

# Chemical Conservation Corporation

10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 855-2812



October 27, 1999

Mr. Robert Snyder, P.E.  
Program Manager  
Hazardous Waste Section  
**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 No. HC02-0026916-001 & HO02-0026916-002

Dear Mr. Snyder:

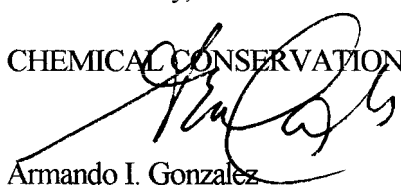
In accordance with instructions in your letter of October 1, 1999, Chemical Conservation Corporation (CCC) is requesting a minor permit modification to allow to submit closure costs estimates for only current operations and processes at the facility. The minor modification will also include a requirement to update financial assurance for closure 60 days prior to the start of new construction to include closure costs for the new processes and operations. A check for \$250.00 is enclosed to pay for the modification fee.

This submittal is divided in five parts: modification comments, cross-reference table, master table of permit modifications, permit modification and certification. A table included after this letter identifies, locates and describes each of these parts. A copy of page 347 contains underlined and strikeout text to indicate words that have been added and deleted in the revised page, respectively. Four copies of the permit modification have been included and every copy contains a certification.

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

Sincerely,

CHEMICAL CONSERVATION CORPORATION

  
Armando I. Gonzalez  
Compliance Officer

cc: Patrick Sullivan  
Roger Randall

**PERMIT MODIFICATION REQUEST**  
**TABLE OF CONTENTS**

<b>IDENTIFICATION</b>	<b>LOCATION</b>	<b>DESCRIPTION</b>
<b>Modification Comments</b>	<b>Tab labeled: Modification Comments</b>	The Modification Comments provides information addressing changes made to the permit application. It also describes the location and extent of the changes.
<b>Cross-Reference Table</b>	<b>Tab labeled: Cross-Reference Table</b>	The Cross-Reference Table lists the current revision date and page number for every revised page contained in this submittal. It also lists the identification number of the revised page and the location where it should be inserted in the permit application. The last column in the table contains a brief description of changes made to the revised page.
<b>Master Table of Permit Modifications</b>	<b>Tab labeled: Master Table of Permit Modifications</b>	The Master Table of Permit Modifications lists the page number, revision dates and last revision number for every revised page since the permit was issued. The last column in the table contains a brief description of changes made to the revised page.
<b>Permit Modification</b>	<b>Tab labeled: 4 Copies of the Permit Modification</b>	The Permit Modification Request contains pages of the permit application revised by this submittal. Every page, figure, table and exhibit has been assigned a page identification number that is referenced in a table of contents located at the beginning of every section. The Cross-Reference Table contains instructions for the location of every revised page of the permit application included in this submittal.
<b>Certification</b>	<b>At the end of every permit modification</b>	A Certification in compliance with 40 CFR 270.11(a) and (d) is contained at the end of every copy of the permit modification request.

Sept 9, 10  
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## **MODIFICATION COMMENTS**

### **Separate Costs Estimate for Current Processes and Operations**

Page 347 has been revised to explain that estimated costs to close current operations may differ from the ones authorized by the permit if the facility has not implemented all permitted operations. Revisions to the permit is to provide a separate set of tables that list closure costs for only operations that are currently in service.

These tables are similar to the existing ones that list costs for all permitted operations. The difference between new set of tables and the existing ones is that closure costs for approved operations that are not currently in service are shown as \$0. Tables that contain closure costs estimates for current and non-current operations in the approved application are located in pages 352 through 361. The new tables are found in pages 361aa through 361aj.

Revisions in page 347 amend a reference to the type of financial instrument used by the facility to provide assurance for closure. The reference has been revised to read that CCC utilizes closure insurance to establish financial assurance, which replaced a trust fund. A sentence has been added that instructs the facility to update closure costs and provide financial assurance 60 days prior to start construction of a new process or operation.

### **Tables of Contents**

A table of contents found at the beginning of the application has been revised to include the new set of tables that list closure costs for only operations that are currently in service. They consist of tables number II.K.1.g.-1a through II.K.1.g.-6a, whose references were inserted in page ix. Minor typographical errors were corrected in the last lines contained in page xi and xii.

Table of contents in pages 328b and 328c were amended to list the table number, name and page number of the new cost estimate tables, and add a missing reference to a quote in page 377. The page number for Exhibit II.K.1.g.-6 and II.K.1.g.-7 were found to be incorrect and were revised. The previous modification assigned page 391 to Exhibit II.K.1.g.-17, but the following section begins with a page that has the same number. Therefore, the page number was changed to 390a and the exhibit was modified accordingly.

**PAGE LOCATION AND CHANGE DESCRIPTION CROSS-REFERENCE TABLE  
FOR PERMIT MODIFICATION REQUEST  
REVISION NOVEMBER 1, 1999  
CHEMICAL CONSERVATION CORPORATION**

Previous Revision Date	Previous Revision Page No.	This Revision Page No.	Location in Permit Application Book	Description of Change
07/29/96	ix	ix	replace page	References to Table II.K.1.g.-1a through II.K.1.g.-6a were inserted.
09/09/99	xi	xi	replace page	An "a" and "(CD)" was added to the number and the name of the reference of the exhibit listed at the bottom of the page.
09/09/99	xii	xii	replace page	The two bottom lines switched position and the page number of Exhibit II.K.1.g.-17 was changed to 390a.
09/09/99	328b	328b	replace page	References to Table II.K.1.g.-1a through II.K.1.g.-6a were inserted.
09/09/99	328c	328c	replace page	Page number 376 and 377 were changed to 374 and 376, respectively. A missing reference to Exhibit II.K.1.g.-8 was inserted.
00/00/00	347	347	replace page	The first line of existing paragraph was revised and a second paragraph was added.
new page	new page	361aa	insert after pp 361	A new Table II.K.1.g.-1a inserted.
new page	new page	361ab	insert after pp 361aa	Continuation of new Table II.K.1.g.-1a inserted.
new page	new page	361ac	insert after pp 361ab	A new Table II.K.1.g.-2a inserted.
new page	new page	361ad	insert after pp 361ac	Continuation of new Table II.K.1.g.-2a inserted.
new page	new page	361ae	insert after pp 361ad	A new Table II.K.1.g.-3a inserted.
new page	new page	361af	insert after pp 361ae	Continuation of new Table II.K.1.g.-3a inserted.
new page	new page	361ag	insert after pp 361 af	Continuation of new Table II.K.1.g.-3a inserted.
new page	new page	361ah	insert after pp 361ag	A new Table II.K.1.g.-4a inserted.
new page	new page	361ai	insert after pp 361ah	A new Table II.K.1.g.-5a inserted.
new page	new page	361aj	insert after pp 361ai	A new Table II.K.1.g.-6a inserted.
09/09/99	391	390a	insert after pp 390	A quote from Action Tek, Inc. was assigned page number 391, which belongs to an existing page. The page number of the quote was changed to 390a.

**MASTER TABLE OF PERMIT MODIFICATIONS  
STATUS AS OF REVISION OF NOVEMBER 1, 1999  
CHEMICAL CONSERVATION CORPORATION**

Permit Application Page No.	List of Revision Dates	Last Revision Number	Description of Last Change
ix	07/29/96* 11/01/99	1	References to Table II.K.1.g.-1a through II.K.1.g.-6a were inserted.
xi	06/15/97* 09/09/99* 11/01/99	3	An "a" and "(CD)" was added to the number and the name of the reference of the exhibit listed at the bottom of the page.
xii	06/15/97* 09/09/99* 11/01/99	3	The two bottom lines switched position and the page number of Exhibit II.K.1.g.-17 was changed to 390a.
73	00/00/00* 09/22/99	1	Replace two emergency coordinators
328b	07/29/96* 09/09/99* 11/01/99	1	References to Table II.K.1.g.-1a through II.K.1.g.-6a were inserted.
328c	07/29/96* 09/09/99* 11/01/99	1	Page number 376 and 377 were changed to 374 and 376, respectively. A missing reference to Exhibit II.K.1.g.-8 was inserted.
332	07/29/96* 09/09/99*	2	References to treated wastewater (TW) deleted from bottom paragraph.
333	07/29/96* 09/09/99*	2	References to treated wastewater (TW) deleted from top paragraph, and a paragraph describing source, rate and volume of decontamination wastewater (DW) and a listing of surface areas to be decontaminated inserted in the middle of the page.
333a	09/09/99*	0	A paragraph describing source, volume and weight of concrete debris inserted.
335	07/29/96* 09/09/99*	2	Waste Inventory Table (II.K.1.c-1) had TW waste type line deleted, volumes for HW and NW modified, and DW and concrete debris (CD) added.
337	00/00/00* 09/09/99*	1	Reference to 2 drums of condensate from cleaning deleted from 2nd paragraph.
338	00/00/00* 09/09/99*	1	Floor surface area modified and sentence added at the bottom of 4th paragraph.
344	00/00/00* 09/09/99*	2	1st and 3rd lines of Sampling Location and Analysis Methods table (II.K.1.e-1) modified.
347	00/00/00* 11/01/99	1	The first line of existing paragraph was revised and a second paragraph was added.
348	07/29/96* 09/09/99*	2	Line for TW waste type deleted and CD added in the disposal cost summary table.
349	07/29/96* 09/09/99*	2	Line for TW waste type deleted and CD added in the transportation cost summary table.
351	07/29/96* 09/09/99*	2	Estimate of area of Container Storage Unit and volume and weight of concrete debris inserted in paragraph at the middle of the page.
353	07/29/96* 09/09/99*	2	Cost estimate for disposal of TW (A.3.c) deleted, non-hazardous wastewater (NH) (A.3.d) modified and CD (A.4.e) added.
354	00/00/00* 09/09/99*	1	Cost estimate for transportation of TW (B.6) deleted.
355	00/00/00* 09/09/99*	1	Cost estimate for transportation of NH (B.6) modified and CD (B.7) added.
358	07/29/96* 09/09/99*	2	Cost estimate for labor of CD (C.11) added.
359	06/15/97* 09/09/99*	2	Number of soil test for analysis methods 8270 (2.a) and 1311/6010 (2.d) modified.
361	06/15/97* 09/09/99*	3	Cost estimate for all the items except for the Engineer Certification modified.
361aa	11/01/99	0	A new Table II.K.1.g.-1a inserted.

361ab	11/01/99	0	Continuation of new Table II.K.1.g.-1a inserted.
361ac	11/01/99	0	A new Table II.K.1.g.-2a inserted.
361ad	11/01/99	0	Continuation of new Table II.K.1.g.-2a inserted.
361ae	11/01/99	0	A new Table II.K.1.g.-3a inserted.
361af	11/01/99	0	Continuation of new Table II.K.1.g.-3a inserted.
361ag	11/01/99	0	Continuation of new Table II.K.1.g.-3a inserted.
361ah	11/01/99	0	A new Table II.K.1.g.-4a inserted.
361ai	11/01/99	0	A new Table II.K.1.g.-5a inserted.
361aj	11/01/99	0	A new Table II.K.1.g.-6a inserted.
380	00/00/00* 09/09/99*	1	Research Environmental, Ind.'s quote for TW replaced by Safety-Kleen's for CD.
381	00/00/00* 09/09/99*	1	2nd page of Research Environmental, Ind.'s quote replaced by a blank one.
385a	09/09/99*	0	A new quote from Robbie D. Wood for CD inserted.
390a	09/09/99* 11/01/99	1	A quote from Action Tek, Inc. was assigned page number 391, which belongs to an existing page. The page number of the quote was changed to 390a.

Note: This table lists modifications submitted after the permit was issued. Approved modifications show an \* next to the date.

- g. *For facilities that use trust funds to establish financial assurance under 264.143 or 264.145 and that are expected to close prior to the expiration of the operation permit, an estimate of the expected year of final closure.*

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The response to the question posed in the previous paragraph is that the CCC facility uses a closure insurance trust fund to establish financial assurance for closure, but it does not plan to close prior to the expiration of the permit. This section is utilized to address requirements that have not been included in previous sections of the application but that must be addressed in a closure plan. Included here is a closure cost estimate, which was requested previously in the part of the application that addresses financial responsibility information. However, the closure cost estimate was deferred for discussion to this section because it is intimately related to other issues that are discussed in it.

A detailed listing of the costs estimated to close the facility is presented in tables found in pages 352 through 361. They list the costs for closing processes and operations referenced in this application. However, it is not expected to have all processes and operations in service at the time the permit is issued. Therefore, a separate listing is provided in pages 361aa through 361aj that addresses estimated costs to close only those processes and operations that are in place at any time after the permit is issued. They are referred to in this application as current processes and operations. Those costs will be updated and financial assurance will be provided accordingly 60 days prior to start construction of a new process and operation.

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TABLE OF CONTENTS  
FOR  
TABLES  
(continued)

Table No.	Table Name	Page No.
II.K.1.g.-3	CLOSURE COST ESTIMATE - DECON. & DISPOSAL - LABOR.....	354
II.K.1.g.-4	CLOSURE COST ESTIMATE - SAMPLE & TEST SOILS .....	359
II.K.1.g.-5	CLOSURE COST ESTIMATE - ENGINEER CERTIFICATION .....	360
II.K.1.g.-6	SUMMARY OF CLOSURE COST ESTIMATES .....	361
II.K.1.g.-1a	CLOSURE COST ESTIMATE - DISPOSAL OF INVENTORY .....	361aa
II.K.1.g.-2a	CLOSURE COST ESTIMATE - TRANSPORTATION OF INVENTORY.....	361ac
II.K.1.g.-3a	CLOSURE COST ESTIMATE - DECON. & DISPOSAL - LABOR .....	361ae
II.K.1.g.-4a	CLOSURE COST ESTIMATE - SAMPLE & TEST SOILS.....	361ah
II.K.1.g.-5a	CLOSURE COST ESTIMATE - ENGINEER CERTIFICATION .....	361ai
II.K.1.g.-6a	SUMMARY OF CLOSURE COST ESTIMATES.....	361aj
II.S.1.a.-1	EQUIPMENT IDENTIFICATION SYSTEM.....	404
II.S.1.a.-2	EQUIPMENT COMPLIANCE SUMMARY.....	405
II.S.4.-1	COMPLIANCE PROGRAM SUMMARY.....	407
II.S.4.-2	EQUIPMENT INSPECTION LOG SHEET (LOG S-1) .....	408
II.S.4.-3	EQUIPMENT LEAK REPAIR LOG SHEET (LOG S-2) .....	409



TABLE OF CONTENTS  
FOR  
EXHIBITS  
(continued)

Exhibit No.	Exhibit Name	Page No.
II.A.4.e.-6	HAZWOPER 8-HOUR TRAINING AGENDA .....	166
II.A.5/6.-1	WASTE COMPATIBILITY TEST MANUAL .....	214a
II.B.1.-1	FLOOR COATING SPECIFICATIONS .....	245
II.C.2.-1	NON-DESTRUCTIVE TEST RESULTS .....	279
II.C.3/4.-1	pH CONTROL AND DOSIFICATION EQUIPMENT .....	302a
II.C.7/9.-1	FLOOR COATING MATERIALS .....	315
II.K.1.g.-1	ENVIRITE CORPORATION QUOTE (CO & CL) .....	362
II.K.1.g.-2	GIANT RESOURCE RECOVERY CO., INC. QUOTE (IH & WF) .....	365
II.K.1.g.-3	HORSEHEAD RESOURCE DEVELOPMENT CO. QUOTE (MH) .....	367
II.K.1.g.-4	MPS QUOTE (P1) .....	370
II.K.1.g.-5	CLEAN HARBORS ENVIRONMENTAL QUOTE (P2) .....	373
II.K.1.g.-6	LAIDLAW ENVIRONMENTAL QUOTE (P3) .....	374
II.K.1.g.-7	CYANAKEM/NUKEM QUOTE (RI) .....	376
II.K.1.g.-8	MPS QUOTE (RI) .....	377
II.K.1.g.-9	CWM, INC. - VICKERY QUOTE (HW) .....	378
II.K.1.g.-10	SAFETY-KLEEN QUOTE (CD).....	380
II.K.1.g.-11	ENVIROTECH SOUTHEAST, INC. QUOTE (NW).....	382
II.K.1.g.-12	ROBBIE D. WOOD, INC. QUOTE .....	384
II.K.1.g.-12a	ROBBIE D. WOOD, INC. QUOTE (CD).....	385a

TABLE OF CONTENTS  
FOR  
EXHIBITS  
(continued)

Exhibit No.	Exhibit Name	Page No.
II.K.1.g.-13	SPRINT STAFFING QUOTE .....	386
II.K.1.g.-14	BRUHL'S WELDING & MILLWRIGHT SERVICE QUOTE .....	387
II.K.1.g.-15	ERC GRAL. CONTRACT SERVICES, INC. QUOTE .....	388
II.K.1.g.-16	ENCO LABORATORIES QUOTE .....	390
II.K.1.g.-17	ACTION TEK, INC. QUOTE .....	390a
II.K.4.a.-1	VAPOR MATE BROCHURE .....	400

TABLE OF CONTENTS  
FOR  
CLOSURE  
(continued)

TABLES  
(continued)

Table No.	Table Name	Page No.
II.K.1.g.-4	CLOSURE COST ESTIMATE - SAMPLE & TEST SOILS .....	359
II.K.1.g.-5	CLOSURE COST ESTIMATE - ENGINEER CERTIFICATION .....	360
II.K.1.g.-6	SUMMARY OF CLOSURE COST ESTIMATES .....	361
II.K.1.g.-1a	CLOSURE COST ESTIMATE - DISPOSAL OF INVENTORY .....	361aa
II.K.1.g.-2a	CLOSURE COST ESTIMATE - TRANSPORTATION OF INVENTORY.....	361ac
II.K.1.g.-3a	CLOSURE COST ESTIMATE - DECON. & DISPOSAL - LABOR .....	361ae
II.K.1.g.-4a	CLOSURE COST ESTIMATE - SAMPLE & TEST SOILS.....	361ah
II.K.1.g.-5a	CLOSURE COST ESTIMATE - ENGINEER CERTIFICATION .....	361ai
II.K.1.g.-6a	SUMMARY OF CLOSURE COST ESTIMATES .....	361aj

EXHIBITS

Exhibit No.	Exhibit Name	Page No.
II.K.1.g.-1	ENVIRITE CORPORATION QUOTE (CO & CL) .....	362
II.K.1.g.-2	GIANT RESOURCE RECOVERY CO., INC. QUOTE (IH & WF) .....	365
II.K.1.g.-3	HORSEHEAD RESOURCE DEVELOPMENT CO. QUOTE (MH) .....	367
II.K.1.g.-4	MPS QUOTE (P1) .....	370

TABLE OF CONTENTS  
FOR  
CLOSURE  
(continued)

EXHIBITS  
(continued)

Exhibit No.	Exhibit Name	Page No.
II.K.1.g.-5	CLEAN HARBORS ENVIRONMENTAL QUOTE (P2).....	373
II.K.1.g.-6	LAIDLAW ENVIRONMENTAL QUOTE (P3) .....	374
II.K.1.g.-7	CYANAKEM / NUKEM QUOTE (RI) .....	376
II.K.1.g.-8	MPS QUOTE (RI).....	377
II.K.1.g.-9	CWM, INC. - VICKERY QUOTE (HW) .....	378
II.K.1.g.-10	SAFETY-KLEEN QUOTE (CD) .....	380
II.K.1.g.-11	ENVIROTECH SOUTHEAST, INC. QUOTE (NW).....	382
II.K.1.g.-12	ROBBIE D. WOOD, INC. QUOTE .....	384
II.K.1.g.-12a	ROBBIE D. WOOD, INC. QUOTE (CD).....	385a
II.K.1.g.-13	SPRINT STAFFING QUOTE .....	386
II.K.1.g.-14	BRUHL'S WELDING & MILLWRIGHT SERVICE QUOTE .....	387
II.K.1.g.-15	ERC ORAL. CONTRACT SERVICES INC. QUOTE .....	388
II.K.1.g.-16	ENCO LABORATORIES QUOTE .....	390
II.K.1.g.-17	ACTION TEK, INC. QUOTE .....	390a

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## A. CLOSURE COST ESTIMATE FOR DISPOSAL OF INVENTORY

### 1. Container Storage Unit

a. Quantity of corrosive liquids (CO) in gallons:	3,960	
Cost of disposal per gallon:	\$ 0.22	
Cost of disposal of corrosive liquids:		\$ 871.20
b. Quantity of waste fuels (IH) in gallons:	24,200	
Cost of disposal per gallon:	\$ 0.25	
Cost of disposal of waste fuels:		\$6,050.00
c. Quantity of inorganic waste (MH) in tons:	66.32	
Cost of disposal per ton:	\$140.00	
Cost of disposal of inorganic wastes:		\$9,284.80
d. Quantity of poison-organic (P1) in gallons:	440	
Cost of disposal per gallon:	\$ 5.91	
Cost of disposal of poison-organic (P1):		\$2,600.40
e. Quantity of poison-inorganic (P1) in gallons:	440	
Cost of disposal per gallon	\$ 9.09	
Cost of disposal of poison-inorganic (P2):		\$3,999.60
f. Quantity of poison-inorganic (P3) in gallons:	440	
Cost of disposal per gallon:	\$ 1.45	
Cost of disposal of poison-inorganic (P3):		\$638.00
g. Quantity of flam. solids & oxidizer (RI) in gallons:	1,320	
Cost of disposal per gallon:	\$ 2.54	
Cost of disposal of flam. solids & oxidizer (RI):		\$3,352.80
<u>Disposal Cost for the Container Storage Unit:</u>		\$26,796.80

### 2. Waste Fuel Tank Storage Unit

Quantity of waste fuels (WF) in gallons:	0	
Cost of disposal per gallon:	\$ 0.25	
Cost of disposal of waste fuels:		\$0
<u>Disposal Cost for the Waste Fuel Tank Storage Unit:</u>		\$0

### 3. Wastewater Tank Storage Unit

a. Quantity of corrosive liquids (CL) in gallons:	0	
Cost of disposal per gallon:	\$ 0.22	
Cost of disposal of corrosive liquids:		\$0
b. Quantity of hazardous wastewater (HW) in gallons:	0	
Cost of disposal per gallon:	\$ 0.30	
Cost of disposal of hazardous wastewater:		\$0

# A. CLOSURE COST ESTIMATE FOR DISPOSAL OF INVENTORY (cont'd)

## 3. Wastewater Tank Storage Unit (cont'd)

c. Quantity of non-hazardous wastewater (NH) in gallons:	0		
Cost of disposal per gallon:	\$ 0.15		
Cost of disposal of non-hazardous wastewater:		\$0	
<u>Disposal Cost for the Wastewater Tank Storage Unit:</u>			\$0

## 4. Closure Generated Residues

a. Activated carbon (consolidated w/IH & WF) in gallons:	0		
Cost of disposal per gallon:	\$ 0.25		
Cost of disposal of activated carbon:		\$0	
b. Ion Exchange Resin (consolidated w/MH) in tons:	0		
Cost of disposal of per ton:	\$140.00		
Cost of disposal of Ion Exchange Resin:		\$0	
c. PVC piping chips (consolidated w/P3) in gallons:	0		
Cost of disposal per gallon:	\$ 1.45		
Cost of disposal of PVC piping chips:		\$0	
d. Steam condensate (DW) in gallons:	4195		
Cost of disposal per gallon:	\$ 0.30		
Cost of disposal of steam condensate:		\$1,258.50	
e. Concrete debris (CD) in tons:	193.48		
Cost of disposal per ton:	\$ 179.00		
Cost of disposal of concrete debris:		\$34,632.92	
<u>Disposal Cost For Closure Generated Residues:</u>			\$35,891.42

<u>TOTAL COST FOR DISPOSAL OF INVENTORY:</u>			\$62,688.22
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## B. CLOSURE COST ESTIMATE FOR TRANSPORTATION OF INVENTORY

### 1. Corrosive Liquids

Quantity of corrosive liquids (CO+CL) in gallons:	3,960	
Size of one load per shipment in gallons:	5,000	
Number of shipments required:	1	
Transportation cost per shipment:	\$ 2,500.00	
Transportation cost for corrosive liquids:		\$2,500.00

### 2. Waste Fuels

Quantity of waste fuels (IH+WF) in gallons:	24,200	
Size of load per shipments in gallons:	5,000	
Number of shipments required:	5	
Transportation cost per shipment:	\$1,175.00	
Transportation cost for waste fuels:		\$5,875.00

### 3. Inorganic Wastes

Quantity of inorganic wastes (MH) in tons:	67.32	
Size of load per shipment in tons:	23.00	
Number of shipments required:	3	
Transportation cost per shipment:	\$1,600.00	
Transportation cost for inorganic wastes:		\$4,800.00

### 4. Poisonous/Reactive Wastes

Quantity of poisonous/reactive wastes (PH+RI) in drums:	53	
Size of load per shipment in drums:	88	
Number of shipments required:	1	
Transportation cost per shipment:	\$2,800.00	
Transportation cost for hazardous wastewater:		\$11,200.00

### 5. Hazardous Wastewater

Quantity of haz. wastewater (HW+DW) in gallons:	0	
Size of load per shipment in gallons ( $\pm 5\%$ ):	5,000	
Number of shipments required:	6	
Transportation cost per shipment:	\$2,800.00	
Transportation cost for hazardous wastewater:		\$0



B. CLOSURE COST ESTIMATE FOR TRANSPORTATION OF INVENTORY (cont'd)

6. Non-Hazardous Wastewater

Quantity of non-hazardous wastewater (NW) in gallons:	0	
Size of load per shipment in gallons:	5,000	
Number of shipments required:	4	
Transportation cost per shipment:	\$1,400.00	
Transportation cost for non-hazardous wastewater:		\$0

7. Concrete Debris

Quantity of concrete debris (CD) in tons:	193.48	
Size of load per shipment in tons:	23	
Number of shipments required:	9	
Transportation cost per shipment:	\$1,127.00	
Transportation cost for concrete debris:		\$10,143.00

TOTAL COST FOR TRANSPORTATION OF INVENTORY: \$34,518.00

## B. CLOSURE COST ESTIMATE OF LABOR FOR DECONTAMINATION AND DISPOSAL

### 1. Metal Piping

Labor for decontamination and disposal in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of decontamination and disposal of metal piping:		\$0

### 2. PVC Piping

Labor for decontamination and disposal in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of decontamination and disposal of PVC piping:		\$0

### 3. Container Storage Unit

a. Labor for loading wastes for transportation in man-hrs:	118	
Cost of labor per man-hr:	\$ 11.22	
Cost of loading wastes for transportation:		\$ 1,323.96
b. Area of structure to be decontaminated in sq.ft.:	5,400	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structures:		\$ 432.00

### 4. Waste Fuel Blending Process

a. Labor for decontamination of reusable equip. in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of decontamination of re-usable equipment:		\$0
b. Area of disposable equip. to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.34	
Cost of decontamination of disposable equipment:		\$0
c. Area of equip. to be dismantled for disposal in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.89	
Cost of preparation of equipment for disposal:		\$0
d. Area of structure to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structure:		\$0

### 5. Waste Fuel Tank Storage Unit

a. Labor for loading wastes for transportation in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of loading wastes for transportation:		\$0
b. Labor for decontamination of re-usable equip. in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of decontamination of re-usable equipment:		\$0
c. Area of tanks to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.34	
Cost of decontamination of tanks:		\$0

C. CLOSURE COST ESTIMATE OF LABOR FOR DECONTAMINATION AND DISPOSAL  
(cont'd)

5. Waste Fuel Tank Storage Unit (cont'd)

d. Area of tanks to be dismantled for disposal in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.89	
Cost of preparation of tanks for disposal:		\$0
e. Area of structure to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structures:		\$0

6. Wastewater Tank Storage Unit

a. Labor for loading wastes for transportation in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost for loading wastes for transportation:		\$0
b. Labor for decontamination of re-usable equip. in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost for decontamination of re-usable equipment:		\$0
c. Area of tanks to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.34	
Cost of decontamination of tanks:		\$0
d. Area of tanks to be dismantled for disposal in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.89	
Cost of preparation of tanks for disposal:		\$0
e. Area of structure to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structure:		\$0

7. Wastewater Treatment Process

a. Labor for decontamination of re-usable equip. in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of decontamination of re-usable equipment:		\$0
b. Area of tanks to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.34	
Cost of decontamination of tanks:		\$0
c. Area of structure to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structure:		\$0

8. Consolidation Area

Area of structure to be decontaminated in sq.ft.:	2,050	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structure:		\$ 164.00

C. CLOSURE COST ESTIMATE OF LABOR FOR DECONTAMINATION AND DISPOSAL  
(cont'd)

9. Consolidation Pad

a. Labor for decontamination of re-usable equip. in man-hrs:	0	
Cost of labor per man-hr:	\$ 11.22	
Cost of decontamination of re-usable equipment:		\$0
b. Area of structure to be decontaminated in sq.ft.:	0	
Cost of labor per sq.ft.:	\$ 0.08	
Cost of decontamination of structure:		\$0

10. Steam Cleaner Rental

Number of days for using the cleaner:	1	
Cost of renting the cleaner per day:	\$ 250.00	
Cost of steam cleaner rental:		\$250.00

11. Demolition of Floor of Container Storage Unit

Demolition of floor and placing debris in transportation vehicle: \$14,288.00

TOTAL COST FOR DECONTAMINATION OF EQUIPMENT AND STRUCTURES: \$16,457.96

#### D. CLOSURE COST ESTIMATE SAMPLING AND TESTING OF SOILS

##### 1. Soil Sampling.

Number of borings for sampling of soils	11	
Cost per boring:	\$ 50.00	
Cost of sampling soils:		\$550.00

##### 2. Soil Testing

a. Number of soil tests using analysis method 8270:	3	
Cost per test:	\$ 350.00	
Cost of soil test using analysis method 8270:		\$1,050.00
b. Number of soil test using analysis method 8240:	0	
Cost per test:	\$ 180.00	
Cost of soil test using analysis method 8240:		\$0
c. Number of soil test using analysis method 8015:	2	
Cost per test:	\$ 150.00	
Cost of soil test using analysis method 8015:		\$300.00
d. Number of soil test using analysis method 1311/6010:	4	
Cost per test:	\$ 180.00	
Cost of soil test using analysis method 1311/6010:		\$720.00

TOTAL COST FOR SAMPLING AND TESTING OF SOILS: \$2,620.00

E. CLOSURE COST ESTIMATE FOR ENGINEER CERTIFICATION

Time to review closure plan in hrs:	4	
Time to inspect closure operations in hrs:	12	
Time to prepare closure certification in hrs:	4	
Professional services in hrs:	20	
Cost of professional service per hr:	\$ 75.00	
Cost of engineer certification:		\$ 1,500.00

TOTAL COST OF ENGINEER CERTIFICATION FOR CLOSURE \$ 1,500.00

### SUMMARY OF CLOSURE COST ESTIMATES

A. Disposal of Inventory	\$62,688.22
B. Transportation of Inventory	34,518.00
C. Decontamination of Equipment and Structures	16,457.96
D. Sampling and Testing of Soils	2,620.00
E. Engineer Certification	<u>1,500.00</u>
	\$117,784.18
10% for Management and Supervision	11,778.41
<u>Total Closure Cost Estimate</u>	<u>\$129,562.59</u>

# Action Tek, Inc. Construction & Consulting

Florida General Contractor License # CG CO 60239

P.O. Box 5831 Winter Park, Florida 32793 (407) 678-8000 Fax (407) 673-0054 email [actiontek@earthlink.net](mailto:actiontek@earthlink.net)

Exhibit:II.K.1.g-17
Revision: 1
Date: 11/01/99
Page: 390a

Mr. Patrick Sullivan  
Vice-President  
Chemical Conservation Corporation  
10100 Rocket Blvd.  
Orlando, FL 32824

Date: 8-18-99

CONSTRUCTION PROPOSAL FOR THE DEMOLITION OF AN EXISTING CONCRETE SLAB LOCATED 10100 ROCKET BLVD., ORLANDO, FL. ACTION TEK, INC. IS PLEASED TO OFFER THE FOLLOWING PROPOSAL FOR THE FOLLOWING SCOPE OF WORK. IT IS THE INTENT OF THIS PROPOSAL TO PROVIDE ALL NECESSARY LABOR, MATERIALS, EQUIPMENT, INSURANCE, WARRANTIES, ADMINISTRATION AND SUPERVISION FOR AND AS PER THE FOLLOWING SCOPE OF WORK.

## SCOPE OF WORK

**Demolition:** to include the removal and disposal (placing debris in Owners' provided on-site receptacle) of the debris of 5,054 square feet of 6" thick concrete floor slab. A total of 2,527 cubic feet of concrete is to be removed.

**EXCLUSIONS :** ANY WORK AND OR MATERIALS NOT DIRECTLY STATED ABOVE AND OR ANY ADDITIONAL WORK AS A RESULT OF ANY UNKNOWN AND OR UNSEEN CONDITIONS.

**BASE PRICE OF THE ABOVE SPECIFIED SCOPE OF WORK = \$14,288.00**

This proposal is valid for thirty days. Upon acceptance of this proposal, a formal contract will be executed.

**ACCEPTED : CHEMICAL CONSERVATION CORP.**

**ACTION TEK, INC.**

**BY: Mr. Patrick Sullivan**

**BY: Allen R. Penney**

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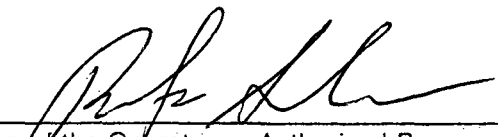
Revision:	0
Date:	11/01/99
Page:	412g

**APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT  
CERTIFICATION  
TO BE COMPLETED BY ALL APPLICANTS**

Facility Name: Chemical Conservation Corporation EPA ID# FLD 980 559 728

**1. Operator**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-730, F.A.C., and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.

  
\_\_\_\_\_  
Signature of the Operator or Authorized Representative\*

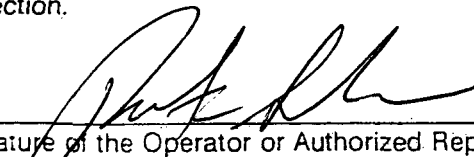
Patrick Sullivan, Vice President/Gral. Manager

\_\_\_\_\_  
Name and Title (Please type or print)

Date: 10/26/99 Telephone : ( 407 ) 859-4441

## 2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Protection.

  
\_\_\_\_\_  
Signature of the Operator or Authorized Representative\*

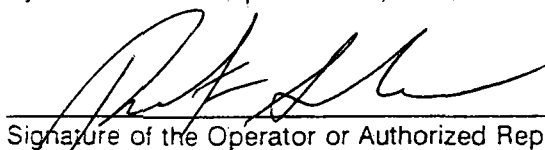
Patrick Sullivan, Vice President/Gral. Manager  
\_\_\_\_\_  
Name and Title (Please type or print)

Date: 10/26/99 Telephone : ( 407 ) 859-4441

**\*Attach a letter of authorization**

## 3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. For hazardous waste disposal facilities, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR §264.119 and §265.119, as adopted by reference in Chapter 62-730, F.A.C.

  
\_\_\_\_\_  
Signature of the Operator or Authorized Representative\*

Patrick Sullivan, Vice President/Gral. Manager  
\_\_\_\_\_  
Name and Title (Please type or print)

Date: 10/26/99 Telephone : ( 407 ) 859-4441

**\*Attach a letter of authorization**

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
PERMITTING APPLICATION PROJECT EVENT SUMMARY REPORT

09-DEC-99

Site Name: CHEMICAL CONSERVATION CORP (HW)  
County: ORANGE

PROJECT

Permit Office: CD (DISTRICT) CRA Reference #: 55710  
Project #: 55710 Agency Action: Issued  
Project name: CHEMICAL CONSERVATION Desc: MINOR MODIFICATION;  
Type/Sub/Req: HC/MM / New Permit Application  
Received: 28-OCT-1999 Issued: 02-DEC-1999 Expires: 02-DEC-2004  
Fee: \$250.00 Realized: \$250.00 Dele: Override: NONE

PROJECT EVENTS

Event	Begin Date	Prd Due Date	Rmn Status	End Date
Receive Request	28-OCT-1999	1 29-OCT-1999	000 Done	28-OCT-1999
Fee Verification	28-OCT-1999	2 30-OCT-1999	000 Sufficient Fee	30-OCT-1999
Completeness Review	28-OCT-1999	60 27-DEC-1999	000 Complete	23-NOV-1999
Determine Agency Action	28-OCT-1999	90 26-JAN-2000	000 Issue	02-DEC-1999
Issue Final Permit	02-DEC-1999	14 16-DEC-1999	000 Issued	02-DEC-1999
ISSUE PERMIT	02-DEC-1999	1 03-DEC-1999	000 Issued	02-DEC-1999
STOP CLOCK	02-DEC-1999	1 03-DEC-1999	000 Done	02-DEC-1999

PERMIT DATA FORM

CHECK

IF

NEW: \_\_\_\_\_

SITE WAFR AIR  
ID# ID# ID#: 0026916

SITE/WAFR/FACILITY NAME: CHEMICAL CONSERVATION

PROJECT NAME: CHANGE PERMIT CONDITION FOR ~~EXCESSIVE~~ <sup>FINANCIAL REQUIREMENT</sup> COST.

DESC: MINOR MODIFICATION

TYPE CODE: HC SUBCODE: MM CHECK IF: GP ☐ EXEMPT ☐

CORRECT FEE: 250.00

PROCESSOR: \_\_\_\_\_

AMOUNT RCV'D: \_\_\_\_\_

DW ONLY: \_\_\_\_\_

AMOUNT REFUND: \_\_\_\_\_

NPDES: YES ☐ NO ☐

MONIES DUE: \_\_\_\_\_

SIC # \_\_\_\_\_

RED \_\_\_ YELLOW \_\_\_ GREEN \_\_\_ NO PERMIT REQ \_\_\_

## HISTORY SHEET

SITE/WAFR/AIR#: 48-0026916-003 TYPE: HC SUBTYPE: mm

**SITE/WAFR/AIR  
NAME:**

## Chemical Conservation

**PROJECT NAME:**

[illegible]

**CHEMICAL CONSERVATION CORPORATION**

PH. 407-859-4441  
10100 ROCKET BOULEVARD  
ORLANDO, FLORIDA 32824

SUNTRUST  
SUNTRUST BANK, CENTRAL FLORIDA, N.A.  
ORLANDO, FL 32837  
63-215/631

58543

\*\*\*\$250 Dollars and 00 Cents\*\*\*

**PAY TO THE ORDER OF:**

FLORIDA DEPARTMENT OF  
ENVIRONMENTAL PROTECTION

DATE

AMOUNT

10/28/99

\*\*\*\$250.00

  
AUTHORIZED SIGNATURE