

Chemical Conservation Corporation

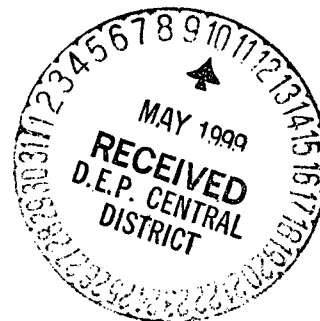
10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 855-2812



May 7, 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:

Chemical Conservation Corporation (CCC) has received 17 drums that are manifested to Waste Technologies Industries (WTI) located in East Liverpool, Ohio. Copies of two manifests on which the drums were shipped are attached to this letter. The drums in question must be removed from the CCC facility within ten days of arrival in accordance with §263.12 because they are on transfer facility basis.

The WTI facility shut down operations this week without previous notice and it will resume operations until June 2, 1999. CCC managed to ship some drums that are not included in the 17 mentioned above to other facilities, where the waste had received previous approval. However, the generator of the waste in the drums is the government, which has very stringent requirements on treatment and disposal facilities that may receive its waste. Therefore, it was not possible to ship the 17 drums to alternate facilities.

CCC will not be able to ship the drums to WTI on time to comply with the 10-day transfer facility requirement because the facility will not accept them until June 2. CCC acknowledges the fact that the regulations do not provide relief from the 10-day requirement under any circumstances. Therefore, it will ship the drums back to the generator if that is the only option left to resolve this problem. By the time they are delivered to generator, they will have to be sent back to CCC in order to arrive on time to catch a shipment scheduled for WTI on June 1, 1999.

The intent of the plan described in the last two sentences is to comply with the regulations. However, the plan seems to contradict the overall intent of the regulations, which is to protect the public. If the plan is carried out, the hazardous waste in those drums will subject the public to additional risk because it will travel thousands of miles on public highways.

Mr. Robert Snyder, P.E.

May 7, 1999

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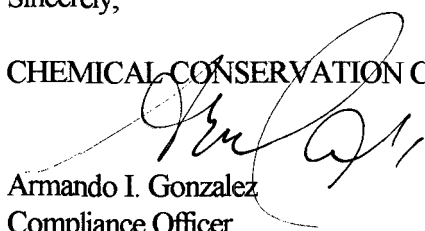
The purpose of this letter is to ask you to consider the option of using the general condition number 9 of the permit referenced above. The condition requires the permittee to notify the Department when the facility is unable to maintain compliance. The notification must include the description of and cause of noncompliance, including time periods and dates, and steps to reduce, eliminate and prevent recurrence of the noncompliance. To my knowledge, this situation has not occurred in the past, and it will not occur as long as CCC is notified on time by the off-site treatment or disposal facility. Please accept this letter as the noncompliance notification letter referenced above.

If your answer allows CCC to keep the drums beyond the 10-day time limit, they will be shipped to WTI on June 1, 1999. They will be stored in the permitted Container Storage Unit and marked in manner that will identify them until they are placed in the transportation vehicle that will take them to the WTI facility.

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

Sincerely,

CHEMICAL CONSERVATION CORPORATION



Armando I. Gonzalez
Compliance Officer

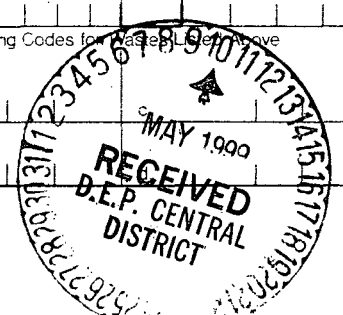
cc: Patrick Sullivan
Marc Sibila

Department of Environmental Protection
Hazardous Waste Regulation Program
Manifest Section
CN 421, Trenton, NJ 08625-0421

Form Approved OMB No. 2050-0039 Expires 9-30-97

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ321002070499030		2. Page 1 of 2		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address US Amry Armament Research, Development & Engineering Center AMSTA-AR-PSE, Building 319 Picatinny Arsenal, NJ 07806-5000 (973) 724-5818				A. State Manifest Document Number NJA 2890413			
5. Transporter 1 Company Name Tri-State Motor Transit Co.				6. US EPA ID Number MOD095038998		C. State Trans. ID-NJDEP 50053	
7. Transporter 2 Company Name Chem-Met Services, Inc.				8. US EPA ID Number MID99696368		D. Transporter's Phone (417) 624-3131	
9. Designated Facility Name and Site Address Waste Technologies Industries 1250 Saint George Street East Liverpool, OH 43920				10. US EPA ID Number OHD980613541		E. State Trans. ID-NJDEP Decal No. -	
11. US DOT Description (Including Proper Shipping Name, Hazard Class or Division, ID Number and Packing Group) HM a. X RQ Waste Hydrazine Aqueous Solution 8 UN2030 PGII L38				12. Containers No. Type 001 DF		13. Total Quantity 00011	
b. X Hazardous Waste Solid, N.O.S. 9 NA3077 PGIII (Spent Carbon) L35				009 DM		03515	
c. X Hazardous Waste Solid, N.O.S. 9 NA3077 PGIII (Diatomaceous Earth) L36				001 DM		000409	
d.							
J. Additional Descriptions for Materials Listed Above ERG# 132 ERG# 171 USAN020				K. Handling Codes for Materials Listed Above a. b.			
15. Special Handling Instructions and Additional Information Contract: SP4400-97-D-0055 D.O.# 44 24 HR Emergency Phone # (973)219-0713 LIC# NM246OK							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name PAUL E. REED, JAMES BERANAH				Signature Paul E. Reed, James Beranah			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name RONALD Lee Trumble				Signature Ronald Lee Trumble			
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Dennis A. Romanst				Signature Dennis A. Romanst			
19. Discrepancy Indication Space							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature							



NJA 2890413

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection and Energy. (609) 292-7172

EMERGENCY CONTACT TELEPHONE NUMBER

**UNIFORM HAZARDOUS
WASTE MANIFEST**
(Continuation Sheet)

21. Generator's US EPA ID No.

Manifest
Document No.

22. Page

Information in the shaded areas is not
required by Federal law.

N J 3 2 1 0 0 2 0 7 0 4 | 9 9 0 3 0

2 of 2

23. Generator's Name

US ARMY ARMAMENT RESEARCH, DEVELOPMENT & ENGINEERING CENTER
AMSTA-AR-PSE, BUILDING 319
PICATINNY ARSENAL NJ 07806-5000 973-724-5818

L. State Manifest Document Number

NJA2890413

M. State Generator's ID

24. Transporter 3 Company Name

CHEMICAL CONSERVATION CORP.

25. US EPA ID Number

F L D 9 8 0 5 5 9 7 2 8

N. State Transporter's ID

O. Transporter's Phone 407-859-4441

26. Transporter _____ Company Name

27. US EPA ID Number

P. State Transporter's ID

Q. Transporter's Phone

28. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

29. Containers

30. Total
Quantity31. Unit
Wt/VolR.
Waste No.

		29. Containers		30. Total Quantity	31. Unit Wt/Vol	R. Waste No.
		No	Type			
a.						
b.						
c.						
d.						
e.						
f.						
g.						
h.						
i.						

S. Additional Descriptions for Materials Listed Above

T. Handling Codes for Wastes Listed Above

CONTINUATION FOR ADDITIONAL TRANSPORTERS ONLY.

32. Special Handling Instructions and Additional Information

GENERATOR
TRANSPORTER
FACILITY33. Transporter 3 Acknowledgement of Receipt of Materials

Printed/Typed Name

DANNY WOODS

Signature

Danny Woods

Date

Month Day Year

04/25/99

34. Transporter _____ Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

35. Discrepancy Indication Space

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. OK4213720846		Manifest Document No. 99022		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address BLDG. 3323 FORT SILL, OK 73503-8900				DRMO FORT SILL		A. State Manifest Document Number 1000052-4							
4. Generator's Phone (580 442-4703)				(580)442-3255		B. State Generator's ID 16002							
5. Transporter 1 Company Name DART TRUCKING COMPANY, INC.				6. US EPA ID Number LOHD009865825		C. State Transporter's ID							
7. Transporter 2 Company Name <i>Chemical Conservation Corp.</i>				8. US EPA ID Number <i>EL42980559728</i>		D. Transporter's Phone 330 533 9841							
9. Designated Facility Name and Site Address WASTE TECHNOLOGIES INDUSTRIES 1250 ST. GEORGE ST. EAST LIVERPOOL, OH 43820				10. US EPA ID Number LOHD980613541		E. State Transporter's ID							
						F. Transporter's Phone <i>407-859-4411</i>							
						G. State Facility's ID LOHD980613541							
						H. Facility's Phone (800) 837-7401							
11. US DOT Description (Including Proper Shipping Name, Hazard Class and ID Number)						12. Containers		13. Total Quantity		14. Unit Wt/Vol		15. Waste No.	
a. HQ. HAZARDOUS WASTE SOLID, N.O.S. 9, NA3077, PGIII (SPENT CARBON) (2,4-Dinitrotoluene) MC (K045) (D030) MC						004 DM		00910		P		K045	
b. HAZARDOUS WASTE LIQUID, N.O.S. 9, NA3082, PGIII (EPINEPHRINE) (P042)						001 DE		00004		P		P042	
c. WASTE MEDICINE SOLID, TOXIC, N.O.S. B.1, UN3249, PGII (NITROGLYCERIN) (P081)						001 DE		00008		P		P081	
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
11A FSFO020 13,14 4X55						9604MA a)T03							
11B FSFO023 8 1X5						9701 b)T03							
11C FSFO022 11 1X5						9704 c)T03							
11D													
15. Special Handling Instructions and Additional Information						SEND PHOTOCOPY OF MANIFEST TO:							
24 HOUR RESPONSE : 1996 ERG GUIDE #:						CHEM-MET SERVICES							
1-800-282-8251x334						18660 ALLEN ROAD							
SP4400-99-D0001 0052						WYANDOTTE, MICHIGAN 48192							
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name Charles N. Cox						Signature <i>Charles N. Cox</i>		Month Day Year 10/4/26/99					
17. Transporter 1 Acknowledgement of Receipt of Materials													
Printed/Typed Name Gary E. Coil						Signature <i>Gary E. Coil</i>		Month Day Year 10/4/26/99					
18. Transporter 2 Acknowledgement of Receipt of Materials													
Printed/Typed Name DOUG NEFF						Signature <i>Doug Neff</i>		Month Day Year 10/5/99					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.													
Printed/Typed Name						Signature		Month Day Year					



