From: Kothur, Bheem
To: Mayberry, Eric;
Subject: FW: Triumvirate Environmental (Florida) Inc draft permit for review April 3 2013 (3) (2) (4) (2).doc
Date: Monday, April 08, 2013 4:25:14 PM
Attachments: Comments.docx

Hi Eric,
Please insert the Attachment into OCULUS under permit application related documents including this e-mails.

Subject: Draft permit comments.
Facility I.D: FLD 981 018 773

If you have any questions, please let me know.
Thanks.
Bheem

From: Wyluda, John H. [mailto:jwyluda@triumvirate.com]
Sent: Thursday, April 04, 2013 2:10 PM
To: Kothur, Bheem; Martin, Lee; Ciaravella, Philip; Lennon, John P. Jr; Barry, Richard M.; LoRusso, Christopher M.; Green, James F.
Cc: Winston, Kathy
Subject: RE: Triumvirate Environmental (Florida) Inc draft permit for review April 3 2013 (3) (2) (4) (2).doc

Bheem,

Shawn Lennon and I reviewed the draft permit and have the following questions/comments. We are particularly interested in our comments 4 and 6. Comment 4 is in regards to testing outbound loads of oil every 100,000 gallons, or twice per month, instead of testing every outbound load. Comment 6 is in regards to Section V of the permit - our operation is to consolidate non-hazardous material, including latex paint and non-hazardous solids, that do not contain oil contaminated solid wastes. Triumvirate does not only consolidate oil contaminated solid wastes.

In addition our corporate compliance department is reviewing the draft permit and will follow up with additional comments.

1. The application itself is for Triumvirate Environmental Florida I.D. Number FLD 981 018 773. The header information is for FCC Environmental, not Triumvirate Environmental.

2. Page 2 of 24: *Hazardous waste in transit to permitted treatment, storage, and disposal facilities may be staged for* ***less than ten days*** *at a specified location at the facility during the transportation process.*
<u>If possible can we change less than ten days to “no more than ten days”</u>

3. Page 9 of 20 *To prevent overflow, the Permittee shall notify the Department when the volume of the used oil stored in any of the tanks exceeds ninety-five (95) percent of the*

maximum storage capacity of the tank as specified in Section 1 of the permit application and Attachment B of the permit.
Tanks cannot be filled to capacity?

4. Page 12 of 24, number 45D. *Analyze, prior to shipment, all outgoing shipments of used oil for the parameters listed in the permit application to determine whether the used oil is on-specification of off-specification.*
The application states that we test the oil every 100,000 gallons or twice per month, whichever is greater. As we do not have a laboratory onsite it would be very difficult to test every shipment.

5. Page 17 of 24 Number 3. *PCW received into the Facility may be commingled and stored in Facility tanks with other petroleum or used oil-contaminated water for processing and recovery"*
Tanks containing PCW should be labeled as PCW and Used oil, or just Used Oil?

6. Page 18 of 24 Part V number 1. *The facility may only accept non-hazardous, oil contaminated solid wastes that do qualify as used oil...*
The old permit read "The facility may accept non-hazardous solid wastes generated from CERCLA and non-CERCLA sites that do not qualify as used oil..." Triumvirate's operations include accepting and consolidating non-hazardous material, such as latex paint and non-regulated material. Triumvirate would like to keep the old langue and follow our Waste Analysis plan for accepting and bulking solid wastes.

7. Page 18 of 24 Part V number 1 f. *There shall be no intermediate storage of treated or untreated waste outside the covered oil tight roll-off.*
In our calculations for storing drummed waste we have allowed for drummed waste to be stored inside the secondary containments alongside the rolloff. Can closed drums be stored in secondary containment alongside the roll-off?

From: Kothur, Bheem [mailto:Bheem.Kothur@dep.state.fl.us]
Sent: Wednesday, April 03, 2013 11:57 AM
To: Wyluda, John H.; Martin, Lee; Ciaravella, Philip; Lennon, John P. Jr
Cc: Kothur, Bheem; Winston, Kathy
Subject: Triumvirate Environmental (Florida) Inc draft permit for review April 3 2013 (3) (2) (4) (2).doc

Hello Everyone, it is Urgent:
Please review and let me know you have any comments ASAP, so that we can issue this permit Intent during next week.

Lee, and John,
Please make sure that the Part V, Non-Hazardous and Non- Used Oil Waste Conditions (solid waste conditions and quantities) are addressed properly and in accordance with the submitted permit application and revised permit application and as appropriate.

Thanks for your help.

Bheem R. Kothur, P.E., DEE
Hazardous Waste Regulation
2600 Blair Stone Road, MS # 4560
Tallahassee, Florida 32399-2400

Please take a few minutes to share your comments on the service you received from the department by clicking on this link. DEP Customer Survey.