From: Tripp, Anthony
To: "Jerry Kubal"; Russell, Merlin;
cc: Stuart.Stapleton@eqonline.com; ken.dean@eqonline.com; Christopher Poole; mlee@kooglerassociates.com;
Subject: RE: EQ Substantial Mod/Modeling Update
Date: Tuesday, March 19, 2013 4:02:00 PM
Attachments: image001.png

Jerry,

Thanks for the update. Just make sure that the submission has documentation to support your contention.

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

From: Jerry Kubal [mailto:Jerry.Kubal@kci.com]
Sent: Tuesday, March 19, 2013 2:36 PM
To: Tripp, Anthony; Russell, Merlin
Cc: Stuart.Stapleton@eqonline.com; ken.dean@eqonline.com; Christopher Poole; mlee@kooglerassociates.com
Subject: EQ Substantial Mod/Modeling Update

Tony, based on your email of 2/20/13 and our follow-up conference call on 3/4/13, we have been meeting with EQ on preparing the haz waste permit renewal/app and also discussing with them the implications of modeling as it relates to substantial modification of the permit.

EQ has indicated that there is no intent to store larger quantities of the constituents to be treated than is currently the case. In other words, they have records for 2012 indicating they have stored 275 gallon totes of various constituents during the year and there is no plan to increase this individual storage capacity when they begin to treat the waste materials. In the case of ammonium hydroxide, for example, they actually plan to store less than they have in the past and will only treat dilute waste streams of this constituent, if at all.

Based on verification of these data, we do not see at this time that there will be an increase in the maximum storage of constituents and consequently no increase in the risk. If the ammonium hydroxide is handled as planned, there may actually be a slightly reduced risk.

I just wanted to give you a head's up that we are coming to the conclusion that the modeling (ala PermaFix) will not be necessary based on the waste codes and quantities of material they expect to store on site at one time.

We will be preparing a letter to this effect so that we can resolve the substantial modification/modeling issue before the permit is submitted.

Please drop me a note or call with any questions.

Thanks.

Jerry

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