

State of Florida
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Interoffice Memorandum

TO: File

THROUGH Robert Snyder
Program Manager
Hazardous Waste Program

FROM: Chris Aoussat

DATE: March 31, 1998

SUBJECT: Orange County - Hazardous Waste
Chemical Conservation Corp.
Phone Conversation

On March 31, 1998 I spoke with Armondo Gonzalez requesting additional information and that the following changes be made to the Waste Compatibility Test Manual:

1. Page 214k - in the second paragraph specify when the final evaluation is conducted.
2. Page 214k - state what the minimum time period between the moment the first sample is poured into the test vessel and the time the final evaluation is conducted.
3. Page 214m - state that fumes and gases are vented through a hood.
4. Include a general statement stating what occurs when materials are found to be non-compatible.

ca

FHD 980-555-728

Department of Environmental Protection

Central District

3319 Maguire Boulevard, Suite 232

Orlando, Florida 32803-3767



Fax Cover Sheet



DATE: 4/7/98

Number of pages including cover sheet: 2

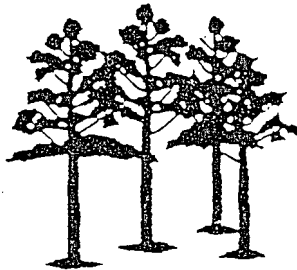
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Message DRAFT WORDING OF SPECIFIC CONDITIONS
RELATING TO CONSOLIDATION / FUEL BLENDING - SIMILAR
WILL APPLY TO ELEMENTARY NEUTRALIZATION



FLP 980559 725

DRAFT

1. Until the training, procedures and equipment outlined in Specific Condition 2 (below) are complete and in place and approved by the Department, CCC shall only consolidate the following:

- a. Lab packs
- b. Waste solids and the liquids resulting from the consolidation of solids, as long as the liquids are not acids.
- c. Wastes from containers belonging to the same waste stream; i.e., same generator and listed on the same manifest.

2. CCC will not begin consolidating wastes except as listed in Specific Condition 1 until the training, procedures and equipment listed below are complete and in place and approved by the Department:

- a. All consolidation of liquid wastes will take place under the direct supervision of a chemist, experienced in determining compatibility. The supervising chemist will screen all incoming wastes to be consolidated, except as defined in SC 1, and approve, in writing, each list of wastes proposed for consolidation prior to compatibility testing. This information will be documented in a written log containing
- b. A procedure will be developed to evaluate compatibility of liquid wastes not belonging to the same waste stream as defined in 1 (c), based on simulation of the proposed consolidation. The compatibility test procedure will evaluate and establish acceptable ranges for changes in pH and temperature, and criteria for evaluating visible reactions ("bubbling", gas generation, color change). The compatibility test procedure will be applied to all containers to be consolidated into tote tanks and all tote tanks and/or containers to be consolidated into tankers and documented in written log.
- c. Installation of laboratory meeting requirements for Quality Assurance Category 2C, as defined in Department Rule 62-160 (Quality Assurance) for sampling and analysis, including all necessary equipment and operator(s) trained in operation of the equipment necessary to 1) screen all incoming materials to verify integrity of waste profiles and 2) provide all information necessary to properly document constituents and waste codes for outgoing shipments of consolidated wastes.
- d. Installation of a venting system, to collect and control fumes generated during consolidation of acids and/or other liquids determined by compatibility testing to be acceptable for consolidation.
- e. Training, verified by written examination, of all personnel involved in waste consolidation on 1) proper use of consolidation codes, 2) application of consolidation procedures, 3) conducting compatibility test and 4) implementation of contingency plan. The training will be conducted, at least in part, by the chemist who will supervise consolidation and documented by trainees and trainers.