



Jeb Bush
Governor

Department of Environmental Protection

FD 980-559-728

Central District
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Orlando, Florida 32803-3767

David B. Struhs
Secretary

April 8, 1999

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

OCD-HW/P-99-0111

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

Dear Mr. Gonzalez:

The Department has reviewed your comments dated April 5, 1999, regarding the closure cost estimates for Chemical Conservation Corporation (CCC). The responses are presented in the order they were addressed in your letter.

DEP's original comments are in italics followed by our response.

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

The Department will concede to your request to defer the closure cost estimate for the demolition and removal of the two existing storage tanks and secondary containment; until CCC commits to the construction and implementation of the fuel blending process, with the following condition:

- a. The 24" side manways of both 15,000-gallon tanks be left open, in order to facilitate inspections and prevent the inadvertent storage of hazardous waste.
2. *Demolition and removal cost of the container storage area was not accounted for in the original cost estimate.*

The Department is not requesting that CCC submit cost estimates for the post-closure but only for the closure, as required by 40 CFR 264.142(a). If hazardous waste is left in place, then 40 CFR 264.142(b) would require CCC to meet the post-closure requirements of 40 CFR 264.117 through 264.120.

"Clean closure" requires that a facility close with no hazardous waste in place. Decontamination of structures and media may not always be possible or economically feasible. In other words, if the contamination is extensive a facility may not be able to clean close by only using decontamination methods, but, may have to resort to the removal and disposal of contaminated materials. Therefore, the closure cost estimate must equal the cost of final closure at the point in the facility's active life when the extent and manner of its operation would make closure the most expensive as required by 40 CFR 264.142(a)(1). Specifically, this would require the removal of any concrete slab or structure that could not be reasonably decontaminated, and the cost of removal and disposal included in the closure cost estimate.

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

The generation of only 110 gallons of steam condensate as stated in table II.K.1c.-1 of the permit, may be correct if only pure steam were being used. If that were the case, then only volatile organic compounds would be volatilized during the process and many other contaminants such as metals would still remain in place. In order for contaminants to be removed by the method of "pressure washing with steam" the contaminants, once dislodged by the steam, would need to be transported away by some type of a medium, such as water, and then collected and disposed. Pressure washing with steam has always inferred that water at high temperature is used in the process and not just steam.

According to U.S. Environmental Protection Agency, Final Guidance Manual: Cost Estimates for Closure and Post-Closure Plans (Subparts G and H), November 1986, EPA/530-SW-87-009, Volume III, pg.5-3, the generation rate provided for decontamination fluid is stated as 4 gallons/ft². In the closure cost estimate, provided by the Department, a conservative 2 gallons/ft² was utilized for the decontamination of 5,400 ft² of containment area. The facility therefore is required to include this cost in the closure cost estimate submitted to the Department.

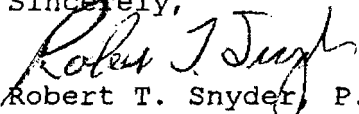
4. *The cost estimates presented for the disposal of the waste inventory in the submitted closure cost estimate should be updated to 1999 values.*

The Department concurs that the inflation factor adjustments are adequate in order to update the closure cost estimates on a yearly basis.

Chemical Conservation Corp.
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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

RTS/Ca
JH