

**From:** Igoe, Amber  
**Sent:** Wednesday, March 6, 2019 8:09 AM  
**To:** 'Christopher Poole' <cpoole@pacskon.com>  
**Cc:** ken.dean@usecology.com; 'Don Locke' <don.locke@usecology.com>  
**Subject:** RE: Extension Request - US Ecology Tampa, Inc.

The 30-day extension request is approved, the Hazardous Waste RAI including the revised modeling report is due April 6, 2019.

Thank you,  
Amber

**Amber Igoe, CHMM**  
**Environmental Consultant**  
**Hazardous Waste Program and Permitting**  
**2600 Blair Stone Rd MS 4560**  
**Florida Department of Environmental Protection**  
**Tallahassee, FL 32399**  
**850-245-8783**

[Amber.igoe@floridadep.gov](mailto:Amber.igoe@floridadep.gov)

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**From:** Christopher Poole <cpoole@pacskon.com>  
**Sent:** Tuesday, March 5, 2019 4:53 PM  
**To:** Igoe, Amber <amber.igoe@dep.state.fl.us>  
**Cc:** ken.dean@usecology.com; 'Don Locke' <don.locke@usecology.com>  
**Subject:** Extension Request - US Ecology Tampa, Inc.

Hi, Amber.

Following up on our discussion this afternoon, we are requesting a 30-day extension to address the modeling effort and rescission our initial request for an additional 10,000 gallons of capacity in the inbound staging area as discussed in my e-mail below dated March 1, 2019.

I will confirm our conference call for tomorrow afternoon at 4:30 to discuss the air modeling and send an appointment with dial-in number tonight.

Thank you for your continued assistance, Amber!

Regards,  
Chris

---

**CHRISTOPHER B. POOLE, PG, CPG**  
**President & COO | Principal**



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**From:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Sent:** Tuesday, March 5, 2019 2:28 PM  
**To:** 'Dr. Max Lee' <[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)>; Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>  
**Subject:** RE: 863\_19\_01\_RE: Air Modeling/Consequence Analysis Conversation Follow Up

Any update on the extension request?

**Amber Igoe, CHMM**  
**Environmental Consultant**  
**Hazardous Waste Program and Permitting**  
**2600 Blair Stone Rd MS 4560**  
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**From:** Dr. Max Lee <[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)>  
**Sent:** Monday, March 4, 2019 4:46 PM  
**To:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>; Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>  
**Subject:** 863\_19\_01\_RE: Air Modeling/Consequence Analysis Conversation Follow Up

Hi Chris,  
Been in meetings all day but please call after 5 so we can catch up on these strings of emails.

Thanks,  
Max



Max Lee, President  
**Koogler and Associates, Inc.**  
Mail: PO Box 5127 | Gainesville, FL 32627-5127  
Physical: 4014 NW 13<sup>th</sup> Street | Gainesville, FL 32609  
Office: 352 377 5822 x19 | Direct: 352 505 8643  
Fax: 352 377 7158 | Mobile: 352 318 4450  
[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
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<https://www.linkedin.com/in/kooglerandassociates/>

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**From:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Sent:** Monday, March 4, 2019 4:41 PM  
**To:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; Dr. Max Lee <[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)>  
**Subject:** Re: Air Modeling/Consequence Analysis Conversation Follow Up

Amber. I wanted to get back to you before the end of the day to let you know that I have not been able to get in touch with my air modeling expert today. I will track him down by tomorrow and get back to you with a proposed extension date.

Have a great night.

Thanks,  
Chris

---

**Christopher B. Poole, PG, CPG**  
**President & COO | Principal**  
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C | [813-447-9433](tel:813-447-9433)  
E | [cpoole@pacskon.com](mailto:cpoole@pacskon.com)  
W | [www.pacskon.com](http://www.pacskon.com)

Sent from my phone.

----- Original message -----

**From:** "Igoe, Amber" <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Date:** 3/4/19 9:32 AM (GMT-05:00)  
**To:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com), 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>, [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Thank you Chris.

**Amber Igoe, CHMM**  
**Environmental Consultant**  
**Hazardous Waste Program and Permitting**  
**2600 Blair Stone Rd MS 4560**  
**Florida Department of Environmental Protection**  
**Tallahassee, FL 32399**  
**850-245-8783**

[Amber.igoe@floridadep.gov](mailto:Amber.igoe@floridadep.gov)

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**From:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Sent:** Monday, March 4, 2019 9:21 AM  
**To:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>;  
[mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** Re: Air Modeling/Consequence Analysis Conversation Follow Up

Thanks, Amber. I need to speak with the team about the time needed for the modeling, etc. I'll circle back with you on a proposed date by end of business today.

Thanks.  
Chris

---

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**President & COO | Principal**  
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C | [813-447-9433](tel:813-447-9433)  
E | [cpoole@pacskon.com](mailto:cpoole@pacskon.com)  
W | [www.pacskon.com](http://www.pacskon.com)

Sent from my phone.

----- Original message -----

**From:** "Igoe, Amber" <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Date:** 3/4/19 8:58 AM (GMT-05:00)  
**To:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com), 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>, [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Good Morning All,  
The Solid Waste RAI has been received via the FTP site.

The February 21, 2019 email granted the request that the Solid Waste RAI and the Hazardous Waste RAI both be due on March 4<sup>th</sup> 2019-this for the first extension request for the Hazardous RAI deadline of February 13, 2019 to match the extension request granted to Solid Waste RAI deadline of March 4, 2019. As the Hazardous Waste RAI, including the modeling report for the requested increase in capacity in the WPB will not make the March 4, 2019 deadline, please submit an extension request for the hazardous Waste RAI (including the modeling report) since today's deadline cannot be met.

Thank you,  
Amber

**Amber Igoe, CHMM**  
**Environmental Consultant**  
**Hazardous Waste Program and Permitting**  
**2600 Blair Stone Rd MS 4560**  
**Florida Department of Environmental Protection**  
**Tallahassee, FL 32399**  
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**From:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Sent:** Friday, March 1, 2019 4:48 PM  
**To:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com); Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Hi, Amber.

Thank you for the quick response to our request. I have discussed this matter extensively with US Ecology and they are not prepared to do the requested modeling on the inbound staging area at this time. As such, we are formally rescinding our request for an additional 10,000 gallons of capacity in the inbound staging area and will continue forward with the currently permitted capacity for this area of 10,000 gallons. We will revise the permit application and supporting documentation to remove any references to the initially requested 10,000 gallons of additional storage capacity in the inbound staging area. The requested increase in hazardous waste storage capacity on the WPB floor from 4,400 gallons to 4,950 gallons will be addressed accordingly from an offsite consequence analysis perspective.

The complete revised solid waste permit application (Volume 3 of 3) will be submitted electronically to the FDEP on Monday, March 4th as requested by the Department (Steve and Javier in SWD); a hardcopy will not be provided. We will copy you on this transmittal. As mentioned in your e-mail of February 21st, we were under the impression that a 30-day extension had already been granted for the hazardous waste permit renewal application (Volumes 1 and 2 of 3)? We have not be able to advance the offsite consequence analysis

modeling effort since the overall scope of this work has been in flux while we debated the substantial modification relative to the inbound staging area. Also, with the rescinding of the initially requested 10,000 gallons of additional capacity in the inbound staging area, the permit application and supporting documentation will have to be reviewed closely and revised accordingly. As such we will not be able to achieve the March 4th deadline.

We look forward to hearing back from you soon and thank you again for your continued assistance!

Best,  
Chris

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**CHRISTOPHER B. POOLE, PG, CPG**  
President & COO | Principal



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**From:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Sent:** Friday, March 1, 2019 10:47 AM  
**To:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Good Morning Everyone

The additional you provided to the Department has been reviewed and the Department maintains the opinion that the request for an increase in storage capacity in the WPB and the request for an increase in capacity in the inbound staging area must be modeled in an analysis for off-site consequences report if a release was to occur to evaluate the requests. Even though it is USE's opinion that the wastes the waste materials have not been accepted by the Facility, it is a temporary storage area until the wastes are treated and/or disposed and the wastes are not in transit as they are physical being stored on the Facility's property. Also, please note, the siting criteria is under Florida Statutes Chapter 403 Section 7211; which, is different than Chapter 62-730 of the Florida Administrative Code and the requests will have to meet both criteria.

Until the request for additional information (RAI) for both the solid and hazardous waste RAI's, including the off-site consequences modeling report that models the requests to increase the volumes in both the WPB and the inbound storage area are received the

RAI is considered to be incomplete and an extension for the off-site consequences modeling report will need to be requested if it will not be submitted by the March 4, 2019 RAI extension request deadline.

Thank you,  
Amber

**Amber Igoe, CHMM**  
**Environmental Consultant**  
**Hazardous Waste Program and Permitting**  
**2600 Blair Stone Rd MS 4560**  
**Florida Department of Environmental Protection**  
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**From:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Sent:** Wednesday, February 27, 2019 5:11 PM  
**To:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up  
**Importance:** High

Hi, Amber.

We have been taking a close look at the regulations regarding this matter, specifically Rule 62-730.182, F.A.C. Based on our review and interpretation of this rule, we concur that the requested increase in hazardous waste storage capacity on the WPB floor from 4,400 gallons to 4,950 gallons represents a substantial modification and will be addressed accordingly from an offsite consequence analysis perspective. However, based on the criteria specified in subsection 62-730.182(7), F.A.C., and the applicability determination for the inbound staging area completed in the attached document, we do not agree with the Department that the requested increase in staging capacity from 10,000 to 20,000 gallons represents a substantial modification. Specifically, this subsection states that *“the modifications listed in paragraph 62-730.182(4)(b), F.A.C., shall not be considered to substantially increase the risk of impact if, evaluated on a unit by unit basis, the applicable criteria within the following conditions are met.”* Consequently, we have responded to each of the 15 criteria (a through o) provided under this subsection in the inbound staging area applicability determination attached hereto and request that the Department review this document and render an opinion accordingly.

Please contact us with any questions or should you require anything further regarding this matter. We look forward to hearing back from you soon and thank you for your continued assistance!

Best,  
Chris

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**CHRISTOPHER B. POOLE, PG, CPG**  
President & COO | Principal



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**Sent:** Thursday, February 21, 2019 9:28 AM  
**To:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Good Moring Everyone,  
I spoke with our air section and the request for additional capacity for in both the inbound area and the treatment building will need to be inputed into the modeling report as the report models worst case scenarios for a release, explosion etc. whether if it occurs in the treatment building or in the inbound area. As indicated in the Hazardous Waste Request for additional information (RAI), the facility is subject to the siting criteria in Chapter 403 Section 7211 and the request to increase capacity is considered a substantial modification which includes any physical change in, change in the operations of, or addition to a facility which could increase the potential offsite impact, or risk of impact, from a release at that facility; and any change in permit conditions which is reasonably expected to lead to greater potential impacts or risks of impacts, from a release at that facility.

As mentioned during the call on February 19, 2019 additional time past the March 4, 2019 deadline for the hazardous waste and solid waste RAIs to complete the monitoring report an extension of 30 days has been granted for the modeling report.

Thank you,  
Amber

**Amber Igoe, CHMM**



**Environmental Consultant  
Hazardous Waste Program and Permitting  
2600 Blair Stone Rd MS 4560  
Florida Department of Environmental Protection  
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**From:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Sent:** Wednesday, February 20, 2019 9:46 AM  
**To:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Thanks, Amber for the response.

Best,  
Chris

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**CHRISTOPHER B. POOLE, PG, CPG  
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**Sent:** Wednesday, February 20, 2019 9:43 AM  
**To:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com)  
**Subject:** RE: Air Modeling/Consequence Analysis Conversation Follow Up

Hi Chris,  
I will forward you request to our air emissions section and get back with you on this matter.

Thanks,  
Amber

**Amber Igoe, CHMM**  
**Environmental Consultant**  
**Hazardous Waste Program and Permitting**  
**2600 Blair Stone Rd MS 4560**  
**Florida Department of Environmental Protection**  
**Tallahassee, FL 32399**  
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**From:** Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Sent:** Wednesday, February 20, 2019 9:30 AM  
**To:** Igoe, Amber <[amber.igoe@dep.state.fl.us](mailto:amber.igoe@dep.state.fl.us)>  
**Cc:** [ken.dean@usecology.com](mailto:ken.dean@usecology.com); 'Don Locke' <[don.locke@usecology.com](mailto:don.locke@usecology.com)>; [mlee@kooglerassociates.com](mailto:mlee@kooglerassociates.com); Christopher Poole <[cpoole@pacskon.com](mailto:cpoole@pacskon.com)>  
**Subject:** Air Modeling/Consequence Analysis Conversation Follow Up  
**Importance:** High

Hi, Amber –

This email is a follow up to our discussion yesterday regarding the air modeling and the offsite consequence analysis (comment number 1 of the Department's November 30, 2018 RAI) for the US Ecology Tampa facility. As discussed, we want to confirm that this modeling effort will be focused on the requested increase in HW storage capacity from 4,400 to 5,000 gallons in the WPB, and will not take into consideration the requested increase in inbound capacity from 10,000 to 20,000 gallons. The requested increase in inbound capacity relates to the staging of wastes at the facility that are still technically in transit and have not yet been accepted and, therefore, modeling of the staging area has not been considered or requested by the Department in the past. It should be noted that all such staged wastes meet or exceed USDOT requirements and the requirements of the Facility Preparedness & Prevention Plan and Contingency/Emergency Response Plan are fully implemented during waste staging. The modeling of the increased storage capacity in the WPB is consistent with the 2016 Offsite Consequence Analysis completed for the facility as requested by the Department and will be updated as necessary.

Please let us know if you have any questions or comments. We look forward to receiving a response at your earliest convenience.

Regards,  
Chris

---

**CHRISTOPHER B. POOLE, PG, CPG**  
**President & COO | Principal**



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