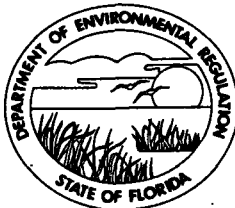


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STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

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

September 4, 1987

CERTIFIED - RETURN RECEIPT

Mr. Bernhardt C. Warren
Certified Hazardous Materials Manager
Quadrex HPS, Incorporated
1940 Northwest 67th Place
Gainesville, Florida 32606

Dear Mr. Warren:

Warning Notice #NE-W-01-4301

Quadrex HPS, Incorporated
FLD 980 711 071
Alachua County - Hazardous Waste
Temporary Operation Permit Application #HT 01-136540
First Notice of Deficiency

This letter acknowledges the receipt of your Temporary Operation Permit application on July 8, 1987, to operate a tank and a container storage area. A review of this submittal revealed that the information which you provided is not complete. The information needed to complete your application is itemized in the attached Notice of Deficiency.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the following additional information pursuant to FAC Rule 17-30.220 and Chapter 403.0876 Florida Statutes.

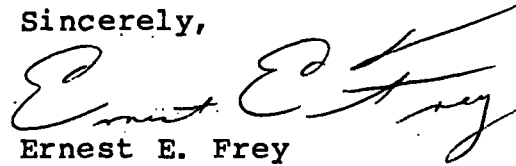
The deficiencies noted in the attached Notice of Deficiency constitute a violation of Department rules. Failure to correct these deficiencies within thirty (30) days could subject you to formal enforcement action including monetary penalties. If you cannot submit this information within thirty (30) days, you must provide a schedule with dates when this information will be submitted. If a complete response to each item is not submitted within the time frame given above, the Department will issue a Notice of Violation, begin the formal process to deny the permit pursuant to Section 120.60 F.S., or take other appropriate actions.

DOCKET # 11

Mr. Bernhardt C. Warren
September 4, 1987
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Four copies of your response should be submitted to this office. You are encouraged to contact this office to discuss the deficiencies noted by the application review. This exchange of ideas will assist you in developing a complete and adequate response. If you would like to arrange a meeting or if you have any questions, please call Ashwin B. Patel at (904) 798-4200.

Sincerely,



Ernest E. Frey
District Manager

EEF:apf
Enclosure

cc: Satish Kastury
Frank Darabi

Notice of Deficiency

Part I - General

B-2 Explain what is Zone A and Zone C in Figure-2.

List surface water bodies in Figure-3. Also, Figure-3 does not cover a 1/4 mile area surrounding the facility.

On a topographic map(s) with a scale of 1":200' show the following:

- map date
- 100 year flood plain area
- contours sufficient to show surface water flow
- sanitary, process sewage systems and fire control facilities, if any.

Provide map date for topographic map(s) with a scale of 1":2000'.

D-4 In Table-3 you have included the name of the publication (U.S. EPA 5W846) for reference. Please specify the method number for each parameter, which will be used for analysis. [40 CFR 265.13]

D-6 Describe what steps will be taken in case there is a discrepancy between the manifest and the waste received from a generator. [40 CFR 265.72]

Specify if one signed copy of the manifest is being given to the transporter immediately upon delivery. [40 CFR 265.71(a)(3)]

Specify if one signed copy of the manifest is being sent to the generator within 30 days after the delivery of waste. [40 CFR 265.71(a)(4)]

Specify if the facility receives waste by rail or water (bulk shipment). If the answer is yes, then provide information as to how you plan to comply with 40 CFR 265.72(b) requirements.

The last paragraph of Section D-6b. of the permit application states that operating records will be maintained throughout the life of the facility; but it does not specify what type of records will be maintained. Please be specific and state that at least the following records will be kept at the facility: [40 CFR 265.73(b)]

1. A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment, storage, or disposal at the facility as required by 40 CFR 265 - Appendix I;

Notice of Deficiency

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2. The location of each hazardous waste within the facility and the quantity at each location. This information must include cross-references to specific manifest document numbers, if the waste was accompanied by a manifest;
3. Records and results of waste analysis and trial tests performed as specified in 40 CFR 265.13 and 265.200.
4. Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 265.56(j);
5. Records and results of inspections as required by 40 CFR 265.15(d) (except these data need be kept only three years);
6. Monitoring, testing, or analytical data when required by 40 CFR 265.191, 265.193 and 265.195.
7. All closure cost estimates under 40 CFR 265.142.

Specify what steps will be taken to comply with the requirements of 40 CFR 265.76, if unmanifested waste is received/accepted by your facility.

State that the facility will provide to the Department a copy of the following and also keep a copy at the facility as part of the records:

- waste minimization certification
- reports of releases, fire and explosions
[40 CFR 265.56(j)]
- closure plan and closure cost estimate [40 CFR 265.112]

- E-3 In this section, you have stated that smoking or open flames are not permitted in the work area, but didn't specify if any "No Smoking" signs are posted. Please provide this information. [40 CFR 265.17(a)]
- E-4 Explain what "dpm" means. Also, provide justification for selecting 2200 dpm/100 cm².
- F-1 Section D-2f. of the permit application states that drum the drum storage area is capable of storing 2,500 30-gallon drums or 2,000 55-gallon drums. Section F-1.a. states that 3,000 55-gallon drums can be stored at any one time. Please clarify this discrepancy and state the correct maximum storage capacity to be permitted.

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In the closure cost estimate, you have considered only 500 drums for solidification. You must specify if these are 55-gallon drums or 30-gallon drums. Also, you must consider the worst case for closure cost estimates. If you are requesting that the permit allow storage of 3000 drums, the closure costs must be calculated for 3000 drums. If appropriate revisions are made to request a permitted capacity of only 500 drums, then closure costs may be estimated for only 500 drums. [40 CFR 265.112(b)(4)]

The cost estimate in F-1.a includes only solidification, transportation and labor costs. You must also include the cost that will be charged by a hazardous waste landfill or other permitted facility that will accept your waste for final disposal. [40 CFR 265.142(a)(2)]

You must consider all the comments of this letter pertaining to the closure plan for container storage (Part II) and tanks (Part III) and submit the revised closure cost estimates. [40 CFR 265.142]

You must establish financial assurance for closure of the facility. You must choose from the options as specified in paragraphs (a) through (e) of 40 CFR 265.143. For more information regarding financial assurance, please contact Ms. Diane Hunt of the Department in Tallahassee at (904) 488-0130.

Part II - Containers

B-1 b. Based on information supplied in the application, the TOP will allow the facility to store only the following waste streams: D001, F001, F002, F003, F004 and F005. In this section of the application, you have stated that Quadrex may receive other types of organic waste(s). If your facility wishes the permit to allow receipt of wastes which are not covered by the above hazardous waste codes, please provide a revised waste analysis plan with other information, to show compliance with all applicable regulations of 40 CFR 265. Once the permit is issued, you will have to receive written authorization from the Department prior to accepting wastes which are not included in the waste analysis plan.

B-6 Provide detailed information explaining solidification of waste in unprocessed drums. [40 CFR 265.112(b)(4)]

Provide a testing program to determine when the site is clean. The testing program must include:

- sampling procedures including locations and frequencies
- parameters to be tested for, including a justification of the selected parameters
- testing or analytical procedures to be used (only methods from EPA Manual SW-846 or method approved under 40 CFR 260.21 are acceptable)
- A detailed discussion of the criteria to be used to evaluate test results in order to determine whether the site is clean closed.

Also, provide a schedule of closure. [40 CFR 265.112(b)(6)]

Part III - Tanks

B-1 Specify the date when the tank was installed.
[40 CFR 265.193(a)(3)]

B-2 Specify the corrosion prevention system which is in use now. Also, include in the daily inspection log corrosion on the outer surface of the tank.
[40 CFR 265.195(a)(2)]

Provide detailed information to show compliance with the requirements of 40 CFR 265.196 - response to leaks or spills and disposition of leaking or "unfit for use" tank systems. To meet these requirements, at a minimum, you must state that in case of a leak or spill,

- flow to the tank will be stopped immediately.
[40 CFR 265.196(a)]
- released material will be removed at the earliest practicable time. [40 CFR 265.196(b)]
- further migration of the leak or spill will be prevented
[40 CFR 265.196(c)]
- the Department will be notified within 24 hours unless the release is exempt per 40 CFR 265.196(d)(2).
- a written report will be sent to the Department within 30 days of such occurrence. [40 CFR 265.196(e)(3)]
- facility will perform the repairs, or provide secondary containment, as required per 40 CFR 265.196(e), prior to returning the tank system to service.
- if repairs are extensive, facility will obtain a certification from an independent, qualified, registered professional engineer prior to returning the tank system to service. Within seven days of the tank system returning to service, a copy of such certification will be sent to the Department [40 CFR 265.196(f)]

B-3 Closure

Facility must consider the worst case for closure. Consider that a third party will have to sample the contents and then send the wastes to a facility other than Oldover (a process other than beneficial reuse). Also, provide the information on how and where the dismantled tank, associated pipes, pumps and filters will be disposed of.

Provide a testing program to determine when the site is clean. The testing program must include:

- sampling procedures including locations and frequencies
- parameters to be tested for, including a justification of the selected parameters.
- testing or analytical procedures to be used (only methods from EPA Manual SW-846 or method approved under 40 CFR 260.21 are acceptable).

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- A detailed discussion of the criteria to be used to evaluate test results in order to determine whether the site is clean closed.

Also provide a schedule of closure. [40 CFR 265.112(b)(6)]

Provide a statement that if all contaminated soils cannot be practicably removed or, complete decontamination cannot be achieved, then the facility will perform post-closure care as per the Department approved plan to meet the requirements of 40 CFR 265.310 to close the tank storage area as a landfill. [40 CFR 265.197(b)]

Part XII - Compliance Schedule

Pursuant to this section of the permit application form, you may want to propose a compliance schedule for achieving compliance with 40 CFR 264 standards for the container storage area and the tank. The Department will include such a schedule as conditions of the permit.

The certification from the operator, facility owner and land owner is not dated. Please date and submit the completed certifications to the Department.