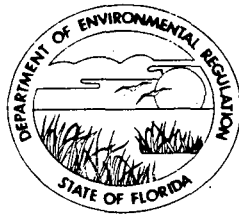


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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

NORTHEAST DISTRICT
3426 BILLS ROAD
JACKSONVILLE, FLORIDA 32207
904/798-4200



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY
ERNEST E. FREY
DISTRICT MANAGER
GARY L. SHAFFER
ASSISTANT DISTRICT MANAGER

April 5, 1988

Mr. Bernhardt C. Warren, CHMM
Manager, Quadrex Waste Management Services
Quadrex HPS, Inc.
1940 N.W. 67th Place
Gainesville, Florida 32606-1649

Dear Mr. Warren:

Quadrex HPS, Inc.
FLD 980 711 071
Alachua County - Hazardous Waste
Modification of Container Storage Areas

On March 21, 1988, we met with Mr. Jack Flaacke of your staff to discuss the upgrade of the container storage area to meet 40 CFR 264 standards. We believe this was an informal meeting and the submittal was also informal. Based on our discussion and review of the submittal, the following are our comments:

1. Any submittal requiring the Department's authorization must be submitted with a professional engineer's certification, pursuant to 17-30.220(5). This includes plans, specifications, calculations, etc.
2. Pursuant to 40 CFR 264.175(b)(1), an asphalt floor is not acceptable as an impermeable surface. Concrete may be used (with or without a liner), provided a demonstration can be made that the concrete would be compatible with the waste stored in the facility.
3. The floor and berms are to be constructed continuously to prevent penetration of waste due to spills (no gaps, cracks, or seams).
4. Provide calculations to show the structural integrity of the floor (i.e., that the floor is capable of supporting the weight of the drums, at full capacity, and the forklift). This will require a professional engineer's certification.
5. Submit a drawing/sketch to show the arrangement of the drums with adequate aisle space.

DOCKET # 14

Letter to Mr. Bernhardt C. Warren
April 5, 1988
Page two

6. Submit calculations that show the containment system has sufficient capacity to contain 10% of the volume of the containers or the maximum volume to be stored.
[40 CFR 264.175(3)]

Enclosed is a container storage checklist to help you in submitting the necessary information. Also attached is a copy of Rule 17-30.220 for your reference.

If you have any questions, please don't hesitate to contact this office for assistance.

Sincerely,



Ashwin B. Patel
Hazardous Waste Supervisor

ABP:jf *MF*
Enclosures

cc: Satish Hastury