

**Thursby, Kim**

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**From:** Yuri Turovsky <yuri.turovsky@liquidenviro.com>  
**Sent:** Thursday, October 20, 2022 2:10 PM  
**To:** Epost HWRS  
**Subject:** RE: Liquid Environmental of Florida, LLC.FLD 981 928 484;First Request for Additional Information (RAI)

**EXTERNAL MESSAGE**

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Received.

**YURI TUROVSKY | PLANT MANAGER**

E: [YURI.TUROVSKY@LIQUIDENVIRO.COM](mailto:YURI.TUROVSKY@LIQUIDENVIRO.COM) | O: 904.354.0372 | C: 904.509.2032 | F: 904.353.4033  
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**From:** Thursby, Kim <Kim.Thursby@FloridaDEP.gov>  
**Sent:** Thursday, October 20, 2022 1:05 PM  
**To:** Yuri Turovsky <yuri.turovsky@liquidenviro.com>  
**Cc:** Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'merizalde.carlos@epa.gov' <merizalde.carlos@epa.gov>; Eldredge, Susan F <Susan.Eldredge@dep.state.fl.us>; Ciaravella, Philip <Philip.Ciaravella@FloridaDEP.gov>; Ashwood, Janet <Janet.Ashwood@FloridaDEP.gov>; 'vogel.jennifer@epa.gov' <vogel.jennifer@epa.gov>; Petersen, Dane <Dane.Petersen@FloridaDEP.gov>; 'jmittau@mittauer.com' <jmittau@mittauer.com>; 'dmittiaur@mittauer.com' <dmittiaur@mittauer.com>; Bradshaw, Bonnie M. <Bonnie.Bradshaw@floridadep.gov>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>  
**Subject:** Liquid Environmental of Florida, LLC.FLD 981 928 484;First Request for Additional Information (RAI)

**This message originated outside of Liquid Environmental Solutions.**

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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](mailto: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](http://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.

Michell Mason Smith  
Environmental Administrator  
Hazardous Waste Program & Permitting





# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

October 19, 2022

Mr. Yuri Turovsky, Plant Manager  
1640 Talleyrand Avenue  
Jacksonville, FL, 32206  
[Yuri.turovsky@liquidenviro.com](mailto:Yuri.turovsky@liquidenviro.com)

Re: **First Request for Additional Information (RAI)**  
**Liquid Environmental of Florida, LLC.**  
EPA ID Number: FLD 981 928 484  
Current Operating Permits: 72815-017-HO; 72815-018-SO  
DEP Application Numbers: 72815-019-HO; 72815-020-SO  
Dual County – Hazardous Waste

Dear Mr. Turovsky:

Thank you for your application for a Used Oil and Material Processing Permit Renewal for the above referenced Facility. A Department staff review of the application submitted on September 19, 2022, indicates the application is incomplete. Pursuant to the provisions of Rule 62-710.800, Florida Administrative Code (F.A.C.) and Chapter 403.722, Florida Statutes (F.S.), all processing of the application is suspended when a permit application is deemed incomplete. Please provide the information listed below and refer to this correspondence in your response.

1. *Used Oil Processing Facility Permit Application (DEP Form 62-710.901(6), incorporated in Rule 62-710.800(3), F.A.C. Effective Date: 12/2019), Part I, A. General Information, Item number 7 and 10., Page 1 of 9:* Facility Street name spelling is “Talleyrand” not “Tellyrand”. Please review and update the application to reflect the changes.
2. *Used Oil Processing Facility Permit Application (Permit Application), Part I, C. Operating Information, Item number 1. Hazardous Waste generator Status (SQG, LQG, etc.) “CESQG”, page 3 of 9:* On the facilities 8700-12 FL, Florida Notification of Regulated Waste Activity, Item 9. RCRA Hazardous Waste Activities at this Facility, C. Very Small Quantity Generator (VSQG), Page 2 of 10: It is indicated that the facility is a Very Small Quantity Generator (VSQG). This was not indicated on the Permit Application. Please review and revise as appropriate for your facility to include all applicable information on your Permit Application. Please review the 8700-12FL form and the Permit Application to assure the two (2) forms are consistent.
3. *Used Oil Processing Facility Permit Application, Part I. C. Operating Information, Item number 2. List Applicable EPA Hazardous Waste Codes, Page 3 of 9:* Permit application lists, D002, D007, D009, D011, F003, F005, however, Form 8700-12FL, Florida Notification of Regulated Waste Activity, Item Number 10, Waste Codes for Federally Regulated Hazardous Wastes, lists additional waste codes. Please review the 8700-12FL form and the

- Permit Application to assure the two (2) forms are consistent and modify as appropriate.
4. *Used Oil Processing Facility Permit Application, Part 1. C. Operating Information, Item Numbers 9 and 10 (Training, Closure Plan, respectively), Page 4 of 9; Attachments C-9 and C-10 (Training, and Closure Plan Plan, respectively), Page 1 of 1; Attachments C-10 and C-9 (Closure Plan, and Training, respectively), Page 1 of 1: Permit Application items 9 and 10, and attachments titles are inconsistent. Please review, revise as appropriate.*
  5. DEP Form 62-701.900(4), B. Additional Information, Page 3 of 4, and Attachment A-Solid Waste Processing Facility Description: The most recent inspection report dated May 13, 2021, indicates the facility processes latex paint and used oil filters which are not mentioned in the application. Please review the application and revise as appropriate.
  6. DEP Form 62-701.900(4), Attachment A-Solid Waste Processing Facility Description: Facility does not include all the activities and materials that you solidify. Please identify all materials solidified onsite. Also, describe the method(s) used to solidify the materials Rule Reference 62-701.710(2)(a).
  7. Attachment C-5, Appendix A, Handling Contaminated Materials and Residues, A.3, Contaminated Media and Disposal Items, Page 14: Please provide additional information on this waste stream and update the Attachment C-5, accordingly.
  8. *Attachment C.6 & 7, Spill Prevention, Control and Countermeasure Plan, Table of Contents, Appendix C-Tank Inspection & Integrity Plan, Page 47: Tanks shall be evaluated, and the re-testing frequency shall be established and implemented in accordance with API Std 653, November 2014, incorporated by reference in subsection 62-762.411(3), F.A.C. Storage tanks shall be evaluated at the time of installation. Evaluations shall be certified by a professional engineer licensed in the State of Florida or approved by an API Std 653 certified inspector. Non-destructive testing shall be performed by qualified personnel as specified in API Std 650, March 2013, incorporated by reference in subsection 62-672.201(67), F.A.C. and API Std, November 2014. All field erected tanks shall be repaired in accordance with API Std 653, November 2014. Field erected tanks with storage capacities of less than 250,000 gallons may be evaluated in accordance with STI SP001, January 2018, incorporated by reference in subsection 62-782.411(3), F.A.C., in lieu of API Std 653, November 2014. Internal and External inspections of the tanks may be required, to assess the condition of the above ground tanks and determine its suitability for continued service. Therefore, provide copies of the most recent internal and external tank inspections for all tanks listed in the application.*
  9. Attachment C.6 & 7, Fire Extinguisher Information Table and Attachment Map, C-7e.2, dated September 2022: The Fire Extinguisher Equipment information listed in these two (2) documents are not inconsistent. Please review, revise as appropriate.
  10. Please provide us a word document and pdf of the Site Plan and the Tank Table, that can be easily inserted into the renewal permit.
  11. Please provide a brief history and description of any environmental enforcement actions taken by the Department, delegated local program, or federal agency against the applicant and provide a history of any reported releases or spills by the applicant within the past five (5) years.

In order for the Department to continue processing your Permit Application and deem it complete, please submit the information requested as soon as possible, and refer to this correspondence in your response. The response must be signed, sealed, and dated by a registered Florida Professional Engineer. The Department must receive a response within 60 days of the date of this letter, or December 14, 2022, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to subsection 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application.

Please submit the response in electronic format to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bheem.kothur@floridadep.gov](mailto:Bheem.kothur@floridadep.gov); If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/FOLDER>. After posting the document, send an e-mail to [HWPP@dep.state.fl.us](mailto:HWPP@dep.state.fl.us), with a copy to [Bheem.kothur@floridadep.gov](mailto:Bheem.kothur@floridadep.gov); alerting us that it has been posted.

If you have any questions, please contact Bheem Kothur by telephone at (850) 245-8781 or by e-mail at [bheem.kothur@floridadep.gov](mailto:bheem.kothur@floridadep.gov)

Sincerely,



Michell Mason Smith, Environmental Administrator  
Hazardous Waste Program & Permitting

MS/bk

Cc:

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)  
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