

Thursby, Kim

From: Stuart Stapleton <Stuart.Stapleton@usecology.com>
Sent: Friday, June 05, 2015 10:51 AM
To: Epost HWRS (Shared Mailbox)
Cc: Kruchell, Carrie L.
Subject: RE: EQ Florida, Inc; FLD 981 932 494;Post-Stabilization Temporary Staging Procedures Discussed at Meeting Held at DEP SW District Office and via Teleconference with DEP Tallahassee on 4-30-15

Received.

From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Friday, May 29, 2015 8:08 AM
To: Stuart Stapleton
Cc: Bahr, Tim; Baker, Bryan; Knauss, Elizabeth; Morgan, Steve; Tripp, Anthony; 'bastek.brian@epa.gov'; Kruchell, Carrie L.
Subject: EQ Florida, Inc; FLD 981 932 494;Post-Stabilization Temporary Staging Procedures Discussed at Meeting Held at DEP SW District Office and via Teleconference with DEP Tallahassee on 4-30-15

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.
Environmental Administrator
Hazardous Waste Program & Permitting





**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**

BOB MARTINEZ CENTER
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
GOVERNOR

CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

May 29, 2015

Sent Via Email

Stuart.Stapleton@usecology.com

Mr. Stuart Stapleton
EHS Manager
EQ Florida, Inc.
7202 East 8th Avenue
Tampa, FL 33619

Re: Post-Stabilization Temporary Staging Procedures Discussed for EQ Florida, Inc. at Meeting Held at DEP SW District Office and via Teleconference with DEP Tallahassee on 4-30-15
FLD 981 932 494; Operation & Construction Permit: 34875-HO-011

Dear Mr. Stapleton:

The Department is in agreement that the temporary staging of post-treatment roll-off containers is allowed within the permitted Hazardous Waste Transfer & Staging (T&S) Area defined by the referenced permit. A summary of our meeting notes is provided below.

1. Discussion

In general, all discussion was related to the new hazardous waste treatment procedures in place at EQ since the beginning of 2015. EQ had three (3) main questions to pose to District and Tallahassee staff regarding the current Operating and Construction Permit (34875-HO-011):

- A. Can the treated product be staged anywhere within the permitted 10-day Hazardous Waste T&S Area?
- B. Is the treated waste still considered 'hazardous waste' after treatment? And, if not, can they do away with the need for secondary containment within the T&S Area?
- C. In time, once production is at maximum capacity, what would it take to increase the footprint of the existing T&S Area to comprise nearly the entire property (south side of E. 9th Avenue in the area of the corporate office)?

2. Roundtable

- A. It was agreed that the roll-offs containing treated (stabilized) waste could be staged anywhere within the currently permitted T&S Area if the following protocols were followed at all times:
 - a. Roll-offs are to be staged within secondary containment until transfer.

- b. Roll-offs can only be staged within the T&S Area until laboratory analytical data is received, which according to EQ, would be approximately 2 days.
 - c. Roll-offs will remain classified as hazardous waste until laboratory analytical confirmation proves otherwise [or until EQ substantiated that their processing and treatment are consistent and the hazardous waste materials are consistent].
 - d. No liquids remain within the roll-offs after treatment.
 - e. Any treated waste yielding confirmatory results which 'failed' will, upon notification of this result, be immediately transferred from the T&A Area back to the treatment area for re-processing.
 - f. All containers shall be clearly labelled and dated with respect to the material that is being treated so that inspectors can clearly determine the status of each container (e.g., treated material pending analysis, etc.).
- B. As in '2Ac' above, treated (stabilized) hazardous waste would continue to be classified as hazardous waste and would require the need for secondary containment until the waste was de-characterized and met land disposal restriction (LDRs) requirements, based upon laboratory data. In addition, the T&S Area, while mostly asphalt-covered, does have bare ground areas near the fenceline and is not bermed to prevent any accidental releases (should any unsuspected liquids be present).
- C. In order to increase the permitted T&S Area, it would take a Permit Modification in addition to redevelopment of the property to ensure the entire Area is property sealed and bermed.

If you should have any questions, please contact me at (850) 245-8765 or via email at Carrie.L.Kruchell@dep.state.fl.us .

Sincerely,



Carrie L. Kruchell, PG
Hazardous Waste Program and Permitting

/clk

cc: Beth Knauss, DEP SW District – Elizabeth.Knauss@dep.state.fl.us
Steve Morgan, DEP SW District – Steve.Morgan@dep.state.fl.us
Anthony Tripp, DEP Tallahassee – Anthony.Tripp@dep.state.fl.us
Brian Bastek, USEPA Region 4 – Bastek.Brian@epa.gov