FLD 980-559-428

Florida Department of Environmental Protection

Central District Hazardous Waste Section

DATE: August 12, 1996 OCD-HW/P-96-0383

TO: Satish Kastury
Environmental Administrator, Hazardous Waste Section
FDEP, Tallahassee

FROM: Bob Snyder NS for
Section Manager, Hazardous Waste Program
FDEP, Orlando

SUBJECT: Orange County - HW
Chemical Conservation Corporation
Construction Permit Number HC48-204160
Permit Modification Number HC02-279948 & HC02-279952

Enclosed are the following document(s):

1. Response to a First Notice of Deficiency
Dated July 18, 1996

Copy(s) to:

Alan Farmer, EPA, Region IV (Document)

Doug Outlaw, FDEP Tallahassee (Document)

Armando Gonzalez - Chemcon (Transmittal)

cc: Permit File HC48-204160
Permit File HC02-279948 & HC02-279952
Reading File (Transmittal)

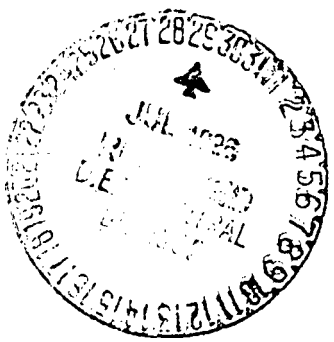
Chemical Conservation Corporation

10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 859-2915

HAND DELIVERED

July 29, 1996



Mr. Robert Snyder, P.E.
Section Manager
Hazardous Waste Program
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803-3767

Re: Chemical Conservation Corporation
EPA I.D. No. FLD 980 559 728
Response to a First Notice of Deficiency Dated July 18, 1996

Dear Mr Snyder:

This letter constitutes a response to the First Notice of Deficiency for a Hazardous Facility Waste Permit Application that Chemical Conservation Corporation (CCC) submitted on November 1, 1995. The response addresses comments contained in a letter from the Florida Department of Environmental Protection (DEP) dated January 24, 1996. Submittal of the response was requested in your letter of July 18, 1996, which also requires CCC to publish a public notice announcing the filing of the application.

Attached to this letter is the response which consists of five items: a response summary, a notarized proof of a newspaper publication, one set of the "red-lined" version of the revised permit application pages, four sets of tab dividers and four sets of the permit application revision. The first four items mentioned above are contained in a binder labeled BOOK 1, and the last item is found in the binder labeled BOOK 2. The response summary consists of a six page document that answers questions contained in the comments and explains how the DEP concerns have been addressed in the application revision. The proof of newspaper publication demonstrates that the public notice has been published as required.

For your convenience, a "red-lined" version of the revision has been included, which depicts changes made to pages of the application by showing strike-out letters where deletions have been made, and it identifies additions with underlined letters. A complete set of tab dividers for each binder containing four sets of the application submitted on November 1, 1995 is included in this response. Please discard all existing dividers to avoid confusion, and insert the ones provided with this submittal in the order specified in pages i and ii of the application. Four sets of pages of the permit application that were revised in response to your comments are submitted to comply with instructions and regulatory requirements. Please insert the revised pages in the permit application binder in numerical and alphabetical order, and discard the ones having identical page numbers which are being replaced with the revised ones.

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

Sincerely,

Armando I. Gonzalez
Compliance ~~Officer~~

CC: Wm. F Labadie
Patrick Sullivan