

**Thursby, Kim**

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**From:** kafx97@gmail.com on behalf of Kurt Fogleman [kfogleman@perma-fix.com]  
**Sent:** Friday, June 04, 2010 3:00 PM  
**To:** Epost HWRS  
**Subject:** Re: Perma-Fix of Florida, Inc.-Gainesville;FLD 980 711 071; draft Construction and Operating Permit Application

Received 04 June 2010

On Fri, Jun 4, 2010 at 11:44 AM, Epost HWRS <[EpostHWRS@dep.state.fl.us](mailto:EpostHWRS@dep.state.fl.us)> wrote:

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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).

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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.

Tim Bahr

Environmental Administrator

Hazardous Waste Regulation

Department of Environmental Protection

E-Mail Address: [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us)

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# Florida Department of Environmental Protection

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

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

June 4, 2010

**SENT VIA E-MAIL**

[kfogleman@perma-fix.com](mailto:kfogleman@perma-fix.com)

Mr. Kurt Fogleman  
Environmental, Health and Safety Manager, Southeast Region  
Perma-Fix of Florida, Inc.  
1940 N.W. 67th Place  
Gainesville, Florida 32653-1692

Subject: Perma-Fix of Florida, Inc.; FLD 980 711 071; draft Construction and Operating Permit  
Application 17680-010-HC

Dear Mr. Fogleman:

A courtesy copy of your hazardous waste permit is attached for your review. Please provide any comments no later than June 18, 2010. If you have any questions, please call me at 850.245.8796 or [merlin.russell@dep.state.fl.us](mailto:merlin.russell@dep.state.fl.us)

Sincerely,

Merlin D. Russell Jr.  
Professional Geologist II  
Hazardous Waste Regulation

MR/mdr

cc with attachment via e-mail:

Edgar Echevarria, DEP/Tallahassee, [Edgar.Echevarria@dep.state.fl.us](mailto:Edgar.Echevarria@dep.state.fl.us)  
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PERMITTEE:  
Perma-Fix of Florida, Inc.  
1940 NW 67<sup>th</sup> Place  
Gainesville, Florida 32653

I.D. NUMBER: FLD 980 711 071  
PERMIT/CERTIFICATION NUMBER: 17680-010-HC  
DATE OF ISSUE: DRAFT  
EXPIRATION DATE: June 8, 2015

ATTENTION:  
Mr. Raymond Whittle  
Vice President

COUNTY: ALACHUA  
LATITUDE / LONGITUDE: 29°42'08" N/82°20'51" W  
PROJECT: OPERATION OF A HAZARDOUS WASTE  
TREATMENT AND STORAGE FACILITY AND  
REPLACEMENT OF ONE TREATMENT UNIT.

Pursuant to authorization obtained by the Florida Department of Environmental Protection (FDEP) under the Resource Conservation and Recovery Act [42 United States Code (U.S.C.) 6901, *et seq.*, commonly known as RCRA] and the Hazardous and Solid Waste Amendments of 1984 (HSWA), this permit is issued under the provisions of Section 403.722, Florida Statutes (F.S.) and Chapters 62-4, 62-160, 62-730, 62-777 and 62-780, Florida Administrative Code (F.A.C.). This permit replaces expired permit 17680-009-HC. The above-named Permittee is hereby authorized to perform the work or operate the facility shown on the application dated December 9, 2009 and additional information dated March 10, 2010 which are incorporated herein and collectively referred to as the "permit application." The "permit application also includes any approved drawing(s), plans, and other documents that are specifically identified and incorporated by reference. The RCRA-regulated units are specifically described as follows:

1. To operate one (1) enclosed container storage area, located in the Treatment and Operations Building (TOB), as illustrated in Figure I.D.1 and described in Part II, Section B of the permit application dated December 9, 2009, and/or subsequent revisions, and shown in Attachment D of this permit. The TOB container storage area contains seven (7) zones for storage of hazardous waste in containers meeting D.O.T. specifications and in size of 718 gallons (B-25 box) or less. The permit authorizes the storage of a maximum volume of 35,200 gallons of hazardous waste in the TOB storage area. The container storage area will include a containment system that consists of concrete curbing at least 4 inches high to prevent run-off. The hazardous waste codes for the waste to be stored in the TOB are listed in Attachment A of the permit.
2. To operate the following hazardous waste treatment units located in the TOB:
  - A. PF-I process (treatment in containers) as described in Attachment I.D.1 (pages 4-5) and Appendix II.B.1, and illustrated in Figures I.D.11.2, I.D.12 and I.D.16 through I.D.18 of the permit application dated December 9, 2009 and/or subsequent revisions. The PF-I process is a two-step process for the permanent stabilization and/or solidification of hazardous and mixed waste conducted primarily in 55-gallon drums.
  - B. Existing PF-II process (miscellaneous treatment unit) as described in Attachment I.D.1 (pages 5-6) and Part II, Section I, and illustrated in Figures I.D.2, I.D.11.3, I.D.12, and I.D.16 through I.D.18 of the permit application dated December 9, 2009 and/or subsequent revisions. The PF-II process consists of thermal desorption and/or chemical oxidation/reduction in a treatment unit. The existing PF-II treatment equipment is planned to be replaced with continuous PF-II treatment

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- equipment and feed preparation equipment in the TOB by December 2014 as described in Attachment II.I.7 of the permit application dated December 9, 2009 and/or subsequent revisions.
- C. Lab Pack decommissioning as described on Attachment I.D.1 (pages 7-9) of the permit application dated December 9, 2009 and/or subsequent revisions.
  - D. Fuel blending activity as described on Attachment I.D.1 (page 8) of the permit application dated December 9, 2009 and/or subsequent revisions.
  - E. Mercury amalgamation as described on Attachment I.D.1 (pages 7 and 13) and Appendix II.B.3 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - F. Non-elementary neutralization as described on Attachment I.D.1 (pages 7 and 13) and in Appendix II.B.4 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - G. Deactivation process as described in Attachment I.D.1 (page 7-8) and Appendix II.B.2 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - H. Treatment using a Drum Rotator as described in Attachment I.D.1 (page 7) of the permit application dated December 9, 2009 and/or subsequent revisions.
  - I. Solvent Recycling, an activity exempt from RCRA permitting requirements.

The above processing will be conducted in the TOB, which is provided with 6-inch thick and at least 5.75-inch high curbing near its walls. Exhaust and fugitive emissions from treatment operations within the TOB will be treated through an air pollution control system consisting of a regenerative thermal oxidizer (RTO)/HEPA filter system. The permitted waste codes for treatment in the TOB are listed in Attachment A of this permit.

- 3. To operate a container storage area, located in the Processing and Storage Building (PSB), illustrated in Figure I.D.4 and described in Part II, Section B of the permit application dated December 9, 2009 and/or subsequent revisions, and in Attachment E of this Permit. The PSB container storage area contains three (3) zones for storage of hazardous waste in containers meeting D.O.T. specifications and in size of 718 gallons (B-25 box) or less. The permit authorizes the storage of a maximum volume of 72,105 gallons of hazardous waste in the PSB storage area. The storage area is covered and has a containment system consisting of 6-inch wide concrete curbing at least 2.75 inches high and two sumps to prevent both run-on and run-off. The permitted hazardous waste codes for the waste stored in this area are listed in Attachment A of this Permit.
- 4. To conduct the following hazardous waste activities located in the PSB:
  - A. Fuel-blending operations including phase separation treatment in this area, as described Attachment I.D.1, Page 7 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - B. Lab Pack Decommissioning as described Attachment I.D.1, Page 8 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - C. Storage and bulking of chemotherapy and pharmaceutical waste as described Attachment I.D.1, Page 9 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - D. Chemical precipitation, chemical reduction, neutralization, filtration, flocculation and physical treatment (i.e., sorting and segregation) as described Attachment I.D.1, Page 9 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - E. Tank storage as described in condition 6 below.
- 5. To operate a 3,000-gallon horizontal, aboveground storage tank illustrated in Figure I.D.4 and described in Part II, Sections C of the permit application dated December 9, 2009 and/or subsequent

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revisions and in Attachment E of this Permit. The storage tank is used for the accumulation and storage of radioactive mixed waste containing ethanol, toluene and xylene that is generated from the LSV process. This tank is located within secondary containment inside the PSB.

6. To operate a container storage area, located in the LSV Processing and Waste Storage Warehouse, illustrated in Figure I.D.7 and described in Section II.B of the permit application dated December 9, 2009 and/or subsequent revisions, and in Attachment C of this Permit. The LSV container storage area consists of two (2) zones for storage of hazardous waste in containers meeting D.O.T specifications and in size of 718 gallons (B-25 box) or less. The permit authorizes the storage of a maximum volume of 54,340 gallons of hazardous waste in the LSV Processing and Waste Storage Warehouse area. The storage area is covered and has a containment system consisting of at least 2.75" high x 5'5" concrete curbing. The hazardous waste codes for the waste permitted to be stored in this area are listed in Attachment A of this Permit.
7. To operate one (1) hazardous waste container treatment unit for hazardous waste debris treatment, located in the Liquid Scintillation Vials (LSV) Processing Area, described in Attachment I.D.1 (Appendix A) of the permit application dated December 9, 2009 and/or subsequent revisions. The unit is comprised of an approximately 250-gallon stainless steel portable vat, equipped with an emission control hood. The unit is located within the 5 3/4" x 6" concrete curbing of the LSV Processing area of the LSV Processing and Waste Storage Warehouse (LSW). Exhaust and fugitive emissions from debris treatment operations within the LSV area will be treated through an air pollution control system consisting of HEPA filters and a regenerative thermal oxidizer. The permitted waste codes for treatment in the LSV Processing Area are listed in Attachment A of this permit.
8. To conduct the additional following hazardous waste activities located in the LSV:
  - A. LSV Processing as described Attachment I.D.1, Pages 9-11 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - B. Repackaging as described Attachment I.D.1, Page 11 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - C. Chemical extraction, physical extraction and micro-encapsulation including debris treatment as described Attachment I.D.1, Pages 11-12 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - D. Lab Pack Decommissioning as described Attachment I.D.1, Page 12 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - E. Solid Waste Management as described Attachment I.D.1, Page 12 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - F. Miscellaneous Waste Storage and Transfer as described Attachment I.D.1, Page 12 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - G. Fuel Blending as described Attachment I.D.1, Pages 13 and 8 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - H. Mercury Amalgamation as described Attachment I.D.1, Page 13 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - I. Non-elementary neutralization as described Attachment I.D.1, Page 13 of the permit application dated December 9, 2009 and/or subsequent revisions.
  - J. Treatment using a drum rotator as described Attachment I.D.1, Page 13 of the permit application dated December 9, 2009 and/or subsequent revisions.

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- K. Deactivation of D003 waste as described Attachment I.D.1, Page 13 of the permit application dated December 9, 2009 and/or subsequent revisions.
9. The existing PF-II treatment equipment is planned to be replaced with a newly constructed continuous PF-II treatment equipment and feed preparation equipment in the TOB by December 2014 as described in Attachment II.I.7 of the permit application dated December 9, 2009 and/or subsequent revisions. This proposed treatment process will replace the existing PF-II process described in item 2.B. above.

The Permittee is required to investigate any releases of contaminants to the environment at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. Solid waste management units (SWMUs) and areas of concern (AOCs) identified to date are listed in Appendix A. Pursuant to 40 Code of Federal Regulations (CFR) 260.10 [as adopted by reference in Rule 62-730.020(1), F.A.C.], the corrective action requirements of this RCRA permit extend to all contiguous property under the control of the Permittee (see Attachment A, a map which demarks the property boundaries of land under the Permittee's control) and to all contamination that originated from discharges at the contiguous property under control of the Permittee.

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with Rule 62-730.290, F.A.C and potential enforcement action.

The facility conducts transfer facility operations for used oil that is regulated under Chapter 62-710, F.A.C. and 40 CFR Part 279. The facility also operates a mercury-containing lamps and devices transfer facility, in accordance with Chapter 62-737, F.A.C. as discussed in Attachment I.D.1 (pages 2 and 11) of the permit application dated December 9, 2009 and/or subsequent revisions. Both transfer operations are located in the LSV Processing and Waste Storage Warehouse, illustrated in Figure I.B.2 of the permit application dated December 9, 2009 and/or subsequent revisions, and in Attachment C of this permit.

The facility conducts Treatability Studies in accordance with 40 CFR Part 261.4(f).

A chain link fence surrounds the site, and gates are locked after normal working hours. The facility is illustrated in Figure I.B.2 and photographs in Attachment I.B.1 of the permit application dated December 9, 2009 and/or subsequent revisions and in Attachments F and G of this permit. The facility is physically located at 1940 NW 67th Place, Gainesville, Florida.

The following documents were used in the preparation of this permit:

1. *Final Report Offsite Consequence Analysis and Air Modeling* dated January 2006.
2. Part B Permit Application and Renewal Application dated December 9, 2009.
3. *Substantial Modification Demonstration, Perma-Fix of Florida, Inc., EPA ID No. FLD 980 711 071, Permit No. 17680-009* dated December 2009
4. PFF response dated March 10, 2010 to FDEP's first Notice of Deficiencies issued on February 10, 2010.

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## **PART I - GENERAL AND STANDARD CONDITIONS**

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are “permit conditions” and are binding and enforceable pursuant to Sections 403.141 and 403.727, F.S. The Permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
3. As provided in Sections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.
4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.
5. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
6. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.
7. The Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:
  - a. Have access to and copy any records that must be kept under conditions of the permit;
  - b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
  - c. Sample or monitor any substances or parameters at any time or location reasonably necessary to assure compliance with this permit or Department rules.

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Reasonable time may depend on the nature of the concern being investigated.

8. The Permittee shall comply with the following notification and reporting requirements:
  - a. If, for any reason, the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide the Department with the following information:
    - (1) A description of and cause of noncompliance; and
    - (2) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.
  - b. Notification of any noncompliance or emergency response including interim source removal, which may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, shall be reported verbally to the Department within 24 hours, and a written report shall be provided within five days. The verbal report shall include the name, address, I.D. number, and telephone number of the facility and its owner or operator; the date, time, and type of incident; the name and quantity of materials involved; the extent of any injuries if any; an assessment of actual or potential hazards; and the estimated quantity and disposition of recovered material. The written submission shall contain all the elements of the verbal report and:
    - (1) A description and cause of the noncompliance.
    - (2) If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.
  - c. The Permittee shall comply with the "Notices" provisions of Rule 62-780.220, F.A.C.
    - (1) prior to performing field activities;
    - (2) when contamination beyond the facility boundary is confirmed by laboratory analysis;
    - (3) when a temporary point of compliance (TPOC) is established beyond the boundary of the source property in conjunction with monitored natural attenuation or active remediation;
    - (4) five year annual update to the status of a TPOC; and
    - (5) warning signs at facilities where there may be a risk of exposure to the public of environmental media contaminated with hazardous waste.
  - d. The Permittee shall give written notice to the Department within 15 days of any planned physical alterations or additions that could affect activities covered by this permit. The notice shall include at a minimum, a summary of the planned change, the reason for the

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planned change, a discussion of the effect(s) the planned change will have on the ability to investigate contamination at or from the contaminated site, and a discussion of the effect(s) the planned change will have on the known or suspected contamination.

- e. The Permittee shall revise "Part I - General" of the Application for a Hazardous Waste Facility Permit [DEP Form 62-730.900(2)(a)] and submit the revised form to the Department within 30 days of any changes in the Part I information.
- f. Biennial report: A biennial report covering facility activities during the previous calendar year shall be submitted by March 1 of each even numbered year.
- g. Manifests:
  - (1) Unmanifested waste report: The Permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.
  - (2) Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the Permittee shall attempt to rectify the discrepancy. If not resolved within 15 days after the waste is received, the Permittee shall immediately submit a letter report, including a copy of the manifest, to the Department.
9. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.
10. The Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.
11. This permit is transferable only upon written Department approval in accordance with Rules 62-4.120 and 62-730.290(6) F.A.C., as applicable. The Permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department. Before transferring ownership or operation of this facility during the term of this permit, the Permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 264 and Chapter 62-730, F.A.C.
12. This permit or a copy thereof shall be kept at the work site of the permitted activity. In the event that there is no building or reasonable repository for such a copy at the work site, then the permit or a copy thereof shall be kept at an alternate location agreed to by the department.
13. Reserved.

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14. The Permittee shall comply with the following recordkeeping requirements:

- a. Upon request, the Permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
- b. The Permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit; copies of all reports required by this permit; records of all data used to complete the application for this permit; and all monitoring data required by 40 CFR Part 264 Subparts F and G, and 40 CFR 264.228. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.
- c. Records of monitoring information shall include all required items in Chapter 62-160, F.A.C. These include at a minimum:
  - (1) The date, exact place, and time of sampling or measurements;
  - (2) The person responsible for performing the sampling or measurements;
  - (3) The dates analyses were performed;
  - (4) The person responsible for performing the analyses;
  - (5) The analytical techniques or methods used; and
  - (6) The results of such analyses.
- d. As a generator of hazardous waste, the Permittee shall retain a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced to comply with land disposal restrictions (40 CFR Part 268) for at least three years from the date that the waste which is the subject of such documentation was last sent to an on property or off-property facility for treatment, storage, or disposal, or until remedial activity is completed, whichever date is later. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
- e. The Permittee shall keep a written operating record at the facility, which includes:
  - (1) The results of any waste analysis;
  - (2) Copies of hazardous waste manifests for three years;
  - (3) The results of inspections;

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- (4) The closure plan, postclosure plan, and remedial action (corrective measures) plans as applicable for each contaminated site, along with cost estimates for each plan;
  - (5) Inspections of emergency and safety equipment (Condition 24 of this Part);
  - (6) Biennial reports;
  - (7) Personnel training records (Part II Subpart A - Condition 2);
  - (8) The Waste Minimization Program Plan (Part II Subpart A - Condition 8);
  - (9) Annual certification of waste minimization (Part II Subpart A - Condition 8);
  - (10) The description and quantity of each hazardous waste [received/generated];
  - (11) The location of each hazardous waste within the facility and the quantity at location;
  - (12) Notices to generators as specified in 40 CFR 264.12(b);
  - (13) A log of dates of operations and unusual events;
  - (14) A summary report and details of incidents that require implementation of the contingency plan (Part II Subpart A-Condition 6);
  - (15) Monitoring and test data for 40 CFR 264 Subparts AA, BB, and CC requirements; and
  - (16) Documentation that local officials have refused to enter into preparedness prevention arrangements with the Permittee.
15. Within the timeframe requested by the Department, the Permittee shall furnish any information required by law which is needed to determine compliance with the permit. If the Department's request does not include a timeframe, the time of response is 30 days. If the Permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.
16. Except as otherwise specifically provided in this permit, all submittals in response to permit conditions shall be provided as described below.
- a. One hard and one electronic copy in optical media format shall be sent to:

Environmental Administrator  
Hazardous Waste Regulation Section M.S. 4560  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

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- b. In addition to copies sent to the Hazardous Waste Regulation Section in Tallahassee, one hard and one electronic copy of all submittals in response to post-closure or operating permit conditions shall be sent to:

Hazardous Waste Supervisor  
Department of Environmental Protection  
Suite 200B  
7825 Baymeadows Way  
Jacksonville, Florida 32256-7590

- 17. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating the name and date of the document submitted, the number(s) of the Part(s) and Condition(s) affected, and the permit number and project name of the permit involved.
- 18. All documents proposing modifications to the approved permit and involving the practice of engineering must be submitted to the Department for review and be signed, sealed, and certified by a Professional Engineer registered in the State of Florida, in accordance with Chapter 471, F.S. and Rule 62-730.220(9), F.A.C. All submittals incorporating interpretation of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with Chapter 492, F.S. and Rule 62-730.220(10), F.A.C.
- 19. The Department of Environmental Protection's 24-hour emergency telephone number is (850) 413-9911 or (800) 320-0519. During normal business hours, the DEP District Office may be contacted at (904) 807-3300 (Jacksonville).
- 20. The following conditions apply to permit modification and revocation of this permit:
  - a. The Department may modify, revoke, reissue or terminate for cause this permit in accordance with Chapters 62-4 and 62-730, F.A.C. The filing of a request for a permit modification, revocation, reissuance, or termination or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition. The Permittee may submit any subsequent modifications to the Department for approval. The application shall meet the fee requirements of Rule 62-730.293, F.A.C. The Permittee shall submit the application for revisions to the address in Condition 16 of this Part. The Permittee shall submit a copy of the cover letter accompanying the revisions and the fee to:

Florida Department of Environmental Protection  
Hazardous Waste Regulation Section  
Post Office Box 3070  
Tallahassee, Florida 32315-3070
  - b. The modification fee may also be submitted electronically. However, if the Permittee intends to submit the modification fee electronically, the Permittee shall obtain instructions from the Department on how to submit the renewal fee electronically prior to attempting such submittal and shall follow such instructions in making the electronic fee submittal.

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- c. All requests for permit modifications shall include an evaluation of the applicability of, and Permittee's compliance with, the siting criteria of Section 403.7211, F.S. and Rule 62-730.186, F.A.C.
21. Prior to 180 calendar days before the expiration of this permit, the Permittee shall submit a complete application for the renewal of the permit on forms and in a manner prescribed by the Department unless postclosure care and all corrective action have been completed and accepted by the Department. If the Permittee allows this permit to expire prior to Department acceptance of the certification of postclosure and termination of all corrective action, the Permittee must reapply for a permit in accordance with DEP Form 62-730.900(2), F.A.C. The Permittee shall submit the renewal to the address in Condition 16 of this Part. The Permittee shall submit one copy of the cover letter accompanying the renewal and the fee to:  
  
Florida Department of Environmental Protection  
Hazardous Waste Regulation Section  
Post Office Box 3070  
Tallahassee, Florida 32315-3070
22. The renewal fee may also be submitted electronically. However, if the Permittee intends to submit the renewal fee electronically, the Permittee shall obtain instructions from the Department on how to submit the renewal fee electronically prior to attempting such submittal and shall follow such instructions in making the electronic fee submittal.
23. The Permittee shall comply with those sections of 40 CFR Part 124 specified in Rule 62-730.200(3), F.A.C., 40 CFR Parts 260 through 268, and 40 CFR Part 270 as adopted in Chapter 62-730, F.A.C., until all operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.
24. The Permittee shall comply with the security provisions of 40 CFR 264.14 and the facility security provisions in Part II.A.4 of the permit application dated December 9, 2009 and/or subsequent revisions.
25. If this facility is a suspected or confirmed contaminated facility where there may be a risk of exposure to the public, then upon direction from the Department the Permittee must comply with the warning sign requirements of Section 403.7255, F.S., and Rule 62-730.225(4), F.A.C. The Permittee is responsible for supplying, installing and maintaining the warning signs.
26. The Permittee shall visually inspect the facility emergency and safety equipment in accordance with 40 CFR 264.15 and Attachment II.A.2 (Contingency Plan) of the permit application dated December 9, 2009 and/or subsequent revisions during permitted activities. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with the requirements of 40 CFR 264.15(c). A schedule for the inspection of the facility emergency and safety equipment must be maintained as the operating record of the facility. Changes, additions, or deletions to the schedule must be approved in writing by the Department.
27. The Permittee shall comply with the following conditions concerning preparedness and prevention:

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- a. At a minimum, the Permittee shall have the equipment available at the facility which is described in Attachment II.A.2 (Contingency Plan) of the permit application dated December 9, 2009 and/or subsequent revisions.
  - b. The Permittee shall test and maintain the required equipment as necessary to assure its proper operation in time of emergency.
  - c. The Permittee shall maintain immediate access to an internal communications or alarm system.
  - d. The Permittee shall maintain arrangements with State and local authorities as required by 40 CFR 264.37. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record. At a minimum, State and local authorities shall include:
    - (1) Gainesville Fire Department.
    - (2) Gainesville Police Department.
    - (3) Local hospital.
    - (4) Your Emergency Response Contractor.
  - e. At a minimum, the Permittee shall maintain aisle space to allow the unobstructed movement of personnel, fire protection, and emergency response equipment to any area of the Facility.
  - f. The Permittee shall perform, at a minimum, an annual review of the Preparedness and Prevention Plan to ensure that it is up to date and contains current information.
  - g. Within one week of completing any updated Preparedness and Prevention Plan, an updated electronic copy shall be sent to each state and local authority in 26.d above.
28. The conditions in this permit shall take precedence over the permit application documents where there are differences between those documents and the permit conditions.
29. The Permittee may claim that any information required to be submitted by this permit is confidential in accordance with Rule 62-730.100(3), F.A.C.
30. All work plans, reports and schedules and other documents ("submittals") required by this permit are subject to approval by the Department prior to implementation. The Department will review the submittals and respond in writing. Upon written approval by the Department, the Permittee shall implement all work plans, reports and schedules as provided in the approved submittal. If the Department disapproves a submittal, the Department may:
- a. Notify the Permittee in writing of the reason(s) why the submittal does not contain information adequate to support the conclusion, alternative, plan, proposal or recommendation, or why the conclusion, alternative, plan, proposal or recommendation is not supported by the applicable criteria. In this case the Permittee shall submit a revised submittal within 60 days of receipt of the Department's disapproval; or



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- b. Revise the submittal, or approve the submittal with conditions, and notify the Permittee of the revisions or conditions. In the case of work plans, the Department may notify the Permittee of the start date of the schedule within the revised or conditionally approved work plan.
31. Any dispute resolution will be conducted in accordance with Chapter 120, F.S. (Administrative Procedure Act), Chapter 28-106, F.A.C. and the Department's existing rules and procedures.
32. The following conditions apply to land disposal (placement) of hazardous wastes:
  - a. 40 CFR Part 268 identifies hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage, or disposal unit. The Permittee shall maintain compliance with the requirements of 40 CFR Part 268. Where the Permittee has applied for an extension, waiver, or variance under 40 CFR Part 268, the Permittee shall comply with all restrictions on land disposal under this Part once the effective date for the waste has been reached pending final written approval of such application.
  - b. A restricted waste identified in 40 CFR Part 268 Subpart C may not be placed in a land disposal unit without further treatment unless the requirements of 40 CFR Part 268 Subparts C and/or D are met.
  - c. The storage of hazardous wastes restricted from land disposal under 40 CFR Part 268 is prohibited unless the requirements of 40 CFR Part 268 Subpart E are met.
33. The Permittee shall implement remedial activities beyond the facility boundary, if there is suspected or confirmed off-property contamination, to protect human health and the environment, unless the Permittee demonstrates to the satisfaction of the Department that, despite the Permittee's best efforts, as determined by the Department, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee shall use all reasonable efforts, including but not limited to correspondence, telephone calls, personal contacts, drafting and redrafting agreements, and payment of a fee, to obtain any access to real property necessary for work to be performed in the implementation of this permit. If necessary access cannot be obtained by the Permittee, or if obtained, is revoked by owners or entities controlling access to the properties to which access is necessary, the Permittee shall notify the Department within five business days of such refusal or revocation. The Department may at any time thereafter seek to obtain such access as is necessary to implement the terms of this permit. The Permittee shall reimburse the Department for any damages, costs, or expenses, including expert and attorneys' fees, that the Department is ordered to pay, or that the Department incurs in connection with its efforts to obtain necessary access to said property. The Permittee shall pay these sums to the Department, or arrange a payment schedule with the Department, within 30 days of demand by the Department. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where off-property access is denied. On-site measures to address such releases will be determined on a case-by-case basis.
34. The Permittee owns the real property that comprises the Facility. If and when the Permittee intends to transfer parcels to third parties, the Permittee may drop a parcel from the Facility covered by this permit, and the Department will approve the dropping of the parcel so long as the

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parcel never contained a contaminated site, or so long as any contamination associated with the contaminated site has been addressed to the satisfaction of the Department. The satisfaction of the Department maybe conditioned on a sale with certain legal restrictions on the future use and/or remedial activity requirements on the parcel being dropped. Even though a parcel is no longer defined as part of the facility as a result of the permit modification (using the minor modification requirements of Rule 62-730.290(4), FAC), in the unanticipated and improbable event that a previously unknown contaminated site is found on the parcel, and such contamination resulted from activities which occurred prior to the sale, the Permittee will be responsible for any corrective action along with any other persons who may have legal responsibility for the contamination.

35. The Permittee shall maintain compliance with 40 CFR Part 264, Subpart H - Financial Requirements and Rule 62-730.180(6), F.A.C. All submittals relating to financial assurance shall be submitted to:

Financial Assurance M.S. 4560  
Hazardous Waste Regulation Section  
Department of Environmental Protection  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

36. Financial assurance shall be based on estimates of the costs to close the facility and to implement postclosure care and/or corrective action (including the assessment phase and interim measures) (collectively referred to hereinafter as "remedial activities") for a continuing (rolling) period of 30 years, unless this period is shortened or increased by the Department in a permit renewal or modification. The cost estimates must be based on the cost to the owner or operator of hiring a third party to conduct remedial activities. The Permittee shall include cost estimates with every work plan required by this permit. Cost estimates are subject to review and written approval by the Department. In the event the total cost estimate for all remedial activities increases beyond the amount provided by Permittee, the financial assurance instrument(s) must be increased accordingly within 60 days of the estimate increase, or, for those facilities using a financial test, in the next scheduled submittal. If the estimate increase causes the inability of the facility to provide financial assurance through its currently selected mechanism, alternate financial assurance must be provided within 60 days. If contamination from the facility goes beyond the property boundary, the Permittee shall provide assurances of financial responsibility for completion of corrective action beyond the property boundary.

## **PART II - OPERATING CONDITIONS**

### **Part II Subpart A - General Operating Conditions**

1. The Permittee shall notify the Department in writing four weeks prior to receipt of hazardous waste from a foreign source. Notice of subsequent shipments of the same waste from the same foreign source is not required.
2. The owner or operator of a facility that receives hazardous waste from an off-site source (except where the owner or operator is also the generator) must inform the generator in writing that he has the appropriate permit(s) for, and will accept, the waste the generator is shipping.

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3. Facility personnel must successfully complete the approved training program indicated in Attachment II.A.3 Personnel Training Program of the permit application dated December 9, 2009 and/or subsequent revisions, within six months of employment or assignment to a facility or to a new position at the facility. Verification of this training must be kept with the personnel training records and maintained at the facility. Personnel shall not work unsupervised until training has been completed. The training must be reviewed by facility personnel at least annually. The Permittee shall maintain an updated list of personnel handling hazardous waste and their respective job titles at the facility.
4. The Permittee shall maintain and operate the facility to minimize the possibility of 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.
5. Permittee shall comply with the manifest requirements of 40 CFR 264.71 and 264.72. The Permittee must document the reconciliation of any manifest discrepancies.
6. The Permittee shall comply with the following conditions concerning the Contingency Plan:
  - a. The Permittee shall immediately carry out the provisions in Attachment II.A. 2 (Contingency Plan) of the permit application of the permit application dated December 9, 2009 and/or subsequent revisions, and follow the emergency procedures described by 40 CFR 264.56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment. The Permittee shall give proper notification if an emergency situation arises and, within five calendar days, must submit to the Department a written report which includes all information required in Part I Condition 8.(b).
  - b. The Permittee shall comply with the requirements of 40 CFR 264.53.
  - c. Within seven calendar days of meeting any criterion listed in 40 CFR 264.54(a), (b) or (c), the Permittee shall amend the plan and submit the amended plan for Department approval. Any other changes to the plan must be submitted to the Department within seven days of the change. Amendments to the plan must be approved in writing by the Department. All amended plans must be distributed to the appropriate agencies.
  - d. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.
7. Sampling and analysis of permitted and new hazardous wastes shall be conducted in accordance with Attachment II.A.4 - Waste Analysis Plan of the permit application dated December 9, 2009 and/or subsequent revisions.
  - a. The Permittee is liable for waste profiles supplied to generators.
  - b. Prior to acceptance of new waste codes a permit modification is required.

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8. The Permittee shall develop and maintain a Waste Minimization Program Plan. The Permittee shall maintain copies of the certification required by this Condition in the facility operating record for a minimum of three years. The Permittee must certify, no less often than annually, that:
  - a. The Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable; and
  - b. The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee, which minimizes the present and future threat to human health and the environment.
9. In addition to the copies sent to the Hazardous Waste Regulation Section in Tallahassee, one electronic and one hardcopy of all submittals in response to permit conditions in this Part shall be sent to the district office at the address listed in Part I.16.b.
10. With respect to ignitable and reactive wastes, the Permittee shall comply with 40 CFR 264.17, 264.176, and 264.198. With respect to incompatible wastes, the Permittee shall comply with 40 CFR 264.177 and 264.199.

## **Part II Subpart B - Specific Operating Conditions**

### **Part II Subpart B.1-Miscellaneous Treatment Units**

1. The Permittee shall conduct the Perma-Fix I<sup>®</sup> Process (PF-I) and Perma-Fix<sup>®</sup> II Process (PF-II) treatment in accordance with specifications and procedures described in Appendix II.B.1 (Perma-Fix I<sup>®</sup> Process) and Section II.I (Perma-Fix<sup>®</sup> II Process) of the permit application dated December 9, 2009 and/or subsequent revisions.
2. The permittee shall not treat in the PF-II process more than 3,000 pounds on any single day. The maximum quantity of hazardous waste treated in any single batch shall not exceed 85 gallons for the existing PF-II process.
3. The Permittee is allowed to treat, in the PF-II reactor vessel, wastes contaminated with the volatile organic hazardous constituents at the maximum concentrations, listed in Table 1 in the Air Toxic Modeling Report dated August 2005 and Table 1 Proposed Waste Codes in the Substantial Modification Demonstration dated December 2009. The waste codes permitted for treatment are listed in Attachment II.A.5 of the permit application dated December 9, 2009 and/or subsequent revisions and Attachment A of this Permit.
4. The Permittee shall only conduct hazardous debris treatment, as described in Attachment I.D.1, Page 11 and Appendix A, Part I of the permit application dated December 9, 2009, and/or subsequent revisions, in the hazardous debris vat unit located inside the LSV Processing area. Also, the Permittee shall capture all solids and liquid residuals generated from the debris treatment activities inside the primary containment vat unit and manage them as described in Attachment I.D.1, Appendix A of the permit application dated December 9, 2009 and/or subsequent revisions.

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5. The Permittee is allowed to treat only hazardous debris with the waste codes listed in Attachment A of the permit. Also, the extent of treatment shall be limited to achieve compliance with 40 CFR 268.45.
6. The Permittee shall not conduct hazardous debris treatment with any equipment that the facility uses in the LSV Process. Furthermore, the Permittee shall not commingle any non-liquid waste from the hazardous debris unit into the LSV Process.
7. The Permittee shall comply with waste compatibility requirements of 40 CFR 264.17(b).
8. All treatment of the hazardous waste shall be conducted by qualified trained personnel, experienced in handling such material. [40 CFR 264.16]
9. The Permittee shall verify and record in the operating records, that the Air Emission Control System (AECS) is engaged and operating properly prior to performing any hazardous waste or hazardous debris treatment activities, including opening, loading or unloading waste containers. Additionally, the Permittee shall verify and record in the operating records that the TOB is under negative pressure prior to performing PF-I or PF-II treatment. The AECS shall remain in operation and the primary chamber temperature be maintained at 1,300°F to 1,500°F while treatment operations are conducted.
10. The Permittee shall remove treated waste and other residues from the treatment unit(s) and ancillary equipment, and decontaminate the equipment, in accordance with the decontamination procedures described in Section II.I "Process Residuals Management" (Pages 5-6) of the permit application dated December 9, 2009, and/or subsequent revisions for the existing PF-II process.
11. The Permittee shall not store more than twenty (20) drums 55 gallons or less in size in the TOB processing area at any time, as listed in Section II.I, Attachment II.I.4 of the permit application dated December 9, 2009, and/or subsequent revisions. The Permittee is authorized to store wastes in totes, B-12 containers, or B-25 containers in the TOB processing area in a single stack as long as these containers do not significantly affect the capacity of secondary containment in the TOB processing area (e.g., containers provided with legs/supports). The Permittee shall remove all treated waste and treatment residues from the treatment areas of the TOB and hazardous debris unit areas within twenty-four (24) hours of completion of the treatment event. Furthermore, staging of waste containers for treatment in the treatment areas of the TOB or hazardous debris unit area will be limited to twenty-four (24) hours prior to beginning treatment. The Permittee shall not store any waste in the treatment unit areas for a period greater than forty-eight (48) hours, including treatment time.
12. The Permittee shall maintain a written record of the date, time, and number of all waste containers being transferred in and out of the TOB treatment area or hazardous debris unit treatment area and shall record this information in the facility operating record.
13. The Permittee shall provide adequate fire protection to ensure confinement and control of any fire resulting from operation, as specified in the Contingency Plan, Attachment II.A.2, Section 4.5.4.1 (Page 5) of the permit application dated December 9, 2009, and/or subsequent revisions.

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14. The Permittee shall maintain an operational record describing treatment activities for PF-I, PF-II and Debris treatment processes. The operational record shall be kept as part of the operating records for a period of 5 years and shall include the following information:
  - a. Description and quantity of each hazardous waste received and treated at the unit(s) and dates of treatment;
  - b. Concentration of volatile organic hazardous constituents for each waste stream placed in the PF-II reactor vessel, pursuant to the Specific Condition 3 of this Part. The Permittee may use generator knowledge (*e.g.*, land ban notifications) or analytical data for the purpose of this record keeping requirement;
  - c. List of personnel present during each treatment operation on a given day;
  - d. Operating conditions of the Air Emission Control System including flow rate and temperature recorded once per day during treatment operation after the proposed PF-II process is implemented. Until then, the RTO temperature will be recorded on a daily basis on each day treatment is performed; and
  - e. Details of any problems discovered during inspections conducted pursuant the Specific Conditions 15 and 16 of this Part and details of remedial actions taken.
15. The Permittee shall conduct internal inspections of the PF-II reactor vessel and accumulator tank, as specified in Section II.I, Attachment II.I.2 of the permit application dated December 9, 2009, and/or subsequent revisions, for the existing process. The Permittee shall also inspect the thermal oxidizer and calibrate the temperature in the primary chamber at least once a year. The Permittee shall conduct an internal inspection of the proposed PF-II reactor vessel at least once a year.
16. The Permittee shall conduct inspections of the miscellaneous unit(s) on each day treatment is conducted in accordance with Section II.I, Attachment II.I.2 of the permit application dated December 9, 2009, and/or subsequent revisions for the existing PF-II process. Inspection of the proposed PF-II process will be conducted on each day treatment is performed, in accordance with Section II.I, Attachment II.I.7 (page 6) of the permit application dated December 9, 2009 and/or subsequent revisions. If a significant deterioration of the concrete pad, joint sealant material or protective coating (due to accidental spills) is noted in these inspections, the Permittee shall re-evaluate the need for a more resistant protective coating or seal material. All the inspection reports including corrective actions must be recorded and kept as part of the operating records [40 CFR 264.15].
17. The Permittee shall implement appropriate remedial actions for the problems discovered during the inspections conducted pursuant to the Specific Condition 15 and 16 of this Part. For problems that cannot be remediated within forty-eight (48) hours, the Permittee shall notify the Department within three (3) working days and follow up with a written report within fourteen (14) days of discovering such problems. The report must include descriptions of the remedial actions taken. The Permittee shall cease operation of the miscellaneous treatment unit until completion of the necessary repairs.
18. The Permittee shall provide a written report to the Department within thirty (30) days of removing any component of the PF-II treatment unit or its ancillary equipment from service and shall include a

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description of the decontamination procedures. The Permittee shall follow the closure plan, Section II.K of the permit application dated December 9, 2009, and/or subsequent revisions, for the decontamination procedures.

## **Part II Subpart B.2-Container Storage Areas/Units**

1. The Permittee is allowed to store the wastes listed in Attachment A of this permit only in the Processing and Storage Building (PSB), Treatment and Operations Building (TOB), and in the Liquid Scintillation Vial (LSV) Processing and Waste Storage Warehouse. Containers must conform to D.O.T. requirements. If a container holding hazardous waste is not in good condition, or begins to leak, the waste shall be transferred to another container that is in good condition [40 CFR 264.171] or it will be overpacked. Containers shall be kept closed, except when adding or removing waste and be handled in a manner that will not allow the containers to rupture or leak [40 CFR 264.173].
2. The Permittee shall not store any hazardous waste, which is not listed in Specific Condition 1 of this Part. Non-hazardous waste, or raw materials/products are authorized to be stored in the permitted container storage areas as long as the total storage does not exceed the permitted capacity.
3. The Permittee shall not store, in a single container, chemical constituents above the quantities listed in under the third column "Maximum Container Quantity (lbs)" of Attachment B. The attachment was developed from Tables 5 and 8 from the "Final Report Offsite Consequence Analysis and Air Modeling" dated January 2006. If a constituent was present in both tables the more restrictive data, (*i.e.* the small number in the "amount released" column) was listed in the table.
4. The Permittee shall use only those containers made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored in them [40 CFR 264.172].
5. The Permittee shall conduct visual daily inspections of the permitted container storage area for each working day, in accordance with Section II.B, Subsection B5 of the permit application dated December 9, 2009, and/or subsequent revisions, to detect leakage in the hazardous waste areas or their associated loading/unloading zones [40 CFR 264.174]. Inspections shall be documented on a weekly basis, at a minimum in accordance with 40 CFR 264.174. If, in spite of the inspections, a significant deterioration of the concrete pad or joint sealant material is noted, the Permittee shall re-evaluate the need for a protective coating/more resistant seal material.
6. The Permittee shall remove spilled or leaked waste and accumulated precipitation from the secondary containment areas in as timely a manner as is necessary to prevent overflow of the secondary containment, per the requirements of 40 CFR 264.175.
7. The Permittee shall comply with the waste compatibility requirements of 40 CFR 264.177 as indicated in Section II.B, Subsections B2 & 3 of the permit application dated December 9, 2009, and/or subsequent revisions.
8. The Permittee shall comply with the following conditions concerning operation of the PSB, TOB, and LSV container storage areas:

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- a. The Permittee shall maintain and operate the facility as required by 40 CFR 264.175 and in accordance with Part II, Section B of the permit application dated December 9, 2009, and/or subsequent revisions.
  - b. The Permittee shall store a maximum of 72,105 gallons of waste in containers and in sizes up to 718 gallons (B-25 box) or less, in the PSB storage area as shown in Figure I.D.4 of the permit application dated December 9, 2009, and/or subsequent revisions. The containers shall meet D.O.T. specifications.
  - c. The Permittee shall store a maximum of 35,200 gallons of waste in containers in sizes up to 718 gallons (B-25 box) or less, in the TOB storage area as shown in Figure I.D.1 of the permit application dated December 9, 2009, and/or subsequent revisions. The containers shall meet D.O.T. specifications.
  - d. The Permittee shall store a maximum of 54,340 gallons in containers in sizes up to 718 gallons (B-25 box) or less, in the LSV Processing and Waste Storage Warehouse, as shown in Figure I.D.7 of the permit application. The containers shall meet D.O.T. specifications.
  - e. The Permittee must place the drums on standard pallets when they are single stacked. The Permittee must use pallets and banding when drums are double stacked, except for the storage inside the chemotherapy and pharmaceutical wastes in the Cage in the PSB.
  - f. For storage of drums larger than fifty-five gallons, the Permittee shall not place more than three (3) drums per pallet and shall not stack them more than two high.
9. The Permittee shall keep all containers and associated equipment used for the fuel blending and phase separation activities inside the secondary containment area of the PSB.
  10. All fuel blending and phase separation activities shall be conducted by qualified personnel experienced in handling such material. [40 CFR 264.16]
  11. The Permittee shall maintain a written record for tracking the date and quantity of all waste processed in the fuel blending and phase separation activities and include quantity of waste solvent transferred out of the LSV 3000-gallon storage tank for use in the fuel blending operation. This information shall be entered in the facility operating record.

#### **Part II Subpart B.3-Tanks**

1. The Permittee is allowed to operate one (1) Above Ground Tank ("AGT") in accordance with the design plans and specifications in Section II.C of the revised permit application dated December 9, 2009, and/or subsequent revisions.
2. The Permittee is authorized to store only radioactive mixed waste in the AGT that is generated from the Liquid Scintillation Vials (LSV) process wastes as described in Attachment I.D.1, pages 9-11 of permit application dated December 9, 2009, and/or subsequent revisions.
3. The Permittee shall store a maximum of 3,000 gallons of waste in the tank.



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4. The Permittee shall notify the Department when the volume of waste stored in the tank reaches ninety-five (95) percent capacity of the tank, *i.e.*, 2,850 gallons. An electronic notification is acceptable.
5. The Permittee shall not place ignitable or reactive waste in the tank system unless the waste is stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react. [40 CFR 264.198(a)]
6. The Permittee shall comply with the protective distance requirements for the tank placement as set forth in *The Florida Fire Prevention Code* (2007) and any subsequent revisions [40 CFR 264.198(b)].
7. The Permittee shall handle incompatible wastes in accordance with the requirements of 40 CFR 264.199, by not introducing hazardous waste into the tank system, which previously held incompatible waste or material, until the tank system is adequately decontaminated.
8. For new tank components which may be required by the repair options of 40 CFR 264.196(f), the Permittee must submit a written assessment, reviewed and certified by an independent professional engineer registered in the State of Florida, which attests to the component's structural integrity. This assessment shall meet the requirements of 40 CFR 264.192. As required in 40 CFR 264.192(b), an independent qualified inspector or independent professional engineer registered in the State of Florida must inspect the installation.
9. The Permittee shall prevent the release of hazardous waste or hazardous constituents to the environment. The secondary containment system shall be maintained according to the Section II.C of the revised permit application dated December 9, 2009, and/or subsequent revisions and shall comply with the requirements of 40 CFR 264.193, including the requirements set forth below:
  - a. All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being placed into service.
  - b. Pursuant to 40 CFR 264.193, the secondary containment system shall be:
    - (1). Maintained to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters;
    - (2). Capable of detecting and collecting releases and run-on until the collected material is removed;
    - (3). Lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses, which may be induced by the environment;
    - (4). Placed on a foundation or base capable of providing support to the secondary containment system;
    - (5). Provided with a leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours;

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- (6). Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation; and
  - (7). Designed and operated, to contain 100% of the capacity of the largest tank within its boundary and also contain the precipitation due to a 25-year, 24- hour rainfall event, if run-on control is not provided.
- c. Ancillary equipment shall be provided with secondary containment, except as provided for in 40 CFR 264.193(f).
10. Pursuant to the general operating requirements of 40 CFR 264.194, the Permittee shall:
- a. Not place hazardous wastes in the tank system if the possibility exists that this may cause the tank system to fail;
  - b. Use appropriate controls and practices to prevent spills and overflows;
  - c. Follow the operating procedures described in Attachment I.D.1 (Page 9) and Section II.C of the permit application dated December 9, 2009 and/or subsequent revisions; and
  - d. Comply with the requirements of 40 CFR 264.196 if a leak or spill occurs from the storage tank system.
11. The Permittee shall inspect the tank system in accordance with Section II.C Paragraph C5 and Appendix E of the permit application dated December 9, 2009, and/or subsequent revisions, as required by 40 CFR 264.195.
12. The Permittee shall follow the procedures outlined in Section II.C, Paragraphs C9 and C11 of the permit application date December 9, 2009, and/or subsequent revisions, and satisfy the requirements of 40 CFR 264.196 when a tank system or secondary containment system produces a leak or spill, or is determined to be unfit for use. As required by 40 CFR 264.196, these requirements shall include following items:
- a. Cessation of use; prevention of flow or addition of waste;
  - b. Removal of waste from tank system or secondary containment system;
  - c. Containment of visible releases to the environment;
  - d. Notifications, reports;
  - e. Provision of secondary containment, repair or closure; and
  - f. Certification of major repairs.
13. The Permittee shall decontaminate any ancillary equipment including pumps, pipes and valves, within thirty (30) days of removing it from service or if the Permittee fails to repair the ancillary equipment within that time. The decontamination shall be in accordance with the Section II.K, Paragraph K7.1.1

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and K.7.1.3 of the closure plan, of the permit application dated December 9, 2009, and/or subsequent revisions, and entered into the facility operating record.

14. The facility shall provide a written report to the Department within forty-five (45) days of removing the AGT unit or ancillary equipment from service and shall include a description of the decontamination procedures.

#### **Part II Subpart B.4-Air Emissions Standards**

1. The Permittee shall inspect, maintain and operate all the facility and equipment including tanks, pumps, compressors, pressure relief devices, flanges and valves in accordance with Section R and S of Part II, of the permit application dated December 9, 2009, and/or subsequent revisions, in accordance with 40 CFR 264 - Subpart AA and BB requirements.
2. The Permittee shall operate the facility in accordance with 40 CFR 264 – Subpart CC requirements.
3. The Permittee shall keep, as part of its operating records, results of inspections, monitoring reports, repairs, and other documents required by 40 CFR 264 Subparts AA, BB, and CC for a minimum of three years.
4. The Permittee shall submit a report of noncompliance, if applicable, with the exemption provisions of 40 CFR 264, Subpart CC outlined at 40 CFR 264.1082(c)(1) or (c)(2) within fifteen (15) calendar days of becoming aware of such noncompliance [40 CFR 264.1090(a)].

#### **Part II Subpart B.5-Construction Requirements**

1. The Permittee is authorized to construct/replace the PF-II treatment process as described in Section II.I, Attachment II.I.7 of the permit application dated December 9, 2009. The Permittee will initiate partial closure activities as provided for under the Closure Plan and Section K of the permit application for the closure of the existing PF-II treatment process.
2. Within thirty (30) days of completion of construction of any new storage or treatment unit, the Permittee shall submit to the Department by certified mail or hand delivery, a certification signed by both the Permittee and an independent professional engineer registered in the State of Florida, stating the construction has been completed in accordance with the design parameters specified in the permit application dated December 9, 2009 and/or subsequent revisions. The Certification shall include as-built drawings and a report describing any changes made during construction, with the seal and signature of a professional engineer registered in the State of Florida.
3. The Permittee may begin to operate constructed storage and/or treatment unit(s) twenty (20) days after submitting the as-built certification, required pursuant Specific Condition 2 of this Part, unless the Department notifies the Permittee not to begin operation.

#### **Part II Subpart C - Closure Conditions**

1. The Permittee shall close the any storage or treatment unit in a manner that minimizes or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of

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- hazardous waste, hazardous waste constituents, hazardous waste decomposition products, contaminated leachate or run-off, to the groundwater, surface waters, or to the atmosphere.
2. The Permittee shall have a written closure plan as required by 40 CFR 264.112(a). The closure plan and all revisions to the plan must be kept at the facility until closure is completed, certified in accordance with 40 CFR 264.115, and accepted by the Department.
  3. The Permittee shall modify/revise the approved Closure Plan per the requirements of 40 CFR 264.112(c) and Rule 62-730.290, F.A.C. by submitting a written request to the Department to amend the approved closure plan.
  4. The Permittee must complete physical closure activities in accordance with the Closure Schedule in Section II.K of the permit application dated December 9, 2009. Any changes in the time allowed for closure activities after approval shall require prior written Department approval.
  5. The Permittee shall notify the Department 45 days prior to the date on which he expects to begin partial or final closure of a unit(s).
  6. At least 30 calendar days prior to initiating closure activities, the Permittee shall prepare and submit a Closure Activities Report with "schedule date" and "completed" columns to document the progress of closure. Upon Department approval, the Closure Activities Report shall be maintained and updated by the Permittee throughout the closure period, with copies submitted monthly to the Department. Each report must be submitted to the Department by the tenth (10th) day of each month for the preceding month until the acceptance of physical closure by the Department. The schedule for submittal can be changed with written Department approval. These reports can be submitted electronically. Any deviation from schedule or described tasks shall be fully documented on the checklist.
  7. Within 90 days after receiving the final volume of hazardous waste, or upon notification by the Department that closure of a unit is required, the owner or operator must treat or remove from the unit all hazardous waste. The Permittee shall complete closure activities within 180 days after notification to the Department of closure. Any changes in the time allowed for closure of the units after approval shall require prior written Departmental approval.
  8. The Permittee shall properly decontaminate or dispose of all equipment, structures, and residues used during or resulting from the closure activities.
  9. The Permittee shall manage all hazardous wastes, residues, sludges, spilled or leaked waste, or contaminated liquids and soils removed during closure of the unit(s) in accordance with the applicable provisions of 40 CFR Parts 260 through 268, including the manifest requirements. A copy of each manifest required as a result of closure activities shall be submitted to the Department with the Closure Certification.
  10. The Permittee shall provide opportunities for site inspections by the Department by informing the Department at least seven calendar days in advance of any physical closure activity (e.g., soil sampling, soil removal, etc.).

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11. Within 60 calendar days of the completion of closure, the Permittee shall submit to the Department, by certified mail or hand delivery, a Closure Certification report signed by the Permittee and an independent Professional Engineer registered in the State of Florida, stating that the unit has been closed in compliance with the Closure Plan and the conditions of this permit. The Closure Certification must be based on the Professional Engineer's own observation and knowledge of the closure activities. The Closure Certification must include, but not be limited to, the following:
  - a. Sampling data to verify clean closure;
  - b. Decontamination data;
  - c. Copies of manifests or other appropriate shipping documents for removal of all hazardous wastes and all contaminated residues;
  - d. Groundwater monitoring data summary pertaining to closure activities;
  - e. A description of the summary of final closure activities; and
  - f. A final inspection check-off sheet.
12. The Permittee shall notify the Department within seven calendar days of any determination that actions undertaken as part of closure or associated monitoring programs no longer satisfy the requirements set forth in this permit. If the Department determines that a modification of the permit is required, the Permittee shall, within 60 calendar days, submit an application for a permit modification in accordance with Rule 62-730.290.
13. Within 30 days of determining that all contaminated soil cannot be practically removed or decontaminated, the Permittee shall notify the Department of such determination. Within 90 days of the determination the Permittee shall submit an application for permit modification to close the facility as a landfill and perform postclosure care as required by 40 CFR 264.310.
14. Within 30 calendar days of submitting a closure certification for a land disposal unit, including a land disposal unit identified under Condition 13 of this Part, the Permittee shall submit to the Department and to the local zoning authority, or the authority with jurisdiction over local land use, a survey plat indicating the type, location, and quantity of hazardous wastes disposed of within the unit with respect to permanently surveyed benchmarks in accordance with 40 CFR 264.116. For hazardous wastes disposed of before January 12, 1981, the owner or operator must identify the type, location, and quantity of the hazardous wastes to the best of his/her knowledge and in accordance with any existing records. This notice is in addition to the requirement to execute a formal land use control (e.g., a restrictive covenant) in order to obtain a site rehabilitation completion order based on restricted exposure risk assumptions under Chapter 62-780, F.A.C.

### **PART III - POSTCLOSURE CONDITIONS**

Not applicable at this time.

#### **Part III Subpart A - General Postclosure Conditions**

Not applicable at this time.

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### **Part III Subpart B - Specific Postclosure Conditions**

Not applicable at this time.

### **PART IV - ENVIRONMENTAL MONITORING CONDITIONS**

Not applicable at this time.

#### **Part IV Subpart A - General Groundwater Monitoring Requirements**

Not applicable at this time.

#### **Part IV Subpart B - Specific Monitoring Conditions**

Not applicable at this time.

#### **Part IV Subpart C - Specific Groundwater Monitoring Requirements for Regulated Units**

Not applicable at this time.

#### **Part IV Subpart D - Groundwater Cleanup Target Levels**

Not applicable at this time.

### **PART V - CORRECTIVE (REMEDIAL) ACTION CONDITIONS**

1. The Conditions of this Part apply to:
  - a. The SWMUs and AOCs identified in Appendix A;
  - b. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means; as used in this Part of the permit, the terms “discover”, “discovery”, or “discovered” refer to the date on which the Permittee either:
    - (1) visually observes evidence of a new SWMU or AOC;
    - (2) visually observes evidence of a previously unidentified release of contaminant(s) to the environment; or
    - (3) receives information from a credible source of the presence of a new release of contaminant(s) to the environment; and
  - c. Contamination that has migrated beyond the facility boundary, if applicable.
2. Within 15 calendar days of discovery, the Permittee shall notify the Department in writing of any newly discovered release(s) of contaminant(s) to the environment; any suspected new AOC(s); and any additional SWMU(s) discovered during the course of groundwater monitoring, field

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investigations, environmental audits, or other means. The notification shall include, at a minimum, the location of the release, AOC or SWMU (hereinafter referred to collectively as "site"), and all relevant information (*e.g.*, location of site(s) on a topographic map of appropriate scale; general dimensions of affected area; media affected; hazardous constituents released; and magnitude of release). The Department may conduct, or require that the Permittee conduct, confirmatory sampling in order to determine whether contamination is present. The Department will notify the Permittee in writing of the final determination as to the status of the newly discovered or suspected site.

3. Upon notification by the Department, the Permittee shall prepare and submit a Confirmatory Sampling (CS) Work Plan for known, suspected, or newly discovered sites. Unless the notification letter specifically establishes a different time frame for work plan submittal, the Work Plan shall be submitted within 60 calendar days of notification by the Department that a CS Work Plan is required. The CS Work Plan shall include schedules for implementation and completion of specific actions necessary to determine whether or not contamination has occurred in any potentially affected media. In order to partly or wholly satisfy the CS requirement, previously existing data may be submitted with the work plan for the Department's consideration.

4. In accordance with the schedule in the approved CS Work Plan, or no later than 60 calendar days after Department written approval of a CS Work Plan if no schedule is included in the Work Plan, the Permittee shall submit a Confirmatory Sampling (CS) Report identifying those sites that are contaminated and those sites that are not contaminated. The CS Report shall include an analysis of the analytical data to support all determinations. Based on the results of the CS Report, the Department will determine the need for further investigation at sites covered in the CS Report and notify the Permittee in writing.

5. De Minimis discharge is a release of contaminant(s) that is removed from the soil, sediment, surface water, and groundwater to cleanup target levels or background concentrations within 30 days of discovery of the release. If the Permittee intends to treat a discharge under the De Minimis discharge provision of 62-780.550 FAC, the Permittee must meet the notification requirements of Condition 2 of this Part, notifying the Department that a De Minimis action is underway. A De Minimis Remediation Report must be submitted to the Department within 90 days of discovery of the release. The report must include a description of all actions taken in response to the discharge and the information required by the Interim Source Removal Report pursuant to 62-780.500(7)(a) F.A.C.

6. Upon notification by the Department, the Permittee shall commence site rehabilitation in accordance with Rule 62-730.225 and Chapter 62-780, F.A.C., for all SWMUs and/or AOCs ("contaminated sites") identified in the notification. Unless the notification letter specifically establishes a different time frame to commence or complete site assessment, the Permittee shall commence and complete site assessment in the manner and within the time limits set forth in Rule 62-780.600, F.A.C.

7. Upon notification by the Department, the Permittee shall submit to the Department an Interim Measures (IM) Work Plan for any release, SWMUs or AOCs that the Department determines necessary to minimize or prevent further migration of contaminants or to limit human or environmental exposure to contaminants. The IM Work Plan shall be designed to mitigate any current or potential threat(s) to human health or the environment and to be consistent with long-term corrective actions at the facility. The IM Work Plan shall include the IM objectives, procedures for implementation, a schedule of activities, and associated designs, plans, and specifications.

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8. If the Department or the Permittee at any time determines that any approved work plan no longer satisfies the requirements of 40 CFR 264.101 or this permit for prior or continuing releases of contaminant(s) to the environment, the Permittee shall submit an amended work plan to the Department within 60 calendar days of such determination.

## **PART VI - REMEDY SELECTION AND IMPLEMENTATION**

### **Part VI Subpart A - General Conditions**

1. Within 90 calendar days of notification by the Department the Permittee shall submit a Remedial Action Plan developed in accordance with Chapters 62-780 and 62-730 F.A.C. Remedial Action Plans may be performance based, submitting remediation options to be implemented based on changing conditions at the site.
2. Within 30 days of Department written approval of the remedial alternative(s) selected, the Permittee shall publish notice of a proposed permit modification in accordance with Rule 62-730.292(3)(c), F.A.C. This modification will serve to incorporate a final remedy into this permit. Final approval of remedial action which is achieved through interim measures shall be in accordance with this condition.
3. The Remedial Action Plan shall include a provision for the Permittee to submit periodic Remedial Action Status Reports in accordance with Rule 62-780.700(13). The intent to implement a different approved remedy in a performance based Remedial Action Plan can be provided in the Remedial Action Status Report. Proposals to modify a previously approved remedy in a performance based Remedial Action Plan can be provided in the Remedial Action Status Report and implemented with written Department approval.
4. When site rehabilitation (remedial action) is complete, the Permittee shall submit to the Department a Site Rehabilitation Completion Report in accordance with Chapter 62-780, F.A.C. Site Rehabilitation Completion Reports can be part of a combined document with the Remedial Action Status Report.
5. For site rehabilitation involving the cleanup of groundwater contaminated by a release from a designated regulated unit, the Permittee must demonstrate that the concentration of constituents of concern remain below cleanup goals for three consecutive years after active remediation has ceased as per 40 CFR 264.100.(f).
6. When appropriate, the Department will approve completion of site rehabilitation by inclusion in a permit renewal, permit modification, or separate Site Rehabilitation Completion Order.

### **Part VI Subpart B - Selected Remedies**

Not applicable at this time.



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### Appendix A Summary of Facility Sites (Solid Waste Management Units and Areas of Concern)

| <b>A.1. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring a RCRA Facility Investigation (RFI):</b>  |   |                                   |                       |                               |
|--|---|-----------------------------------|-----------------------|-------------------------------|
| SWMU/AOC<br>No/Letter  | SWMU/AOC<br>Name                          | Unit<br>Comment                   | Dates of<br>Operation | Potentially<br>Affected Media |
| There are no units identified at this time as requiring a RCRA Facility Investigation.   |   |                                   |                       |                               |
| <b>A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:</b>   |   |                                   |                       |                               |
| SWMU/AOC<br>No/Letter  | SWMU/AOC<br>Name                          | Unit Comment and<br>Basis for NFA | Dates of Operation    |                               |
| SWMU 1<br>**   | North Unloading Area                      |                                   |                       |                               |
| SWMU 2<br>**   | South Unloading Area                      |                                   |                       |                               |
| SWMU 3   | Temporary Holding Area                    |                                   |                       |                               |
| SWMU 4<br>*  | Processing and Storage Building (PSB)     |                                   |                       |                               |
| SWMU 5<br>**   | Incoming Bulk Waste Transfer Station      |                                   |                       |                               |
| SWMU 6<br>*  | 3,000-Gallon Waste Liquids Tank           |                                   |                       |                               |
| SWMU 7   | Tanker/Liquids Loading Station Within PSB |                                   |                       |                               |
| SWMU 8   | Outdoor Staging Area                      |                                   |                       |                               |
| SWMU 9   | Indoor Staging Area                       |                                   |                       |                               |
| <p>* Permitted Unit</p> <p>** Unit identified in RFA dated February 22, 1990, but determined to be no longer in use after Supplemental VSI conducted September 15, 2000.</p> |   |                                   |                       |                               |

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| A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:   |   |                                |                    |
|---|---|--------------------------------|--------------------|
| SWMU/AOC No/Letter  | SWMU/AOC Name                                     | Unit Comment and Basis for NFA | Dates of Operation |
| SWMU 9a   | Roller Conveyors in LSV Processing Area           |                                |                    |
| SWMU 9b<br>**   | Lift in LSV Processing Area                       |                                |                    |
| SWMU 9c<br>**   | In-Feed Hopper in LSV Processing Area             |                                |                    |
| SWMU 9d<br>**   | Shaker Table in LSV Processing Area               |                                |                    |
| SWMU 9e<br>**   | Crusher/Shredder in LSV Processing Area           |                                |                    |
| SWMU 9f<br>**   | Rinse Basket Trough in LSV Processing Area        |                                |                    |
| SWMU 9g<br>**   | Three Chamber Rinse in LSV Processing Area        |                                |                    |
| SWMU 9h<br>**   | Drain Table in LSV Processing Area                |                                |                    |
| SWMU 9i   | LSF Holding Tanks in LSV Processing Area          |                                |                    |
| SWMU 9k   | Grinder Crusher in LSV Processing Area            |                                |                    |
| SWMU 9m   | Fines Removal System (FRS) in LSV Processing Area |                                |                    |
| SWMU 10   | Processing Area Ventilation System – HEPA Filter  |                                |                    |
| SWMU 11   | Carbon Adsorption System                          |                                |                    |
| * Permitted Unit<br>** Unit Identified in RFA dated February 22, 1990, but determined to be no longer in use after Supplemental VSI conducted September 15, 2000. |   |                                |                    |

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| <b>A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:</b>   |   |                                       |                           |
|--|---|---------------------------------------|---------------------------|
| <b>SWMU/AOC No/Letter</b>  | <b>SWMU/AOC Name</b>                          | <b>Unit Comment and Basis for NFA</b> | <b>Dates of Operation</b> |
| SWMU 12  | LSF Pipe                                      |                                       |                           |
| SWMU 13<br>**  | Packing Material Wastes Drum Holding Area     |                                       |                           |
| SWMU 14  | Empty Drums Holding Area                      |                                       |                           |
| SWMU 15<br>**  | Crushed Glass/Plastic Vials Drum Holding Area |                                       |                           |
| SWMU 16<br>**  | Crushed Vials Final Drainage Station          |                                       |                           |
| SWMU 17<br>**  | Drained Crushed Vials Drum Holding Area       |                                       |                           |
| SWMU 18  | Gondolas (10)                                 |                                       |                           |
| SWMU 19<br>**  | Dumping Trailers                              |                                       |                           |
| SWMU 20  | Waste Handling Routes                         |                                       |                           |
| SWMU 21  | North Retention Pond                          |                                       |                           |
| SWMU 22  | East Retention Pond                           |                                       |                           |
| SWMU 23  | North Drainage Ditch                          |                                       |                           |
| SWMU 24  | East Drainage Ditch                           |                                       |                           |
| <p>* Permitted Unit</p> <p>** Unit Identified in RFA dated February 22, 1990, but determined to be no longer in use after Supplemental VSI conducted September 15, 2000.</p> |   |                                       |                           |

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| <b>A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:</b>                                      |  |                                       |                           |
|---|--|---------------------------------------|---------------------------|
| <b>SWMU/AOC No/Letter</b>   | <b>SWMU/AOC Name</b>                             | <b>Unit Comment and Basis for NFA</b> | <b>Dates of Operation</b> |
| SWMU 25<br>**   | Former Glass/Plastic Shredder Unit               |                                       |                           |
| SWMU 26<br>**   | Field Trailers Service Area                      |                                       |                           |
| SWMU 27<br>**   | PCB Drummed Waste Storage Area                   |                                       |                           |
| SWMU 28<br>**   | Freon Distillation Waste Collection Unit         |                                       |                           |
| SWMU 29<br>**   | Sand and Grit Drum Storage Area                  |                                       |                           |
| SWMU 33   | Laboratory Buildings                             |                                       |                           |
| SWMU 34<br>*  | Treatment and Operations Building (TOB)          |                                       |                           |
| SWMU 35   | Liquid Scintillation Vial (LSV) Warehouse        |                                       |                           |
| SWMU 36   | East Loading Dock                                |                                       |                           |
| SWMU 37   | Cloths Washing Room                              |                                       |                           |
| SWMU 38   | Treatment Operations Building (TOB) Loading Ramp |                                       |                           |
| SWMU 39   | Freon Distillation Unit                          |                                       |                           |
| SWMU 40   | North-South Unloading Area                       |                                       |                           |
| <p>* Permitted Unit</p> <p>** Unit identified in RFA dated February 22, 1990, but determined to be no longer in use after Supplemental VSI, September 15, 2000.</p> |  |                                       |                           |

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| <b>A.2. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring no further action at this time:</b>  |  |                                |                    |                            |
|---|--|--------------------------------|--------------------|----------------------------|
| SWMU/AOC No/Letter  | SWMU/AOC Name                                | Unit Comment and Basis for NFA |                    | Dates of Operation         |
| SWMU 41<br>*  | LSV Hazardous Waste Storage Area             |                                |                    |                            |
| AOC A   | Spray Paint Booth Area                       |                                |                    |                            |
| AOC B   | Equipment Laydown and Temporary Storage Area |                                |                    |                            |
| AOC C   | Print Shop Area                              |                                |                    |                            |
| <p>There are no units identified at this time as requiring any further action.</p> <p>* Permitted Unit</p> <p>** Unit Identified in RFA dated February 22, 1990, but determined to be no longer in use after Supplemental VSI conducted September 15, 2000.</p> |  |                                |                    |                            |
| <b>A.3. List of solid waste management units (SWMUs) and areas of concern (AOCs) requiring Confirmatory Sampling:</b>   |  |                                |                    |                            |
| SWMU/AOC No/Letter  | SWMU/AOC Name                                | Unit Comment                   | Dates of Operation | Potentially Affected Media |
| There are no units at this time requiring Confirmatory Sampling.  |  |                                |                    |                            |
| <b>A.4. List of solid waste management units (SWMUs) and areas of concern (AOCs) undergoing Corrective Action (CA):</b>   |  |                                |                    |                            |
| SWMU/AOC No/Letter  | SWMU/AOC Name                                | Unit Comment and Basis for CA  | Dates of Operation | Potentially Affected Media |
| There are no units identified at this time as requiring Corrective Action (CA).   |  |                                |                    |                            |

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Issued

STATE OF FLORIDA DEPARTMENT  
OF ENVIRONMENTAL PROTECTION

\_\_\_\_\_  
**CHARLES F. GODDARD, CHIEF**  
**BUREAU OF SOLID AND HAZARDOUS WASTE**

Filing and Acknowledgment

Filed on this date, pursuant to Section 120.52, Florida Statutes, with the designated Clerk, receipt of which is acknowledged.

\_\_\_\_\_  
CLERK

\_\_\_\_\_  
DATE

cc:

Cynthia Moore Chestnut, Chair, Alachua County Board of County Commissioners,  
[cmchestnut@alachuacounty.us](mailto:cmchestnut@alachuacounty.us)  
Kurt Fogleman, Perma-Fix, [kfogleman@perma-fix.com](mailto:kfogleman@perma-fix.com)  
Karen Knight, EPA/Region 4, [knight.karen@epamail.epa.gov](mailto:knight.karen@epamail.epa.gov)  
Mayor Craig Lowe, City of Gainesville, [LoweSC@cityofgainesville.org](mailto:LoweSC@cityofgainesville.org)  
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Attachment A

**Permitted Waste Codes for Storage and Treatment (except for tank storage)**

|      |      |      |      |      |      |      |      |      |      |      |      |
|------|------|------|------|------|------|------|------|------|------|------|------|
| D001 | D039 | K062 | P030 | P074 | P122 | U020 | U060 | U099 | U140 | U179 | U221 |
| D002 | D040 | K086 | P031 | P075 | P123 | U021 | U061 | U101 | U141 | U180 | U222 |
| D003 | D041 | K156 | P033 | P077 | P127 | U022 | U062 | U102 | U142 | U181 | U223 |
| D004 | D042 | K157 | P034 | P078 | P128 | U023 | U063 | U103 | U143 | U182 | U225 |
| D005 | D043 | K158 | P036 | P081 | P185 | U024 | U064 | U105 | U144 | U183 | U226 |
| D006 | F001 | K159 | P037 | P082 | P188 | U025 | U066 | U106 | U145 | U184 | U227 |
| D007 | F002 | K161 | P038 | P084 | P189 | U026 | U067 | U107 | U146 | U185 | U228 |
| D008 | F003 | K169 | P039 | P085 | P190 | U027 | U068 | U108 | U147 | U186 | U234 |
| D009 | F004 | K170 | P040 | P087 | P191 | U028 | U069 | U109 | U148 | U187 | U235 |
| D010 | F005 | K171 | P041 | P088 | P192 | U029 | U070 | U110 | U149 | U188 | U236 |
| D011 | F006 | K172 | P042 | P089 | P194 | U030 | U071 | U111 | U150 | U189 | U237 |
| D012 | F007 | P001 | P043 | P092 | P196 | U031 | U072 | U112 | U151 | U190 | U238 |
| D013 | F008 | P002 | P044 | P093 | P197 | U032 | U073 | U113 | U152 | U191 | U239 |
| D014 | F009 | P003 | P045 | P094 | P198 | U033 | U074 | U114 | U153 | U192 | U240 |
| D015 | F010 | P004 | P046 | P095 | P199 | U034 | U075 | U115 | U154 | U193 | U243 |
| D016 | F011 | P005 | P047 | P096 | P201 | U035 | U076 | U116 | U155 | U194 | U244 |
| D017 | F012 | P006 | P048 | P097 | P202 | U036 | U077 | U117 | U156 | U196 | U246 |
| D018 | F019 | P007 | P049 | P098 | P203 | U037 | U078 | U118 | U157 | U197 | U247 |
| D019 | F020 | P008 | P050 | P099 | P204 | U038 | U079 | U119 | U158 | U200 | U248 |
| D020 | F021 | P009 | P051 | P101 | P205 | U039 | U080 | U120 | U159 | U201 | U249 |
| D021 | F022 | P010 | P054 | P102 | U001 | U041 | U081 | U121 | U160 | U202 | U271 |
| D022 | F023 | P011 | P056 | P103 | U002 | U042 | U082 | U122 | U161 | U203 | U278 |
| D023 | F026 | P012 | P057 | P104 | U003 | U043 | U083 | U123 | U162 | U204 | U279 |
| D024 | F027 | P013 | P058 | P105 | U004 | U044 | U084 | U124 | U163 | U205 | U280 |
| D025 | F028 | P014 | P059 | P106 | U005 | U045 | U085 | U125 | U164 | U206 | U328 |
| D026 | F032 | P015 | P060 | P108 | U006 | U046 | U086 | U126 | U165 | U207 | U353 |
| D027 | F034 | P016 | P062 | P109 | U007 | U047 | U087 | U127 | U166 | U208 | U359 |
| D028 | F035 | P017 | P063 | P110 | U008 | U048 | U088 | U128 | U167 | U209 | U364 |
| D029 | F037 | P018 | P064 | P111 | U009 | U049 | U089 | U129 | U168 | U210 | U367 |
| D030 | F038 | P020 | P065 | P112 | U010 | U050 | U090 | U130 | U169 | U211 | U372 |
| D031 | F039 | P021 | P066 | P113 | U011 | U051 | U091 | U131 | U170 | U213 | U373 |
| D032 | K001 | P022 | P067 | P114 | U012 | U052 | U092 | U132 | U171 | U214 | U387 |
| D033 | K048 | P023 | P068 | P115 | U014 | U053 | U093 | U133 | U172 | U215 | U389 |
| D034 | K049 | P024 | P069 | P116 | U015 | U055 | U094 | U134 | U173 | U216 | U394 |
| D035 | K050 | P026 | P070 | P118 | U016 | U056 | U095 | U135 | U174 | U217 | U395 |
| D036 | K051 | P027 | P071 | P119 | U017 | U057 | U096 | U136 | U176 | U218 | U404 |
| D037 | K052 | P028 | P072 | P120 | U018 | U058 | U097 | U137 | U177 | U219 | U409 |

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|------|------|------|------|------|------|------|------|------|------|------|------|
| D038 | K061 | P029 | P073 | P121 | U019 | U059 | U098 | U138 | U178 | U220 | U410 |
|      |      |      |      |      |      |      |      |      |      |      | U411 |

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**Attachment B**  
**Consolidated Data from Tables 5 and 8**

| Constituent  | Waste Code | Maximum Container Quantity (lbs) |
|--|------------|----------------------------------|
| Allyl alcohol  | P005       | 32                               |
| Thiophenol   | P014       | 6,415                            |
| Dichloromethyl ether; Chloromethyl ether   | P016       | 1.08                             |
| Bromoacetone   | P017       | 46.5                             |
| Acetaldehyde, chloro-; Chloroacetaldehyde  | P023       | 380                              |
| Benzyl chloride  | P028       | 730                              |
| Aziridine; Ethyleneimine   | P054       | 18.5                             |
| Fluorine   | P056       | 16.1                             |
| Methane, isocyanato-; Methyl isocyanate  | P064       | 0.25                             |
| Aziridine, 2-methyl-; 1,2-Propylenimine  | P067       | 156                              |
| Methyl hydrazine   | P068       | 9.3                              |
| 2-Methylactonitrile; Acetone cyanohydrin   | P069       | 195                              |
| Nickel carbonyl  | P073       | 1.35                             |
| Nitrogen dioxide   | P078       | 96                               |
| N-nitrosodimethylamine   | P082       | 105                              |
| Parathion; Phosphorothioic acid, O,O-diethyl O-(4-nitrophenyl) ester                         | P089       | 11                               |
| Phosgene   | P095       | 3                                |
| Phosphine  | P096       | 4.9                              |
| Propargyl alcohol  | P102       | 38                               |
| Tetraethyldithiopyrophosphate; Thiodiphosphoric acid, tetraethyl ester; Ethyl butyrate, TEDP | P109       | 10.5                             |
| Diphosphoric acid, tetraethyl ester; Tetraethyl pyrophosphate, TEPP                          | P111       | 5.5                              |
| Tetranitromethane  | P112       | 17.8                             |
| Acetyl chloride  | U006       | 0.32                             |
| Acrylic acid   | U008       | 1,895                            |
| Acrylonitrile  | U009       | 710                              |
| Benzenesulfonyl chloride   | U020       | 1,105                            |

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**Attachment B (cont)**

| Constituent  | Waste Code | Maximum Container Quantity (lbs) |
|--|------------|----------------------------------|
| Bis(2-chloroethoxy)methane                                       | U024       | 235                              |
| Dichloroethyl ether; Ethane, 1,1'-oxybis [2-chloro-              | U025       | 830                              |
| Carbon oxyfluoride; Carbonyl fluoride                            | U033       | 55.3                             |
| Trichloroacetaldehyde (Chloral)                                  | U034       | 750                              |
| Epichlorohydrin, 1-chloro-2,3-epoxy propane                      | U041       | 1,007                            |
| Chloromethane (methyl chloride)                                  | U045       | 2,000                            |
| Chloromethyl methyl ether (methyl chloromethyl ether)            | U046       | 3.75                             |
| 2-Chlorophenol   | U048       | 523                              |
| 1,2-Dibromo-3-chloropropane                                      | U066       | 0.25                             |
| Ethylene dibromide (1,2-dibromomethane)                          | U067       | 4500                             |
| 1,2-Benzenedicarboxylic acid, dibutyl ester; Dibutyl phthalate   | U069       | 1,385                            |
| 1,4-Dichloro-2-butene  | U074       | 70                               |
| Dichlorodifluoromethane  | U075       | 1,000,000                        |
| 1,2-Dichloroethylene   | U079       | 22,000                           |
| 1,3-Dichloropropene  | U084       | 125                              |
| 1,2,3,4-Diepoxybutane; Diepoxybutane; 2,2-Bioxirane              | U085       | 19                               |
| Diethyl phthalate  | U088       | 6,636                            |
| Dimethylamine  | U092       | 1,900                            |
| Cumene hydroperoxide   | U096       | 6,122                            |
| Dimethylcarbamoyl chloride                                       | U097       | 95                               |
| 1,1-Dimethylhydrazine  | U098       | 40.7                             |
| 1,2-Dimethylhydrazine  | U099       | 40.8                             |
| 1,2-Benzenedicarboxylic acid, dimethyl ester; Dimethyl phthalate | U102       | 138                              |
| Dimethyl sulfate   | U103       | 19                               |
| Di-n-octyl phthalate   | U107       | 2,218                            |
| Ethyl acrylate   | U113       | 1,970                            |

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**Attachment B (cont)**

| <b>Constituent</b>                           | <b>Waste Code</b> | <b>Maximum Container Quantity (lbs)</b> |
|--|-------------------|---|
| Ethylene oxide                               | U115              | 555                                     |
| Ethyl methacrylate                           | U118              | 815                                     |
| Formic acid                                  | U123              | 64                                      |
| Furfural                                     | U125              | 391                                     |
| Glycidylaldehyde                             | U126              | 8                                       |
| Hydrazine                                    | U133              | 32.2                                    |
| Hydrogen fluoride                            | U134              | 108.8                                   |
| Hydrogen sulfide                             | U135              | 104.5                                   |
| Methane, iodo-; Methyl iodide                | U138              | 5,100                                   |
| Isosafrole                                   | U141              | 6,696                                   |
| Methacrylonitrile; Methylacrylonitrile       | U152              | 280                                     |
| Methyl Mercaptan; Thiomethanol; Methanethiol | U153              | 825                                     |
| Methyl Chlorocarbonate; Methyl chloroformate | U156              | 5                                       |
| Methyl methacrylate                          | U162              | 6,300                                   |
| Paraldehyde                                  | U182              | 710                                     |
| Pentachloroethane                            | U184              | 8,900                                   |
| 1,3-Pentadiene                               | U186              | 2,000                                   |
| 2-Picoline                                   | U191              | 5,638                                   |
| n-Propylamine                                | U194              | 4,287                                   |
| Toluene-2,4-di-isocyanate                    | U223              | 1.55                                    |
| Toluene-2,6-di-isocyanate                    | U223              | 1.55                                    |
| Bromoform (tribromomethane)                  | U225              | 75.1                                    |
| Triethylamine                                | U404              | 65                                      |

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**Attachment B (cont)**

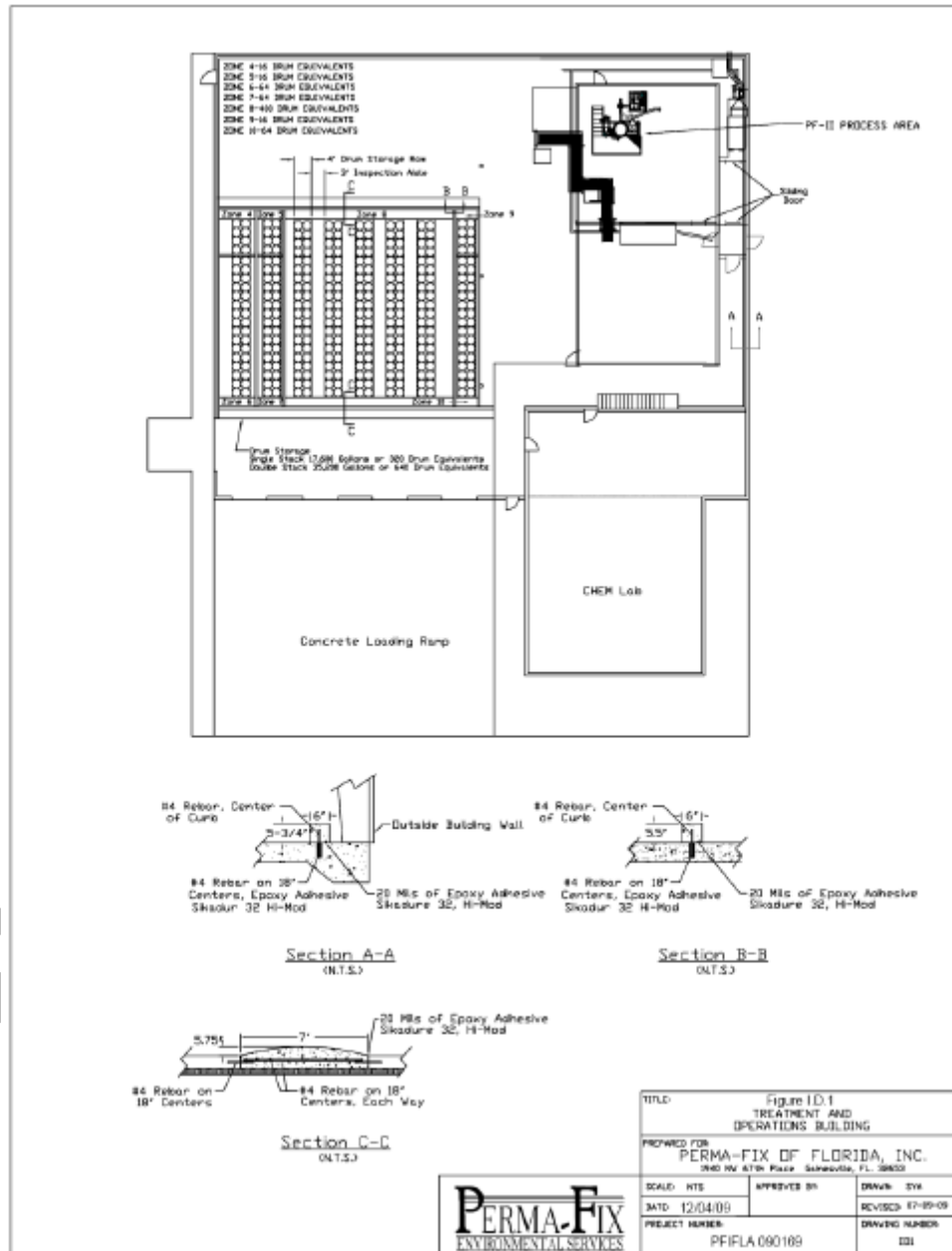
| Constituent  | Waste Code | Maximum Container Quantity (lbs) |
|--|------------|----------------------------------|
| O-Chlorophenol (2-Chlorophenol)  | K001       | 10,000                           |
| Ethyl Benzene  | K048       | 10,000                           |
| Carbon Disulfide (Carbon bisulfide)  | K049       | 7,000                            |
| Acetone  | K086       | 3,600                            |
| Butyl Benzyl Phthalate   | K086       | 2,750                            |
| Cyclohexanone  | K086       | 3,175                            |
| Ethyl Acetate  | K086       | 4,300                            |
| Methanol   | K086       | 4,861                            |
| Methyl Ethyl Ketone (2-butanone, ethyl methyl ketone)  | K086       | 5,000                            |
| Methyl Isobutyl Ketone (Hexone)  | K086       | 3,100                            |
| Methylene Chloride   | K086       | 10,000                           |
| N-Butyl Alcohol  | K086       | 3,125                            |
| Nitrobenzene   | K086       | 10,000                           |
| O-Dichlorobenzene (1,2-Dichlorobenzene)  | K086       | 10,000                           |
| 1,1,1-Trichloroethane (Methyl Chloroform)  | K086       | 10,000                           |
| Trichloroethylene  | K086       | 10,000                           |
| Acetonitrile   | K156       | 1,475                            |
| Aniline  | K156       | 10,000                           |
| Chlorobenzene (Benzene Chloride)   | K156       | 4,000                            |
| Chloroform   | K156       | 10,000                           |
| Pyridine   | K156       | 3,375                            |
| Carbon Tetrachloride   | K157       | 10,000                           |
| Ethyl Benzene  | F037       | 2,750                            |
| This attachment was generated from Tables 5 and 8 from the <i>Final Report Offsite Consequence Analysis and Air Modeling</i> dated January 2006 and <i>Substantial Modification Demonstration</i> dated December 2009. If a constituent was present in both tables the more restrictive data ( <i>i.e.</i> , the smaller number in the "amount released" column) was listed in this table. |            |                                  |

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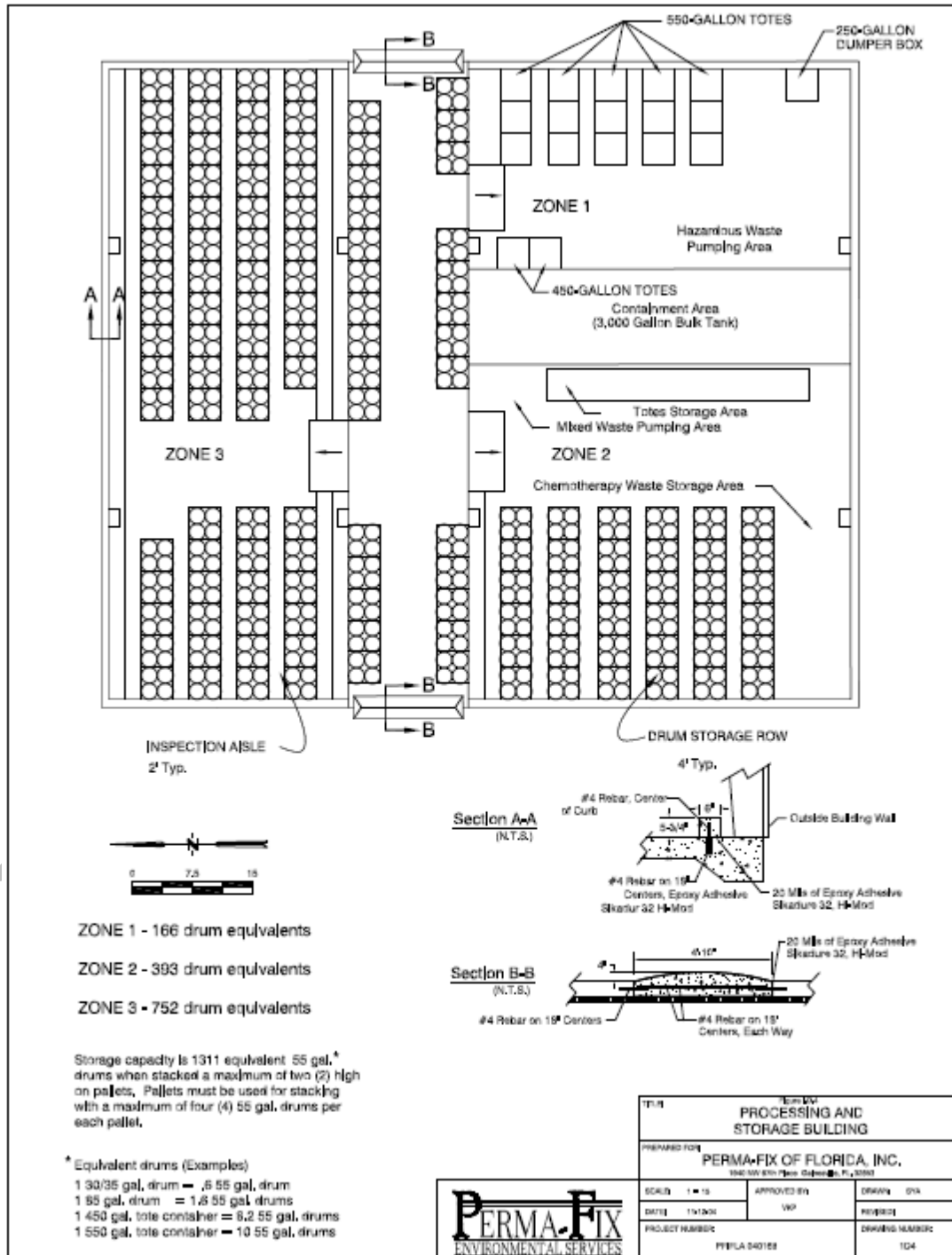
## Attachment D Treatment and Operations Building



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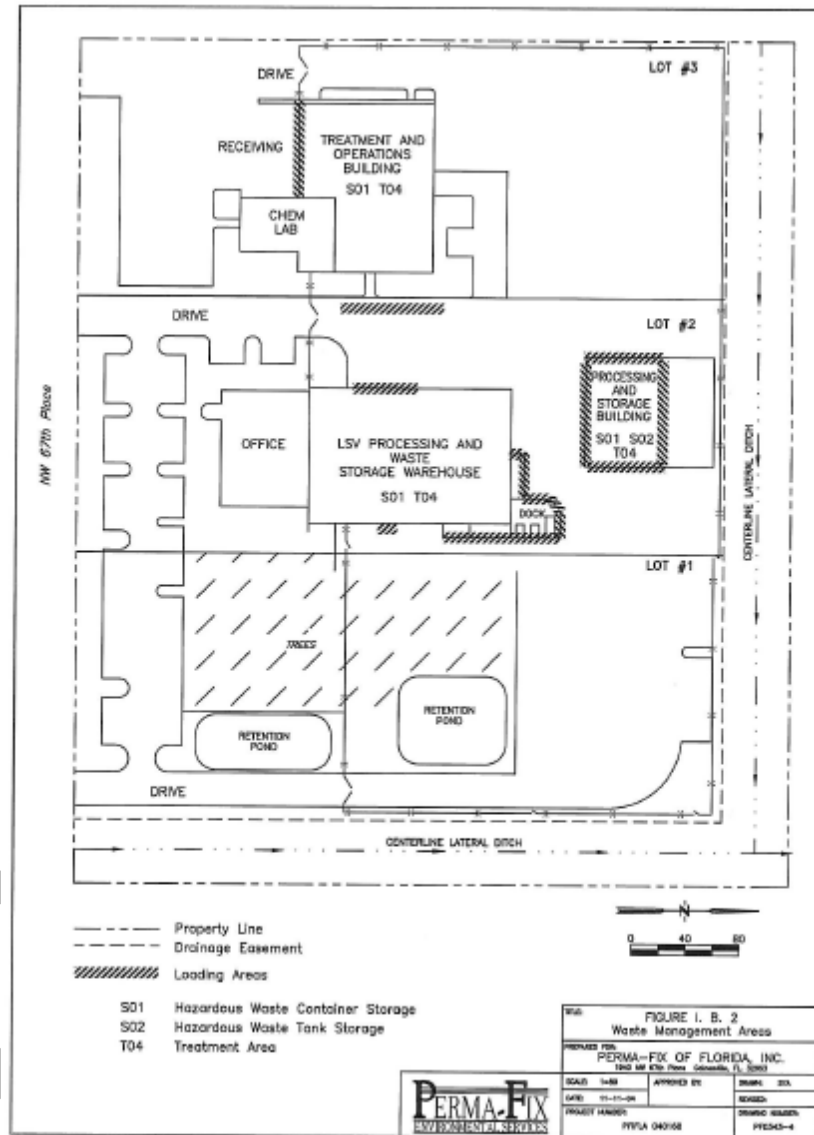
## Attachment E Processing and Storage Building



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## Attachment F Buildings Layout





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### Attachment G Property

