

February 13, 2012

Sent Via E-mail Merlin.Russell@dep.state.fl.us

Merlin D. Russell Jr., PG Hazardous Waste Regulation Florida Department of Environmental Protection 2600 Blair Stone Road Tallahassee, Florida 32399-2400

Subject: Clean Harbors Florida, LLC, FLD 980 729 610, Operating Permit No. 64247-HO-009, Final comments on draft issue of Operating Permit No. 64247-HO-010.

Dear Mr. Russell,

We have reviewed the draft permit sent to us by FDEP on February 6<sup>th</sup> via email and submit this response as our final comments as requested due NLT today the 13<sup>th</sup>.

Clean Harbors would like to propose one last change to the draft permit. We will be replacing the RCRA storage tank T-106 this year. It will take approximately 4 months to fabricate and deliver once the order is placed. We just received approval to initiate the purchase so it should be fabricated and on site NLT July and ready to resume operations in August (Best Estimate). Our understanding is that the replacement "In Kind" of this tank will not be an actual permit modification but rather considered a part of our O&M (Operation and Maintenance). The use of this tank, including storage capacity and types of waste stored, will not change from the previously permitted storage activities of the original tank. We understand that prior to resuming storage operations using this replacement tank, we will be required to submit the "as built" drawings certified by a PE to FDEP and receive final FDEP approval. At that time, Clean Harbors will submit revised drawings reflecting the physical presence of this tank to replace the current permit drawings that show we had it removed.

If you would like to arrange a meeting, telephone discussion to further clarify items or have any additional questions regarding this response submittal, please call me at 863-519-6319 or contact me via email at: berman.stephen@cleanharbors.com.

Respectfully.

Steve Berman, CHMM Environmental Manager

863.519.6319

cc via e-mail
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