## State of Florida DEPARTMENT OF ENVIRONMENTAL REGULATION



# Interoffice Memorandum

FOR ROUTING TO OTHER THAN THE ADDRESSEE	
То:	. Loctn:
То:	Locne:
To:	LOCTN:
Frecim:	. DATE:

#### NORTHEAST DISTRICT - JACKSONVILLE

TO:

Satish Kastury

FROM:

Ashwin Patel W. Sor

DATE:

December 28, 1987

SUBJECT:

Quadrex HPS, Incorporated

Alachua County FLD 980 711 071

HT01-136540

Attached for your review is the draft TOP for Quadrex HPS. Please provide comments by January 18, 1988.

ABP:jf

cc: Rabin Prusty



#### STATE OF FLORIDA

### DEPARTMENT OF ENVIRONMENTAL PLEGULATION



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

PERMITTEE:

Quadrex HPS, Incorporated Post Office Box 4100 Gainesville, Florida 32606 I.D. Number: FLD 980 711 071

Permit/Certification No. HT 01-136540

Date of Issue: Expiration Date: No County: Alachua

Latitude/Longitude: 29°42'08"N/82°20'51"W

Section/Township/Range: 18/9S/20E

Project: Operation of a tank and a container

storage facility.

This permit is issued under the provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Rules 17-4 and 17-30. The above-named permittee is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof and specifically described as follows:

To operate the following two (2) hazardous waste storage units at Quadrex HPS, Incorporated, located at 1940 N.W. 67 Place, Gainesville, Florida. The facility is described in Figure 10 of the permit application dated July 8, 1987, and Figure 11, revised October 1, 1987:

- A. A container storage area as described in Figure 11 contains three (3) zones to store hazardous waste in containers ranging from 1/2 gallon to fifty-five (55) gallon drums. The storage area is allowed to store a maximum volume of 110,000 gallons of hazardous waste.
- B. A 3,000 gallon aboveground storage tank, installed on September 1, 1983, is constructed of 1/4" carbon steel.

The hazardous wastes stored at this facility and their designated hazardous waste codes are as follows:

Flammable Liquids (D001)
Spent Halogenated Solvents (F001, F002)
Spent Non-halogenated Solvents (F003, F004, F005)

Operation of these facilities will be in accordance with the Temporary Operation permit application dated July 8, 1987, and the supplemental information received on October 8, 1987 and October 21, 1987.

DER Form 17-1.201(5) Effective November 30, 1982 - Page 1 of 11

Quadrex HPS, Incorporated



Date of Issue: No Expiration Date: No

#### GENERAL CONDITIONS:

- 1. The terms, conditions, requirements, limitations, and restrictions set forth herein are "Permit Conditions" and as such are binding upon the permittee and enforceable pursuant to the authority of Sections 403.161, 403.727, or 403.859 through 403.861, Florida Statutes. The permittee is hereby placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of the "Permit Conditions" by the permittee, its agents, employees, servants or representatives.
- 2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.
- 3. As provided in Subsections 403.087(6) and 403.722(5), Florida Statutes, the issuance of this permit does not convey any vested rights or any exclusive privileges. Nor does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state or local laws or regulations. This permit does not constitute a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in the permit.
- 4. This permit conveys no title to land or water, does not constitute state recognition or acknowledgement of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the state. Only the Trustees of the Internal Improvement Trust Fund may express state opinion as to title.
- 5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, plant or aquatic life or property and penalties therefore caused by the construction or operation of this permitted source, nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.
- 6. The permittee shall at all times properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed or used by the permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

Quadrex HPS, Incorporated

I.D. Number:

Permit/Certification No. HT 01-136540

Date of Issue: No Expiration Date: No

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law, access to the premises, at reasonable times, where the permitted activity is located or conducted for the purpose of:

- a. Having access to and copying any records that must be kept under the conditions of the permit;
- b. Inspecting the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sampling or monitoring any substances or parameters at any location reasonably necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

- 8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately notify and provide the Department with the following information:
  - a. a description of and cause of noncompliance; and
  - b. the period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or revocation of this permit.

- 9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source, which are submitted to the Department, may be used by the Department as evidence in any enforcement case arising under the Florida Statutes or Department rules, except where such use is proscribed by Sections 403.73 and 403.111, Florida Statutes.
- 10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance, provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules.
- 11. This permit is transferable only upon Department approval in accordance with Florida Administrative Code Rules 17-4.120 and 17-30.300, as applicable. The permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department.

Quadrex HPS, Incorporated

I.D. Number: FLD 980 711 071

Permit/Certification No. HT 01-136540

Date of Issue: 
Expiration Date:

12. This permit is required to be kept at the work site of the permitted activity during the entire period of construction or operation.

- 13. This permit also constitutes:
  - () Determination of Best Available Control Technology (BACT)
  - () Determination of Prevention of Significant Deterioration (PSD)
  - () Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500)
  - () Compliance with New Source Performance Standards
- 14. The permittee shall comply with the following monitoring and record keeping requirements:
  - a. Upon request, the permittee shall furnish all records and plans required under Department rules. The retention period for all records will be extended automatically, unless otherwise stipulated by the Department, during the course of any unresolved enforcement action.
  - b. The permittee shall retain at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation), copies of all reports required by this permit, and records of all data used to complete the application for this permit. The time period of retention shall be at least three years from the date of the sample, measurement, report or application unless otherwise specified by Department rule.
  - c. Records of monitoring information shall include:
    - the date, exact place, and time of sampling or measurements;
    - the person responsible for performing the sampling or measurements;
    - the date(s) analyses were performed;
    - the person responsible for performing the analyses;
    - the analytical techniques or methods used; and
    - the results of such analyses.
- 15. When requested by the Department, the permittee shall, within a reasonable period of time, furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware that relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be submitted or corrected promptly.

Quadrex HPS, Incorporated

I.D. Number:

Permit/Certification No. HT 01-136540

Date of Issue: No Expiration Date:

16. In the case of a hazardous waste facility permit, the following permit conditions shall also apply.

- a. The permittee shall submit the following reports to the Department:
  - (1) Manifest discrepancy report: If a significant discrepancy in a manifest is discovered, the permittee must attempt to reconcile the discrepancy. If not resolved within 15 days after receiving the waste, the permittee shall immediately submit a letter report including a copy of the manifest to the Department.
  - (2) Unmanifested waste report: Permittee shall submit an unmanifested waste report to the Department within 15 days of receipt of unmanifested waste.
  - (3) All the manifest requirements in accordance with 40 CFR 265.71.
  - (4) Annual report: An annual report covering facility activities during the previous calendar year must be submitted, in accordance with Florida Administrative Code Rule 17-30.
- b. Notification of any noncompliance which may endanger health or the environment, including the release of any hazardous waste that may endanger public drinking water supplies, or the occurrence of a fire or explosion from the facility which could threaten the environment or human health outside the facility, shall be verbally submitted to the Department within 24 hours and a written submission provided within 5 days. The verbal submission within 24 hours shall contain the name, address, I.D. number and telephone number of the facility and owner or operator, the name and quantity of materials involved, the extent of injuries (if any), an assessment of actual or potential hazards, and the estimated quantity and disposition of recovered material. The written submission shall contain the following:
  - (1) a description of and cause of noncompliance; and
  - (2) If not corrected, the anticipated time the noncompliance is expected to continue and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.
- c. Reports of compliance or noncompliance with, or any progress reports on, requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
- d. All reports or information required to be submitted to the Department by a hazardous waste permittee shall be signed by a person authorized to sign a permit application.

#### SPECIFIC CONDITIONS - PART I: General Operating Requirements

17. The permittee shall maintain and operate the facility to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or constituents to air, soil, or surface water which could threaten human health or the environment, in accordance with 40 CFR 265.31.

Quadrex HPS, Incorporated

I.D. Number: FLD 980 711 971
Permit/Certification No. HT 01-136540
Date of Issue: M

18. The permittee shall notify the Department in writing at least four weeks in advance of the date the permittee expects to receive hazardous waste from a foreign source, in accordance with 40 CFR 265.12. Notice of subsequent shipments of the same waste from the same foreign source in the same calendar year is not required.

Expiration Date:

- 19. This permit allows the permittee to store only those wastes specified in the waste analysis plan of this application at the facility. Prior to acceptance of new hazardous wastes, the permittee shall submit to the Department, for approval, a waste analysis of the proposed new waste stream. This analysis must be incorporated in the general waste analysis plan and retained on site. (40 CFR 265.13)
- 20. The permittee shall follow the procedures described in the waste analysis plan, Section D-4, Part I of the permit application. [40 CFR 265.13(b)]
- 21. The permittee shall comply with the security provisions of 40 CFR 265.14(b)(2) and (c).
- 22. The permittee shall inspect the facility operating, emergency and safety equipment in accordance with the schedule approved in Section E-1, Part I of the permit application. The permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with the requirements of 40 CFR 265.15(c). Changes, additions, or deletions to the schedule must be approved in writing by the Department. The schedule must be maintained as part of the operating record of the facility. (40 CFR 265.15)
- 23. Facility personnel must successfully complete the approved training program indicated in Section E-5, Part I of the permit application, within 6 months of employment or assignment to a facility or to a new position at the facility. Verification of this training must be kept with the personnel training records and maintained on-site. Personnel shall not work unsupervised until training has been completed. The training must be reviewed by facility personnel at least annually. (40 CFR 265.16)
- 24. The permittee shall comply with the general requirements of 40 CFR 265.17(a) and (b), and the location requirements of 40 CFR 265.176 and 265.198.
- 25. The permittee shall comply with the following conditions concerning preparedness and prevention:
  - a. At a minimum, the permittee shall equip the facility with the equipment described in the contingency plan, Section E-3, Part I of the permit application, as required by 40 CFR 265.32.
  - b. The permittee shall test and maintain the equipment specified in Condition 25(a) as necessary to assure its proper operation in time of emergency, as required by 40 CFR 265.33.
  - c. The permittee shall maintain access to the communications or alarm system, as required by 40 CFR 265.34.
  - d. At a minimum, the permittee shall maintain aisle space as shown in Figure 11 of the permit application, as required by 40 CFR 265.35.
  - e. The permittee shall maintain arrangements with state and local authorities, as required by 40 CFR 265.37. If state or local officials refuse to enter into preparedness and prevention arrangements with the permittee, the permittee must document this refusal in the operating record.

Quadrex HPS, Incorporated

I.D. Number: 115 980 11 02

Permit/Certification No. HT 01-136540

Date of Issue: 
Expiration Date:

26. The permittee shall comply with the following conditions concerning the contingency plan:

- a. The permittee shall immediately carry out the provisions of the contingency plan, Section E-2, Part I of the permit application and follow the emergency procedures described by 40 CFR 265.56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment. The permittee shall give proper notification if an emergency situation arises and within fifteen (15) days must submit to the Department a written report which includes all information required in 40 CFR 265.56(j).
- b. The permittee shall comply with the requirements of 40 CFR 265.53.
- c. The permittee shall immediately amend the contingency plan and distribute the amended plan to the appropriate agencies if any criteria in 40 CFR 265.54 are met. Amendments to the plan must be approved in writing by the Department.
- d. The permittee shall comply with the requirements of 40 CFR 265.55, concerning the emergency coordinator.
- 27. The permittee shall comply with the manifest requirements of 40 CFR 265.71, 265.72, and 265.76.
- 28. The permittee shall maintain a written operating record at the facility which includes:
  - the description and quantity of each hazardous waste received
  - the location of each hazardous waste within the facility, and the quantity at each location
  - the results of the waste analyses
  - a summary report and details of incidents that require implementation of the contingency plan
  - manifest numbers
  - the results of inspections (for 3 years)
  - the closure plan and cost estimates

These records must be maintained at the facility until completion and certification of closure.

29. The permittee shall maintain and operate the facility in accordance with Section D-2, Part I of the permit application (including Figures 8, 9, 10, and 11).

#### SPECIFIC CONDITIONS - PART II: Containers

- 30. The permittee is allowed to store only the hazardous wastes approved in Section D-2.a, Part I of the permit application in the approved storage area. Containers must conform to DOT specification and be managed in accordance with the approved operation plan. Containers shall be kept closed except when adding or removing waste and shall be handled in a manner that will not allow the containers to rupture or leak, in accordance with 40 CFR 265.173. If a container holding hazardous waste is not in good condition, or begins to leak, the waste shall be transferred to another container in good condition, in accordance with 40 CFR 265.171.
- 31. The permittee shall comply with the compatibility requirements of 40 CFR 265.172, as indicated in Section B-2, Part II of the permit application.

Quadrex HPS, Incorporated

I.D. Number: FLD 980 711 071
Permit/Certification No. HT 01-136540
Date of Issue: MExpiration Date: ME

- 32. The permittee shall conduct weekly visual inspections, in accordance with Section E-4, Part I of the permit application (the inspection schedule), to detect leakage in the container storage area or its associated loading/unloading zones. (40 CFR 265.174) If, in spite of the weekly inspections, a significant deterioration of the pavement (due to occasional spills) is noted, the need for a resurfacing/seal material shall be reevaluated.
- 33. The permittee shall store a maximum of 110,000 gallons of waste in 2,000 fifty-five gallon drums or 2,500 containers in sizes ranging from 1/2 gallon to 30 gallons, in the container storage area as shown in Figure 11 (revised October 1, 1987).
- 34. The permittee shall notify the Department when the capacity of the container storage area reaches 90 percent, i.e., volume of 99,000 gallons in 1,800 fifty-five gallon drums or 2,250 containers in sizes ranging from 1/2 gallon to 30 gallons.
- 35. The permittee shall not place more than four drums per pallet and shall not stack them more than two high.
- 36. The permittee shall comply with the waste compatibility requirements of 40 CFR 265.177, as indicated in Section B-2, Part II of the permit application.

#### SPECIFIC CONDITIONS - PART III: Tanks

- 37. The permittee is allowed to store in the tank only those hazardous wastes approved in Section D-2, Part I of the permit application.
- 38. The permittee shall store a maximum of 3,000 gallons of waste in the storage tank.
- 39. The permittee shall notify the Department when the volume of waste stored in the tank reaches ninety (90) percent capacity of the tank, i.e., 2,700 gallons.
- 40. The permittee shall not place ignitable or reactive waste in tank systems unless the waste is stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react. [40 CFR 265.198(a)]
- 41. The permittee shall comply with the protective distance requirements for the tank placement as set forth in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981), as required by 40 CFR 265.198(b).
- 42. The permittee shall handle incompatible wastes in accordance with Section B-1, Part III of the permit application and 40 CFR 265.199, by not introducing hazardous waste into unwashed tank systems which previously held incompatible waste or material.
- 43. For new tank components which may be required by the repair options of 40 CFR 265.196(f), the permittee must submit a written assessment, reviewed and certified by an independent registered professional engineer, which attests to the component's structural integrity. This assessment shall include the requirements of 40 CFR 265.192. As required in 40 CFR 265.192(b), an independent qualified inspector or independent registered professional engineer must inspect the installation.
- 44. The permittee shall prevent the release of hazardous waste or hazardous constituents to the environment. The secondary containment system should be maintained according to Sections A-l and B-l, Part III of the application and shall comply with the requirements of 40 CFR 265.193, including the requirements set forth below:

Quadrex HPS, Incorporated

TLD 980-711.071 I.D. Number:

Permit/Certification No. HT 01-136540

Date of Issue: &

Expiration Date: 8

44. All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being put into service.

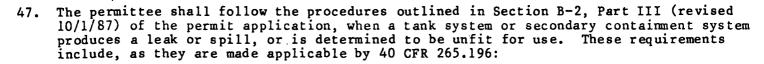
- The secondary containment system shall meet the requirements of 40 CFR 265.193 and shall be:
  - (1) Updated to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters.
  - (2) Capable of detecting and collecting releases and run-on until the collected material is removed.
  - Lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses which may be induced by the environment.
  - (4) Placed on a foundation or base capable of providing support to the secondary containment system.
  - (5) Provided with leak detection equipment designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours.
  - (6) Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation.
  - (7) Designed and operated, with the exception of double walled tank containment, to contain 100% of the capacity of the largest tank within its boundary and also contain the precipitation due to a 25-year, 24-hour rainfall event, if run-on control is not provided.
- c. Ancillary equipment shall be provided with secondary containment, except as provided for in 40 CFR 265.193(f).
- 45. The permittee shall, as part of the general operating requirements of 40 CFR 265.194:
  - a. Not place hazardous wastes or treatment reagents in a tank system if the possibility exists that this may cause the tank system to fail.
  - Use appropriate controls and practices to prevent spills and overflows, and
  - Comply with the requirements of 40 CFR 265.196 if a leak or spill occurs.
- 46. The permittee shall inspect the tank system in accordance with Section B-2, Part III of the permit application and as required by 40 CFR 265.195. These requirements include:
  - Developing and following a schedule and procedure for inspecting overfilling controls, and
  - Inspecting at least once each operating day the aboveground portions of the tank system, data from leak detection or monitoring equipment, and the construction materials and area immediately surrounding the tank.
  - The results of the inspections in (a) and (b), of this condition shall be maintained in the operating record of the facility.

Ouadrex HPS, Incorporated

#### I.D. Number: FI

Permit/Certification No

Date of Issue: A Expiration Date: A



- a. Cessation of use; prevention of flow or addition of waste.
- b. Removal of waste from the tank system or secondary containment system.
- c. Containment of visible releases to the environment.
- d. Notifications, reports.
- e. Provision of secondary containment, repair or closure, and
- f. Certification of major repairs.

#### SPECIFIC CONDITIONS - PART IV: Closure

- 48. The permittee shall comply with the following conditions concerning closure:
  - a. The permittee shall close the facility as required by 40 CFR 265.111, and in accordance with the closure plan, Section B-6, Part II and B-3, Part III (both revised on October 1, 1987) of the permit application.
  - b. The permittee shall amend the closure plan in accordance with 40 CFR 265.112(b) whenever necessary.
  - c. In accordance with 40 CFR 265.112(d)(1), the permittee shall notify the Department at least forty-five (45) days prior to the date he expects to begin closure and submit a complete closure permit application. [17-30.260(1), FAC]
  - d. Within ninety (90) days after receiving the final volume of hazardous waste, the permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan, Section B-6, Part II and B-3, Part III (both revised on October 1, 1987) of the permit application, and in accordance with 40 CFR 265.113(a).
  - e. The permittee shall decontaminate and/or dispose of all facility equipment as required by 40 CFR 265.114, 265.197, and the closure plan, Section B-6, Part II and B-3, Part III (both revised October 1, 1987) of the permit application.
  - f. The permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan, as required by 40 CFR 265.115.

#### SPECIFIC CONDITIONS - PART V: Permit Modification/Renewal

- 49. The Department may modify, revoke and reissue, or terminate for cause, this permit in accordance with the provisions of 17-30.290, FAC. The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the permittee does not stay the applicability or enforceability of any permit condition. The permittee may submit any subsequent revisions to the Department for departmental approval. Should these revisions constitute a major modification to the permit, the permittee shall meet the requirements of 17-30.290, FAC.
- 50. Prior to 135 days before the expiration of this permit, the permittee shall submit a complete application for renewal of this permit or a complete application for an operation permit on forms and in a manner prescribed by the Department, unless the facility is to be closed prior to the expiration date of this permit, in accordance with the requirements of 17-30.300(1), FAC.

Quadrex HPS, Incorporated



#### SPECIFIC CONDITIONS - PART VI: Compliance Schedule

- 51. The permittee shall comply with 40 CFR Part 264, Subpart H Financial Requirements before July 1, 1988.
- 52. Within sixty (60) days of issuance of this permit, the permittee shall submit to the Department detailed plans for upgrading the container storage area to meet the secondary containment requirements of 40 CFR 264.175. The plans shall contain a detailed schedule for implementation, but they shall not be implemented until the permittee has received approval from the Department. The following items shall be addressed in the containment system plans:
  - a. Provisions for a base underlying the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation. These provisions shall include composition and permeability of the base materials, an engineering evaluation of the structural integrity of the base, and an evaluation of the compatibility of the base with the types of waste being stored.
  - b. Provisions for containment of at least 11,000 gallons of liquid (ten percent of the 110,000 gallon maximum volume of waste permitted to be stored in the area) plus any run-on which will not be prevented from entering the system. The information submitted shall include design drawings of the containment system, dimensions of the system, calculations demonstrating the system's capacity, liquid collection and removal systems, a description of the base's grade and slope, and a complete description of the curbs, dikes, berms, ditches, and trenches.
  - c. Provisions to prevent run-on into the containment system. The information submitted shall include calculations for maximum potential run-on, design drawings of the cover system, and a description of the materials to be used in construction of the cover system.
  - d. A description of any necessary changes in operating procedures which will be implemented during and after construction of the containment and cover systems.
- 53. Within thirty (30) days of receiving the Department's approval of the plans required by Specific Condition 52, the permittee shall begin implementation of the plans. Within 180 days of receiving the Department's approval of the plans, the permittee shall complete all activities necessary to meet the container storage requirements of 40 CFR 264, Subpart I.
- 54. Within 120 days of issuance of this permit, the permittee shall ensure that the existing tank system complies with all applicable requirements of 40 CFR, Subpart J.

Executed in Jacksonville, Florida.

STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

Ernest E. Frey District Manager

Northeast District 3426 Bills Road Jacksonville, Florida 32207