



NOV 25 1992

HAZARDOUS WASTE
PERMITTING

November 23, 1992

Sent Via Facsimile
and Federal Express
Mail - November 23 1992

Ms. Kimberly S. Charick
RCRA Permitting Section
United States Environmental Protection
Agency Region IV
345 Courtland Street, N.E.
Atlanta, GA 30365

Subject: Draft Hazardous and Solid Waste Amendments Permit
Medley Facility, Florida
EPA ID # FLD 984 171 694

Dear Ms. Charick:

This letter is to comment on the above mentioned draft permit. Our comments are described below.

Part VI.A., Page 24 of 24 of the draft permit lists only three waste codes authorized, D006, D007, and D008. Please list or mention by reference all the Toxicity Characteristic waste codes that we applied for in our Part B permit for Florida.

Appendix A-2 which lists SWMU's that require no further action at this time in Page 2 of 3 identifies SWMU No. 1 as a container storage area regulated by the state's portion of the RCRA permit. We request that SWMU No. 1 be described as a container storage/transfer waste area. Transfer wastes are also placed in the permitted drum storage area. Transfer wastes are always segregated from the permitted wastes.

Regarding Appendix A-2 again, we also request that you include our return/fill area in the list. The return/fill area includes wet dumpsters, pump/s, and piping all of which are ancillary to the dirty mineral spirits tank system. These equipment are used to transfer our dirty mineral spirits from drums into our dirty mineral spirits storage tank. This area is also regulated by the state's portion of the RCRA permit.

Thank you for your assistance in this matter. If you have any questions, please call me at (813)682-8094.

Sincerely,

Victor L. San Agustin

Victor L. San Agustin, P.E.
Regional Environmental Manager
Tampa Region

cc: Knox McKee, SEFDER
Satish Kastury, BS&HW