

From: [Yuri Turovsky](#)
To: [Bradshaw, Bonnie M.](#)
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up
Date: Thursday, October 3, 2019 3:42:50 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[eBay_Order_details.08.12.19.pdf](#)
[eBay_07.12.19_CC.pdf](#)
[eBay_07.17.19_CC.pdf](#)
[Halogen Detector Training SOP_September 2019.pdf](#)

Bonnie – attached please find the halogen detector SOP/training and the purchase receipts.

From: Bradshaw, Bonnie M. [mailto:Bonnie.Bradshaw@floridadep.gov]
Sent: Friday, September 27, 2019 11:43 AM
To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Good morning,

Please forward the receipt for the halogens detectors and the training roster/sign-in sheet.

Thank you and have a good weekend!



Bonnie Bradshaw
Environmental Specialist III
Northeast District – Jacksonville
Florida Department of Environmental Protection
Bonnie.Bradshaw@floridadep.gov
Phone: (904) 256-1638
Fax: (904) 256-1590

From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Sent: Wednesday, September 25, 2019 10:48 AM
To: Bradshaw, Bonnie M. <Bonnie.Bradshaw@floridadep.gov>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Good morning Bonnie,

We have two outstanding issues.

1. On the halogen testing, we have purchased (4) TIF5000 halogen detectors, trained the drivers and implemented the procedure. Please let me know what you need from me to document the completion.
2. On the secondary containment integrity, we have completed the wall and floor repairs. I am currently working with a PE to have the containment inspected and certified. I will forward the documentation to you as soon as I receive it (hopefully very soon).

Thank you,
YT

Yuri Turovsky

Plant Manager

Liquid Environmental Solutions

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From: Bradshaw, Bonnie M. [<mailto:Bonnie.Bradshaw@floridadep.gov>]

Sent: Tuesday, September 24, 2019 12:22 PM

To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>

Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Mr. Turovsky,

I was just checking in to see if you have any updates on any of the violations. Thanks!



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From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Sent: Tuesday, July 2, 2019 9:08 AM
To: Bradshaw, Bonnie M. <Bonnie.Bradshaw@floridadep.gov>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

How about 1:30?

From: Bradshaw, Bonnie M. [<mailto:Bonnie.Bradshaw@floridadep.gov>]
Sent: Tuesday, July 02, 2019 9:06 AM
To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Let's do your office. Would 1:00 be ok?

From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Sent: Tuesday, July 2, 2019 9:05 AM
To: Bradshaw, Bonnie M. <Bonnie.Bradshaw@floridadep.gov>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Bonnie,

I can do Monday afternoon at your office or mine, whatever you prefer.

Thanks,
YT

From: Bradshaw, Bonnie M. [<mailto:Bonnie.Bradshaw@floridadep.gov>]
Sent: Tuesday, July 02, 2019 8:17 AM
To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Something has possibly come up for Wednesday, so if you can still do Monday afternoon that would be great.

Thanks-



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From: Bradshaw, Bonnie M.

Sent: Monday, July 1, 2019 10:15 AM

To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>

Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

If you prefer Pam be present, we would need to meet here and could do Monday afternoon (maybe around 1:00?) or Wednesday between 9:00 and 1:00.

If Pam isn't present, I can do anytime Monday afternoon or Wednesday after 10:00 at your facility.



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From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>

Sent: Friday, June 28, 2019 4:34 PM

To: Bradshaw, Bonnie M. <Bonnie.Bradshaw@floridadep.gov>

Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

I thought Pam would be participating, that's why I offered to come to your office to make it easier for you. I am afraid next week will be kind of hectic being it a holiday week. How about the week

after next? I am open Monday afternoon, Tuesday afternoon and any time Wednesday and Thursday.

From: Bradshaw, Bonnie M. [<mailto:Bonnie.Bradshaw@floridadep.gov>]
Sent: Friday, June 28, 2019 4:19 PM
To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Mr. Turovsky,
What is your availability for next week? I am pretty open. It may be easier for me to come to you. That way I can verify the items you list as "completed" below. I have a few additional informational follow-up questions to close some gaps in the report as well. It may be easier to provide the answers if you are at the facility. There are a couple of questions that I have provided below which may take a little more time to find an answer on:

1. Why does the PCW profile you provided indicate there are TCLP semi-volatiles present?
Another PCW profile I have says the same(520854).
2. Do you generate any solids/sludge from the used oil processing tanks and if so how is it managed?

Just let me know when would be best for you.

Thank you-



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From: Yuri Turovsky <yuri.turovsky@liquidenviro.com>
Sent: Friday, June 21, 2019 4:34 PM
To: Bradshaw, Bonnie M. <Bonnie.Bradshaw@floridadep.gov>
Subject: RE: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Hello Bonnie,

I wanted to update you on the status of the issues that you identified during the facility inspection and answer some questions that you had. Below please find my answers and comments in red.

You will find some items that I would like to further discuss with you. If that's okay we can schedule for me to come to your office.

Please let me know if you need any additional information.

Thank you,
YT

Yuri Turovsky

Plant Manager

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From: Bradshaw, Bonnie M. [<mailto:Bonnie.Bradshaw@floridadep.gov>]

Sent: Tuesday, May 21, 2019 1:45 PM

To: Yuri Turovsky <yuri.turovsky@liquidenviro.com>

Subject: [External Email]FLD 981 928 484 Liquid Environmental Solutions Hazardous Waste Inspection Follow-up

Mr. Turovsky,

Thank you for your assistance during the "Routine Inspection" conducted by the DEP's Hazardous Waste Section at your facility on May 7, 2019. Below is a list of issues that were discussed during the inspection. Should you have any questions or concerns, please feel free to contact me.

- Several portions of the secondary containment area appeared to be in poor repair. Please have a professional engineer inspect and certify, following any required repairs, that the containment area is sound and will function as designed. In addition, there are several areas with a greasy-like build-up and/or vegetation in the wall/floor juncture areas and vicinity that should be removed/cleaned to allow for proper inspection and meet permit requirements.

Work in progress. Actively working with a service company that was referred to us by our PE. They have inspected the site, recommended a number of products and scheduled a test application for Monday 6/24. I anticipate the work being done during the month of July and the PE inspection taking place in August.

- Tank 22 was labeled as both “Used Oil” and “Diesel Fuel”. Please ensure the tank is labeled only with the correct label. **Completed**
- Filter cake solids and solidification pit solids should be considered two separate waste streams and sampled and analyzed separately each quarter moving forward. **Implemented beginning Q3 2019.**
- Halogen screening of all used oil transports should be conducted. **From my search, I was unable to find a hand-held halogen detection instrument (sniffer) approved by EPA. Could you suggest some instruments for our drivers to use that would be acceptable to FDEP?**
- Excess chemicals not being used in the former lab should be properly managed. **Completed**
- Universal waste bulbs in the former lab should be properly disposed of. **Completed**
- Spent acetone from the lab should be collected and managed separately as hazardous waste. **We have a couple of options that I would like to discuss with you before we proceed.**
- The spent fire extinguisher in the processing area should be properly recharged. **Completed**
- It does not appear that the locations of emergency equipment match the diagram included in the SPCC plan incorporated by the permit. The SPCC plan should be updated and resubmitted to the local police, fire, hospital and local emergency response teams. In addition, the arrangements with the local authorities should also be updated. **Work in progress. Should be completed by our PE at the time of the secondary containment inspection.**
- Inspection forms should be updated to ensure that it is clear that all inspections required to be documented by the permit are being conducted. **Would like to discuss a format that would be acceptable to FDEP.**
 - “Conducting visual inspection to detect deterioration or signs of releases at least once each operating day” and “maintain documentation of inspection results dated and available for inspection as part of the operating record of the facility” (would not be covered by the weekly inspections being conducted)
 - The owner/operator “shall conduct daily inspections to document the conditions of the storage containers, the pavement within the storage facility, and the processing equipment. These inspections shall be recorded on an appropriate form on a weekly basis” with corrective actions. (This is relating to non-hazardous, non-used oil waste).

In addition to the above, please send me the following information:

- Used oil driver/transportation staff training records. **attached**
- Records of total amount of oil contaminated solid waste delivered, processed and disposed of annually. **Received and processed 8,638 gallons of oil contaminated solid waste in 2018. Electronic records are available for inspection.**
- Record of written assurance that PCW does not contain levels of hazardous constituents above those found in the source of the PCW for manifest 74787 (material profile form) **attached**
- The JEA Industrial User Discharge Permit (the one we have on file expired 2/1/18). **attached**
- Most recent invoice for rag laundering. **attached**
- You said that operations began in 1997, but our previous report states December 2009. Can

you please clarify when operations began at the current location. Operations began in 1987 under Industrial Water Services. Liquid Environmental Solutions acquired IWS in December 2009.



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