

HAND DELIVERED

January 2, 2002

Mr. Robert Snyder, P.E.
Program Manager
Hazardous Waste Section
Florida Department of Environmental Protection
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Re: Permit Modification Request for Revision of the Contingency Plan
Perma-Fix of Orlando, Inc., FLD 980559728
Hazardous Waste Facility Permit No. HC02-0026916-001/002

Dear Mr. Snyder,

This submittal is a Permit Modification Request for Revision of the Contingency Plan for Perma-Fix of Orlando, Inc. (PFO). The plan revision replaces members on the Emergency Coordinators list. In accordance with line B.6.a of the listing contained in Appendix I to Section 270.42, this type of permit change is a Class 1 permit modification.

A copy of revised page 73 of PFO's application for the hazardous waste facility permit referenced above and an owner/operator certification is attached. Also attached is a table that shows the permit modifications submitted after the permit was issued on November 6, 1998.

If you have any questions or wish to discuss the modification, in whole or part, please feel free to contact me at 407-859-4441.

Sincerely,



Albert Smith, SE Region EH&S Manager

a large release. In case the equipment mentioned above may not be available at any given time due to unforeseen reasons, CCC will seek the help of OHM Materials and of Environmental Recovery Group, who have been designated the emergency response contractors to assist the facility during special emergency circumstances.

4.0 EMERGENCY COORDINATORS

In case of emergency, the following people would be in charge of coordinating and remedial action:

<u>NAME</u>	<u>TITLE</u>	<u>HOME ADDRESS</u>	<u>PHONE</u>
Patrick Gillespie	Senior Chemist	1804 Deestiny Blvd. #304 Kissimmee, FL 34741	O: 407/859-4441 H: 407/421-6801
Patrick Sullivan	General Manager	6105 Mastere Blvd. Orlando, FL 32819	O: 407/859-4441 H: 407/876-4630

If an emergency situation develops at the facility, the discoverer should contact an emergency coordinator listed above. Patrick Gillespie, the primary emergency coordinator, should be contacted first. If he is not available, the other coordinators should be called.

The primary emergency coordinator and his alternates have the authority to commit all resources of the company in the event of an emergency.

5.0 AREAS AND MATERIAL PRESENTING POTENTIAL HAZARDS

The facility has several areas that present a potential hazard because of the materials that are stored or processed at those locations. The degree of hazard present in these areas is based on the material types and their quantities managed in them, and the level of handling of such materials. These areas are the Container Storage Unit, the Waste Fuel Removal and Blending Process, the Waste Fuel Tank Storage Unit, the Wastewater Tank Storage Unit, the Wastewater Treatment Process, and the Consolidation Areas. Figure II.A.4.b.-3 contains a layout of the CCC facility showing the areas listed above. The portion of the facility that comprises the areas mentioned above is considered the "active portion of the facility". This section of the plan describes the areas in detail, operations conducted in such areas, materials handled, and locations where each type of material is stored or processed.

5.1 Container Storage Unit

This area receives hazardous waste in drums that are stored on pallets which are double-stacked, each pallet holding 4 - 55 gallon containers. The pallets are placed in rows, as depicted in Figure II.A.4.b.-4. Every row is designated with a two-letter code shown at the middle of each row which is named the Storage Group Code (SGC). The SGC allocates waste types to storage cells based in a compatibility system established by the Department of Transportation (DOT). There are five SGCs in the container storage unit. Most wastes stored in rows or cells labeled IH have a low flash point and they are classified as flammables and combustibles. Waste types in the RI cells consist of flammable and non-flammable/non-poisonous gases, spontaneously and non-

CERTIFICATION IN ACCORDANCE WITH 40 CFR 270.11(d)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Chris Blanton
Vice President, Southern Region
Perma-Fix Environmental Services, Inc.

Date: January 2, 2002

**MASTER TABLE OF PERMIT MODIFICATIONS
STATUS AS OF REVISION OF DECEMBER 15, 1999
CHEMICAL CONSERVATION CORPORATION**

Permit Application Page No.	List of Revision Dates	This Revision Number	Description of This Change
ix	07/29/96* 11/01/99*	1	References to Table II.K.1.g.-1a through II.K.1.g.-6a were inserted.
xi	06/15/97* 09/09/99* 11/01/99*	3	An "a" and "(CD)" was added to the number and the name of the reference of the exhibit listed at the bottom of the page.
xii	06/15/97* 09/09/99* 11/01/99*	3	The two bottom lines switched position and the page number of Exhibit II.K.1.g.-17 was changed to 390a.
70	06/15/97* 12/15/99*	2	Insert three-digit exchange number in front of local phone numbers and revise some others.
73	09/22/99* 02/04/00* 01/02/02	3	Replace emergency coordinators
328b	07/29/96* 09/09/99* 11/01/99*	1	References to Table II.K.1.g.-1a through II.K.1.g.-6a were inserted.
328c	07/29/96* 09/09/99* 11/01/99*	1	Page number 376 and 377 were changed to 374 and 376, respectively. A missing reference to Exhibit II.K.1.g.-8 was inserted.
332	07/29/96* 09/09/99*	2	References to treated wastewater (TW) deleted from bottom paragraph.
333	07/29/96* 09/09/99*	2	References to treated wastewater (TW) deleted from top paragraph, and a paragraph describing source, rate and volume of decontamination wastewater (DW) and a listing of surface areas to be decontaminated inserted in the middle of the page.
333a	09/09/99*	0	A paragraph describing source, volume and weight of concrete debris inserted.
335	07/29/96* 09/09/99*	2	Waste Inventory Table (II.K.1.c-1) had TW waste type line deleted, volumes for HW and NW modified, and DW and concrete debris (CD) added.
337	00/00/00* 09/09/99*	1	Reference to 2 drums of condensate from cleaning deleted from 2nd paragraph.
338	00/00/00* 09/09/99*	1	Floor surface area modified and sentence added at the bottom of 4th paragraph.
344	00/00/00* 09/09/99*	2	1st and 3rd lines of Sampling Location and Analysis Methods table (II.K.1.e-1) modified.
347	00/00/00* 11/01/99*	1	The first line of existing paragraph was revised and a second paragraph was added.
348	07/29/96* 09/09/99*	2	Line for TW waste type deleted and CD added in the disposal cost summary table.
349	07/29/96* 09/09/99*	2	Line for TW waste type deleted and CD added in the transportation cost summary table.
351	07/29/96* 09/09/99*	2	Estimate of area of Container Storage Unit and volume and weight of concrete debris inserted in paragraph at the middle of the page.
353	07/29/96* 09/09/99*	2	Cost estimate for disposal of TW (A.3.c) deleted, non-hazardous wastewater (NH) (A.3.d) modified and CD (A.4.e) added.
354	00/00/00* 09/09/99*	1	Cost estimate for transportation of TW (B.6) deleted.
355	00/00/00* 09/09/99*	1	Cost estimate for transportation of NH (B.6) modified and CD (B.7) added.
358	07/29/96* 09/09/99*	2	Cost estimate for labor of CD (C.11) added.
359	06/15/97* 09/09/99*	2	Number of soil test for analysis methods 8270 (2.a) and 1311/6010 (2.d) modified.

Permit Application Page No.	List of Revision Dates	This Revision Number	Description of This Change
361	06/15/97* 09/09/99*	3	Cost estimate for all the items except for the Engineer Certification modified.
361aa	11/01/99*	0	A new Table II.K.1.g.-1a inserted.
361ab	11/01/99*	0	Continuation of new Table II.K.1.g.-1a inserted.
361ac	11/01/99*	0	A new Table II.K.1.g.-2a inserted.
361ad	11/01/99*	0	Continuation of new Table II.K.1.g.-2a inserted.
361ae	11/01/99*	0	A new Table II.K.1.g.-3a inserted.
361af	11/01/99*	0	Continuation of new Table II.K.1.g.-3a inserted.
361ag	11/01/99*	0	Continuation of new Table II.K.1.g.-3a inserted.
361ah	11/01/99*	0	A new Table II.K.1.g.-4a inserted.
361ai	11/01/99*	0	A new Table II.K.1.g.-5a inserted.
361aj	11/01/99*	0	A new Table II.K.1.g.-6a inserted.
380	00/00/00* 09/09/99*	1	Research Environmental, Ind.'s quote for TW replaced by Safety-Kleen's for CD.
381	00/00/00* 09/09/99*	1	2nd page of Research Environmental, Ind.'s quote replaced by a blank one.
385a	09/09/99*	0	A new quote from Robbie D. Wood for CD inserted.
390a	09/09/99* 11/01/99*	1	A quote from Action Tek, Inc. was assigned page number 391, which belongs to an existing page. The page number of the quote was changed to 390a.

Note: This table lists modifications submitted after the permit was issued. Approved modifications show an * next to the date.



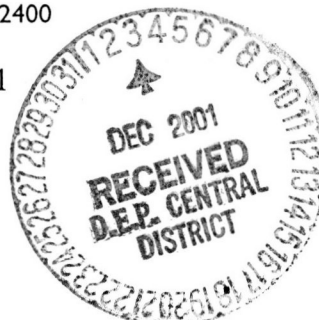
Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

November 10, 2001



Mr. Albert Smith
Perma Fix of Orlando, Inc.
10100 Rocket Boulevard
Orlando, Florida 32824-8565

Re: FLD 980 559 728
Perma Fix of Orlando, Inc.
10100 Rocket Boulevard
Orlando, Florida 32824-8565

Dear Mr. Smith:

The department has reviewed the existing documentation submitted to demonstrate financial responsibility and finds it in order. The American Guarantee & Liability Insurance Company surety bond # 3512884 effective August 15, 2000 for \$124,859 adequately covers the closure cost approved by the department. The standby trust fund agreement established on March 29, 2000 now between Perma Fix of Orlando, the Grantor, and Southtrust Bank, the Trustee, remains valid and on file. In addition, the Steadfast Insurance Company certificate of liability insurance demonstrating the required coverage for sudden accidental occurrences is equally adequate.

Therefore, Perma Fix of Orlando is in compliance with the financial assurance requirements of 40 CFR Part 264 Subpart H as adopted by reference in Rule 62-730.180 of the Florida Administrative Code.

If you have any questions, please contact me at 850-488-0300.

Sincerely,

Edgar Echevarria

Edgar Echevarria
Environmental Specialist II
Hazardous Waste Regulation

CC: Mr. Jeffrey Pallas, USEPA/Region 4
✓ Mr. William Bostwick, FDEP/Central District Office
FDEP File

"More Protection, Less Process"

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