

**From:** [Kurt Fogleman](#)  
**To:** [Russell, Merlin](#); [Breland, Jabe](#)  
**Subject:** RE: Permit Questions  
**Date:** Friday, January 23, 2015 1:26:28 PM

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I wanted to clarify that the new inspection forms are still daily inspections. The old forms were completed for each individual zone, but a single form covered two weeks. The new form has a place for daily inspections for one week. I have clarified wording so that the questions are more natural with a "yes" answer indicating no discrepancies. Our plan is to attach the form to a work order that is issued at the start of each week. The work order is used to track deficiencies and corrective actions. The forms will now cover all storage areas instead of dividing it up by zone.

Thanks,  
Kurt

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**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]  
**Sent:** Wednesday, January 14, 2015 12:20 PM  
**To:** Kurt Fogleman; Breland, Jabe  
**Subject:** RE: Permit Questions

Kurt,

On inspections, I believe you should be doing them every day but I wanted to discuss with Jabe. 264.193(c)(3) requires that the leak detection system must detect a release within 24 hours (See RO 13063). This mandates that inspections occur on days when manufacturing operations are not conducted. Let me discuss this with Jabe.

On another note, the review is taking me longer than I had hoped. I have a medical issues that needs attention. Regardless, I am about 2/3 of the way through and have only a page of comments/questions so the application is looking pretty good. We should be done with the review next week.

Did you send an electronic copy? If not, let's wait until the few items are resolved/updated and you can send on final electronic copy.

merlin

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**From:** Kurt Fogleman [<mailto:kfogleman@perma-fix.com>]  
**Sent:** Wednesday, January 14, 2015 12:06 PM  
**To:** Russell, Merlin; Breland, Jabe  
**Subject:** RE: Permit Questions

Thank you for the feedback on the land lines. As we get into the review process I will probably provide a revised sheet.

On the inspection form question, is it possible to begin using the proposed inspection sheets for

daily inspections?

Thanks,  
Kurt

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**From:** Russell, Merlin [<mailto:Merlin.Russell@dep.state.fl.us>]  
**Sent:** Monday, January 05, 2015 10:47 AM  
**To:** Kurt Fogleman; Breland, Jabe  
**Subject:** RE: Permit Questions

Kurt,

Jabe is out today. I'll talk with him tomorrow. In my opinion, being available 24/7 is the key requirement.

It took my wife and I a while to give up our land line but have never missed it. A lot of people are going that route.

merlin

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**From:** Kurt Fogleman [<mailto:kfogleman@perma-fix.com>]  
**Sent:** Monday, January 05, 2015 9:12 AM  
**To:** Breland, Jabe; Russell, Merlin  
**Subject:** Permit Questions

Jabe and Merlin, I was approached by several of the emergency coordinators asking if it is possible to list just work and mobile numbers on the emergency list instead of work, mobile and home. Several people are interested in discontinuing land lines at home and want to use their mobile numbers exclusively. The regulations require "phone numbers (office and home)." Where the mobile numbers are clearly the best way to contact coordinators, if we list office and mobile, where the mobile number covers 24/7 access including time at home, would that be acceptable to the Department?

Also, we are preparing inspection sheets for the new year and we would like to use the proposed new forms in the permit application if possible.

Thanks,  
Kurt

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