

Chemical Conservation Corporation

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April 25, 1994

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

Re: Chemical Conservation Corporation
EPA I.D. No. FLD 980 559 728
Construction Permit No. HC48-204160

Dear Mr. Snyder:

This letter contains an application for the modification of the permit referenced above. The permit modification application is included in a binder identified as Attachment A. The continuation of this letter summarizes the changes contained in the permit modification application.

WASTE SEGREGATION METHOD

The waste segregation method contained in the current permit establishes the incompatibility of two materials based on binary chemical reactions. The first step in this method is to determine the chemical groups to which the two materials belong. Every chemical group has been assigned a Reactivity Group Number (RGN). The reaction effect from the combination of the two materials is shown in a chart where the RGNs for the materials are entered. This method presents the following problems:

1. The identification of the chemical group to which the material belongs often becomes a guess work when the waste consists of a mixture of several chemicals.
2. The RGN is not readily available to the operator who decides where the waste is to be stored; the operator has to search the RGN in the office. The time consumed in searching RGNs and the error factor involved in this operation for a shipment consisting of 80 drums, each containing a separate waste stream, is too burdensome and dangerous.

The permit modification application in this submittal contains a new waste segregation method required by the Department of Transportation (DOT) for Hazardous Materials (Hazardous Wastes), which has been selected to replace the one referenced in the previous paragraphs because of the following reasons:

1. Much of the waste stored at Chemical Conservation Corporation (Chem-Con) is in transfer facility status, which is considered to be in a "storage facility during

the course of transportation", and as such, it is subject to the 49 CFR § 177.848 - Segregation of Hazardous Materials. A letter from the DOT dated March 8, 1994, indicates that waste which is shipped to and stored at Chem-Con with the intent to ship it to off-site facilities for treatment or disposal, is required to comply with the regulations cited in the previous sentence. Attachment B contains the inquiry letter from Chem-Con and the response letter from DOT.

2. The DOT segregation method uses the DOT Hazard Classes to establish compatibility of materials. The Hazard Class is a RCRA required method to classify hazardous waste (40 CFR § 262.32(a)) in accordance with their hazardous characteristics. The Hazard Class is shown in the hazardous waste label affixed to every container that holds hazardous waste, which makes it easy for the operator to determine where to store the waste once the area is divided in Hazard Classes.

The roll-over berm that used to isolate the large cell on the east side of the Container Storage Unit has been deleted, because the wastes stored there are compatible with the flammable wastes stored in the northwest corner of the unit, in accordance with the DOT segregation method.

CONTAINER CAPACITY INCREASE AND RELOCATION OF WASTE TYPES

This permit modification application proposes to increase the number of containers stored in the Container Storage Unit. Additional capacity is requested for the following areas (please refer to the drawing in Attachment C):

Northwest corner of unit, waste type IH: Flammable and combustible wastes stored in this cell will experience an expansion of 80 drums (4,400 gallons). The original application called for the demolition of the fire wall on the north side of the unit, however, it was discovered that when the wall was built, the purlins on which the roof rests were cut-off from the original building structure where they were supported, and made them rest on the wall. Therefore, the fire wall cannot be weakened on the west-east section, which prevents the opening of passages on that section of the wall for transferring drums from the storage unit to the process area. A space between the row of pallets and the wall was left open to allow maneuvering space for transferring drums to the adjacent area; this space will be occupied by four pallets (double stacked) per row.

East side of unit, waste type HM: A six pallet row (double stacked) has been added to this cell that stores inorganic and some organic contaminated wastes, in a space left available where a shower used to be, after it was demolished.

South side of unit, waste type RI, CO, PH and MH: A door that leads to the offices will not be used, which results in a space for an additional six pallet row (double stacked) in this area that holds oxidizers, organic peroxides, flammable solids, corrosives, poisonous and miscellaneous hazardous wastes.

WASTE REMOVAL PROCESS SYSTEM

A new system to remove waste from containers is being proposed in this application to replace the one contained in the current permit. The current permit shows six mixers used to blend waste fuels, and the one proposed here requires only one, which reduces drastically the amount of waste handled in this area. The intent of this change is to improve safety, efficiency and reduce emissions.

ADDITION OF D030 - 2,4-DINITROTOLUENE

Due to a typographical error, D030 - 2,4-Dinitrotoluene contaminated hazardous waste, was left out of the list of permitted waste codes in the current permit, while including U105 - 2,4-Dinitrotoluene pure grade hazardous waste. D030 has been added to tables that list the hazardous waste codes to be managed at the facility.

CONSOLIDATION AREA AND RELOCATION OF STORAGE TANKS

The section at the northern end of the waste removal process building has been enlarged to accommodate a trailer in order to conduct the bulking operations in an area that is totally enclosed. Since the storage tanks are located at the entrance of the enlarged section of the building, the tanks need to be relocated to a location where they allow the trailers access to the consolidation area.

AMENDMENT OF CONTAINER STORAGE UNIT CLOSURE PLAN

The Tank Removal Plan for the two above ground concrete tanks that were used as secondary containment for the Tank Storage Unit requires Chem-Con to amend the closure plan to address soil testing beneath the unit. The soil testing requirement is described in the amendment to the closure plan, the Tank Removal Plan is included as an exhibit for reference, and the estimated closure costs were increased to reflect the testing costs.

TANKS SUBSTITUTION

In accordance with instructions provided by DEP in our last meeting, a note has been inserted in the drawings for the Tank Storage Unit and for the Tank Detail/Specification, which states that the cone bottom tanks may be substituted with flat bottom tanks.

OTHER MINOR MODIFICATIONS

This application contains a new listing of emergency coordinators, new profile and land disposal notification forms.

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

Sincerely,


Armando Gonzalez
Compliance Officer

AG/jb

CC: William F. Labadie