

Chemical Conservation Corporation

10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 855-2812



April 15, 1997

Mr. Robert Snyder
Section Manager
Hazardous Waste Program
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: Chemical Conservation Corporation FLD 980 559 728
Hazardous Waste Facility Permit Application HC02-279948 & HO02-279952

Dear Mr. Snyder:

Chemical Conservation Corporation (CCC) appreciates the opportunity you gave us to meet with you and your staff to discuss several issues concerning the permit application referenced above.

One of those issues was the identification of transfer facility waste at the facility. Transfer facility waste differs from permitted waste by the fact that the manifest used to ship the waste does not show CCC as the designated facility. Also, transfer facility waste remains in the facility for a short period of time.

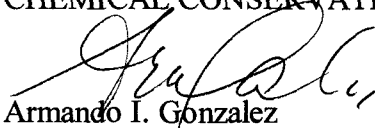
This letter refers to procedures used to distinguish transfer facility waste from permitted waste. Existing language in the permit application establishes such procedures; however, it may require minor changes to fully achieve this objective.

Figures attached to this letter show the locations where transfer facility waste is staged while it remains at the facility and a label found on the container that helps identify permitted waste. Sheets attached to both figures describe information contained in them.

If you have any questions, please call me at 859-4441.

Sincerely,

CHEMICAL CONSERVATION CORPORATION


Armando I. Gonzalez
Compliance Officer

cc: William F. Labadie

HAZARDOUS WASTE
FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
 IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY
 AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

ACCUMULATION START DATE	E.P.A. WASTE NO.	DOO2
D.O.T. PROPER SHIPPING NAME		
RQ, Waste Corrosive Liquid, Acidic, Inorganic, n.o.s. (Ferric Chloride, Water), 8, PG-I		
AND		
U.N. OR N.A. NO.	UN3264, CADF1239, (BQ8679), (CORAW)	
GENERATOR NAME		
CAD-TEC		
ADDRESS		
8910 Research Blvd.		
CITY	STATE	Texas
E.P.A. I.D. NO.	TXR000012369	
MANIFEST DOCUMENT NO.		

PRINTED BY: **PEEL HERE**

E 6 0 1 0 0 3
4 / 1 0 / 9 7

① [3-1/2" X 15/16" STICKER]--DRUM I.D. LABEL

[4/10/97]--FACILITY RECEIPT DATE ②

[E6011003]--DRUM I.D. NUMBER ③

④ [CADF1239]--INBOUND APPROVAL CODE

[(BQ8679)]--OUTBOUND APPROVAL CODE ⑤

⑥ [8]--DOT HAZARD CLASS/DIVISION

[CORAW]--CONSOLIDATION CODE ⑦

⑧ [BLANK]--GENERATOR ACCUMULATION DATE

CHEMICAL CONSERVATION CORPORATION

HAZARDOUS WASTE LABEL
 INFORMATION DESCRIPTION

FIGURE 2

APRIL 14, 1997

HAZARDOUS WASTE LABEL INFORMATION DESCRIPTION

1. **DRUM I.D. LABEL:** A 3-1/2" X 15/16" sticker only found in containers holding permitted waste. The sticker is usually located in the bottom section of the Hazardous Waste Label because it offers the best adhering surface. The label will continue to show the phrase "HAZARDOUS WASTE--Federal Laws....." as required in §§262.32(b). The sticker may be completed by a printing machine or by hand. Stickers showing printed data suggests that it has not been altered since it was placed on the drum upon receipt. Hand written data indicates that the container may have received material while at the facility, such as a consolidation drum. A consolidation drum is a container filled at the facility with waste from other containers that requires a new identification number the first time waste is put into it while at the facility. Another possible scenario for a hand completed Drum I.D. Label is that of an original printed sticker that was damaged or missing and had to be replaced.
2. **FACILITY RECEIPT DATE:** Is the date the waste was received at the facility. This date is also written on one side of the container just in case the Drum I.D. Label falls off the wall or becomes damaged during handling. Having the receipt date written on the drum wall facilitates the completion of a replacement sticker.
3. **DRUM I.D. NUMBER:** This is a code number that identifies the container. It is the code used to track the waste from the generator, through the facility and to the off-site facility where it is shipped for treatment or disposal. The code number is also written on one side of the container, next to the receipt date.
4. **INBOUND APPROVAL CODE:** Every waste stream approved by CCC for management at its facility is assigned an Inbound Approval Code. This is a perpetual code that identifies a waste generated by an off-site source. The same code is used in every inbound shipment of the waste stream.
5. **OUTBOUND APPROVAL CODE:** This is a code similar to the Inbound Approval Code used to identify permitted waste when shipped out by CCC. Permitted waste may be a waste in transfer (not transfer facility waste), consolidated waste, waste fuel or treated wastewater that has been managed at the CCC facility.

6. DOT HAZARD CLASS/DIVISION: This a component of the DOT Description for hazardous materials, and also a marking requirement for containers used to ship hazardous waste. Upon receipt at the CCC facility, permitted waste is placed in a storage cell depending on this component. Every storage cell is assigned a Storage Group Code (SGC) and only specific DOT Hazard Class/Division codes are allowed in a SGC. This procedure insures the segregation of wastes in compatible groups.
7. CONSOLIDATION CODE: This code is assigned to a waste stream during the waste approval process. The code is selected from a list that has been developed by CCC that identifies waste types compatible with each other that can be successfully treated by the same treatment method. The selection of the Consolidation Code is based on the composition and characteristics of the waste described in the waste evaluation documents. Similarity in codes sometimes does not establish the relationship of compatibility between wastes.
8. GENERATOR ACCUMULATION DATE: The date entered by the generator in this space is not altered at the facility, and it is left blank if one is not found upon receipt. The facility will comply with the receipt date requirement as explained in paragraph 2 above.

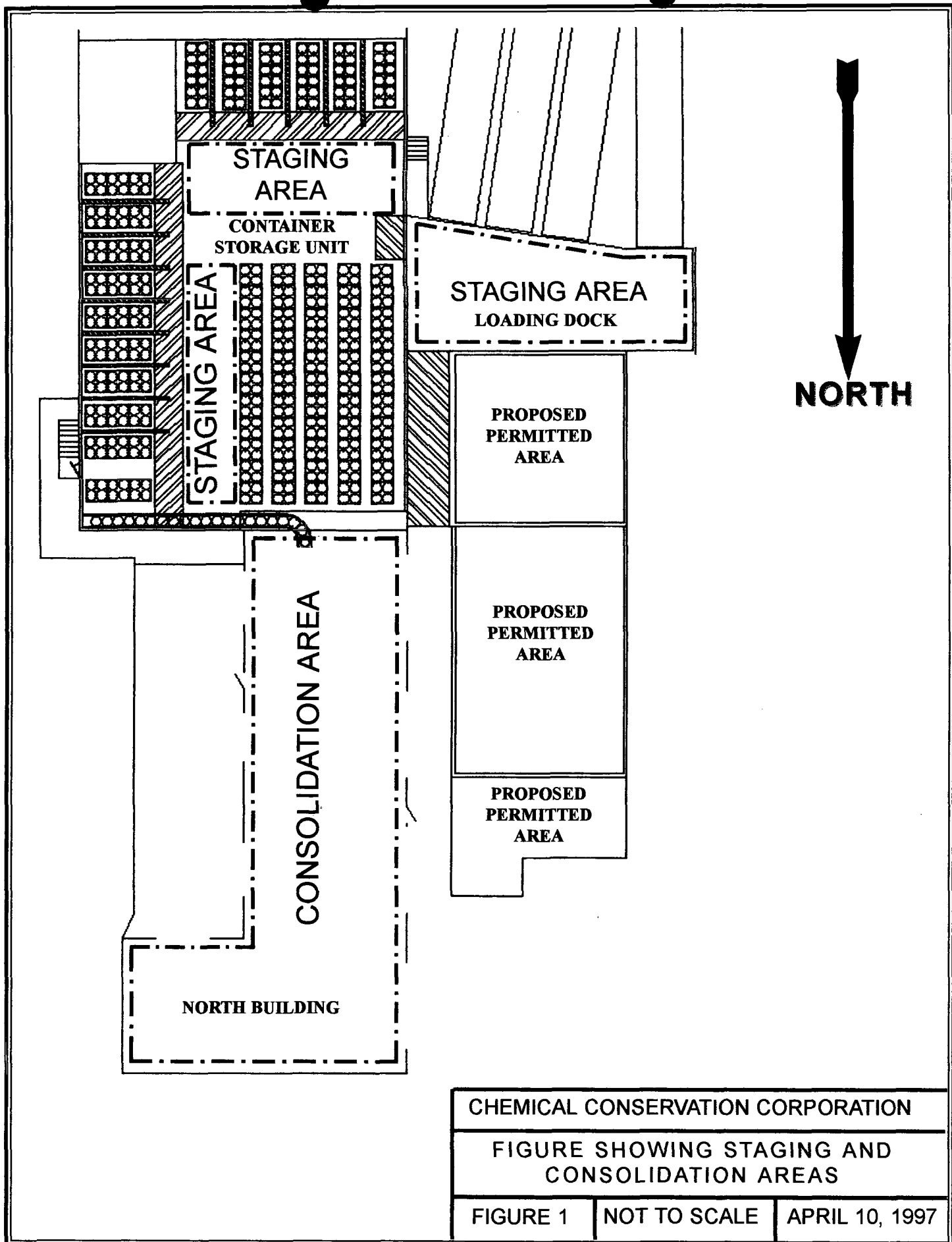


FIGURE SHOWING STAGING AND CONSOLIDATION AREAS INFORMATION DESCRIPTION

Figure 1 shows areas the permit application establishes as spaces where transfer facility containers are staged while they wait for transportation to designated facilities. It also shows the area where wastes are consolidated. These areas are delimited by dash-and-dot lines.

Staging of transfer facility containers takes place at two locations in the Container Storage Unit and at the Loading Dock. These are areas where drums are temporarily placed, either when transferred between transportation vehicles parked at the Loading Dock, or while they wait for one to arrive. They may be single or double stacked, and they may be resting on pallets or on the floor. In either instance, they will be positioned in a manner where they are stable and arranged in a row. The two areas in the Container Storage Unit will be clearly marked.

The entire floor space in the North Building has been designated as a Consolidation Area. Eventually, a section of it will be occupied by the fuel blending process. Containers will be transferred from the Container Storage Unit with a forklift or on a conveyor. Only drums containing waste to be consolidated or that has been consolidated during a workday may be found in this area. Any drums containing hazardous waste will be moved to the Container Storage Unit before the workday has concluded. Containers that are being transferred to or from the North Building may be placed in any area for a short period of time because of transportation constraints. However, a forklift will be actively working toward moving the drums to their final destination while they rest in such an area. The only circumstance under which the statement in the previous sentence may not apply is that of an equipment breakdown. In any case, the containers will be transferred to the Container Storage Unit before the workday ends.

Eventually, the northern most Proposed Permitted Area will be used to conduct waste consolidation operations. It will comply with the terms stated in the previous paragraph

Purpose of meeting was to meet Mr. Paul Miller -
w/ Phillips Environmental Services Group.