

## Thursby, Kim

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**From:** Dan Cain <dcain@perma-fix.com>  
**Sent:** Monday, December 30, 2019 10:38 AM  
**To:** Thursby, Kim  
**Subject:** RE: Perma-Fix of Florida, Inc.; FLD 980 711 071;First Request for Additional Information (RAI)

Good morning,

I am confirming receipt of this message and attachment.

Regards,

Dan Cain  
Environmental, Health & Safety Manager  
Perma-Fix of Florida  
352-395-1347  
[dcain@perma-fix.com](mailto:dcain@perma-fix.com)

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**From:** Thursby, Kim <Kim.Thursby@FloridaDEP.gov>  
**Sent:** Monday, December 30, 2019 9:50 AM  
**To:** 'rself@perma-fix.com' <rself@perma-fix.com>  
**Cc:** Smith, Michell M. <Michell.M.Smith@dep.state.fl.us>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'Housley.Denise@epa.gov' <Housley.Denise@epa.gov>; 'york.brook@epa.gov' <york.brook@epa.gov>; Petersen, Dane <Dane.Petersen@FloridaDEP.gov>; Cosgrove, Pamela <Pamela.Cosgrove@FloridaDEP.gov>; Mitchell, Cheryl L <Cheryl.L.Mitchell@FloridaDEP.gov>; 'Dan Cain' <dcain@perma-fix.com>; 'bkelly@trihydro.com' <bkelly@trihydro.com>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>  
**Subject:** Perma-Fix of Florida, Inc.; FLD 980 711 071;First Request for Additional Information (RAI)

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Program and Permitting section is forwarding the attached document to you by electronic correspondence "e-correspondence" in lieu of a hard copy through the normal postal service.

We ask that you verify receipt of this document by sending a "reply" message to [epost\\_hwrs@dep.state.fl.us](mailto:epost_hwrs@dep.state.fl.us). (An automatic "reply message" is not sufficient to verify receipt). If your email address has changed or you anticipate that it will change in the future, please advise accordingly in your reply. You may also update this information by contacting Kim Thursby at (850) 245-8792.

The attached document is in "pdf" format and will require Adobe Reader 6 or higher to open properly. You may download a free copy of this software at [www.adobe.com/products/acrobat/readstep2.html](http://www.adobe.com/products/acrobat/readstep2.html).

Your cooperation in helping us affect this process by replying as requested is greatly appreciated. If you should have any questions about the attached document(s), please direct your questions to the contact person listed in the correspondence.

Michell Mason Smith



# FLORIDA DEPARTMENT OF Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, FL 32399-2400

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Noah Valenstein**  
Secretary

## REQUEST FOR ADDITIONAL INFORMATION

December 30, 2019

Mr. Randy Self  
Vice President Southeast Operation  
1940 NW 67<sup>th</sup> Place  
Gainesville, Florida, 32653  
[rself@perma-fix.com](mailto:rself@perma-fix.com)

**Re: First Request for Additional Information (RAI)**

Alachua County – Hazardous Waste  
Facility Name: Perma-Fix of Florida, Inc.  
Facility ID: FLD 980 711 071  
Current Permit No.: 17680-011-HO  
DEP Application No.: 17680-012-HO

Dear Mr. Self:

Thank you for your application for a Hazardous Waste Operating Permit Renewal for the above referenced Facility. The Department has assigned DEP Application No. 17680-012-HO to the application. A Department staff review of the application and supporting documentation submitted on December 11, 2019, indicates the application is incomplete. Pursuant to the provisions of Rules 62-730.220 and 62-730.220(6), Florida Administrative Code (F.A.C.) and Chapter 403.722, Florida Statutes (F.S.), all processing of the application is suspended when a permit application is deemed incomplete.

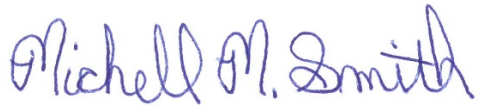
In order for the Department to continue processing your application, please provide the information requested in the Attachment below, and refer to this correspondence in your response. The Department must receive a response within 30 days of the date of this letter, or *no later than* January 29, 2020, unless a written request for additional time to provide the requested information is submitted and approved. Pursuant to Rule 62-730.220(6), F.A.C. and Section 120.60, F.S., failure of an applicant to provide the timely requested information by the applicable deadline may result in denial of the application.

Please submit the response in electronic format to [hwpp@dep.state.fl.us](mailto:hwpp@dep.state.fl.us), with a copy to [bradley.buselli@floridadep.gov](mailto:bradley.buselli@floridadep.gov). If the file is very large, you may post it to a folder on this office's ftp site at: <ftp://ftp.dep.state.fl.us/pub/incoming/DWM/Perma-Fix/>. After

posting the document, send an e-mail to [hwpp@dep.state.fl.us](mailto:hwpp@dep.state.fl.us), with a copy to [bradley.buselli@floridadep.gov](mailto:bradley.buselli@floridadep.gov), alerting us that it has been posted.

If you have any questions, please contact Bradley Buselli by telephone at (850) 245-8989 or by e-mail at [bradley.buselli@floridadep.gov](mailto:bradley.buselli@floridadep.gov).

Sincerely,



Michell M. Smith, Environmental Administrator  
Hazardous Waste Program & Permitting

Attachment: List of Requested Information

cc (w/ Attachment):

Brian Bastek, EPA Region 4, [bastek.brian@epa.gov](mailto:bastek.brian@epa.gov)  
Denise Housley, EPA Region 4, [housley.deinese@epa.gov](mailto:housley.deinese@epa.gov)  
Brooke York, EPA Region 4, [york.brooke@epa.gov](mailto:york.brooke@epa.gov)  
Dane Peterson, DEP Headquarters, [dane.peterson@floridadep.gov](mailto:dane.peterson@floridadep.gov)  
Pam Cosgrove, DEP Northeast District, [pamela.cosgrove@floridadep.gov](mailto:pamela.cosgrove@floridadep.gov)  
Cheryl Mitchell, DEP Northeast District, [cheryl.l.mitchell@floridadep.gov](mailto:cheryl.l.mitchell@floridadep.gov)  
Dan Cain, Perma-Fix, [dcain@perma-fix.com](mailto:dcain@perma-fix.com)  
Bill Kelly, Trihydro, [bkelly@trihydro.com](mailto:bkelly@trihydro.com)

### **Attachment: List of Requested Information**

Facility Name: Perma-Fix of Florida, Inc.  
Facility ID: FLD 980 711 071  
Current Permit No.: 17680-011-HO  
DEP Application No.: 17680-012-HO

**Operating Permit Renewal Application Review Comments:** Comments for the operating permit renewal application are included below. Please submit any necessary revisions electronically, unless a physical copy is otherwise noted or requested. Once all revisions are accepted by the Department, a complete electronic copy of the revised application should be provided for our records.

1. **Part I.D, Summary of Site Processes:** The application describes a non-elementary neutralization (N-EN) process performed in a portable 300-gallon tank; this activity is further described in Appendix I-E. Please note that this tank is listed under Part II, Section K.2.1 of the application as a RCRA permitted unit.
  - a. **Appendix I-E, Section 1.1, Process Description:** This section appears to indicate that both elementary neutralization and N-EN processes may be performed using the 300-gallon tank. While elementary neutralizations are exempt from RCRA permitting, the N-EN process is not because it involves mixed wastes. Therefore, the language of this section should be revised to clarify the distinction between the two processes; noting that the tank is considered a permitted unit, and not exempt from RCRA permitting. The Department recommends that the facility consider the use of separate tanks or units for each process, if for instance the process were to be performed on a non-mixed waste stream. The utilization of one unit for RCRA-exempt elementary neutralizations and another for N-EN avoids any potential issues of regulated sludges or residues passing into in the neutralized liquid.
2. **Part I, Figure I-15:** The area on the figure marked for “Universal Waste Storage” has not been observed to be used for this type of storage since the 2017 District inspection. Additionally, facility personnel during the 2017, 2018 and 2019 inspections stated that the area was no longer used for UW storage. The area observed during these inspections that is now used for UW storage is on the east side of the warehouse, the aisle closest to the outside wall. If a defined area for UW storage is not consistently utilized, then the figure should be revised to either indicate all possible locations or to remove the area designation and clarify the possible location(s) within the application text.
3. **Part II.A.1, General Information:** The application provides a description of the scale for Figure II-A-1, however this is not noted in the figure itself. Several other figures throughout the application do not have a map scale listed. Please review and update all figures in the application to provide the map scale, as appropriate.
4. **Part II.I.1, Description of Miscellaneous Units:** The Department acknowledges

that the current PF-II process may be replaced with a continuous thermal desorption unit, and that information was also included / reviewed in the previous permit renewal application. According to Appendix II-I-1, several existing components will be incorporated into the new process and as-built written certification for any new PF-II process components or updates to equipment lists will be submitted when the changes are completed. The Department recommends that, if available, any additional information be provided within the text, tables, or figures of the permit application that could facilitate the operational transition to the new continuous PF-II process without the need to subsequently modify the permit after these activities are completed.

5. Part II.Q, RCRA Facility Assessment: The Department acknowledges that SWMUs 30, 31 & 32 are not part of the facility. However, the tables located in Appendix A of the Permit (and future permit applications) must continue to denote these units for historical tracking purposes, because these were previously identified in the Final RFA dated June 27, 1990.
6. Part II.R, Process Vents: Paragraph 3 of this section indicates (as well as other sections of the permit application) that the planned solvent recycling activities (distillation) are exempt from RCRA permitting requirements. Please revise this section to include the specific exemption citation and clarify how this process relates to the current / future PF-II thermal desorption process and overall operations within the TOB. Is the proposed / RCRA exempt solvent distillation process planned to take place within a non-exempt permitted unit that manages other wastes? Also, please see Comment 7b below.
7. Part II, Appendix II-A-2, Contingency Plan:
  - a. The plan does not have a Quick Reference Guide as required by 40 CFR 262.262(b).
  - b. Section 2, Paragraph 3: This paragraph indicates that the facility has planned to perform solvent recycling activities (distillation). The text references that complete details of the process can be found in Part II Section I of the permit application dated November 2014. Upon review of this reference, it appears that this section of the prior permit renewal application does not reference solvent recycling activities, but specifically addresses potential changes to the PF-II thermal desorption process described in Comment 3 above. Please clarify / update the reference and update any other parts of the current permit application that discuss these activities, as appropriate. In addition, should these operational changes modify any existing permitted units, then a permit modification may be required, if adequate detail is not provided within the current permit application.
  - c. Section 4.5.2: This section says that "Facility records available for review include manifests, and waste analysis data on-site kept at the file cabinets in the hallway next to the copy room for at least three years, and then kept off-site..." However, Part II, A-7 (Operating Record/Biennial Report) of the

application states that: “Copies of the manifests and operating records will be maintained on-site for at least one year. After that, all records may be transferred to an off-site...” Please reconcile these two sections as to records that are kept on-site and that would be accessible during an emergency.

- d. Table 2: This table does not include the address information for Emergency Coordinators as required by 40 CFR 264.52(d).
  - e. Figure 5: Legend entry is missing for “Points of Egress” as shown in other figures.
  - f. Figure 8: This figure indicates the “hazards” and includes the term “hazardous wastes” on both the PSB and LSV building, but not the TOB, which also contains hazardous wastes. Please discuss the reason for this omission.
8. Part II, Appendix II-T, DEP Form 62-730.900(2)(d): The Facility Operator (Mr. Randy Self, Operations Manager) has signed all sections of this form, including the Facility and Land Owner certifications. If the Facility Operator is an authorized representative, please attach / provide a letter of authorization as indicated on the certification form. Otherwise, these certifications should be resubmitted with an authorized signature.