

Chemical Conservation Corporation

10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 855-2812



October 2, 1997



Mr. Robert Snyder, P.E.
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
Revised letter dated October 1, 1997

Dear Mr. Snyder:

This letter revises the steps that Chemical Conservation Corporation (CCC) will put into effect to prevent recurrence of gas releases or other type of incidents that may result from bulking acid liquids at the facility. The steps listed in our correspondence dated October 1, 1997 are being repeated below along with additional steps (underlined) that CCC proposed during a meeting held at your offices on October 1, 1997.

- ✓ ① CCC will stop acid bulking operations until DEP approves measures taken to prevent commingling of incompatible waste and methods to control fumes.
- ✓ ② CCC ^{may only} will consolidate labpacks, waste solids as well as wastes that belong to the same waste stream and liquids removed from solids as long as they are not acids.
- ③ A chemist will supervise the entire bulking operation.
- ④ A procedure that simulates the bulking operation will be implemented to test the compatibility of every waste before it is bulked into tote tanks and tankers.
- ⑤ The compatibility test result for every waste tested will be documented in a log that identifies the waste container and indicates changes in temperature, bubbling action and gas generation observed.
- ⑥ A report containing a list of wastes to be consolidated will be completed and approved by a chemist before the compatibility test is performed.
- ⑦ Waste will be tested for compatibility before it is bulked into tote tanks and, then, tested again for compatibility before it is bulked into a tanker.
- ⑧ Bulking operations into tote tanks and tankers will not begin unless the chemist authorizes them by signing the log that documents the compatibility test results for the waste involved.

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9. Personnel involved in bulking operations will be trained in conducting the compatibility test and proper use of the consolidation code, and their training will be documented by the trainees and the trainer.
10. A system to control fumes generated by bulking of acid liquids will be installed at the facility.
11. Vents of tote tanks and tankers will be connected to a working system to control fumes during bulking operations.
12. Chromic acid will not be bulked with other materials.
13. CCC plans to have the compatibility test procedures and the fumes control equipment in place by October 20, 1997.
14. CCC will report to DEP and the NRC spills of any size that occur at the facility.

DEP will be notified when the steps listed above are in place and ready for you to verify that they meet the appropriate specifications.

If you have any questions, please call me at (407) 859-4441.

Sincerely,

CHEMICAL CONSERVATION CORPORATION



Armando I. Gonzalez
Compliance Officer

cc: William F. Labadie
Patrick Sullivan