From: Tripp, Anthony
To: "Wyluda, John H."; Kothur, Bheem;
cc: Lennon, John P. Jr;
Subject: RE: Triumvirate Environmental Florida used oil permit renewal application
Date: Friday, January 11, 2013 11:27:00 AM

John,

I have added comments (in red) to the items below to correspond to what we discussed on the phone January 10, 2013.

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

From: Wyluda, John H. [mailto:jwyluda@triumvirate.com]
Sent: Tuesday, January 08, 2013 2:59 PM
To: Tripp, Anthony; Kothur, Bheem
Cc: Lennon, John P. Jr
Subject: RE: Triumvirate Environmental Florida used oil permit renewal application

Hi Anthony,

Attached are the responses to the following questions. I am getting question 4 signed and we will submit that shortly.

2 – Updated the latitude Okay.
3 – pending Noted (for future reference this is Item 4).
6 – added the following phrase "Used oil is processed at the facility utilizing proprietary physical and chemical methodologies. Used oil is separated from water by allowing the material to settle, it is then heated and in addition chemical separation is also utilized (MSDS sheets supplied for chemical additives). Used oil and non-hazardous waste are tested in accordance with the facility's Waste Analysis Plan (Located in Attachment E)." As we discussed, it is not so much your process that is proprietary, but the chemicals added during the process. Therefore, go ahead and describe the general physical processes used to process the used oil and mention that proprietary chemicals are added during the process. Then provide the MSDS sheets for those chemicals.

18 – Attached a new map with safety equipment on it This map needs to include most of the items listed in table of Appendix C of Attachment I of the permit application. I do not need to see where empty drums or pressure washers are

stored. The map and Appendix C also need to correspond with regards to quantities. You stated that one of your eye wash stations does not work. That should be repaired or explain why it is not needed and then remove that station.
22 – Provided Attachment I (text) Appendix A: Need to provide copies of the correspondence documents with local authorities.
25 – updated Section 3.1, 3.2, 6.1, 6.2 of the closure plan Sections 3.2, 6.1, and 6.2 still need characterization language stating that waste materials generated during the closure process will be characterized to demonstrate they are not hazardous wastes.
26 – updated section 3.3, 6.2 Okay.
27 – updated 6.2 to state that a minimum of 4 soil samples will be taken per containment area Okay.
28 – added the length of time that training records will be retained Okay.
29 – attached tank 1's in inspection. Also, the tanks were painted in after the inspection and they are on the list to be painted again Okay.
32 – The application satisfies this question, including attachment C Okay.
33 – Added numbers to the appendix in the table of contents. For future application submittals, the entire document needs to be paginated so that each page has a unique identifier which can be cited for reference purposes. The current application does not meet this standard, but at this point in the renewal process it is not worth the effort to have that done.
34 – provided a cleaner piping diagram. Need a diagram that clearly shows the piping that is used to transfer used oil from Point A to Point B during the used oil processing procedure. This should also include pumps and valves. The diagram will need to have sufficient detail so that an inspector can use the diagram to determine how used oil is being transferred within the facility.

From: Tripp, Anthony [mailto:Anthony.Tripp@dep.state.fl.us]
Sent: Friday, December 14, 2012 4:27 PM
To: Wyluda, John H.
Cc: Lennon, John P. Jr
Subject: Triumvirate Environmental Florida used oil permit renewal application

John,

I am filling in for Bheem Kothur while he is on annual leave during December. In reviewing your November 20, 2012 response to our October 19, 2012 request for additional information, there are a number of items that are still needing to be addressed. The original attachment to the October 19, 2012 request for additional information has been attached to this document. In that document, items for which sufficient information has been received have been stricken. Items for which additional information is still required are followed by

comments in red describing what is still required.

Give me a call when you have had the opportunity to review these documents and we can discuss any items that you would like clarified.

I will talk with you next week.

Tony

Anthony R. Tripp, Ph.D., P.E.
Professional Engineer III
Hazardous Waste Regulation Section
(850) 245-8766

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