

## Thursby, Kim

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**From:** Raymond Whittle <rwhittle@perma-fix.net>  
**Sent:** Wednesday, March 25, 2015 6:19 AM  
**To:** Epost HWRS (Shared Mailbox)  
**Cc:** 'Kurt Fogleman'  
**Subject:** RE: Perma-Fix of Florida, Inc.;FLD 980 711 071;Responses to Comments on Draft Operating & Construction

Received

Raymond Whittle  
Perma-Fix Of Florida

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**From:** Thursby, Kim [mailto:Kim.Thursby@dep.state.fl.us] **On Behalf Of** Epost HWRS (Shared Mailbox)  
**Sent:** Friday, March 20, 2015 3:06 PM  
**To:** 'rwhittle@perma-fix.com'  
**Cc:** Bahr, Tim; Baker, Bryan; 'bastek.brian@epa.gov'; 'kfogleman@perma-fix.com'; Breland, Jabe; Patel, Ashwin; Kruchell, Carrie L.  
**Subject:** Perma-Fix of Florida, Inc.;FLD 980 711 071;Responses to Comments on Draft Operating & Construction

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](mailto: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](http://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](mailto:epost_hwrs@dep.state.fl.us)





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JONATHAN P. STEVERSON  
SECRETARY

March 20, 2015

**Sent Via E-mail**

[rwhittle@perma-fix.com](mailto:rwhittle@perma-fix.com)

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

**Re: Perma-Fix of Florida, Inc.  
FLD 980 711 071  
Responses to Comments on Draft Operating & Construction  
Permit Number: 17680-011-HO**

Dear Mr. Whittle:

On Wednesday, March 18, 2015, we received comments from Kurt Fogelman, EHS Manager, regarding various sections of the draft Operating and Construction permit, and have prepared our responses to his questions below:

*Q1: Is it possible to have 60 days versus 30 in Part I Condition 14 (was old Part I Condition 15)?*

This condition slightly modifies subsection 62-4.160(15), F.A.C. by adding in the 30-day timeframe. Typically, letters from the Department include deliverable due dates; this condition sets a default deadline of 30 days in the case whereby the Department has not indicated a deadline. If, however, 30 days is not enough time to respond to the Department's request, you may always ask for additional time. Time extensions are granted if they are justified and reasonable.

*Q2: Can insurance companies transmit financial assurance electronically based on Part I 26e?*

Paper documents bearing original wet signatures are still required for proof of Financial Assurance when utilizing closure insurance and liability insurance mechanisms.

*Q3: Does Part II.A.5.a mean we verify the profiles received from customers, or the profiles provided to generators? The second option would be a profile written on behalf of a generator, similar to services provided by a broker.*

**Condition 5 in Part II Subpart A – General Operating Conditions**, was modified to be consistent with other recent operating permits. This condition was modified as stated below:

5. Sampling and analysis of permitted and new hazardous wastes shall be conducted in accordance with the Waste Analysis Plan of the permit application. Prior to acceptance of new waste codes, a permit modification per Condition I.22 is required. The need for a substantial modification shall be evaluated using the criteria in Subsection 62-730.182(4), F.A.C.

*Q4: Are groundwater requirements in Part I Condition 11 (was old Part I Condition 10) necessary in our situation?*

This condition addresses surface waters, and is taken from subsection 62-4.160(10), F.A.C. This is one of the several general requirements that are issued in all Department permits. It cannot be changed without going through rule revisions. At this time, there are no groundwater requirements in your permit.

In addition to what is explained above, we made a few minor changes to the draft permit as follows:

- We added the following condition to **Part II Subpart B.5-Construction Requirements**:
  - 4. The closure cost for the facility will be revised after construction of the continuous PF-II process equipment but prior to its operation.
- On Page 3, Item #7, we have amended the paragraph as follows (*in italics*):
  - 7. To operate one (1) hazardous waste container treatment unit for hazardous waste debris treatment, located in the Liquid Scintillation Vial (LSV) Processing Area, described in the permit application and/or subsequent revisions. The unit is comprised of an approximately 250-gallon stainless steel portable vat, equipped with an emission control hood. This unit is located within the

Mr. Raymond Whittle

March 20, 2015

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5 ¾ " x 6" concrete curbing containment of the LSV Processing area of the LSV Processing and Waste Storage Warehouse building. *In certain cases, debris treatment may be performed in the TOB area.*

Exhaust and fugitive emissions from debris treatment operations within the LSV area will be treated through an air pollution control system consisting of HEPA filters and a regenerative thermal oxidizer. The permitted waste codes for treatment in the LSV Processing Area are listed in Attachment A of this permit.

- Lastly, as we discussed on March 19, 2015 with Kurt Fogelman, we have made a few minor informational changes to Appendix A.7, List of SWMUs/AOCs.

Thank you for the time and effort expended in the preparation of your Permit Application. If you have any questions or require further explanation of the draft permit responses included herein, please feel free to contact me by email at [Carrie.L.Kruchell@dep.state.fl.us](mailto:Carrie.L.Kruchell@dep.state.fl.us), or by telephone at (850) 245-8765.

Sincerely,



Carrie L. Kruchell, PG  
Professional Geologist II  
Hazardous Waste Program & Permitting

clk/at

Enclosure

cc via e-mail:

Brian Bastek, EPA/Region 4, [bastek.brian@epa.epamail.gov](mailto:bastek.brian@epa.epamail.gov)  
Kurt Fogleman, Perma-Fix of Florida, Inc., [kfogleman@perma-fix.com](mailto:kfogleman@perma-fix.com)  
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