Quadrex Permit



NORTHEAST DISTRICT
OCT 21 1987

Quadrex HPS Ind

OCKET#17

1940 N.W. 67th Place, Gainesville, Florida 32606-164950NV; 904-373-6066 TWX 910-590-2438 TELEX 35-2031 TELECOPY 904-373-0046

October 19, 1987

Mr. Ashwin Patel
State of Florida
Dept. of Environmental Regulation
3426 Bills Road
Jacksonville, FL 32207

Dear Mr. Patel:

This is regarding your telephonic request for changes to our application.

- 1. Attached is Rev. 2 to page 31a stating that a letter will be sent to the generator to confirm the telephonic resolution of manifest discrepancies.
- The items of concern expressed by the Dept. of HRS to the DER regarding the permit application appear to be beyond the scope of the DER evaluation. These items are being resolved directly with the Dept. of HRS during the renewal of the Radioactive Materials License issued to Quadrex HPS.
- 3. The establishing of financial surety as required by the State DER and HRS is pending. It is intended by Quadrex HPS that since most of the waste on site is a mixed waste that the decommissioning of the site to unrestricted use would satisfy both Agencies' requirements. However, the cost for this cleanup should be under one financial surety. Both the DER (Tallahassee) and HRS (Tallahassee) have been contacted to resolve this issue. Quadrex HPS remains available to provide any assistance in explaining any concerns addressed by either Agency. I would hope this matter could be resolved by the end of 1987.

I hope this information answers your questions. If you need additional information, please contact me.

Very truly yours,

Bernhardt C. Warren

Manager, Institutional Waste

BCW/kdg2-43

Enclosure

cc: Dept. of HRS, Office of Radiaton Control Bob Bruce, Corporate President Susan McDonough, Radiation Safety Officer Frank Darabi, Chemical Consultant

- c. Records and results of waste analysis and trial tests performed as specified in 40 CFR 265.13 and 265.200.
- d. Summary reports and details of all incidents that require implementation of the contingency plan as specified in 40 CFR 265.56(j).
- e. Records and results of inspections as required by 40 CFR 265.15(d) (except these data need be kept only three years).
- f. All closure cost estimates under 40 CFR 265.142.

Quadrex HPS will also maintain the following records and provide to the DER:

- a. Waste minimization certification.
- b. Reports of releases, fire, and explosions (40 CFR 265.56(j)).

Also, Quadrex HPS will provide to the satisfaction of the State DER a:

- a. Closure plan and closure cost estimate (40 CFR 265.112).
- 4. Upon receipt of waste from a generator with an apparent discrepancy, the generator/broker will be contacted to resolve the discrepancy. If the discrepancy is a difference in number of drums of waste (batch waste is described in 40 CFR 265.72(a)), the matter will be resolved by telephone with the respective broker/generator. A follow up letter will be forwarded to the generator to confirm the corrections.