PERMA-FIX
ENVIRONMENTAL SERVICES

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August 13, 1999

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DEPT. OF ENV. PROTECTION
NORTHEAST DISTRICT - JAX

Mr. Ashwin Patel
Florida Department of Environmental Protection
7825 Baymeadows Way, Ste. B200
Jacksonville, FL 32256

Subj: Fourth Notice of Deficiency
Perma-Fix of Florida, Inc.
FLD 980 711 071

Dear Mr. Patel:

In response to the subject Notice of Deficiency (NOD), Perma-Fix of Florida is pleased to provide the attached line-by-line response and modified sections of the application affected by the response.

Certain sections of the Air Toxics Modeling Report and the Off-Site Consequences Analysis Report are affected by this response. Those reports are currently being revised and will be forwarded under separate cover. An advanced copy of the revised pages has been forwarded to Dr. Stephen Roberts along with the line-by-line response.

If there any technical questions arising from this response, Perma-Fix would appreciate the opportunity to discuss those issues in an informal manner, with the goal of avoiding another NOD.

If you have any questions or need further information, please do not hesitate to contact me at (352) 395-1356.

Sincerely,

Steven Douglas
Regulatory Affairs Manager

Attachments

cc: Stephen Roberts, UF
Scott Ellis, SYA
Suresh Chandnani, JEA
Satish Kastury, DEP-Tallahassee

DOCKET # P-19

PERMA-FIX OF FLORIDA, INC.
ITEM-BY-ITEM NOD RESPONSE

The following is an item-by-item response to each of the issues raised in the Notice of Deficiency (NOD) dated July 30, 1999, and received by Perma-Fix of Florida, Inc. (PFF) on or about August 2, 1999, regarding the PFF permit renewal and expansion application submitted on June 24, 1998. When appropriate, PFF responses to NOD items are provided in their entirety. In other instances, additions, deletions or revisions to the permit application made in response to a NOD item are described and/or referenced below.

As appropriate, draft changes to the permit application described below are attached for DEP review and consideration. New and deleted text is underlined and struck out to facilitate the review of proposed revisions. PFF intends to submit a complete revised permit application once DEP and PFF have agreed that the proposed changes described below and/or attached are sufficient to satisfy the issues raised in the July 30, 1999 NOD.

Attachment A Comments

1. *The treatment tank proposed for debris treatment use in the LSV area will be a miscellaneous treatment unit and must be included in the closure plan, the closure cost estimate and comply with subpart CC requirements.*

Response

The debris treatment tank (dip tank) has been added to the Facility Closure Plan and included in the CostPro closure cost estimate forms. See the revised Section K and revised cost estimate CostPro forms. The Facility will employ a regenerative thermal oxidizer (RTO) to meet the Level 3 Subpart CC emission control requirements specified in 40 CFR 264.1086 (e) during all debris treatment operations, including dip tank use. Section II.R, S: Subpart CC – Air Emissions Standards for Tanks and Containers has been revised to note use of the RTO and compliance with the appropriate Subpart CC Level 3 emission control requirements.

2. *The area within the LSV processing and Non-Hazardous Waste storage building that will be used for storage of hazardous waste debris prior to treatment, need to be included in the closure cost estimate, as a loading/unloading (staging) area.*

Response

Hazardous waste debris treated in the LSV Processing and Non-hazardous Storage Warehouse (Warehouse) will not be stored in the Warehouse prior to treatment. Typically, hazardous waste debris will be brought into the LSV Processing Area through the LSV Processing Area bay doors. Hazardous waste debris will be stored in either the Treatment and Operations Building or Processing and Storage Building container storage area prior to treatment and then moved directly into the LSV Processing Area for treatment. The container storage and staging areas within the Processing and Storage Building and inside the LSV Processing Area in the Warehouse are included in the Facility Closure Plan and closure cost estimate.

3. *Attachment II.A.5: The closure plan and closure cost estimate must address all hazardous waste constituents including those PFF were previously permitted to accept but are proposing to no longer accept.*

Response

The Facility closure plan and closure cost estimate addresses all hazardous waste constituents that are currently being accepted at the Facility as well as the additional constituents associated with two new waste codes (D002 and D003) proposed for acceptance at the Facility. It should be noted that PFF does not plan to discontinue the acceptance of any approved waste codes subject to the current storage permit. The list of acceptable waste codes and associated hazardous waste constituents proposed for the Facility is included in the permit application as Attachment II.A.5 to the Facility Waste Analysis Plan.

4. *Please provide information on how PFF will verify that decontamination of the PF-II equipment is sufficient, as only water (10 gallons) will be used for decontamination.*

Response

The assertion that only 10 gallons of water will be used to decontaminate the Perma-Fix® II process equipment is incorrect. The decontamination procedures are described in detail in Section II.I of the permit application and include the rinsing of components and the application of high-pressure steam to component surfaces. A nominal 10 gallons of distilled water will be added to and evaporated in the reactor vessel after the reactor vessel has been decontaminated and the after the separator, absorber and accumulator tanks have been emptied and flushed with distilled water. The distilled water will be evaporated and run through the system to flush any residual contamination from the condensing surfaces (e.g., steel packing in the separator and absorber tanks) of the system. As noted on page 8 of Section II.I, additional water will be added, heated and recirculated through the system, as necessary, until a visual inspection of the condensate in the separator, absorber or accumulator does not indicate phasing or discoloration of the rinsate. The lack of discoloration in the rinsate will indicate that the condensing surfaces have been decontaminated.

5. *Please describe the materials of construction for the ductwork and piping associated with the "VOC Collection System", shown in Drawing # 3366, and provide information on how PFF will assure its integrity along with an inspection plan and schedule.*

Response

Figure I.D.13 has been revised to include the following notes regarding the materials of construction for the VOC emissions control system ductwork and associated equipment.

1. ALL DUCT SUPPORT STRUCTURE, STAIRS, WALKWAYS, AND PLATFORMS TO BE GALVANIZED ASTM A-36 STEEL.

2. ALL ELEVATED PLATFORM SUPPORT COLUMNS TO BE GALVANIZED ASTM A-36 STEEL.
3. ALL DUCTWORK TO BE SS 304 WELDED, MIN. #16 GA. THK. DUCT FLANGES SHALL BE WELDED SS 304 WITH VITON® GASKETS.
4. MINIMUM SOIL BEARING PRESSURE TO BE 2500 LB./SQ. FT. ELEVATED WALKWAYS SHALL HAVE A MINIMUM BEARING CAPACITY OF 100 LB./SQ. FT.

The integrity of the ductwork and flanges of the VOC emissions control system will be evaluated on a weekly basis in accordance with the inspection form entitled "Weekly Inspection Log for Pollution Control Ductwork and Flanges," which has been added to Attachment S-6 (Sample Inspection Forms and VOC Analyzer Logs) in Section II.R, S of the permit application.

6. *Please include specifications and P.E. certification for the proposed new 3000 gallon storage tank, in the final application.*

Response

Perma-Fix is planning to replace the bulk tank in September 1999. The replacement tank will be physically identical to the existing tank, except that construction will be stainless steel vice carbon steel. DEP will be furnished a workplan and the opportunity to observe the replacement operation, as was previously agreed. The workplan will include certification of the replacement tank by a Florida registered P.E.

7. *Please explain why toluene was chosen for the Proposed Worst-case: Toxic substance, but 1,1,2-Trichloro- 1,2,2-Trifluoro-ethane was chosen for the Proposed Alternate-case: Toxic, in Table 2.9 & 2.10 of the Off-Site Consequence Analysis & Air Modeling report.*

Response

Please note that the May 1999 Off-Site Consequence Analysis & Air Modeling Report prepared for PFF by Jones, Edmunds & Associates, Inc. (JEA) contained errors with regard to the selection and modeling of the alternate case toxic substance releases. The May 1999 report mistakenly determined that 1,1,2-Trichloro–1,2,2-Trifluoroethane resulted in the greatest impact distance under the alternate scenario for a toxic release. JEA has redone the analysis and modeling identifying toluene as the constituent of concern for both the worst case and alternate case toxic release scenarios. A revised report, which includes revisions to Tables 2.7 and 2.10 and an explanation of the figures in the revised tables, is being submitted to DEP under separate cover.

8. *In the Air Toxics Modeling report, Table 1, a 98% condenser efficiency assumption is used. Please justify this assumption and provide information on how PFF will maintain this operation standard and what actions PFF will take if the condenser efficiency drops. If the condenser efficiency should drop to 90%, as an example, the linear calculations for emission concentrations in the Air Modeling Results, Table 2, would show increases for some pollutants above the NTL's for the 46 m range (property boundary). Please comment on the*

results in Table 2 for Chloroform at the 46 m range, which show calculated emissions above the NTL.

Response

The June 1999 Air Toxic Modeling report (Report) and the referenced table incorrectly state assumptions of a 98% "condenser" efficiency for purposes of calculating potential organic constituent emissions, and comparing the potential emissions to the identified 'No Threat Levels' (NTLs). The Report should have referred to the 98% efficiency as a Perma-Fix II process (Process) **overall system VOC removal efficiency** and noted the 95% VOC reduction efficiency of the regenerative thermal oxidizer (RTO) that will be used to control (reduce) organic emissions from the Process after the condenser/absorber VOC removal system.[1] The 98% overall efficiency assumption used in the calculations presented in the Report is based on actual bench scale experiments and calculations addressing typical organic contaminants and debris matrices to be treated in the Perma-Fix II Process. As shown in the summary spreadsheet in Appendix F of the Report, 98% is the overall (system) efficiency obtained, when allowing for the 95% reduction in organic emissions afforded by the RTO. 98% overall system efficiency is achievable at the lowest condenser/absorber VOC removal system efficiency of 82%.

Using a more conservative approach, JEA has rerun the model using an overall system (condenser/absorber) efficiency assumption of 82%, the low end of the bench top results range. In addition, PFF has adjusted the anticipated maximum concentrations estimates in Table 1 of the Report, as the concentrations can be controlled in the incoming feed streams. It should be noted that the estimated overall system efficiencies do not take the effects of the chemical oxidation component step of the Process into account. The application of the chemical oxidation step is expected to produce recovery efficiencies consistent with the original 98% estimate of condenser/absorber VOC removal system efficiency.

The revised Report is being sent under separate cover.

9. *The Off-Site Consequence Analysis & Air Modeling and Air Toxics Modeling reports were also reviewed by the department's consultant, Dr. Stephen Roberts of the University of Florida. Please respond to his comments, found in Attachment B.*

Response

Responses to Dr. Roberts' comments on each of the above reports are addressed below.

Attachment B Comments

Air Toxics Modeling Report

[1] See Appendix F of the Report which provides a range of overall efficiencies that factor in the application of the thermal desorption, condensation, and chemical separation or liquid-liquid extraction (i.e., absorber) steps of the Process, as well as the minimum 95% efficiency of the RTO.

Response

The June 1999 Air Toxic Modeling report (Report) and the referenced table incorrectly state assumptions of a 98% "condenser" efficiency for purposes of calculating potential organic constituent emissions, and comparing the potential emissions to the identified 'No Threat Levels' (NTLs). The Report should have referred to the 98% efficiency as a Perma-Fix II process (Process) **overall system VOC removal efficiency** and noted the 95% VOC reduction efficiency of the regenerative thermal oxidizer (RTO) that will be used to control (reduce) organic emissions from the Process after the condenser/absorber VOC removal system.[1] The 98% overall efficiency assumption used in the calculations presented in the Report is based on actual bench scale experiments and calculations addressing typical organic contaminants and debris matrices to be treated in the Perma-Fix II Process. As shown in the summary spreadsheet in Appendix F of the Report, 98% is the overall (system) efficiency obtained, when allowing for the 95% reduction in organic emissions afforded by the RTO. 98% overall system efficiency is achievable at the lowest condenser/absorber VOC removal system efficiency of 82%.

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Dr. Roberts notes several comments or concerns in his July 26, 1999 comment letter to Satish Kastury regarding the Air Toxics Modeling Report (Report). Each of these comments/concerns is addressed below.

1. *pg. iv, line 3, "Upon surveying the surrounding areas, it was determined that no environmental receptors are in immediate vicinity of the property, and therefore the impact analysis for environmental receptors is not necessary for this facility.": The map of the surrounding area (Appendix B) shows the site to be in an area of woods and marshes. On what basis was it concluded that there are no environmental receptors in the vicinity of the property?*

Response

In Clean Air Act risk management planning and off-site consequence analysis parlance an "environmental receptor" is defined as a national or state park, forest, or monument; officially designated wildlife sanctuary, reserve, refuge, or similar area; or Federal wilderness area. The use of the term environmental receptor in the above referenced sentence was intended in this context. This section of the Air Toxics Modeling Report (Report) has been revised to state that modeled potential emissions do not exceed the NTLs at the Facility property boundary and that off-site receptors are, therefore, not likely to be impacted by the Perma-Fix II Process. The term "environmental receptor" has been deleted from this section of the Report.

2. *pg. iv, first complete paragraph: The report states here that concentrations of constituents of concern are below the "No Threat Level" at the property boundary and at the location of the nearest residential receptors. There are several businesses in the immediate vicinity of Perma-Fix. Some explicit statement about potential health effects to workers at these businesses is warranted.*

Response

If the Annual Air Concentrations (AACs) of the modeled constituents are below the annual NTLs at the property boundary, there is no reason to believe that workers at business locations or residents that live further away from the Perma-Fix property boundary will be impacted. This section of the Air Toxics Modeling Report (Report) has been revised to state that modeled potential emissions do not exceed the NTLs at the Facility property boundary and that off-site receptors are, therefore, not likely to be impacted by the Perma-Fix II Process.

3. *pg. 3-1, "Potential Emission Calculations": The air concentrations calculated in this modeling exercise are apparently those associated specifically with the Perma-Fix II process. Evaluating air concentrations generated by one process in isolation may not realistically reflect conditions at the facility. If there are other emission sources at the facility for these and related chemicals, then the modeled concentrations reflect only an undefined fraction of the total chemical present in air. Under these circumstances, the health implications – particularly for non-carcinogens – cannot be interpreted. If there are other emission sources at the facility, this needs to be factored into the analysis.*

Response

The potential emissions presented in the Report are representative of all the point source organic emissions associated with the Perma-Fix II Process (the focus of the modeling efforts) and the LSV Processing Area. The emissions from each of these operations are included in the calculations. Column one in Table 1 was mislabeled as Perma-Fix II. The 15 modeled constituents addressed in this column were actually combined emissions from the Perma-Fix II process and the LSV Process. Table 1 has been revised and divided into Table 1.a and Table 1.b to more clearly delineate the sources of the modeled emissions.

4. *Table 1: The second and third columns from the right under the LSV Process are both labeled "lbs/hr," yet have very different values. Has there been an error in labeling the units in one of these columns?*

Response

The referenced units as presented originally in Table 1 for the LSV process are correct. Table 1.b for the LSV process area now presents this information as "VOCs Processed" lbs./hr and VOC PTE lbs./hr in the third and second column from the right respectively. The VOCs processed column does not take into consideration the RTO efficiency and the evaporation rate.

5. *pg. 5-1, "NTL" values: The method for calculating an air concentration corresponding to a 10^{-6} excess cancer risk using the unit risk value from IRIS is correct. The document states, "For purposes of this analysis, the acceptable risk was considered to be one in a million, which is a conservative assumption for all toxic constituents across the board, because not all the constituents are carcinogenic." There is no need, and indeed no way, to develop NTLs for non-carcinogens based on cancer risk, and it is unclear how the NTLs for non-carcinogens were developed. Clarification on this point is needed.*

Response

The sentence quoted above has been revised to read as follows:

"For purposes of this analysis, the acceptable risk was considered to be one in a million for carcinogenic chemicals only."

The NTLs for non-carcinogens have not been developed on the basis of cancer risk. They are based on the RfC and RfD values cited in the IRIS and HEAST (1997 version) documents.

6. *pg. 5.1, "All the human population receptors that are exposed to the toxic emissions for a long-term chronic exposure are located at or more than 700 yards away from the emission source." This is not accurate. There are commercial businesses located in the immediate vicinity of the Perma-Fix property (i.e., much closer than 700 yards), and presumably some of these workers have been, or will be, employed there for several years. Chronic exposure*

of these workers is an important consideration in evaluating potential health impacts of facility emissions.

Response

The sentence quoted above has been revised to read as follows:

"All the residential human population receptors that are potentially exposed to toxic emissions for a long-term chronic exposure are located at or more than 700 yards away from the emission source."

Commercial businesses do have employees working near the Facility. However, if the (AACs) of the modeled constituents are below the annual NTLs at the property boundary, there is no reason to believe that workers at business locations 50 yards (or more) further away from the Perma-Fix property boundary will be impacted.

7. *Table 2: USEPA's IRIS (Integrated Risk Information System) is listed as the source of all of the NTLs in this table. Some of the NTLs reflect current information on IRIS, some are different from the current IRIS listings, and the source of other values is a mystery. The NTLs for benzene, carbon tetrachloride, chloroform, and 1,1,2-trichloroethane reflect the current IRIS unit risk values for these chemicals and a 10^{-6} excess cancer risk, as stated. The NTL for chlorobenzene appears to be the inhalation reference concentration (RfC) for this chemical taken from USEPA's Health Assessment Summary Tables (HEAST), which is OK. The NTL for cyanides should be 3 ug/m^3 and the NTL for methylene chloride should be 2 ug/m^3, based on their current inhalation RfC and unit risk, respectively, in IRIS. I have no idea how NTLs were derived for 1,2-dichlorobenzene, tetrachloroethene, trichloroethene, xylene, methyl isobutyl ketone, methanol, toluene, and isobutanol. They were clearly not taken directly from inhalation toxicity values in either IRIS or HEAST. They do not appear to be inappropriately high, and in fact many are lower than values listed in HEAST or in USEPA Region III's risk-based concentration tables. Their source should be explained, however.*

   The variation between modeled concentrations and NTLs as presented in Table 2 is not informative. A more conventional procedure is to express the modeled concentration and the NTL as a ratio (i.e., modeled concentration divided by the NTL). This better enables consideration of additive effects, which is missing from this analysis. Many of these chemicals share the same toxic endpoints and target organs, and it is reasonable to expect that they will not act independently when exposure occurs to more than one of them at the same time. Additivity, which is generally the default assumption regarding chemical interaction, can be addressed by summing the ratios for individual chemicals to develop an overall Hazard Index. Whether through this procedure or some other, the possibility of combined effects of multiple chemicals in RTO emissions needs to be explicitly addressed in this analysis.

Response

NTLs were derived from two primary sources. The preferred source was the risk slope factors or unit risk factors maintained by U.S. EPA (EPA) in the IRIS database. If NTLs could not be derived from the IRIS database, then EPA's Health Assessment Summary Tables (HEAST) were consulted. Table 2 has been revised to include the most currently available risk factors from these two EPA sources. The NTLs for non-carcinogen chemicals are based on the RfC and RfD factors in Table B of HEAST. IRIS was mistakenly identified as the sole source of the health factor data in the June 1999 Report. The report has been revised to correct and clarify the source and derivation of the NTLs.

PFF appreciates the nature of Dr. Robert's comment regarding potential interactive health effects of exposure to the modeled organic constituents. However, given the conservative nature of the SCREEN3 model, the operating assumptions used in conducting the modeling, and the conservative nature of the NTL comparative standard, PFF believes that it is not necessary to create an overall "Hazard Index". The scope of the air modeling effort (as agreed in our May 4 meeting with DEP) was to compare the results of the air modeling results for selected toxic constituents with the NTLs which were supposedly to be provided by the DEP. Neither PFF nor JEA had agreed to conduct any risk assessments or any other type of risk quantification. The NTL values were derived using the most conservative and worst case assumptions. While multiple organic constituents will likely be treated together in Perma-Fix II Process, the concentrations of individual constituents will, on average, be significantly lower than the concentrations used in the modeling. In short, under actual operating conditions, the AACs at the property boundary are going to be even lower than the concentrations presented in the Report.

While the possibility of combined effects exists, PFF respectfully submits that applying a conservative default assumption of additivity regarding chemical interaction will not lead to a different Report conclusion, given the extremely low concentrations of organic emissions predicted by the SCREEN3 model at the property boundary. Chemical additivity effect analysis is usually done only for non-carcinogen chemicals that affect the same target organ. Upon reviewing the derived NTLs for the three non-carcinogenic chemicals that have the same target organ (central nervous system), cyanides, xylene and isobutanol, the additive risk results in a reduction of NTL values for these chemicals by a factor of 3. The concentrations of these constituents at the property boundary will still be below the NTL values even if they are lowered by a factor of 3.

8. *Appendix C: Correspondence from Perma-Fix to FDEP dated May 6, 1999 specifies chemicals that will be included in the Air Toxics Modeling. Several of these were not, in fact, included in the analysis submitted in June (i.e., methyl ethyl ketone, pyridine, 1,1,1,-trichloroethane, 1,1,2-trichloro-1,2,2,-trifluoroethane, acetone, ethyl acetate, ethylbenzene, ethyl ether, n-butyl alcohol, cyclohexanone, carbon disulfide, 2-ethoxyethanol, and 2-nitropropane). This discrepancy should be explained.*

Response

Appendix C of the Report contains an unsigned draft version of the actual letter that was sent to Ashwin Patel of the DEP to describe the rationale for the selection of constituents for the proposed air toxics modeling. A copy of the actual letter sent to Mr. Patel has been inserted as Appendix C of the revised Report.

As noted in the letter to Mr. Patel, the proposed constituents "were selected based on their likelihood to have the highest ambient exposure levels at the maximum processing rates. Constituents with threat levels less than or equal to 1000 ug/m^3 and high concentration levels in the waste streams were deliberately chosen, because they are more likely to be a cause for concern."

The above referenced comment notes that the unsigned, draft letter indicates that several hazardous waste constituents were to be modeled but were not addressed in the Report. Please note that in column 5 of Table 1 in the actual correspondence, the constituents at issue were marked as being excluded from modeling because of a very low anticipated treatment volume or because the constituents had a proposed NTL greater than 1000 ug/m^3. Additionally, several wastes contain inorganic constituents and will not mobilize (vaporize) during the Perma-FIX I or II processes. Hence those constituents were not considered for modeling.

Off-Site Consequence and Air Modeling Report

Dr. Roberts raises two issues or concerns in his July 26, 1999 letter to Satish Kastury of the DEP regarding the Off-Site Consequence and Air Modeling Report (Report). Each of these issues/concerns are addressed below.

The first issue may be summarized as criticism of the technical accuracy of the Report's characterization of the public health implications of using one-tenth the IDLH as a level of concern (LOC) standard in an off-site consequence analysis. Specifically, Dr. Roberts criticized the following sentence found on page 2-1 of the Report:

"The use of this endpoint represents a conservative approach as for most chemicals, a concentration of one tenth the IDLH is well below the toxicity level of the chemical that will adversely affect the human population or environmental receptors."

As suggested, this sentence has been deleted from the revised Report.

The second issue concerns statements in the report indicating that the modeled worst-case or alternative-case scenarios impact no environmental receptors. See page 3-2 of the June, 1999 Report. As explained above in a previous response, in Clean Air Act risk management planning (RMP) and off-site consequence analysis parlance, an "environmental receptor" is defined as a national or state park, forest, or monument; officially designated wildlife sanctuary, reserve, refuge, or similar area; or Federal wilderness area. The use of the term environmental receptor on page 3-2 of the Report was intended in this RMP context. There are in fact no RMP environmental receptors impacted within a 0.5 mile radius of the Facility, according to the RMP off-site consequence analysis. PFF recognizes that this does not mean there would be no potential off-site impacts in the event of a release event at the Facility.

Regarding general off-site impacts, it should be noted that PFF commissioned the off-site consequence analysis (OCA) to specifically address whether or not the proposed changes in Facility operations increase the potential impact or potential risk of an airborne release of "life-threatening concentrations of hazardous substances" compared to current operations. The Report's conclusion is that the OCA indicates that the proposed Facility changes do not increase the potential impact or potential risk of an airborne release of a life-threatening hazardous substance and the Facility is therefore not proposing a substantial modification to its operations as defined by the Florida hazardous waste facility siting statute (403.7211, F.S.).