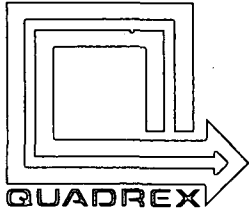


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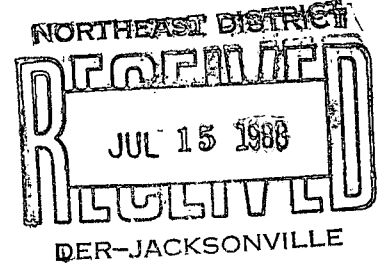
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Erm



Quadrex HPS Inc.

1940 N.W. 67th Place, Gainesville, Florida 32606-1649
904-373-6066 TELEX 53-5429 TELECOPY 904-373-0040

July 12, 1988



Mr. Ashwin Patel
State of Florida, Northeast District
Department of Environmental Regulation
3426 Bill Road
Jacksonville, FL 32207


Dear Mr. Patel:

Per your request, enclosed are revisions to Tables 2 and 3 of our Temporary Operating Permit Application describing more details in the waste analysis program.

Also as we discussed, Quadrex HPS will comply with the 95% fill level of the tank before notification of the State Department of Environmental Regulation.

If there is any more information you may require, please contact me.

Sincerely,


Bernhardt C. Warren, CHMM for
Manager-Quadrex Waste Management Services

BCW/djb

enclosure

DOCKET # 34

TABLE 2

PARAMETER/RATIONALE

<u>Hazardous Waste</u>	<u>Parameter</u>	<u>Rationale</u>
Mixed LS Fluid	Flash Point	The fluid is a mixture of solvents with a flash point less than 140°F.
	Moisture Content	Major constituent of waste.
	pH	Monitor corrosiveness of waste.
	Specific Gravity	Monitor total weight.
	Chlorine Content	Fuel monitoring requirement.
	Organic Composition	Major composition of hazardous constituents
Bulk Non-LSF	Flash Point	Monitor for characteristic ignitibility.
	Moisture Content	Waste Profile Monitoring.
	pH	Monitor corrosiveness of waste.
	Specific Gravity	Monitor total weight.

The above parameters are monitored to maintain compliance with operating permit. Generator waste streams are physically characterized prior bulking the fluid. The data is used to assure Waste Profile Compliance. Gas chromatography analysis is performed in the event of noncompliance.

Table 3

<u>Parameter</u>	<u>Test Method</u>	<u>Reference</u>
Flash Point	4000-002; Pensky-Martens Closed-Cup Method	USEPA SW-846, Method 1010
Moisture Content	4000-003; Moisture Detrm. by Karl Fischer	ASTM-1533
pH	4000-004; pH Measurement	USEPA SW-846, Method 9040
Specific Gravity	4000-005; Specific Gravity Determination	ASTM-287
Chlorine Content	4000-006; Total Chlorine In Waste Oils	CHEMetrics, Inc.
Halogenated Volatile Organics	4000-001; Organic Analysis	USEPA SW-846, Method 8010
Nonhalogenated Volatile Organics	4000-001; Organic Analysis	USEPA SW-846, Method 8015
Aromatic Volatile Organics	4000-001; Organic Analysis	USEPA SW-846, Method 8020
Acrolein, Acrylonitrile, Acetonitrile	4000-001; Organic Analysis	USEPA SW-846, Method 8030

U.S. Environmental Protection Agency, "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846, 2nd Edition, Revised, Office of Solid Waste and Emergency Response, Washington, DC (April 1984a).