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Via Fax 407/893-3167,  
via [Janine.kraemer@dep.state.fl.us](mailto:Janine.kraemer@dep.state.fl.us)  
& 1<sup>st</sup> Class Mail

June 22, 2006

Janine Kraemer  
Hazardous Waste Section  
Florida Dept. of Environmental Protection  
Central District Office  
3319 Maguire Blvd., Suite 232  
Orlando, FL 32803-3767

**RECEIVED**  
**JUL 06 2006**  
**Central Dist. - DEP**

Subject: Storing Hazardous Transfer Waste for 11 Days;  
Perma-Fix of Orlando, Inc., 10100 Rocket Blvd., Orlando;  
EPA ID No. FLD 980 559 728  
HW Permit No. 26916-HO-004

Dear Ms. Kraemer:

This letter shall serve as our written follow up to the telephone notification we made last Tuesday, June 20, 2006 regarding the referenced subject. The following information is being provided to the Department in accordance with General Condition 8 of our hazardous waste permit.

#### **Description of Non-Compliance**

Review of hazardous transfer waste logs at Perma-Fix of Orlando, Inc. (PFO) shows that drummed hazardous transfer waste sat in one trailer at the above referenced facility for 11 days, from May 31, 2006 to June 11, 2006.

Page 1 of 69 of our Part B Hazardous Waste Permit states, *"The Permittee is authorized to operate as a Hazardous Waste Transfer Station on-site in accordance with Chapter 62-730.171, F.A.C.. All transfer waste shall be manifested from and to a facility other than the Permittee's facility and may be stored for up to 10 days."*

#### **Cause of Non-Compliance**

Based on discussions with PFO transportation personnel, the hazardous transfer waste in question was originally scheduled to leave the PFO facility on Friday, June 9, 2006 in compliance with the 10 day limit. PFO transportation personnel contacted personnel from Perma-Fix of South Georgia, Inc. (PFSG) prior to June

9 to ship the waste from PFO on June 9 and have the waste received at PFSG the same day, June 9, a Friday.

PFSG, located in Valdosta, Georgia and the designated facility shown on the manifest is approximately 4 hours driving time away from PFO. PFSG personnel however, informed PFO personnel during the same time they were contacted by PFO that they could not receive the load on June 9 because they were already fully booked to receive hazardous wastes from other transporters on June 9. PFSG was closed on Saturday, June 10 and Sunday, June 11.

The hazardous transfer waste left PFO on Sunday evening, June 11 and was received at PFSG on Monday morning, June 12.

### **Steps Being Taken to Prevent Recurrence of Non-Compliance**

The importance of complying with the 10 day storage limit on hazardous transfer waste has been re-emphasized to PFO Operations and PFO Transportation personnel.

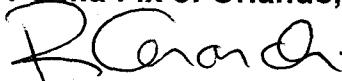
As discussed during our June 22 phone conference, arrangements have been made within the Perma-Fix corporate network to prevent recurrence. Effective immediately, PFO personnel will contact PFSG personnel on or before Day 7 of transfer waste storage and schedule the shipment for receipt at PFSG. If PFSG has no problem receiving the load from PFO, then there are no compliance issues. However, if PFSG informs PFO that they could not receive the transfer wastes, PFO will notify PFSG and Perma-Fix corporate personnel via email immediately that their assistance is needed in helping PFSG receive the waste. Perma-Fix corporate personnel will then work with PFSG so that the transfer waste from PFO can be shipped by day 10 and received at PFSG.

Also, PFSG is currently in the process of hiring additional personnel who will help receive and process incoming wastes at PFSG. The addition of personnel at PFSG will help in receiving more incoming wastes.

We hope that you will find our corrective action acceptable. If you have any questions or need additional information, please call me or Victor San Agustin at 407/859-4441.

Sincerely,

**Perma-Fix of Orlando, Inc.**



Richard Grondin  
Vice President of Technical Services  
RG/vsa