From: Riffel, Bruce
To: Russell, Merlin;
cc: Desha, David; BOSEK, JOHN E; Knauss, Elizabeth; Tripp, Anthony;
Subject: RE: Clean Harbors draft HW operating permit with solid waste modification
Date: Monday, September 23, 2013 4:08:59 PM

Merlin,

Here is suggested wording for the small change in the permit, Part II.

Part II Subpart B-Specific Hazardous Waste Operating Conditions-Containers

4. ...The maximum container volume that may be placed on one pallet shall not exceed 255 gallons in drums or 330 gallons in one bulk container. ...

Let me know if this will be acceptable.

I have one other question. It concerns roll-off storage.
Page 23 section 15 says we can store non-regulated waste in permitted storage units provided the non-reg material counts against the total volume allowed to be stored in the unit.

Page 3 section 5 says capacity is 32,320 gallons four roll-offs.

We had asked that we be able to store 4 additional non-hazardous roll-offs, which would be a total of 4 haz and 4 non-hazardous roll-offs. The way I read the permit we can store non-haz roll-offs, but their volume would count against the total amount of Hazardous roll-off stored in the WMU which would mean we can store only 4 roll-offs total still.

Thanks

Bruce Riffel
Senior Compliance Manager
Clean Harbors La Porte, LLC
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La Porte, TX 77571
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From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Friday, September 20, 2013 8:25 AM
To: Riffel, Bruce
Cc: Desha, David; BOSEK, JOHN E; Knauss, Elizabeth; Tripp, Anthony
Subject: RE: Clean Harbors draft HW operating permit with solid waste modification

Bruce,

We can modify that condition. Feel free to suggest alternative language for us to consider, along with any other comments you might have.

merlin

From: Russell, Merlin
Sent: Thursday, September 19, 2013 7:13 AM
To: 'Riffel, Bruce'
Cc: Desha, David; BOSEK, JOHN E; Knauss, Elizabeth; Tripp, Anthony
Subject: RE: Clean Harbors draft HW operating permit with solid waste modification

Bruce,

I am not sure where the 255 originated but it was before my time. When I draft a permit, I generally start with your existing language and update it as needed.

Beth/Tony, as you two were around before my second tour of duty, was there a specific reason for limiting the container size to 255 gallons or can we go with the 330 gallon totes? Thanks.

merlin

From: Riffel, Bruce [mailto:riffel.bruce@cleanharbors.com]
Sent: Wednesday, September 18, 2013 4:56 PM
To: Russell, Merlin
Cc: Desha, David; BOSEK, JOHN E
Subject: RE: Clean Harbors draft HW operating permit with solid waste modification

Merlin,

I have been reviewing our draft permit and came across some language I had not noticed before.

Part II Subpart B-Specific Hazardous Waste Operating Conditions-Containers

4. …The maximum container volume that may be placed on one pallet shall not exceed 255 gallons in drums or one bulk container. …

I am wondering about totes of material. Totes normally are 275 or 330 gallons. They are on self contained pallets. The way I read this we cannot store totes in the container management units because the volume would exceed 255 gallons on one pallet in one bulk container.

If this is a correct interpretation can we have the 255 changed to 330 gallons.

We are just about finished reviewing the draft and so far have not had any other questions.

Thanks

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From: Russell, Merlin [mailto:Merlin.Russell@dep.state.fl.us]
Sent: Tuesday, September 17, 2013 7:31 AM
To: Riffel, Bruce; BOSEK, JOHN E; Desha, David; cindy@bartow-airport.com
Cc: Knauss, Elizabeth; Morgan, Steve; Tripp, Anthony; Bahr, Tim; Echevarria, Edgar
Subject: Clean Harbors draft HW operating permit with solid waste modification

Good Morning Bruce, John, Dave and Cindy,

Attached is a draft permit that includes a modification to the RCRA permit for construction and operation of a solid waste mix tub. On the HW side, we eliminated the language about T-106 not being in service because it has been replaced. Because there are no major HW changes (only elimination of previous T-106 conditions and addition of the mix tub as a SWMU), it should not take long to review this document. Please have comments to Steve and me by the close of business, next Monday, September 23. We would like to go with the Intent to Issue before the end of the month. Thank you.

Please call if you have any questions.

merlin

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