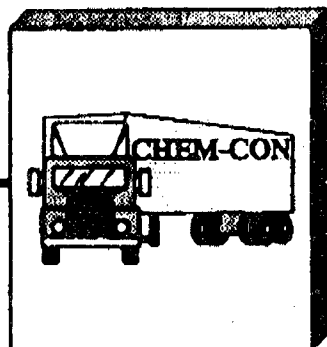




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FAX TRANSMITTAL SHEET

TO: MARY ~~MCHE~~ MCGEHEEFROM: ARMANDODATE: 5-5-97NUMBER OF PAGES: 5 (INCLUDING COVER SHEET)MESSAGE: PLS. REVIEW & COMMENT

Item number 19 of the NOD refers to a topic discussed in page 110, paragraph 4 dealing with potential exposures of employees to air contaminants in the workplace. There are concerns about the level of air contaminants generated by operations and processes proposed in the application that may affect operators laboring at those locations.

The same NOD item references another topic discussed in paragraph 3 of pages 188 and 302 that deals with removing organic contaminants from wastewater by the air stripper and carbon absorption unit. The topic described in this paragraph refers to contaminants in a media that differs from the one considered in the previous paragraph, one is wastewater in the treatment process and the other is air at the workplace.

There are two other topics that should not be confused with the ones described above, one is air emissions posing environmental concerns and the other is prevention of emissions from accidental releases that may affect on-site and off-site human receptors.

Air emissions are subject to permitting and regulatory requirements by the Clean Air Act (CAA) and RCRA. Requirements under the CAA have been discussed in a response to item number 8 of the NOD. RCRA has permitting requirements for process vents (Subpart AA), equipment leaks (Subpart BB), and containers and tanks (Subpart CC). The only process vent proposed in this application is the one where contaminants removed from wastewater are vented out to the atmosphere. Process vent requirements are addressed in Section R of the permit application, and it consists of a method to control organic emissions exhausted by the air stripper. Requirements for equipment leaks addressed in the application in Section S proposes a monitoring and repair program for leaks in waste fuel piping components and pumps to prevent organic emissions. Section Sa of the application explains that container requirements will be met by using covered DOT containers and propose control methods for organic emissions emanating from tanks.

Accidental releases should be addressed separately from employee exposure to air contaminants in the workplace. The first usually involves emissions that occur during a short period of time but result in a highly toxic or explosive condition because of the type and/or quantity of the release. The second deals with emissions typical of some operations and processes that may have adverse effect in human health if exposure above certain concentration levels continues for a long period of time. However, both are somehow related because methods used to control one usually affect the other.

The permit application intends to address employee exposure to air contaminants in sub-section II.A.4.c.(3) under Air Contaminants Reduction and accidental releases in sub-section II.A.4.c.(6), both sub-sections are found in Section II.A.4.c, Mitigation Procedures.

The present language addressing reduction of air contaminants in sub-section II.A.4.c.(3), found in paragraph 4 of page 110 of the permit application is modified as follows:

Air Contaminants Reduction: CCC's waste management operations will meet current requirements from the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA) regarding contaminant exposure levels that are considered safe for the health of the workers. There are five proposed operations where employee exposure to air contaminants poses a concern. These are: the container storage unit, the waste fuel blending operation (waste removal stations), the trailer bulking operation and the liquid consolidation operations.

The container storage unit presents a potential danger to operators only when the unit is opened for the first time during the day. There is a concern that toxic vapors may have accumulated during the night, weekend or holidays and affect the first operators attempting to enter the unit. CCC plans to address this issue by using fans or blowers to remove the air that has accumulated inside the unit before operators enter the unit. CCC will establish a system to insure that the proposed method is followed by the first operator to enter the unit at the beginning of the workday.

The waste fuel blending operation generates emissions consisting of organic vapors. Similar operations elsewhere have demonstrated that employee exposure is not a concern if the area where such operations are conducted is ventilated and operators wear appropriate respirators. CCC proposes to use the same method to prevent the accumulation of vapors in the fuel blending area and provide operators with adequate protection.

Trailer bulking operations generate emissions consisting of dust from the material being bulked. CCC has been conducting this type of operations for several years now, which has provided the facility with considerable first hand experience on this area. Dust emissions have not been a noticeable on-site or off-site problem at any moment since this operation began. Also, improvements in the operation intended to resolve other problems resulted in even lower emissions. For example, one-cubic-yard bags used to be opened while hanging over the trailer, which required an operator to stand on one side of the trailer in order to have access to the bottom of the bags. Now, the bag contents are first dumped into a metal bin fabricated for that purpose, and then, the bin contents are dumped into the trailer. This change in operation resulted in a significant emissions' reduction. If dust emissions during trailer bulking operations become a problem, CCC will install an equipment to spray a fine water mist over the area where the waste material is dumped into the trailer to reduce emissions.

Liquid consolidation operations will take place at two locations in the facility: the consolidation area and the consolidation pad. The consolidation area is the space between the areas where the trailer bulking and the waste fuel blending operations are conducted in the North Building. The consolidation pad is an area surrounded by a roll-over berm that borders the North end of the wastewater

tank storage unit. This area contains the consolidation pad, pumps to transfer wastewater from inbound containers into storage tanks, a section of the wastewater drum conveyor, filter-press, particulate filter, ion exchange unit, air stripper and carbon absorption unit. The empty space in the Northwest section of this area is known as the consolidation pad. Tote tanks placed in the consolidation pad receive acidic and non-corrosive wastewater that cannot be treated at the facility, or because it has been decided not to pump it into the tanks and treated it later separately.

The consolidation area will be enclosed so that vapors generated during the consolidation operation are confined to the space where the operation is conducted. The vapors will be removed and directed to a scrubber for treatment. This will assure that harmful vapors will not be released to the outside where they may affect on-site and off-site personnel. Clean air will be supplied to respirators worn by operators inside the confined area while the consolidation operation takes place. The same method will be utilized to protect operators from exposure to air contaminants when they conduct consolidation operations in the consolidation pad.

The present language of sub-section II.A.c.(6), in paragraph 4 of page 110 of the permit application is modified as follows:

(6) Prevent releases to atmosphere; and

The facility will prevent releases of air contaminants to atmosphere that may pose a threat to the environment or to human health. Proposed processes and operations present two types of air contaminants and several emission source points. The air contaminant types consist of a wide range organic contaminants that are managed in the waste fuel blending and storage system, and of a number of acid gases that are managed in the wastewater treatment and storage system. The waste fuel blending process and waste fuel tank storage unit will emit organic contaminants from the non-halogenated spent solvents processed and stored in the system. The emission points for these contaminants are five stationary sources consisting of one waste fuel blending tank and four storage tanks. Emissions from these sources are limited by hazardous waste regulations that require the facility to install emission control equipment. Compliance with these requirements is addressed in Section Sa of the permit application. These air contaminants do not pose a threat to human health; however, they may present an environmental concern and an odor problem. Similar processes elsewhere without the emissions control systems proposed in this application have not experienced odor problems. Therefore, it is not expected that the CCC facility will generate odors at unacceptable levels. Environmental concerns with respect to these contaminants are addressed by RCRA requirements described in previous sentences and by Clean Air Act (CAA) requirements that will be explained at the end of this sub-section.

Item number 19 of the NOD refers to a topic discussed in page 110, paragraph 4 dealing with potential exposures of employees to air contaminants in the workplace. There are concerns about the level of air contaminants generated by operations and processes proposed in the application that may affect operators laboring at those locations.

The same NOD item references another topic discussed in paragraph 3 of pages 188 and 302 that deals with removing organic contaminants from wastewater by the air stripper and carbon absorption unit. The topic described in this paragraph refers to contaminants in a media that differs from the one considered in the previous paragraph, one is wastewater in the treatment process and the other is air at the workplace.

There are two other topics that should not be confused with the ones described above, one is air emissions posing environmental concerns and the other is prevention of emissions from accidental releases that may affect on-site and off-site human receptors.

Air emissions are subject to permitting and regulatory requirements by the Clean Air Act (CAA) and RCRA. Requirements under the CAA have been discussed in a response to item number 8 of the NOD. RCRA has permitting requirements for process vents (Subpart AA), equipment leaks (Subpart BB), and containers and tanks (Subpart CC). The only process vent proposed in this application is the one where contaminants removed from wastewater are vented out to the atmosphere. Process vent requirements are addressed in Section R of the permit application, and it consists of a method to control organic emissions exhausted by the air stripper. Requirements for equipment leaks addressed in the application in Section S proposes a monitoring and repair program for leaks in waste fuel piping components and pumps to prevent organic emissions. Section Sa of the application explains that container requirements will be met by using covered DOT containers and propose control methods for organic emissions emanating from tanks.

Accidental releases should be addressed separately from employee exposure to air contaminants in the workplace. The first usually involves emissions that occur during a short period of time but result in a highly toxic or explosive condition because of the type and/or quantity of the release. The second deals with emissions typical of some operations and processes that may have adverse effect in human health if exposure above certain concentration levels continues for a long period of time. However, both are somehow related because methods used to control one usually affect the other.

The permit application intents to address employee exposure to air contaminants in sub-section II.A.4.c.(3) under Air Contaminants Reduction and accidental releases in sub-section II.A.4.c.(6), both sub-sections are found in Section II.A.4.c, Mitigation Procedures.

The present language addressing reduction of air contaminants in sub-section II.A.4.c.(3), found in paragraph 4 of page 110 of the permit application is modified as follows:

Air Contaminants Reduction: CCC's waste management operations will meet current requirements from the Environmental Protection Agency (EPA) and the Occupational Safety and Health Administration (OSHA) regarding contaminant exposure levels that are considered safe for the health of the workers. There are five proposed operations where employee exposure to air contaminants poses a concern. These are: the container storage unit, the waste fuel blending operation (waste removal stations), the trailer bulking operation and the liquid consolidation operations.

The container storage unit presents a potential danger to operators only when the unit is opened for the first time during the day. There is a concern that toxic vapors may have accumulated during the night, weekend or holidays and affect the first operators attempting to enter the unit. CCC plans to address this issue by using fans or blowers to remove the air that has accumulated inside the unit before operators enter the unit. CCC will establish a system to insure that the proposed method is followed by the first operator to enter the unit at the beginning of the workday.

The waste fuel blending operation generates emissions consisting of organic vapors. Similar operations elsewhere have demonstrated that employee exposure is not a concern if the area where such operations are conducted is ventilated and operators wear appropriate respirators. CCC proposes to use the same method to prevent the accumulation of vapors in the fuel blending area and provide operators with adequate protection.

Trailer bulking operations generate emissions consisting of dust from the material being bulked. CCC has been conducting this type of operations for several years now, which has provided the facility with considerable first hand experience on this area. Dust emissions have not been a noticeable on-site or off-site problem at any moment since this operation began. Also, improvements in the operation intended to resolve other problems resulted in even lower emissions. For example, one-cubic-yard bags used to be opened while hanging over the trailer, which required an operator to stand on one side of the trailer in order to have access to the bottom of the bags. Now, the bag contents are first dumped into a metal bin fabricated for that purpose, and then, the bin contents are dumped into the trailer. This change in operation resulted in a significant emissions' reduction. If dust emissions during trailer bulking operations become a problem, CCC will install an equipment to spray a fine water mist over the area where the waste material is dumped into the trailer to reduce emissions.

Liquid consolidation operations will take place at two locations in the facility: the consolidation area and the consolidation pad. The consolidation area is the space between the areas where the trailer bulking and the waste fuel blending operations are conducted in the North Building. The consolidation pad is an area surrounded by a roll-over berm that borders the North end of the wastewater

tank storage unit. This area contains the consolidation pad, pumps to transfer wastewater from inbound containers into storage tanks, a section of the wastewater drum conveyor, filter-press, particulate filter, ion exchange unit, air stripper and carbon absorption unit. The empty space in the Northwest section of this area is known as the consolidation pad. Tote tanks placed in the consolidation pad receive acidic and non-corrosive wastewater that cannot be treated at the facility, or because it has been decided not to pump it into the tanks and treated it later separately.

The consolidation area will be enclosed so that vapors generated during the consolidation operation are confined to the space where the operation is conducted. The vapors will be removed and directed to a scrubber for treatment. This will assure that harmful vapors will not be released to the outside where they may affect on-site and off-site personnel. Clean air will be supplied to respirators worn by operators inside the confined area while the consolidation operation takes place. The same method will be utilized to protect operators from exposure to air contaminants when they conduct consolidation operations in the consolidation pad.

The present language of sub-section II.A.c(6), in paragraph 5 of page 111 of the permit application is modified as follows:

(6) Prevent releases to atmosphere; and

The facility will prevent releases of air contaminants to atmosphere that may pose a threat to the environment or to human health. Proposed processes and operations present two types of air contaminants and several emission source points. The air contaminant types consist of a wide range organic contaminants that are managed in the waste fuel blending and storage system, and of a number of acid gases that are managed in the wastewater treatment and storage system. The waste fuel blending process and waste fuel tank storage unit will emit organic contaminants from the non-halogenated spent solvents processed and stored in the system. The emission points for these contaminants are five stationary sources consisting of one waste fuel blending tank and four storage tanks. Emissions from these sources are limited by hazardous waste regulations that require the facility to install emission control equipment. Compliance with these requirements is addressed in Section Sa of the permit application. These air contaminants do not pose a threat to human health; however, they may present an environmental concern and an odor problem. Similar processes elsewhere without the emissions control systems proposed in this application have not experienced odor problems. Therefore, it is not expected that the CCC facility will generate odors at unacceptable levels. Environmental concerns with respect to these contaminants are addressed by RCRA requirements described in previous sentences and by Clean Air Act (CAA) requirements that will be explained at the end of this sub-section.

Acid gases will be emitted by two tanks located at the South end of the wastewater tank storage unit and two reactors located to the East of the North Building. Acid gases from these sources pose two levels of concern, one is that normal emissions will corrode equipment and structure made out of metal. Also, they may be a nuisance to on-site and off-site personnel, particularly during certain weather conditions. The other level of concern is an accidental reaction inside the tanks resulting in an unusually high rate of gas emissions. These concerns will be addressed by collecting acid gases and treating them in the scrubber mentioned in sub-section II.A.4.c.(3), in a paragraph that addresses reduction of air contaminants. The scrubber will render gases vented by tanks harmless to on-site and off-site personnel and to property, even during accidental situations

An air stripper that removes organic constituents from wastewater will emit organic contaminants through a process vent regulated by Subpart AA of Part 264 of the RCRA regulations. The emission rate of organic contaminants from this vent is not expected to reach levels at which it may present a threat to human health. However, it may become an odor problem during certain weather conditions. A control method proposed to comply with regulatory requirements will reduce these emissions to acceptable levels. Compliance with these regulations is described in Section R of the permit application.

The two middle tanks located in the wastewater tank storage unit and the ones referenced two paragraphs above this one may store wastewater contaminated with organic constituents. These tanks are not expected to emit organic contaminants at levels of concern. However, they are also subject to Part 264, Subpart AA of RCRA because wastewater stored in these tanks may have organic constituents present in concentrations above threshold levels. The method of compliance with such requirements is addressed in Section Sa of the permit application.

Accidental releases may also occur during consolidation operations at the consolidation area and the consolidation pad. These releases will consist of acid gases, and they may be caused by a reaction between waste materials or due to the high vapor pressure and toxicity of one or more of them. Acid gases from accidental releases occurring at these operational areas will be confined to the space where the operation is conducted. Gases will be directed to the scrubber mentioned in a previous paragraph for treatment. The consolidation area and the consolidation pad will be enclosed to prevent gases from escaping outside and a gas moving equipment will be used to transfer them to the emission control equipment.

CCC will have to assess the source classification of the facility for operations and processes proposed in the permit application with respect to the Clean Air

Act Amendments of 1990 (CAAA). The CAAA requires a permit for Title V major source facilities. CCC will have to calculate its "potential to emit" (pte) air pollutants for all stationary sources at the facility to determine whether it classifies as a minor or a major source. Air pollutants listed in the regulations consist of Hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOCs). However, sometimes an air pollutant may be classified as both a HAP and a VOC. The facility is classified as a major source when its estimated pte level is over a certain threshold. Major source facilities are subject to extensive permitting requirements; however, they may elect to apply for a synthetic minor permit to reduce the facility's pte. A synthetic minor permit contains conditions with enforceable limits. These limits consist of requirements to control emissions and/or restrictions in production or operation.

Acid gases will be emitted by two tanks located at the South end of the wastewater tank storage unit and two reactors located to the East of the North Building. Acid gases from these sources pose two levels of concern, one is that normal emissions will corrode equipment and structure made out of metal. Also, they may be a nuisance to on-site and off-site personnel, particularly during certain weather conditions. The other level of concern is an accidental reaction inside the tanks resulting in an unusually high rate of gas emissions. These concerns will be addressed by collecting acid gases and treating them in the scrubber mentioned in sub-section II.A.4.c.(3), in a paragraph that addresses reduction of air contaminants. The scrubber will render gases vented by tanks harmless to on-site and off-site personnel and to property, even during accidental situations.

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