks. (It says the same thing for the water treatment tanks' containment area.)

It is my understanding that we have allowed them to use the fluid capturing system in this area as secondary containment, but to my recollection, it hasn't come up as an issue during any of my inspections. I suppose it could have been formally negotiated in an Order or something, but I don't think so. I think it's been more of an understanding that any spilled fluids would be collected for processing and that the system could handle it. Jim will be back from vacation next Monday (01/04/10), and he's more knowledgeable about the facility than I am. Frankly, after reviewing their permit this afternoon, I want to discuss it with him myself to make sure we (i.e., the Department) are okay with them using this area as a transfer area, and that we are okay with its designation as a containment area without them providing a volume or capacity of the fluid collection system.

Let me know if you need any more info. I will be around for a while today, but I will be on vacation all next week.

-kelly

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**From:** Randall\_Strauss@doh.state.fl.us [mailto:Randall\_Strauss@doh.state.fl.us]  
**Sent:** Thursday, December 24, 2009 3:30 PM  
**To:** Honey, Kelly  
**Cc:** Dregne, James; Joseph\_Sowers@doh.state.fl.us; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557

Kelly,

The tankers are located in the area labeled "Sludge Drying Bed #2" - I take from your discussion that this area "maybe" meets your requirements for secondary containment? I seem to remember that this area may meet some solid waste definition of containment (or perhaps it was negotiated in a CO and/or granted an Alternate Procedure) because it directs any liquid to a collection sump where it is then pumped to the plant that is contained - perhaps that is why a containment volume is not specified?

Randy

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**From:** Honey, Kelly [mailto:Kelly.Honey@dep.state.fl.us]  
**Sent:** Thursday, December 24, 2009 2:57 PM  
**To:** Strauss, Randall  
**Cc:** Dregne, James; Sowers, Joseph; Meetze, Alison; Culbreth, Laurel; Knauss, Elizabeth  
**Subject:** RE: Howco 8624557