From: Ken Dean
To: Knauss, Elizabeth
Cc: Don Locke; Garcia, Javier; Brian Lindman
Subject: RE: Condensate Management Response
Date: Wednesday, July 18, 2018 5:03:09 PM

Good afternoon Beth,

My apologies for the delayed response to the Subpart CC procedure that you requested from the inspection on 6/20/18. Please let me know if you need anything.

- Retail wastes that are commingled into the cubic yard box for more efficient transportation, are all contained with a primary container that are below the 26.4 gallon threshold that would require Subpart CC level 2 controls. If the primary container is damaged, the item is placed in zip-loc bag to maintain the integrity of the primary container and compliance with Subpart CC level 1 controls.
- Liquid wastes, that are poured up onsite are commingled into UN-rated containers. The container closed to meet the manufacture's requirements except when add or removing waste (i.e. funnels removed) and fully compliant with Subpart CC level 2 controls.

Respectfully,

Ken Dean
EHS Compliance Specialist

ken.dean@usecology.com
p: 813.319.3433 | c: 813.748.4403 | f: 813.626.7451

7202 East Eighth Ave. Tampa, FL 33619

Emergency Response: 800.839.3975
Customer Service: 800.592.5489

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From: Ken Dean
Sent: Tuesday, July 17, 2018 6:14 PM
To: 'Knauss, Elizabeth' <Elizabeth.Knauss@dep.state.fl.us>
Cc: Don Locke <Don.Locke@usecology.com>; Garcia, Javier <Garcia.Javier@epa.gov>
Subject: RE: Condensate Management Response

Beth,

Good evening. My apologies for the delay in the response. I know Don reached out to you today in regards to your voicemail to me while I am off site for training. Our corporate EHS is still reviewing everything to formulate a response and may not be able to submit tomorrow. Would you be available tomorrow for a follow up call to discuss? Please let me know. Again I apologies for the delay.

Respectfully,

Ken Dean
EHS Compliance Specialist

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From: Knauss, Elizabeth [mailto:Elizabeth.Knauss@dep.state.fl.us]
Sent: Wednesday, July 11, 2018 2:29 PM
To: Ken Dean <Ken.Dean@usecology.com>
Cc: Don Locke <Don.Locke@usecology.com>; Garcia, Javier <Garcia.Javier@epa.gov>
Subject: RE: Condensate Management Response

Hi, Ken

We also had questions about the yard box being used to collect containers of makeup. It looks like the lid may comply with 40 CFR 264.1086(c)(1)(ii), however we would need to know your procedures for ensuring that this type of container is not managing waste in light material service. Please see 40 CFR 264.1086(c)(5).

Can you please forward a copy of your written procedure to us?

Thanks,

From: Ken Dean [mailto:Ken.Dean@usecology.com]

Sent: Tuesday, July 10, 2018 6:30 AM
To: Knauss, Elizabeth <Elizabeth.Knauss@dep.state.fl.us>
Cc: Don Locke <Don.Locke@usecology.com>
Subject: Condensate Management Response

Good morning Beth,

I hope you had a good 4th. My apologies for the delay in sending this response about how we plan to mitigated the condensate material from the roll-off boxes that are loaded and placed in storage post treatment awaiting analytical results. It is common to observe moisture on the ground due to an accumulation of condensation on the outside of roll-off boxes due to the frequent high humidity in the Tampa area and the temperatures reached during the treatment process. We can't stop the condensate from forming with the temperature changes. In the future we will contain the condensate with pop up containments and placing the roll-off boxes, typically four per batch, that are filled directly after a passing Paint Filter Test, (PFT, SW846 Method 9095B), post treatment. The containments will aid in capturing the condensate material if it occurs. In these cases, our first course of action will be to clean-up any material, inspect the container integrity and tighten the latch on the rear gate. Subsequent inspections should reveal that the issue had been resolved or additional or alternative action is necessary. If a condensate leak cannot be stopped, the box will be moved into the Waste Processing Building (WPB) and transferred to another box. Any standing water found in a containment post rain event will be managed in the treatment tank or containerized and placed in the hazardous waste storage area in the WPB until the material can be managed in the treatment tank. Please let us know if you have any questions.

Respectfully,

Ken Dean
EHS Compliance Specialist

ken.dean@usecology.com
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