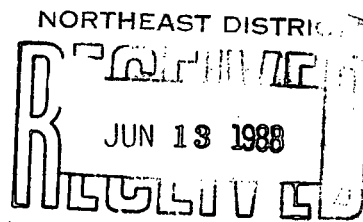




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Quadrex HPS INDER-JACKSONVILLE

1940 N. W. 67th Place, Gainesville, Florida 32606-1649
904-373-6066 FAX 910-590-2438 TELEX 35-2031 TELECOPY 904-373-0040

June 10, 1988

Mr. John Schert, Director
Department of Environmental Services
825 N.W. 23rd Avenue, Suite F-10
Gainesville, FL 32609

Dear Mr. Schert:

This is in reply to your letter of April 18, 1988 requesting information about our permit application which has been filed and approved by the Department of Environmental Regulation. We are happy to provide the Alachua County DES the following responses which are in order of your questions.

1. In response to your first comment which was discussed with Mr. Richard Lusk of your office and Mr. Frank Darabi, our environmental engineering consultant, questions were asked regarding the flood plane areas. Figure 3 that was a part of the application was a composite of data available from the USGS topographic map, flood insurance map and actual survey available from the Northwest Industrial Park site plan data. We have revised Figure 3 (copy attached) to show additional elevations of the on-site retention pond, the pond overflow and the roadside swale.

The actual flood elevation for Potato Patch/Buck Bay area appears to be at 175 feet. The on-site topographic data indicates the Quadrex site to be at an elevation of 186 to 180 feet. The pond bottom is at an elevation of 183 feet with an overflow at 183.7 feet, and the roadside swale elevation is at 180 feet. Therefore, the entire area is 5 feet above the published 100 year storm elevation of 175 feet. We, therefore, do not anticipate an expansion of the flood elevation due to any channelization that may have occurred to the north of the Quadrex property.

2. In reply to the question regarding "where and how" certain wastes were disposed, please refer to the application, page 11, table 1. The only hazardous wastes received at Quadrex are D001, F001-5 classification liquid wastes contained in containers or the bulk tank for temporary storage.

DOCKET # 28



June 10, 1988
Page Two

In the Process Flow Diagram (figure 8) it shows the by-products created by the process and the disposition:

- a) Absorbents (packing materials) are currently reused as a source of aggregate material in the manufacture of concrete aggregate with a regional cement firm. Other applicable uses of this material are constantly being researched to optimize its potential value.
- b) Vials are shredded, cleaned, dried and currently transported, along with liners and destroyed containers to a large industrial landfill near Savannah, Georgia.
- c) Empty 55 gallon drums are handled by a drum recertifier who burns, reshapes, repaints and retests the drums in order to qualify as USDOT certified drums. Currently we use Drum Service of Zellwood, Florida.

All of the above contractors have been inspected by Quadrex to assure compliance with their regulatory requirements and Quadrex standards. Also, none of the above by-products are hazardous wastes. They are by-products of the decommissioning of the drums. No by-products are retained nor disposed on site.

3. Liquid hazardous wastes as specifically identified on the listing of chemicals attached to the draft permit are transported to Oldover for reuse as a fuel. Currently, no other kiln operator is used by Quadrex for disposal of liquid hazardous waste fuels. There are no other hazardous wastes transported under this permit.
4. The waste analysis program as detailed in the permit requires Quadrex to have a plan for the types of wastes authorized to receive. While the permit application provides the overview of the waste analysis plan, specific procedures have been developed to assure all wastes that potentially could be received are classified appropriately. The Quadrex "Standard Laboratory Procedure" includes specific operating procedures for performing the appropriate characterization. Attached is the "Waste Stream Information & Management" flow chart indicating our procedure. Also, the following is a listing of dynamic procedures used to perform waste analysis:
 - o Standard Operating Procedure for the Analysis and Characterization of Hazardous Waste Samples
 - o Waste Approval Procedure
 - o Analysis & Characterization
 - o Method of Analysis for Organic Analysis of Waste Stream Samples by Gas Chromatography
 - o The Hydrometer Method for Specific Gravity Determination
 - o Pensky-Martens Closed-Cap Method for Flash-Point Determination



June 10, 1988
Page Three

- o Moisture Determination by Karl Fischer Method
- o pH Measurement of Aqueous Waste
- o Total Chlorine in Waste Oil

Also, enclosed are respective forms and instructions provided generators to facilitate the obtaining of proper information.

The composite procedures fulfill the requirements of waste analysis as established by 40CFR261-265 and the State DER permit conditions.

Secondly, you indicate there are non-"F" series listed on the permit. These wastes are listed on the permit (i.e. "U" listed wastes) because if the waste has not been used, it may not be considered "spent" by the generator and thus not qualify as an "F" series waste. Since the waste analysis for these is similar, if not identical in most cases, it was appropriately felt by the DER and Quadrex that these wastes could appropriately be handled by Quadrex.

5. Your comment regarding background data on soil and groundwater quality recommended a quarterly sampling method. This has been discussed at some length by Quadrex management and environmental safety staff and remains in consideration.

An intermediate alternative would be for the Alachua County DES to perform sampling. Our philosophy is to maintain upfront proactive control procedures to assure that hazardous wastes are not being released to the environment.

6. The Contingency Plan now contains the 911 emergency number and the State warning point number to be used as appropriate.

To reduce the hazards caused by lightning and static electricity a grounding system has been installed. Four separate 3/4" copper rods were driven into the earth a minimum of 20'. After verifying resistance limits per code recommendations they were connected by copper grounding cable to the main facility, the 3000 gal. bulk storage tank, the processing equipment, and the storage area fencing. As the covered areas specified per the implementation schedule are constructed, they will likewise be protected in a similar manner.

The Gainesville Fire & Rescue Department has visited Quadrex several times and has brought personnel and equipment from a number of their locations to review our operations. In addition, a copy of the "Contingency Plan and Emergency Procedures" has been filed with them as required. Copies of any revisions will also be provided.

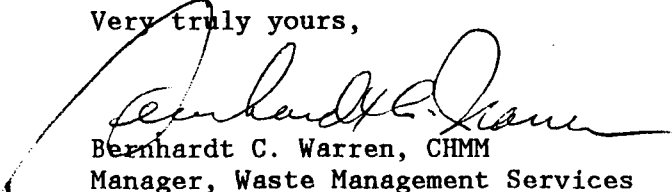


June 10, 1988
Page Four

7. A copy of the Implementation Plan will be provided the ACDES, as requested, within 60 days of issuance of the permit.

Thank you for your perusal of our application to the State DER. I trust you will find this information clarifying. If you have any further questions or comments, please contact me, or in my absence, Jack Flaacke, P.E. of our office, or Frank Darabi, our environmental engineering consultant. Otherwise, see you on June 29th.

Very truly yours,


Bernhardt C. Warren, CHMM
Manager, Waste Management Services

jkc

Enclosures: Figure 3
Waste Stream Information & Management Flow Chart

cc: Robert Bruce, CEO
Jack Flaacke, Project Engineer
Frank Darabi, Consultant
Ashwin Patel, State DER