Chemical Conservation Corporation
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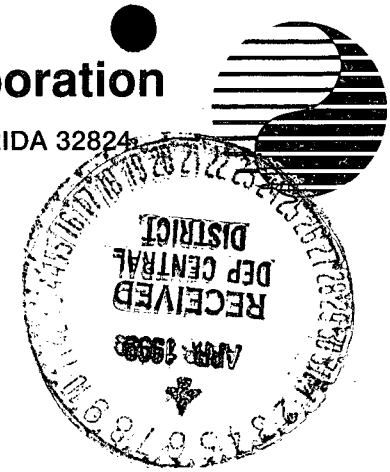


April 5, 1999

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) submitted to the Florida Department of Environmental Protection (DEP) revised closure costs for the facility with correspondence dated January 15, 1999. The closure costs revision includes the most recent estimates applicable to the facility at the present time under the requirements of the new permit issued on November 6, 1998.

Comments to CCC's submittal were provided by DEP in a letter dated February 10, 1999. This letter contains a response to those comments. The DEP comments are paraphrased below in italic type followed by the corresponding response in regular type.

1. *Demolition and removal cost of the two existing storage tanks and secondary containment was not accounted for in the original cost estimate.*

Response: The secondary containment referenced in this comment is a structure that limits the North side of the loading dock. The existing storage tanks are two 14,000-gallon vertical tanks mounted on legs that are sitting inside the secondary containment. The structure and the tanks will be used to store hazardous waste when the fuel blending process authorized in the new permit is implemented.

leave inspection plates off

This response addresses two issues raised by the comment. One issue is the request to include in the estimate a unit that has not been used and authorized to manage hazardous waste. The

tanks cannot store hazardous waste until the facility complies with a number of requirements listed in the new permit. The facility will comply with such requirements once there is a commitment by CCC to operate the tank storage unit. However, at the present time there has not been a commitment on part of CCC to use the tank system. In fact, it is now believed that the fuel blending process may never be implemented. Therefore, the facility does not want to secure funds to close a secondary containment structure and two tanks that may never be used to manage hazardous waste. Once the facility is committed to implement the fuel blending process and comply with requirements in the new permit, it will provide financial assurance to close all the components of such a process.

264.73(b)(8)

The other issue raised by the comment is that the secondary containment structure has to be demolished and removed. Closure regulations in §264.112(b)(4) require that contaminated containment system components and structures be removed or decontaminated. The closure plan included in the approved permit application states that it will use the "clean closure" approach to close structures at the facility by decontaminating them. CCC believes that clean closure is the most favorable method from the environmental standpoint, rather than disposing of contaminated construction debris in a landfill. In accordance with §264.110(b), CCC is not subject to the post-closure requirements in §264.116 through §264.120 because it is not a disposal facility, and it does not operate any of the units listed in that section. Therefore, the facility may attempt to clean close structures and soils before being required to comply with post-closure requirements.

264.142(a)

264.110(a) is required

2. *Demolition and removal cost of the container storage area was not accounted for in the original cost estimate.*

Response: This comment requires the facility to demolish and remove the secondary containment structure for the container storage area. The reasons stated above for not having to demolish and remove the storage tank's secondary containment also apply to the structure referenced in this comment.

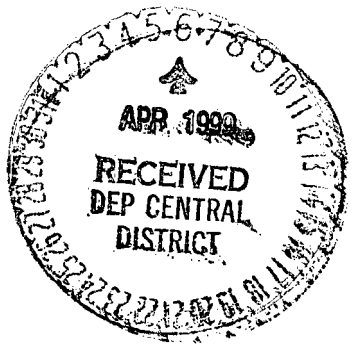
NO

The closure plan in the approved permit application describes the method the facility will utilize to clean close the container storage area. The plan also describes methods to sample and analyze the soils beneath the structure to verify that there will not be contaminants left in the area after closure.

3. *Transportation and disposal cost of decontamination fluid for tank system and container storage area was not accounted for in the original cost estimate.*

Response: The second paragraph in page 337 of the closure plan states that the method to be used for decontaminating structure and equipment is pressure cleaning with steam. Such a method was selected because steam cleans better and generates a small amount cleaning liquids. Condensate from steam will be collected mostly from cleaning the internal side of tank walls. Steam cleaning of the exterior of equipment and structures generates a very little volume of condensate.

NO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The condensate volume generated by decontamination operations is included with the inventory of wastewater from the bulk storage unit. Table II.K.1c.-1 in page 335 of the permit application shows the condensate volume included in the waste type named Hazardous Wastewater, which is listed in the third line of the table from the bottom. A note at the bottom of the table explains that the steam condensate was added to the wastewater tank inventory. The unit cost for disposal and transportation of the condensate is shown in third line from the bottom in tables contained in pages 348 and 349. The closure cost estimate for disposal and transportation of the condensate is listed in line item 4.d in page 353 and line item 5 in page 354, respectively.

4. *The cost estimates presented for the disposal of the waste inventory in the submitted closure cost estimate should be updated to 1999 values.*

Response: CCC's closure costs revision submittal of January 15, 1999 included two costs estimate tables. One of them had figures crossed-out to indicate revisions. The last page of these tables contained a summary of closure cost estimates. The last two items in that page show the inflation factor adjustments for 1996 and 1997, to update the total closure costs to 1998's dollars. CCC plans to update the facility closure costs to 1999's dollars on June 30, 1999, the facility's anniversary date. OK

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

Sincerely,

CHEMICAL CONSERVATION CORPORATION

Armando I. Gonzalez
Compliance Officer

cc: Patrick Sullivan


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