INSPECTION 3/23/2006
JOHN WHITE
KATHY GAYNOR

3/28/2006
JOHN WHITE

Perma-fix Orlando
FLD980559728

Permit Number 26916-HO-004 for Operation of Hazardous Waste Storage Facility and Treatment Unit and to Implement Corrective Action pursuant to HSWA

Permit Issued: November 14, 2003
Permit Expires: November 6, 2008

Perma-Fix, located at 10100 Rocket Boulevard, Orlando, Orange County, Florida, is a registered hazardous waste and used oil transporter and operates a permitted storage facility where consolidation and transfer of loads occur.

This renewal permit is for continued operation of an existing container storage area and to construct a waste fuel tank storage area, a wastewater tank storage area, a reactor area, chemical fixation area, neutralization area and an additional to the container storage area. (Attachment A – Facility Layout, Figure I.B.3-1)

Permitted waste is unloaded from the incoming trailers and placed on the loading dock or in the staging area located inside the container storage unit. A "drum check-in sheet" is printed for every waste stream that arrives in a shipment. The upper half of the form shows a printout of the analysis system screen, which contains the same information that must be displayed on the hazardous waste label. Operators review the label to verify that the information matches the information on the printout. Each container is inspected for integrity and compatibility with the waste material. Every container is assigned a code number that is used to identify the container and track the waste through processing at the facility.

Container Storage Area:
The container storage area is an approximately 93 feet by 60 feet area with 16 secondary containment cells. Perma-Fix is permitted to store 824 55-gallon drums, or a volume equivalent to 45,320 gallons in the container storage area.

Hazardous Waste Transfer Station
This area is used for storage of hazardous waste for up to 10 days in accordance with Chapter 62-730.171, FAC.

Proposed Container Storage Area Expansion
The Proposed Container Storage Area is approximately 70 feet by 47 feet with secondary containment cells as shown in Figure II.B.3-1).

The expansion will be started within 1 year of the issue of this permit (by November 14, 2004) and completed within 6 months for this construction authorization to be valid. No waste shall be stored in this area until the Department has inspected and accepted it. There will be a projected increase of 432 55-gallon drums with a volume of 23,760 gallons allowed after financial assurance has been provided that covers this area.

This area was not constructed. The facility has recently contacted the Department regarding a construction permit for this area.

Proposed Waste Fuel Tank Storage Area
The Proposed Waste Fuel Tank Storage Area has four 15,000-gallon vertical tanks and secondary containment.

This expansion will start within 3 years and 6 months of the issue date of this permit (by May 14, 2007) and be completed within 6 months for this construction authorization to be valid. The facility can store up to 60,000 gallons of waste in these tanks after the Department has inspected and accepted them and financial assurance has been provided that covers this area.

Waste Fuel Blending:
The Proposed Fuel Blending Area has materials handling equipment, a blending tank and secondary containment.

This expansion will start within 3 years and 6 months of the issue date of this permit (by May 14, 2007) and be completed within 6 months for this construction authorization to be valid. The facility will blend a projected 15,000 gallons of fuel each day after the Department has inspected and accepted them and financial assurance has been provided that covers this area.

Wastewater Tank Storage Area:
The Proposed Wastewater Tank Storage Area has two 8,000-gallon and four 10,000-gallon vertical tanks with secondary containment.

This expansion will start within 3 years and 6 months of the issue date of this permit (by May 14, 2007) and be completed within 6 months for this construction authorization to be valid. The facility will store a projected 56,000 gallons of wastewater after the Department has inspected and accepted them and financial assurance has been provided that covers this area.

Wastewater Reactor Area
The Proposed Wastewater Reactor Area has two 2,500-gallon tanks with secondary containment.

This expansion will start within 3 years and 6 months of the issue date of this permit (by May 14, 2007) and be completed within 6 months for this construction authorization to be valid. No waste shall be in this area until after the Department has inspected and accepted them and financial assurance has been provided that covers this area.

Chemical Fixation Process Area
The Proposed Chemical Fixation Process Area....

The expansion will be started within 1 year of the issue of this permit (by November 14, 2004) and completed within 6 months for this construction authorization to be valid. The facility will process a projected 40 cubic yards (8,080 gallons) of waste per day after the Department has inspected and accepted the construction of the chemical fixation process area and financial assurance has been provided that covers this area.

This area was not constructed. The facility has recently contacted the Department regarding a construction permit for this area.

Neutralization Operation Area
The Proposed Neutralization Operation Area is ...

The expansion will be started within 1 year of the issue of this permit (by November 14, 2004) and completed within 6 months for this construction authorization to be valid. The facility will process a projected 1,650 gallons of waste per day after the Department has inspected and accepted the construction of the neutralization operation area and financial assurance has been provided that covers this area.

This area was not constructed. The facility has recently contacted the Department regarding a construction permit for this area.

Solid Waste Management Units

Eleven solid waste management units have been identified at the facility in an EPA permit issued on August 10, 1995. SWMU 7 and SWMU 9 require no further action. No remedial corrective action is required at the facility at this time.

Specific Conditions:

SC I.2 - Does the facility meet the financial requirements of 40 CFR 264, Subpart H? Yes ✓ No_____

SC I.6 - Did the facility apply for permit renewal at least 180 days before the expiration date of this permit, and comply with all other requirements of Rule 62-730.260(2), FAC? Yes_____ No_____ N/A

SC I.10 - Did the facility comply with the required notice of 40 CFR 264.12(c) and 62-730.300 FAC before transferring ownership or operation of the facility? Yes_____ No_____ N/A

SC I.11 - Is the facility maintaining security at the facility as described in Part II, Section II.A.4.a (Security Procedures), of the permit application? Yes ✓ No_____

SC I.12 – Does the facility visually inspect Emergency & Safety equipment? Yes ✓ No_____

SC I.13 - Does the facility conduct personnel training and maintain training documents and records as required by 40 CFR 264.16 and describe in Section II, A.4.e, of the permit application? Yes ✓ No_____

SC I.14 - Has the facility owner/operator maintained and operated the facility in such a manner as to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment [40 CFR 264.31]? Yes ✓ No_____

SC I.15.a - Does the facility have the equipment available as described in Section II.A.4.d of the permit application? Yes ✓ No_____

SC I.15.b - Does the facility test and maintain the emergency & safety equipment? Yes ✓ No

SC I.15.c - Does the facility maintain access to the communications & alarm system? Yes ✓ No
TESTED ANNUALLY

SC I.15.d - Does the facility maintain arrangements with State and local Authorities as required by 40 CFR 264.37? Yes ✓ No

SC I.15.e - Does the facility maintain adequate aisle space? Yes ✓ No

SC I.16 – Is the contingency plan reviewed periodically and Immediately amended if any criteria in 40 CFR 264.54 are met? Yes ✓ No

SC I.16 - If yes, were the changes approved by the Department? Yes ✓ No

SC I.17.a - Did the facility implement the contingency plan and Follow the emergency procedures in 40 CFR 264.56, in the event of A fire, explosion, or release of hazardous waste or hazardous waste Constituents which could threaten human health or the environment? 2005 2006 PO Yes No N/A

SC I.17.a - If an emergency situation arose that required the contingency plan to be implemented, did the facility submit a written report, which includes all information in 40 CFR 264.56(j), to the Department within 15 calendar days? Yes No N/A

SC I.17.c - Does the facility meet any of following criteria:
- Was the facility permit revised? Yes No ✓
- Did the plan fail an emergency? Yes No N/A
- Did the facility change its design, construction, operation maintenance, or any other circumstances in a way that materially increases the potential for fires, explosion, or releases of hazardous wastes or hazardous wastes constituents, or changes the response necessary in an emergency? Yes No ✓
- Does the facility, during normal operations periodically review operating procedures in conjunction with incident reports and determines that new procedures should be implemented to optimize safety? Yes ✓ No

SC I.18 - Has the facility identified any significant waste discrepancies in the last year? Yes ✓ No

SC I.18 - Did the facility, upon discovering a significant waste discrepancy, attempt to reconcile the discrepancy with the waste transporter or generator? Yes ✓ No

SC I.18 - If the discrepancy was not resolved within 15 days after receiving the waste, did the facility submit to the Department a letter describing the discrepancy and attempt to reconcile it, and a copy of the manifest or shipping paper at issue [40 CFR 264.72(b)]? Yes ✓ No

GREENLEAF SHIPMENT DID NOT MATCH MANIFEST. REJECTED LOAD.

SC I.19 - Does the facility maintain a written operating record which includes: Yes ✓ No ____ COMPUTER BASED

- ✓ a) Records and results of waste analysis
- ✓ b) Summary reports and details of all incidents that require implementing the Contingency Plan
- ✓ c) Copies of manifests for 3 years
- ✓ d) Records and results of inspections (3 year retention period)
- ✓ e) Closure plan and updated closure cost estimate
- ✓ f) Biennial Reports (3 year retention period)
- g) Results of monitoring, testing, or analytical data
- ✓ h) Inspections of emergency & safety equipment (3 years)
- i) Personnel training records
- ✓ j) Waste minimization program plan
- ✓ k) Description and quantity of each hazardous waste received or generated
- ✓ l) The location of each hazardous waste within the facility and the quantity at each location.
- m Biennial certification of waste minimization program
- n ~~m~~) A copy of all notices, demonstrations, certifications and other documents related to land disposal restrictions

SC I.20 – Does the facility have a waste minimization program? Yes ✓ No ____

SC I.26 – Has the facility made any physical alterations or additions which impact known or suspected contamination areas? Yes ____ No ✓

SC I. 26 – If the facility has made physical alterations or changes, Was the Department notified in writing prior to the change? Yes ____ No ____ N/A

Containers:

SC III.1 - Does the facility abide by the maximum total storage capacity of the hazardous waste, 824 (55 gallon) drums, or the equivalent to 45,320 gallons? Yes ✓ No ____

SC III.2 - Are the containers kept closed except when adding or removing wastes and are handled in a manner that will not allow the containers to rupture or leak? Yes ✓ No ____

SC III.3 - Are the containers used compatible with the hazardous waste to be stored, per 40 CFR 264.172? Yes ✓ No ____

SC III.4 – Does the facility inspect~~ion~~ the container storage area? Yes ✓ No ____

SC III.5 - Does the facility removed any spilled or leaked waste from the container storage, staging areas and collection area in a timely manner to prevent overflow of the collection system? Yes ✓ No ____

SC III.6 - Does the facility have the containers placed in the aisles between facility storage units in a manner that obstructs inspection or prevents any emergency action that may be necessary due to a spill or release? Yes ____ No ✓

SC III.7 - Has the facility placed any incompatible waste, or incompatible wastes and materials in the same container unless 40 CFR 264.177 (a) is complied with? Yes_____ No_✓_

SC III.8 - Has the facility placed any hazardous waste in an unwashed container that previously held an incompatible waste or material? Yes_____ No_✓_

SC III.9 - Does the facility store waste in the container storage unit according to Storage Group Codes (SGC)? Yes_✓_ No_____

SC III.10 - Does the facility store non-regulated waste in the storage area? If so, do they comply with requirements of 40 CFR 264.175 and that volume is included in the total volume of waste permitted to be stored in the permitted storage area. Yes_✓_ No_____

SC III.11 – Does the facility ensure that transfer waste containers managed under 40 CFR 263 are clearly identified? Yes_✓_ No_____

SC III.12 - Does the facility comply with the 15 meters (50 feet) setback rule concerning the storage of ignitable and reactive wastes in containers? Yes_✓_ No_____

Waste Consolidation

SC VI.1 – Does the facility consolidate any wastes other than: Yes_____ No_✓_
- Lab Packs
- Acids of the same Reactivity Group (RG1, RG2, RG3)
- Liquids and solid waste determined to be compatible
- Chromic acid with a concentration <50%

SC ~~IV~~ VI.2 – During consolidation, does the facility comply with:

Prevent commingling of incompatible waste and control fumes? Yes_✓_ No_____

Does a chemist supervise the entire bulking operation? Yes_✓_ No_____

Is the Perma-Fix Compatibility Test Procedure Manual used? Yes_✓_ No_____

Are compatibility test results for each waste tested documented in a log that includes changes in temperature and bubbling/gas generation? Yes_____ No_✓_ NOT FOR ALL TESTS

Is the list of wastes to be consolidated completed and approved by a Chemist prior to each test? Yes_✓_ No_____

Is corrosive waste tested for compatibility prior to bulking in totes and Again prior to bulking in tankers? DO NOT BULK INTO TANKERS Yes_____ No_____ N/A

Does bulking of corrosives begin prior to authorization by the chemist? Yes_____ No_✓_

Are personnel conducting the bulking of corrosives trained in the Compatibility test and proper use of the consolidation code? Yes_____ No_____

Is this training documented by trainers and trainees? Yes_✓_ No_____

Is a scrubber system used to control fumes? Yes_____ No_✓_

Are compatibility testing procedures included in the facility's operating record? Yes_✓_ No_____

Has the facility reported all spills exceeding the RQ to DEP and the NRC? Yes_✓_ No_____

CHECK BULK ACIDS IF SMALL 55-GAL NO RESULTS KEPT CHECK BUT DO NOT LOG

SC VII.1 - Does the facility have a written closure plan as required by 40 CFR 264.110 and described in the permit application? Yes_✓_ No_____

Operating Conditions:

Has the facility owner/operator maintained and operated the facility in such a manner as to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment [40 CFR 264.31]? Yes ✓ No

Has the facility received hazardous waste from a foreign source? Yes ✓ No

If yes, was the Department notified in writing at least 4 weeks prior to the receipt of the hazardous waste as required in 40 CFR 264.12? Yes No VICTOR WILL CHECK

Does the facility notify off-site generators in writing that the facility has the appropriate permit and will accept the hazardous waste the generator is shipping? Yes ✓ No

Has the facility identified any SWMU's not listed in FDEP application Form 62-730.900(2), Section II.P.1, page 392, (SWMU's), of the permit application? Yes No ✓

HEALTH DEPT - GRAND OAKS HOMEOWNERS - MILLCAT