

From: [Kurt Fogleman](#)
To: [Kruchell, Carrie L.](#); [Russell, Merlin](#); [Breland, Jabe](#)
Cc: [Baker, Bryan](#); [Tripp, Anthony](#); viraftp@syaeng.com
Subject: RE: Draft PFF RCRA Permit Attached
Date: Wednesday, March 18, 2015 3:25:58 PM
Attachments: [150225 PFF draft operating permit +at clk bb + kaf vp - 3-11-15.doc](#)
[Strike-edit revised pages 3-18-2015.docx](#)
[Revised pages 3-18-2015.pdf](#)

Please see the attached strike-edit draft permit. I made the following changes:

- Page 2 restored Oxidation/Reduction treatment in containers in the summary (item #2J)
- Page 3 item #7 reverted to previous language describing debris wash process – LSV processing is a separate process.
- Page 3 item #9, “Attachment A” changed to “Attachment G”
- Page 9 Condition 13b, included offsite document storage condition language from the previous permit (Old Part I condition 14, New Part I condition 13)
- Page 11 Condition 19, added language from previous permit exempting updating the permit list in Part I (Old Part I condition 8e, New Part I condition 19)
- Page 16 Part II.A.11.a, “maintained as the operating record” changed to “maintained in the operating record”
- Page 16 Part II.A.11.c, replaced list of responders with specific list from the previous permit (Old Part I 27.d, New Part II A.11.c). Unless there is a list of specific agencies where we are required to have coordination agreements, certain elements of the Perma-Fix customer base may interpret the condition in a broader sense than FDEP intends.
- Page 27 Part V.A1.b, “or other mean” changed to “or other means”

I also have a couple of questions/requests:

- Is it possible to have 60 days versus 30 in Part I condition 14 (was old Part I condition 15)
- Can insurance companies transmit financial assurance electronically based on Part I 26e?
- 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 in behalf of a generator, similar to services provided by a broker.
- Are groundwater requirements in Part I condition 11 (was old Part I condition 10) necessary in our situation?

We did also note that the drawings in the attachments are from the previous application, and we can send updated versions. I have also attached strike-edit and clean copy versions of the updated contingency plan information and container inspection log.

Thanks,
Kurt

From: Kruchell, Carrie L. [mailto:Carrie.L.Kruchell@dep.state.fl.us]
Sent: Wednesday, March 11, 2015 11:41 AM
To: kfogleman@perma-fix.com

Cc: Baker, Bryan; Russell, Merlin; Breland, Jabe; Tripp, Anthony
Subject: Draft PFF RCRA Permit Attached
Importance: High

Hi Kurt.

I called yesterday and again today but was told that you were out of the office.

We are trying to ensure that we keep things moving and have PFF's draft permit ready to finalize as soon as possible. We are still awaiting the Site Plan Map that has been revised with the building designations (each building identified by a large letter per the Fire Department) so that we can add a copy to the permit backup prior to renewal.

I have attached the draft permit as it stands right now. This version will have accounted for all FDEP Tallahassee and NE District stakeholder comments/edits/revisions, so you will need to review it carefully to ensure that all aspects of PFF's operations as described in detail within, are in keeping with PFF's protocols, standards and methodologies.

As soon as you have finished your review, email us back your edits using 'track changes', and we will incorporate them into the document.

Merlin, Tony and I will work closely together next week to wrap everything up as quickly as we can, provided we have your feedback and any additional items deemed vital to permit processing.

Kind regards,

Carrie

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