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Environmental Protection

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CERTIFIED
P 337 150 844

January 24, 1996

Mr. Armando Gonzalez
Compliance Officer
Chemical Conservation Corporation
10100 Rocket Boulevard
Orlando, Florida 32824

OCD-HW/P-96-0030

Orange County - HW
Chemical Conservation Corporation (CCC)
HC02-279948 & HO02-279952
First Notice of Deficiency

Dear Mr. Gonzalez:

We have reviewed the permit application submitted on November 3, 1995 for the construction and operation of the proposed hazardous waste storage and treatment facility. This application will modify the construction permit (HC48-204160) which was issued on March 19, 1993 and will expire on March 19, 1996.

CCC has submitted an entirely new application with the appropriate fees to cover permitting for construction and operating procedures. Due to the complexity of the application, we feel it is essential to discuss issues in a meeting. However, listed below are specific items which will need to be addressed or further explained.

1. Fuel Blending Process, Page 8 states: "CCC may use this process to remove and blend wastes other than fuels."

Comment: This paragraph explains how CCC will blend fuels. In a separate paragraph, explain the other wastes CCC intends to blend. How will the facility prevent cross contamination if the blending equipment (i.e., blending tank, shredder, tank storage system, grinder/pump) will be used for various hazardous waste streams?

2. Hazardous Wastewaters Treatment Process, Page 9 states: "CCC wants to construct and operate a process to treat acidic wastewaters contaminated with metal and organic constituents. The process will consist of a tank storage system to store non-treated and treated wastewaters, a neutralization system to adjust the pH, a filter press to remove precipitated

solids and an air stripper to remove organic contaminants from wastewaters."

Comment: How will CCC demonstrate the wastewater has been adequately treated? Has CCC contacted the air program to determine if an air permit will be needed for the air stripper? If so, has an application been made?

3. Hazardous Wastewaters Treatment Process, Page 9, states:
"Inbound waste will be segregated in the following streams for storage in the tank storage unit: acidic wastewaters having listed hazardous waste codes, non-acidic wastewaters having listed hazardous waste codes and non-acidic wastewaters designated only with characteristic hazardous waste codes."

Comment: What procedures will be in place to assure that listed waste are not inadvertently mixed with waste that are characteristic only.

4. Contingency Plan and Emergency Procedures, Page 75 states:
"Figure II.A.4.b-4 shows the container storage unit, where every row is labeled with a SGC. However, the permit gives CCC the flexibility of relocating and replacing the SGCs depending on the distribution and quantities of waste types that are stored in the unit at any given time. The only condition when relocating and replacing SGCs is that reactive and ignitable materials are stored outside the 50 - foot property set back line and that no more than one SGC is assigned to a cell."

Comment: Provisions for altering the layout should be included in the operating portion, not contingency plan portion of the application. If this is intended to be a factor in situations where the contingency plan will be implemented, then the condition which requires relocation of SGC's should be specified.

Further, if the cells are to be segregated by SGC's then appropriate signs or other acceptable method should be also included to clarify location of RCRA coded waste within each SGC. Please provide the procedure by which you have determined appropriate RCRA codes to be included in each SGC.

5. Contingency Plan and Emergency Procedures, Page 99 states:
"Releases confined to the cell where the spill occurs are considered minor spills, which do not present a hazard to human health or the environment as long as they are collected within a reasonable short period of time after the spill take place, and in accordance with proper safety procedures. Minor spills will not activate the implementation of the emergency procedures in the contingency plan."

Comment: Please quantitatively define minor, medium and major spills. Also, propose procedures for documenting incidents occurring at the facility.

6. Contingency Plan and Emergency Procedures, Page 101 states: "Minor spills that may occur in the tanker loading area will be contained by berms and curves built on the parking lot. Releases inside and to the outside of the tank farm's secondary containment will be collected and decontaminated in the manner described in the section addressing the container storage unit." Similar situation identified for the Wastewater Tank Storage Unit.

Comment: Please address what CCC will be considered a minor spill for both the Waste Fuel Tank Storage Unit and the Wastewater Tank Storage Unit. How will CCC handle the reporting requirements for the spills which may occur during the loading activities outside the tank farms?

7. Design and Operation of the Facility, Pages 115-119 discuss the proposed waste storage specifications using the Storage Group Codes established by DOT.

Comment: As stated above, if the cells are to be segregated by SGC's then appropriate signs or other acceptable method should be also included to clarify location of RCRA coded waste within each SGC.

8. Waste Analysis Plan, Page 172 states: "CCC is a hazardous waste transporter subject to the DOT regulations with respect to description, marking, labeling, placarding and packaging of hazardous waste, which are regulated by DOT as hazardous materials during transportation." "Segregation and separation of the wastes during transportation and storage is determined in accordance with the hazard class shown in the DOT description."

Comment: As stated above, if the cells are to be segregated by SGC's then appropriate signs or other acceptable method should be also included to clarify location of RCRA coded waste within each SGC.

9. Waste Analysis Plan, Page 172 states: "A discussion on "transfer waste" is outside the scope of this plan.

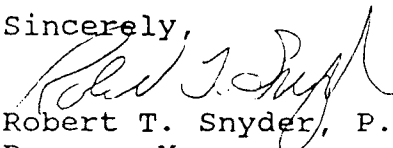
Comment: Since all materials stored within the confines of the facility will be addressed in the permit, please include to identify, profile and track the transfer waste. Also, the citation for transfer facility requirements should be F.A.C. Section 62-730.171.

10. Waste Analysis Plan, Waste Material Profile form, pages 173 & 174:

Comment: Does CCC accept generator knowledge to satisfy the profile requirements?

Please contact our office within 10 days to schedule a meeting to discuss the items above. If you have any questions, do not hesitate to contact Mary McGehee or me at (407) 893-3323.

Sincerely,



Robert T. Snyder, P.E.
Program Manager
Hazardous Waste Section

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RTS/mm

cc: Satish Kastury, FDEP
Alan Farmer, EPA Region IV
Kim Clifton, EPA Region IV