

Chemical Conservation Corporation

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July 8, 1998

Mr. Chris Aoussat
Permitting Engineer
Hazardous Waste Program
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803-3767

Re: Chemical Conservation Corporation FLD 980 559 728

Dear Mr. Aoussat:

This letter explains Chemical Conservation Corporation's (CCC) a preliminary plan for expanding the size of the loading dock that I briefly described to you over the phone on July 1, 1998.

Photo 1, enclosed with this letter illustrates the reason that prompted such a plan. The photo shows a number of drums that CCC is seeking to keep out of the Container Storage Unit (CSU).

The vast majority of the drums handled at the facility contain waste that has not been manifested to CCC. They are drums whose designated facilities are other than CCC, and they are referred to in this letter as "transfer facility" drums. They need to be removed from the trailer that brought them into the facility in order to have access to "permitted drums", which are drums manifested to CCC that were loaded more distantly into the trailer. Or they need to be transferred into another outbound trailer that will take them to their designated facilities. However, sometimes transfer facility drums cannot be transferred immediately to outbound trailers because of the lack of empty spaces next to the dock for them to park. Therefore, these drums are unloaded and staged somewhere in the CSU until the outbound trailer finds an empty parking space on the dock where they can be loaded with these drums. More often than 90% of the time transfer facility drums are removed from the CSU on the same day they were placed into it.

Many containers shown at the front in the photo are transfer facility drums that were staged in the unit due to the reasons described in the previous paragraph. Apart from permitted drums stored in the CSU's cells that appear at the far end, the photo also shows a few permitted drums staged for inspection to the right of the transfer facility drums. The scenario portrayed in Photo 1 does not depict the most drum-congested instance in the CSU. Sometimes it becomes very congested.

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This situation is the source of compliance problems and safety concerns. CCC believes that only permitted drums that have been inspected should be in the CSU. That is the reason that compelled us to consider a plan to expand the size of the loading dock. However, CCC cannot proceed with the plan unless it meets two conditions: low capital investment and minor permit modification requirements. The plan seems to meet the first condition. We are asking you to help us determine if it meets the second condition.

Figure 1 shows the loading dock expansion plan. The area covered with yellow is a 12-foot "East expansion" at the East end of the dock that CCC proposed in the permit application under review by the Florida DEP. The dock expansion CCC is considering now is a 32.25-foot Southward extension, which would create an area that is delineated in the figure with a darker color, labeled the "South expansion".

This expansion will allow CCC to stage 128-55 drums on the loading dock if stacked in a single layer. Transfer facility drums will be staged and permitted drums will be inspected on the loading dock, and no drums except for permitted drums in storage will be found in the CSU. Transfer facility drums may remain on the dock as long as they are in compliance with the holding time period regulations allow for transfer facility waste and permitted drums will be placed in the CSU before the workday ends. This practice will not only improve the appearance of the area inside the CSU, but it also will reduce the safety risk presented by drums that are now staged in the unit. Compliance of waste stored in the CSU will also improve.

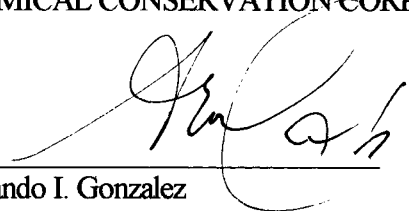
In the last telephone conversation we had you were concerned that the relocation of transfer facility drums on the dock may increase the magnitude a potential gaseous release. The plan envisioned by CCC will not change the waste type nor the number of drums in the facility, only the location where they would be temporarily staged. They would be staged on the loading dock instead of the CSU. However, neither the CSU nor the loading dock are designed to contain a gaseous release, which is the only parameter that will be affected by CCC's expansion plan. Therefore, it seems like none of the parameters that may affect a gaseous release are involved in changes prompted by this proposal. The goal of this plan is to reduce the potential of an incident that may result in a gaseous release.

If you have any questions, please call me at (407) 859-4441.

49 HRS MAY

Sincerely,

CHEMICAL CONSERVATION CORPORATION



Armando I. Gonzalez
Compliance Officer

cc: Patrick Sullivan

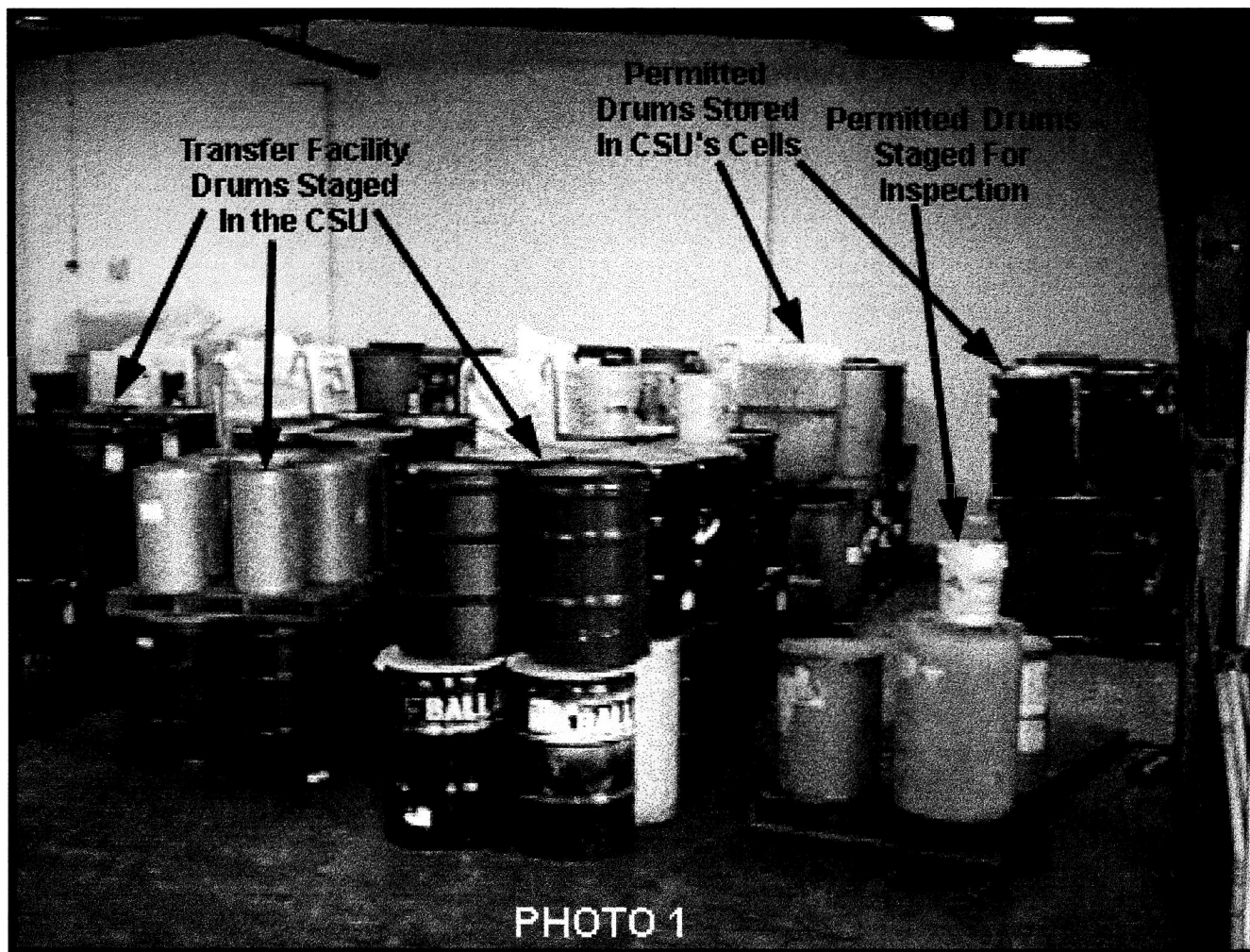


PHOTO 1

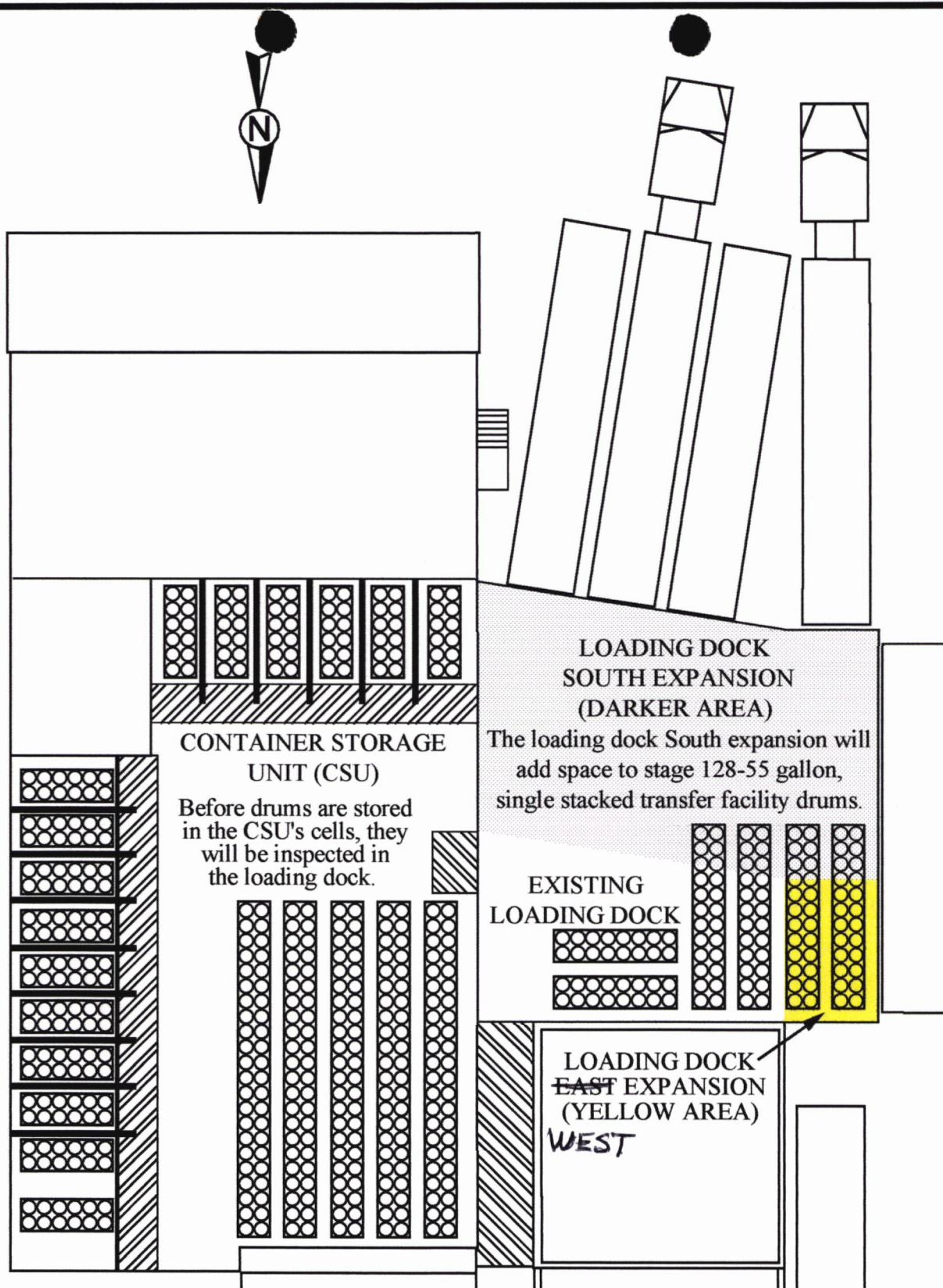


FIGURE 1

Chemical Conservation Corporation
Loading Dock Expansion Plan
Prepared by: A. Gonzalez
July 1, 1998
Not to scale