

Florida Department of Environmental Protection

Central District 3319 Maguire Boulevard, Suite 232 Orlando, Florida 32803-3767 Charlie Crist Governor Jeff Kottkamp Lt. Governor

Michael W. Sole Secretary

ELECTRONIC MAIL

kfogleman@perma-fix.com

Mr. Kurt Fogleman Perma-Fix of Orlando 10100 Rocket Blvd. Orlando, FL 32824 OCD-HW- E-08-188

Orange County – HW
Perma-Fix of Orlando, Inc.
Rocket Blvd. HW # FLD980559728, HW permit # 26919-HO-004 & SW permit #- SO48-0152516-002
General Drive HW id # FLR000115469
June 24, 2008 Inspection Report

Dear Mr. Fogleman:

On June 24, 2008, representatives of the Florida Department of Environmental Protection and the United States Environmental Protection Agency conducted an inspection to determine whether Perma-Fix of Orlando, located at 10100 Rocket Road, Orlando, was in compliance with the Department's solid and hazardous waste permits and rules. In addition, the solid waste and used oil processing areas located at General Drive were inspected to determine if they met the closure requirements stipulated in the respective permits. Copies of the inspection reports are attached. Additional comments are as follows:

Solid Waste Processing Area

As discussed during the inspection and subsequent email conversations an updated site plan showing the correct locations of the soil samples gathered at the General Drive facility needs to be submitted to the Department.

TSD

The facility must notify the Department 10-days prior to reinstating the lab packing and consolidating operations in the permitted area. Additionally, all paper documents must be removed from the area before lab packing and bulking operation can occur.

Perma-Fix Inspection Report cover letter Page 2 of 2

Within 10 days of receipt of this letter please provide the requested item listed above. If you have any questions or need further information, please contact Jeff Waters at (407) 893-3328 or by e-mail at jeff.t.waters@dep.state.fl.us.

Sincerely,

Lu Burson

Environmental Manger Solid and Hazardous Waste

July 22, 2008 Date

MLB/jtw

Enclosures Inspection Report(s) Inspection Photographs

cc: Edmond Burks, EPA, <u>burks.edmond@epa.gov</u>
Daniel Kuncicky, FDEP, <u>Daniel.Kuncicky@dep.state.fl.us</u>



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INSPECTION REPORT

1.	INSPECTION TYPE: ⊠Routine □Complaint □Follow-Up □Permitting □Pre-Arranged
	FACILITY NAME Perma-Fix of Orlando, Inc. EPA ID # FLD 980559728
	STREET ADDRESS 10100 Rocket Boulevard, Orlando, Florida 32824
	EMAIL ADDRESS <u>kfogleman@perma-fix.com</u>
	COUNTY Orange PHONE 352-395-1356 DATES 06/24/2008 TIMES 9:30 am
	NOTIFIED AS: N/A CURRENT STATUS:
2.	Non Handler □ CESQG (<100 kg/mo.) □ SQG (100-1000 kg/mo.) □ SQG (100-1000 kg/mo.) □ Generator (>1000 kg/mo.) □ Generator (>1000 kg/mo.) □ Transporter □ Transfer Facility □ Interim Status TSD Facility □ Interim Status TSD Facility □ TSD Facility □ Interim Status TSD Facility □ Unit Type(s): Storage □ Unit Type(s): Storage □ Exempt Treatment Facility □ Exempt Treatment Facility □ Used Oil: Transporter □ Used Oil: Transporter
	□ 40 CFR 261.5 □ 40 CFR 262 □ 40 CFR 263 □ 40 CFR 264 □ 40 CFR 265 □ 40 CFR 266 □ 40 CFR 268 □ 40 CFR 273 □ 40 CFR 279 □ 40 CFR 280 □ 62-701, FAC □ 62-710, FAC □ 62-730, FAC □ 62-737, FAC □ 62-761, FAC
3.	RESPONSIBLE OFFICIAL(s): Kurt Fogleman, Environmental, Health, and Safety Manager, Perma-Fix
4.	INSPECTION PARTICIPANTS:
	Jeff Waters, FDEP, Solid & Hazardous Waste Janine Kramer, FDEP, Hazardous Waste Daniel Kuncicky, FDEP, Hazardous Waste Edmond Burks, EPA, RCRA Division Raj Singh, Perma-Fix Operations Manager John MacDonald, Perma-Fix
5.	LATITUDE/LONGITUDE: 28°25'04" / 81°23'10"
6.	NAICS Code: 562112
7.	TYPE OF OWNERSHIP: Private Federal State County Municipal
8.	HAZARDOUS WASTE PERMIT #: 26919-HO-004 ISSUED: 11/14/03 EXPIRES: 11/06/08 SOLID WASTE PERMIT #: SO48-0152516-002 ISSUED: 03/21/05 EXPIRES: 01/19/10

9. **INTRODUCTION**:

On June 24, 2008, Jeff Waters, Janine Kramer, Daniel Kuncicky, (Florida Department of Environmental Protection [FDEP]), and Edmond Burks (US Environmental Protection Agency [EPA]) inspected both Perma-Fix of Orlando, Inc. (Perma-Fix) locations for compliance with solid and hazardous waste regulations. The Perma-Fix of Orlando, Inc., located at 10100 Rocket Boulevard, is a hazardous waste transporter, a 10-day hazardous waste transfer facility and a permitted hazardous waste treatment, storage and disposal facility. This inspection is described below.

The solid waste inspection at Perma-Fix of Orlando, Inc., located at 10225 General Drive, Orlando, Orange County, Florida, is documented on a separate checklist.

10. HAZARDOUS WASTE INSPECTION HISTORY:

Operations have been conducted at these locations since 1985 but the business was originally called Chemical Conservation Corporation (ChemCon). The facility changed names to Perma-Fix of Orlando, Inc. in 2001. The facility has been inspected yearly since 1985. The following information lists specific inspections:

August 1998

The facility was in compliance at the time of the inspection.

September 1998

The facility was out of compliance at the time of the inspection. The facility was cited for failure to provide annual training on hazardous waste regulations. The facility submitted the records at a later date and the case was closed without enforcement.

September 1999

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations: failure to conduct proper waste determinations and appropriate land ban restrictions, failure to update contingency plan, failure to segregate hazardous waste, failure to conduct annual hazardous waste training, failure to maintain the facility to minimize sudden releases, failure to submit annual verification of insurance, and failure to maintain current financial assurance. The case was closed through the execution of a Short Form Consent Order including the assessment of \$1700.00 in civil penalties.

November 1999

The facility was in compliance at the time of the inspection.

June 2000

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations: storing non-hazardous waste in the hazardous waste storage area, and failure to notify the Department of ability to meet a specific permit condition. Specifically, ChemCon was using an unacceptable surety company for insurance. The case was resolved by executed Consent Order No. 00-1471 and the assessment of \$2,550.00 in civil penalties.

May and August 2001

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations: failure to maintain the facility to minimize sudden releases, failure to utilize the waste analysis plan and violating specific permit condition. Specifically, ChemCon failed to rectify

Perma-Fix June 2008 Inspection Report Page **3** of **3**

manifest discrepancies within 15 days of receipt of the waste. The case was resolved by executed Consent Order No. 02-0027 and the assessment of \$12,100.00 in civil penalties.

April 2002

The facility was out of compliance at the time of the inspection. The facility was cited for the following violations: failure to label hazardous waste containers, failure to maintain hazardous waste containers closed, failure to conduct weekly inspections, failure to label hazardous waste containers with an accumulation start date, storing over the capacity of facility as stated in the permit, failure to meet land disposal treatment standards, and storing transfer waste longer than 10 days. The case was resolved by executed Consent Order No. 02-2060 and the assessment of \$13,350.00 in civil penalties.

March 2003

The facility was out of compliance at the time of the inspection. The facility had 4 drums stored longer than 1 year; however, the drums were shipped off-site the day after the inspection. The Department took no further action.

May 2004

The facility was out of compliance at the time of the inspection and numerous violations were cited including: exceeding hazardous waste storage requirements as stated in the facility's permit, hazardous waste determination process, hazardous waste training requirements, used oil violations, and storage tank violations. The case was resolved by executed Consent Order No. 04-1771 and the assessment of \$51,845.00 in civil penalties.

April 2006

An inspection was conducted as a result of a fire that was reported to the State Warning Point (SWP) on April 19, 2006. The facility was out of compliance with their hazardous waste permit specific condition #14, Maintenance and Operation. Specifically, the facility allowed a fire to occur due to improper storage and/or management of incompatible hazardous waste. As requested the facility updated their operation/contingency plan. The case was resolved by executed Consent Order No. 06-1668 and the assessment of \$10,950.00 in civil penalties.

December 2006 & February 2007

The facility was out of compliance at the time of inspections. The facility was cited for the following violations: failure to perform waste determination, operations of the TSD facility, hazardous waste container management, and used oil labeling. The case was resolved by executed Consent Order No. 07-1790 with the assessment of \$14,681.00 in civil penalties. In lieu of paying the civil penalty the facility elected and the Department approved a supplemental environmental project (SEP) that off-set 80% of the civil penalty and involved lab packing services for Central Florida school laboratories. The value of the SEP was one and a half times the civil penalty off-set amount (\$17,617.00). The remaining 20% of the civil penalties (\$2,936.00) in addition to Department cost (\$1,000.00) was paid by the facility.

October 17, 2007

The facility was in compliance at the time of inspection. The facility had discontinued consolidating waste and was storing small amounts of hazardous waste at the permitted facility.

11. PROCESS DESCRIPTION:

Hazardous Waste Treatment, Storage and Disposal (TSD) Facility (10100 Rocket Boulevard):

Perma-Fix collects hazardous waste from generators using Perma-Fix's own transportation services as well as other registered hazardous waste transporters. Generators serviced by Perma-Fix are those that generate hazardous waste that is exclusive of explosive, radioactive, or biomedical waste. Perma-Fix operates under hazardous waste storage permit number 26919-HO-004, issued November 14, 2003 and expires November 6, 2008. A permit renewal application has been submitted to the Department as required.

Before collecting any waste, the generator's request is reviewed to determine if the generator's waste stream has passed their evaluation process. Perma-Fix requires that each new waste stream be tested and that each waste stream's acceptance be updated yearly. The evaluation process used is described in detail in the waste analysis plan section of the facility's permit application. Based on the regulatory status of the waste stream and the conditions set forth in the permit that authorizes Perma-Fix to manage hazardous waste, Perma Fix then decides whether to accept the waste.

Perma-Fix collects hazardous waste and stores the material in its warehouse for up to a year before transporting the waste to an off-site disposal facility; currently the facility is not storing waste on site for a year. Perma-Fix is currently operating the facility as a 10-day transfer facility in order to avoid re-manifesting, record keeping, reporting, and other more stringent permit requirements. If waste is stored for a period longer than ten days, it is transferred to Perma-Fix's designated storage facility. Perma-Fix then amends the incoming manifest to reflect the change, the containers are relabeled, and the waste is managed in accordance with permit requirements.

Hazardous wastes are segregated at the facility according to compatibility groups as outlined in their permit. Storage areas have secondary containment to minimize and prevent possible releases to the environment.

Perma-Fix's permit allows the bulking and consolidation of hazardous waste; however, at the time of inspection and several months prior to the previous inspection in October 2007 Perma-Fix was not performing these operations.

Perma-Fix is in the process of renewing the hazardous waste permit for the facility. The renewal permit was submitted to the FDEP as required and is in the processes of being reviewed. The facility has also submitted a solid waste permit application for the processing of solid waste. This process is similar to what previously occurred at the General Drive location; the permit application is in the process of being reviewed.

In a letter dated May 20, 2008, the FDEP allowed the facility to temporarily bring solid waste to the Rocket Boulevard location for consolidation and/or solidification. The process is allowed to occur until the FDEP reaches a decision concerning the solid waste permit application that has been submitted.

12. INSPECTION:

Storage Area

No hazardous waste was being stored in this area at the time of inspection.

Perma-Fix June 2008 Inspection Report Page **5** of **5**

Eight 55-gallon, properly labeled and dated, containers of petroleum contact water were being stored in this area.

Three 55-gallon, properly labeled containers of used oil filters were being stored in this area.

In total, there was approximately 605 gallons of waste in the permitted TSD portion of the facility.

A small storage unit to store wastes that are water reactive was staged along the northern wall of the TSD. No waste was in the unit at the time of inspection. The unit is to be equipped with dry fire extinguisher and will sit inside one of the bermed areas located within the permitted TSD.

Loading Dock

Two semi-trucks were being used for 10-day storage during the inspection.

The solid waste processing container has been moved to this area temporarily as approved by a letter from the FDEP on May 20, 2008.

An 17,640 gallon frac tank is also located in this. The facility is using it to store used oil. Because the facility does not have a Used Oil Processor permit for this location they can only store up to 25,000 gallons of used oil at a time and must remove it within 35 days.

Lab Pack and Bulking Consolidation Area

This area contained no hazardous waste but was being used to store oily waste water and used oil in 55-gallon drums destined for the frac tank. Paper documents continue to be stored in this area.

An agreement remains that the facility must notify the Department 10-days prior to reinstating the lab packing and bulking operations in the permitted area. Additionally, all paper documents must be removed from the area before lab packing and bulking operation can occur.

Record Review

Hazardous waste manifests were reviewed and found to be in compliance.

Raj Singh's hazardous waste training was out of date at the time of the inspection; however, John MacDonald's was current. Raj Singh began his training renewal on July 18, 2008, and stated it would be completed on July 25, 2008.

The contingency plan's emergency contacts were out of compliance at the time of inspection. The facility updated the contacts list and provided the Department with a copy.

13. **CONCLUSION**:

Perma Fix, Orlando is a hazardous waste and used oil transporter, 10-day hazardous waste transfer facility, and permitted storage facility of hazardous waste. The facility was in compliance at the time of inspection.

Report Prepared By:

07/21/2008

Date

Report Reviewed by:

Lu Burson

Environmental Manger Solid and Hazardous Waste

July 22, 2008

Date



Facility Information:

Facility Name: PERMA-FIX OF ORLANDO, INC. TS

On-Site Inspection Start Date: 06/24/2008 On-Site Inspection End Date: 07/02/2008

WACS No.: 83718

Facility Street Address: 10225 GENERAL DRIVE

City: ORLANDO County Name: ORANGE Zip: 32824

Inspection Participants (Include ALL Landfill and Department Personnel with Corresponding Titles):

Principal Inspector: Jeff Waters

Other Participants: Janine Kramer

TYPE OF FACILITY:

Landfill: C&D Facility: Waste Processing Facility: Other Facilities:

Transfer Station

TYPE OF INSPECTION:

Closure, Routine

ATTACHMENTS TO THE INSPECTION CHECK LIST:

This Cover Page to the Inspection Checklist may include any or all of the following attachments as appropriate.

SECTION 1.0 - FILE REVIEW

SECTION 4.0 - WASTE PROCESSING FACILITIES



SECTION 1.0 - FILE REVIEW

Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

Item No.	FILE REVIEW (Pre- or Post-Inspection, as appropriate.) Completed	Ok	Not Ok	Unk	N/A
1.1	For landfills, is the method and sequence of filling wastes according to plans? 62-701.500(2)(f)				~
1.2	For landfills, are the following records being reported to the Department?(Check any that are Not OK.)				
	Waste reports (quarterly) 62-701.500(4)				~
	Annual estimate of remaining life 62-701.500(13)(c)				
1.3	Is leachate sampled, tested and disposed as required? 62-701.500(8)(a) & 62-701.510(6)(c)				~
1.4	Is gas monitoring being performed as required by the permit? 62-701.500(9) & 62-701.530(2)				~
1.5	Are the results of the gas sampling reported to the Department quarterly? 62-701.530(2)				~
1.6	.6 Is water quality sampling and testing performed according to standard procedures and at the required frequencies? See 62-701.510(2) for landfills; 62-701.730(4)(b) & (10) for C&D debris sites; 62-713.400(3) for stationary soil treatment facilities.				~
1.7	Do the results of the water quality testing suggest there may be adverse impacts to water quality from the operation of the solid waste facility? 62-701.510(3) & (4)				~
1.8	For closed landfills and C&D disposal facilities with final elevations higher than 20 feet above grade, has a final survey report verifying the final elevations and contours of the facility been submitted to the Department? 62-701.610(3) & 62-701.730(9)(c)				~
1.9	Is financial assurance adequate? See 62-701.630 for landfills; 62-710(7)(a) & (10)(a) for WPFs; 62-701.730(11)(a) for C&D debris facilities; 62-713.600(6)(a) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities. NOTE: The Solid Waste Financial Coordinator in Tallahassee can assist with this information.	V			
1.10	Are cost estimates current and adjusted every year? See 62-701.630(4) for landfills; 62-701.710(7)(b) & (10)(a) for WPFs; 62-701.730(11)(b) for C&D debris facilities; 62-713.600(6)(b) & (c) for stationary soil treatment facilities; 62-711.500(3) for waste tire facilities.	~			
1.11	For C&D debris disposal and disposal with recycling facilities, is an Annual Report submitted to the Department for the disposal operation by April 1st of each year? 62-701.730(12)				~
1.12	For C&D recycling facilities with no disposal, is an Annual Report for the recycling operation submitted to the Department by April 1st of each year? 62-701.710(9)(b)				~
1.13	For compost facilities, has the compost product been sampled and analyzed every 20,000 tons or every 3 months (whichever is sooner)? 62-709.530(1)				~
1.14	For compost facilities, has the annual report been submitted by June 1st? 62-709.530(3)				~



SECTION 4.0 - WASTE PROCESSING FACILITIES

Requirements:

This section provides an opportunity for the department inspector to add a narrative explaining any requirements identified as "Not Ok" at the time of the inspection. Some requirements may be identified as "Ok" but are discussed further in the "areas of concern" portion of the narrative section.

Item No.	SOLID WASTE PROHIBITIONS (unless "grandfathered" in, see 62-701.300(16)) Completed	Ok	Not Ok	Unk	N/A
4.1	Unauthorized disposal/storage prohibited, except yard trash, within 500' of a potable water well? 62-701.300(2)(b)	~			
4.2	Unauthorized disposal/storage prohibited, except yard trash, within 1000' of a potable water well serving a community water system? 62-701.300(2)(h)	>			
4.3	Unauthorized storage/disposal of yard trash prohibited within the minimum setbacks of (Check any that are Not OK) 62-701.300(12) 100 feet for potable water wells (except on-site)? 50 feet for water bodies? 200 feet for community water supply wells?	>			
4.4	Unauthorized disposal/storage prohibited in an area subject to frequent and periodic flooding unless flood protection measures in place? 62-701.300(2)(d)	>			
4.5	Unauthorized disposal/storage prohibited in any natural or artificial body of water including ground water? 62-701.300(2)(e)	>			
4.6	Unauthorized disposal/storage prohibited, except yard trash, within 200' of any natural or artificial body of water, including wetlands without permanent leachate controls, except impoundments or conveyances which are part of an on-site, permitted stormwater management system or on-site water bodies with no off-site discharge? 62-701.300(2)(f)	>			
4.7	Unauthorized open burning of solid waste prohibited except in accordance with Department requirements? 62 -701.300(3)	>			
4.8	Are the following prohibited wastes or special wastes properly managed? (Check any that are Not OK) Hazardous waste 62-701.300(4) Biomedical waste 62-701.300(6) Yard trash 62-701.300(8)(c) Whole waste tires 62-701.300(8)(e) Used oil, except as exempted 62-701.300(11) Lead-acid batteries, mercury-containing switches and lamps in WTEs 62- PCB wastes 62-701.300(5) Lead-acid batteries 62-701.300(8)(a) White goods 62-701.300(8)(d) Liquids 62-701.300(10)	*			
Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE Completed	Ok	Not Ok	Unk	N/A
4.9	Do the tipping, processing, sorting, storage and compaction areas that are in an enclosed building or covered area have adequate ventilation? 62-701.710(3)(a)	>			
4.10	For areas not enclosed, is litter controlled and are litter control devices maintained? 62-701.710(3)(a)				
4.11	Is leachate collection and removal system maintained and operated as required? 62-701.710(3)(b)				~
4.12	Are all drains and leachate conveyances kept clean so that leachate flow is not impeded? 62-701.710(4)(b)				~
4.13	Are the following records or plans current and available on-site? (Check any that are Not OK.) Operation and Maintenance Manual 62-701.710(4)(a)1. Contingency Plan 62-701.710(4)(a)3. Operation records 62-701.710(9)(a)	>			



Item No.	WASTE PROCESSING FACILITY OPERATION AND MAINTENANCE Completed	Ok	Not Ok	Unk	N/A
4.14	Is the Operation and Maintenance Manual substantially followed? 62-701.710(4)(a)1.	~			
4.15	Are putrescibles stored no longer than 48 hours or as otherwise allowed in the Operation and Maintenance Plan? 62-701.710(4)(b)	~			
4.16	Are areas where waste is stored or processed cleaned at least weekly to prevent odor and vector problems? 62-701.710(4)(b)	~			
4.17	Are the operating hours posted at the facility? 62-701.710(4)(c)1.	~			
4.18	Is a trained operator on duty whenever the facility is operating? 62-701.710(4)(c)1.	~			
4.19	Is at least one trained spotter on duty at all times that waste is received at the facility to inspect the incoming waste? 62-701.710(4)(c)2.	~			
4.20	Are prohibited materials removed from the waste stream and placed into appropriate containers for disposal at a permitted facility? 62-701.710(4)(c)2.	~			
4.21	Is the facility operated to control objectionable odors? 62-701.710(4)(d)	>			
4.22	Is adequate fire protection equipment available and operational? 62-701.710(4)(e)	~			
4.23	Is access to the facility controlled by fencing or other effective barriers to prevent disposal of unauthorized waste? 62-701.710(4)(f)	~			
4.24	If the facility is a Transfer Station and is claiming the financial assurance exemption, does it manage the waste on a first-in, first-out basis and store waste for no greater than 7 days? 62-701.710(10)(a)				~
4.25	Is stormwater effectively controlled? 62-701.710(8)	~			
4.26	Are all specific conditions in the permit being followed? 62-701.320(1)	~			

Item No.	WASTE PROCESSING FACILITY CLOSURE Completed	Ok	Not Ok	Unk	N/A
4.27	Has the solid waste residue been properly disposed of within 30 days after receiving the final solid waste shipment? 62-701.710(6)(c)	>			
4.28	Has closure been completed within 180 days after receiving the final solid waste shipment? 62-701.710(6)(d)	٧			

Inspection Comments:

Comment Date: 07/02/2008 User: WATERS_JT

Description: The location of the soil sample taken for the purpose of fulfilling the closure plan requirements was

incorrectly identified on the site plan submitted to the Department.

The vehicle maintenance area adjacent to the transfer station continues to operate on facility

vehicles. This area was in good order.



Inspection Attachments:

Attachment Date: 07/02/2008 User: WATERS_JT

Description: Soil sampling location 1, identified incorrectly in closure plan



Attachment Date: 07/02/2008 User: WATERS_JT

Description: Soil sample location 2



Attachment Date: 07/02/2008 User: WATERS_JT

Description: Empty waste processing area



Signed:



Signed:

FDEP	PFO
ORGANIZATION	ORGANIZATION
Janine Kramer	Raj Singh
INSPECTOR NAME	REPRESENTATIVE NAME
No signature available	No signature available
INSPECTOR SIGNATURE DATE	REPRESENTATIVE SIGNATURE DATE
FDEP	
ORGANIZATION	
Inspector	
PRINCIPAL INSPECTOR TITLE	
Jeff Waters	
PRINCIPAL INSPECTOR NAME	
/7/2/2008	
PRINCIPAL INSPECTOR DATE SIGNATURE	

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Not Ok" or areas of concern.

Perma-Fix of Orlando

Jeff Waters June 24, 2008



Fig. 1 – Loading dock



Fig. 3 - Solid waste solidification container



Fig. 5 – TSD area 1



Fig. 2 – Used oil frac tank



Fig. 4 – Loading dock, note solidification container



Fig. 6 – TSD area 2

Perma-Fix of Orlando

Jeff Waters June 24, 2008



Fig. 7 – TSD area 3



Fig. 8 – Water reactive storage locker within the TSD





Fig. 9 & 10 – Lower warehouse previously used for consolidation of hazardous waste.



Fig. 11 – Lower warehouse 3



Fig. 12 – Outside storage area of empty containers