

Thursby, Kim

From: Raymond Whittle <rwhittle@perma-fix.net>
Sent: Monday, January 26, 2015 6:41 AM
To: Epost HWRS (Shared Mailbox)
Subject: RE: Perma-Fix of Florida, Inc., FLD 980 711 071,First Notice of Deficiencies

Received,
Raymond Whittle
Perma-Fix Of Florida

From: Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)
Sent: Friday, January 23, 2015 10:33 AM
To: 'rwhittle@perma-fix.com'
Cc: Bahr, Tim; Baker, Bryan; 'bastek.brian@epa.gov'; 'kfogleman@perma-fix.com'; Breland, Jabe; Patel, Ashwin; Russell, Merlin; Tripp, Anthony
Subject: Perma-Fix of Florida, Inc., FLD 980 711 071,First Notice of Deficiencies

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to epost_hwrs@dep.state.fl.us. (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at www.adobe.com/products/acrobat/readstep2.html.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Bryan Baker, P.G.
Program Administrator
Permitting & Compliance Assistance Program
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us





**FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION**
BOB MARTINEZ CENTER
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TALLAHASSEE, FLORIDA 32399-2400

RICK SCOTT
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CARLOS LOPEZ-CANTERA
LT. GOVERNOR

JONATHAN P. STEVERSON
SECRETARY

January 23, 2015

Sent Via E-mail
rwhittle@perma-fix.com

Mr. Raymond Whittle
Vice President
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653

**Subject: Perma-Fix of Florida, Inc., FLD 980 711 071, Operating Permit 17680-011-HC
Alachua County
First Notice of Deficiencies**

Dear Mr. Whittle:

Your application for a hazardous waste permit has been reviewed and found to be incomplete. The required information and amendments necessary to complete your application are itemized in the enclosed Notice of Deficiencies.

When a permit application is incomplete, all processing of the application is suspended. You are hereby advised to provide us with the requested additional information pursuant to Florida Administrative Code (F.A.C.), Rule 62-730.220, and Chapter 403.722, Florida Statutes (F.S.).

If you cannot submit this information within thirty (30) days, you must provide a detailed schedule with dates when this information will be submitted.

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 have any questions, please call me at 850-245-8796 or merlin.russell@dep.state.fl.us

Sincerely,

Merlin D. Russell Jr.
Professional Geologist III
RCRA Program & Permitting

MR/mdr

Enclosure

cc via e-mail w/enclosure:

Brian Bastek, EPA/Region 4 bastek.brian@epa.epamail.gov
Kurt Fogleman, Perma-Fix, kfogleman@perma-fix.com
Jabe Breland, DEP, Jabe.Breland@dep.state.fl.us
Ashwin Patel, FDEP Jacksonville, Ashwin.Patel@dep.state.fl.us

Enclosure
Perma-Fix of Florida, Inc. FLD 980 711 071
Operating Permit 17680-011-HC

General Comment:

For the purposes of this response, revised pages or sections may be submitted. In addition, a complete electronic pdf copy of the entire, final document must also be submitted.

Specific comments:

1. Part I A.19 The attachment with the remaining permits (e.g., biomedical permit; EPA's PCB authorization) is missing.
2. Part I, Table 2 Treatment Codes.... LSV Processing...(page 15): "TS4" should be "T54".
3. Attachment II.A.3 Personal Training Program:
 1. Include annual RCRA training (add to Figure 2)
 2. Include periodic training (e.g. professional development courses) for the lab chemists
4. Contingency Plan: Section 14.3.1 (page 14), although under Section "14.4 Bomb Threat" appears to be evacuation procedures for any emergency where evacuation is required, and not solely for bomb threats. As an example, on page 15, the second bullet discusses a rally point "upwind" of the incident. This suggests a spill or fire, and not necessarily a bomb threat. Should this information be located elsewhere?
5. This 264.98(b) requirement appears to be missing.

The owner or operator of a facility where ignitable or reactive waste is stored or treated in a tank must comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in Tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code," (1977 or 1981), (incorporated by reference, see Sec. 260.11)..

6. Although the response to leaks or spills is included, the disposition of leaking or unfit-for-use tank systems is absent (264.196).
7. Include the procedures to remove, and properly dispose of, any visible contamination of the soil or surface water required by 264.196(c)(2).

Mr. Raymond Whittle

January 23, 2015

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8. Part II.K.1, paragraph 2, second bullet: For you information, if you are in the process of conducting partial or final closure, you may not need to submit a modification to the permit. You should notify the Department of any changes as soon as practicable. It is likely that most changes can be documented in the certification of closure for the unit that is signed and sealed by a P.E.

9. Part II.K.6, page 7, paragraph 6 (and other similar places elsewhere): for assessment and remediation, the RCRA section requires the corrective action process in Chapter 62-780, F.A.C., along with the administrative RCRA requirements (such as public notice of final Remedial Action Plans (RAP)). Therefore, a permit modification will not be needed for environmental assessment. Site Assessment must be done in accordance with Rule 62-780.600, F.A.C. However, a permit modification and public notice would be required for RAP approval.

10. Part II.K.6.1, page 8, paragraph 1 (and elsewhere): The Cleanup Target Levels in Chapter 62-777, F.A.C. can be used to demonstrate that decontamination is complete but these levels were developed for environmental media. We have no objection to referencing DEP guidance or rules pertaining to acceptable rinsate levels (if available) at the time of closure.

11. Part II.K.6.1, page 8, paragraph 2: The analysis for the Appendix VIII constituents previously stored (and treated) at the facility is acceptable as long as any degradation and reaction products are included.