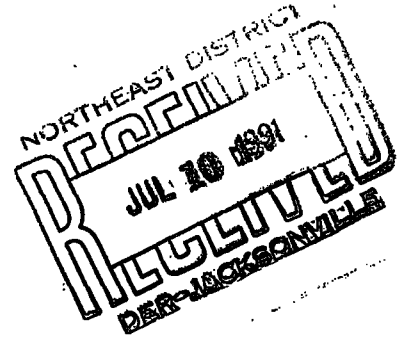


QUADREX ENVIRONMENTAL COMPANY, INC.

Jan 1080
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PP

July 10, 1991



Mr. Ashwin Patel
Department of Environmental Regulation
7825 Baymeadows Way
Jacksonville, Florida 32256

Dear Mr. Patel:

I am writing to present a modification to the hazardous waste permit application, which was delivered to your office May 31, 1991 by Quadrex Environmental Company. The modification deletes a water treatment system and changes the solids processing to a solids blending process. In the following paragraph the changes in the application are noted; and new pages are attached to be used in updating the original application.

1. Area 1-4 changes to Area 2-3 for solids repackaging
Replace Page 24
2. Modify solids processing to processing and blending and give new description
Replace Page 25
3. Delete water treatment unit
Delete Pages 26 and 27, Replace Page 28, Delete Figure 11
4. Change solids processing unit to solids processing and blending
Replace Figure 10
5. Remove processing code SO1 for water treatment unit
Replace Page 32
6. Remove EPA waste codes for water treatment unit
Replace Page 52
7. Modify Floor Plan to reflect above changes
Replace Floor Plan

BOOKET #

15P

Original

~~on bookcase~~

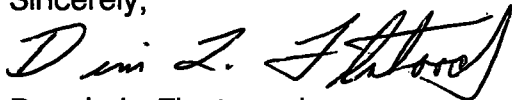
Mr. Ashwin Patel

July 10, 1991

Page 2

8. Modify Container Storage pattern-- Solids processing area 1-4 becomes container storage and solids processing and blending moves to East end of existing container storage Area 2-3 and becomes designated Area 2-4.
Replace Container Storage pattern drawings
9. Remove additional water treatment information in tank description text
Replace Page 180, Delete Pages 181 and 182
10. Remove water treatment equipment specifications
Delete Appendix C

Sincerely,



Dennis L. Fleetwood
Manager, Regulatory Compliance

Attachment

Enclosure

The bulking process will be conducted manually by dumping or raking the materials into a drum which will then be compacted or closed for disposal. The process will be repeated until the container is full, at which time it will be closed and placed into storage awaiting shipment to a permitted disposal facility. This process will be conducted in Area 2-1 and Area 2-3 as indicated on Floor Plan.

- (d) Occasionally containers of ignitable waste will be received at the facility with solids, sludges or other precipitates settled in the bottom of the container. This material will be removed from the container and processed through a blender, whereupon the resultant material will be mixed with ignitable waste in the holding tank or packaged for fuels substitution or disposal. This operation is in Area 2-1 on Floor Plan.
- (e) Solvent Recycling. Solvents which can be recovered from wastes will be recycled utilizing distillation. Solvents will be recycled in a batch process at the rate of approximately one drum per batch. The clean solvent will be stored for reuse and the still bottoms will be mixed back into the bulk tank for reuse as fuel or packaged for disposal.
- (f) Occasionally non-hazardous waste will be stored in the storage area. All non-hazardous wastes will be compatible with the permitted hazardous wastes.
- (g) Liquid wastes which contain regulated amounts of Toxic Characteristics will be received at Quadrex and either bulked, treated, or simply trans-shipped to approved facilities for fuels substitution or disposal. Also, solid materials contaminated with TC or other hazardous wastes will be received at Quadrex for trans-

shipping or repackaging before being shipped to an EPA-approved facility for fuels substitution or disposal.

- (h) Solids Processing and Blending (Area 2-3 on Floor Plan). The solids waste materials which Quadrex process vary widely to include such things as resins, contaminated rags, filters, dried paint and paint-related materials, and contaminated clean-up materials. The EPA waste codes included in this waste would be all those currently on Quadrex's permit which are allowable for recycling by fuels substitution, and for which selected cement kilns are able to receive. Solid waste which cannot be used for fuels substitution will be sent off-site for disposal or treatment.

The Solids blending process will remove solids from containers by dumping or augering. The solids will then be shredded into a blender tank. This slurried material will then be further reduced by moving through a grinder before being pumped into a Mixer tank. At this point the blended material will be stored until it is pumped into a tanker for shipment off-site fuels substitution or incineration.

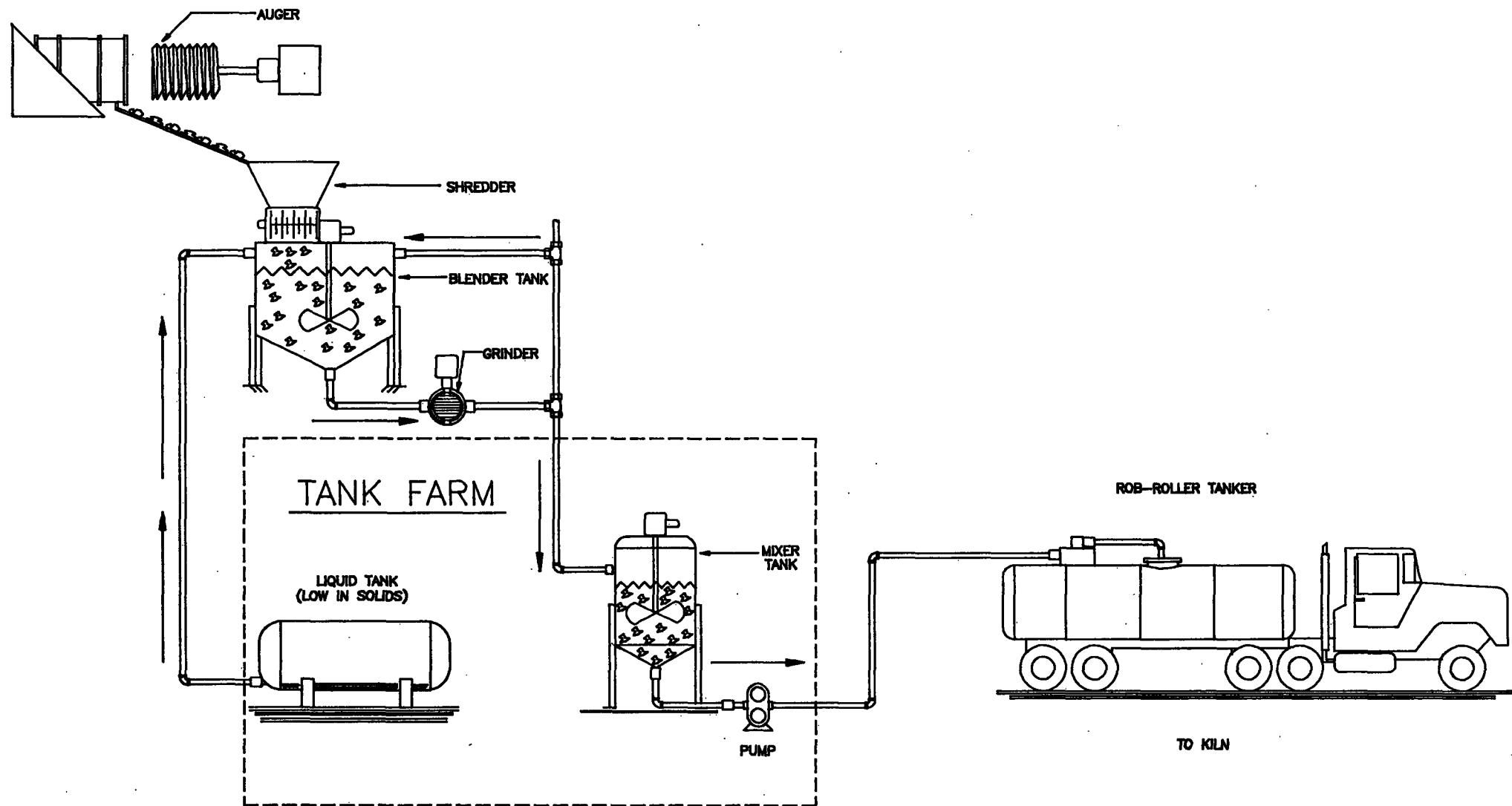
DELETE WATER TREATMENT DESCRIPTION PAGE 26

DELETE WATER TREATMENT DESCRIPTION PAGE 27

- (j) Quadrex proposes to construct a labpack decommissioning area (Areas 2A-3 & 2A-4 of Floor Plan) wherein labpack wastes will be unpacked and bulked in larger containers for off-site fuels substitution or disposal. The proposed Lab Pack Decommissioning area will allow Quadrex to process and consolidate wastes generated by hospitals, schools, laboratories, and other small generators in a safe and efficient manner.

The decommissioning area will be located in the northeast corner of Quadrex's processing facility as shown on the enclosed site plan. The area will be divided into two separate storage and processing areas to assure separation of incompatible materials. One area will be used for the processing of flammable materials and pesticides. The other, which will have a separate ventilation system, will process acids, bases, and oxidizers.

Each area will be bermed to prevent any material migration in the event of a spill. The berming will be four inches high, and ramps will allow for material to be easily moved in and out of the areas. The berms and flooring in the decommissioning area will be coated with a chemical resistant epoxy which will prevent material from entering the concrete matrix in the event of a spill. The epoxy will be resistant to corrosive materials as well as organic and chlorinated solvents.



SOLIDS PROCESSOR & BLENDING
(FIGURE 10)