

Jeb Bush  
Governor

# Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

David B. Struhs  
Secretary

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

OCD-HW/P-99-0181

FLD-980-559-728

Orange County - HW  
Chemical Conservation Corporation  
Construction/Operation Permit  
HC02-0026916-001 & HO02-0026916-002  
RE: Closure Cost Estimate

Dear Mr. Gonzalez:

This letter is to confirm your conversation with Chris Aoussat on 5/18/99, in our office, regarding the closure cost estimates for your facility.

As agreed upon at that time, Chemical Conservation Corporation (CCC) will add the cost of demolition and disposal of the permitted concrete pad storage area to the closure cost estimate.

The cost estimate for the decontamination process will also be updated to include a more realistic figure for the amount of decontamination fluid generated. The estimated amount of 3,240 gallons of decontamination fluid generated, that was submitted by you from "ADCA Pressure Cleaning", equivalent to 0.6 gallons/ft<sup>2</sup>, may be used in the cost estimate of decontamination. This amount is well below the EPA recommended value of 4 gallons/ft<sup>2</sup>. Taking into consideration that the surface of the concrete storage area has been sealed to aid in the prevention of infiltration of contaminants into the concrete slab; this value is acceptable at this time, until further research or information determines otherwise.

CCC  
Page 2

In response to your comment regarding the paragraph from page 16426 of the federal register, Volume 51, Number 85 of Friday, May2, 1986, that reads:

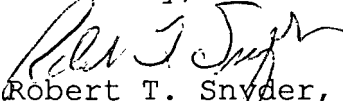
"The Agency also does not intend this rule to require that an owner or operator remove structures otherwise required by process-specific requirements to be maintained and used after closure."

This statement could be interpreted, as you stated in your response, that the concrete slab would not have to be removed, depending on the amount of contamination, if the facility were to be used again as a hazardous waste storage facility or warehouse. Again, taking into account the worst case scenario, the facility may be sold and used as a daycare center or other similar establishment. This would then require that the contamination be addressed and possibly require the removal of the concrete slab.

Please submit an updated copy of the closure cost estimates with the recommended changes for the current permit application on file.

Please do not hesitate to contact Chris Aoussat, at (407) 893-3323 if you should have any questions regarding this matter.

Sincerely,

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

Date: 5/20/99

  
RTS/ca  
MK

cc: Permit File