Kim Thursby Digitally signed by Kim Thursby Date: 2020.06.03 13:29:30 -04'00'

Thursby, Kim

From: Dan Cain <dcain@perma-fix.com>
Sent: Wednesday, June 3, 2020 1:02 PM
To: Thursby, Kim; ksilverman@ashland.com; Epost HWRS
Cc: Buselli, Bradley
Subject: RE: Perma-Fix of Florida, Inc.; FLD 980 711 071; Final Issuance

Received, thanks.

Regards,

Dan Cain
Environmental, Health & Safety Manager
Radiation Safety Officer
Perma-Fix of Florida
Desk: 352-395-1347
Cell: 503-200-8082
dcain@perma-fix.com

From: Thursby, Kim <Kim.Thursby@FloridaDEP.gov>
Sent: Wednesday, June 3, 2020 12:11 PM
To: 'ksilverman@ashland.com' <ksilverman@ashland.com>
Cc: Smith, Michell M. <Michell.M.Smith@FloridaDEP.gov>; Walker, Kim (Waste) <Kim.Walker@FloridaDEP.gov>; 'bastek.brian@epa.gov' <bastek.brian@epa.gov>; 'merizalde.carlos@epa.gov' <merizalde.carlos@epa.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>; 'annie_dziergowski@fws.gov' <annie_dziergowski@fws.gov>; 'FWCConservationPlanningServices@myfwc.com' <FWCConservationPlanningServices@myfwc.com>; Kothur, Bheem <Bheem.Kothur@FloridaDEP.gov>; Buselli, Bradley <Bradley.Buselli@dep.state.fl.us>
Subject: Perma-Fix of Florida, Inc.; FLD 980 711 071; Final Issuance

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. (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.

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

June 3, 2020

Mr. Kevin Schmuggerow
Vice President Southeast Operation
1940 NW 67th Place
Gainesville, Florida, 32653
kschmuggerow@perma-fix.com

RE: **Perma-Fix of Florida, Inc.**
EPA ID Number: FLD 980 711 071
Operating Permit: 17680-012-HO
Alachua County, Gainesville, Florida

Dear Mr. Schmuggerow:

Enclosed is Permit Number 17680-012-HO for the operation of a hazardous waste treatment and storage facility, and the replacement of one treatment unit. This permit is being issued pursuant to Section 403.722, Florida Statutes (F.S.), and Chapters 62-4, 62-160, 62-730, and 62-780, Florida Administrative Code (F.A.C.).

Upon issuance of this final permit, any party to this order has the right to seek judicial review of it under Section 120.68, F.S. by the filing of a notice of appeal under Florida Rules of Appellate Procedure 9.110 and 9.190 with the Clerk of the Department of Environmental Protection in the Office of General Counsel (Mail Station #35, 3900 Commonwealth Boulevard, Tallahassee, Florida 32399-3000) and by filing a copy of the notice of appeal accompanied by the applicable filing fees with the appropriate district court of appeal. The notice must be filed within 30 days after this order is filed with the Clerk of the Department.

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

Sincerely,

Michell Mason Smith, Environmental Administrator
Hazardous Waste Program & Permitting

Enclosure

cc (w/ Enclosure):

Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Carlos Merizalde, EPA Region 4, merizalde.carlos@epa.gov
Pam Cosgrove, DEP Northeast District, pamela.cosgrove@floridadep.gov
Cheryl Mitchell, DEP Northeast District, cheryl.l.mitchell@floridadep.gov
Dan Cain, Perma-Fix, dcain@perma-fix.com
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Annie Dziergowski, U.S. Fish & Wildlife Service, annie_dziergowski@fws.gov
Florida Fish & Wildlife Conservation Planning Services, FWCConservationPlanningServices@myfwc.com

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

PERMITTEE:
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA 32653

I.D. NUMBER: FLD 980 711 071
PERMIT NUMBER: 17680-012-HO
DATE OF ISSUE: JUNE 3, 2020
EXPIRATION DATE: JUNE 8, 2025

ATTENTION:
MR. KEVIN SCHMUGGEROW
VICE PRESIDENT

COUNTY: ALACHUA
PROJECT: OPERATION OF A HAZARDOUS WASTE TREATMENT AND STORAGE FACILITY AND REPLACEMENT OF ONE TREATMENT UNIT

Pursuant to authorization obtained by the Florida Department of Environmental Protection (FDEP) under the Resource Conservation and Recovery Act [42 United States Code (U.S.C.) 6901, *et seq.*, commonly known as RCRA] and the Hazardous and Solid Waste Amendments of 1984 (HSWA), this permit is issued under the provisions of Section 403.722 Florida Statutes (F.S.), and Chapters 62-4, 62-160, 62-730, 62-777 and 62-780 Florida Administrative Code (F.A.C.). This permit replaces expired permit 17680-011-HO. The above-named Permittee is hereby authorized to perform the work or operate the facility shown on the application dated December 11, 2019 and supplemented by additional information dated March 25, 2020, that are incorporated herein and collectively referred to as the "permit application." The permit application also includes any approved drawing(s), plans, and other documents that are specifically identified and incorporated by reference. Solid waste management units (SWMUs) and areas of concern (AOCs) identified to date are listed in Appendix A. The RCRA-regulated units, permitted units or permitted activities are specifically described as follows:

1. To operate one (1) enclosed container storage area, located in the Treatment and Operations Building (TOB), as illustrated in the permit application, and/or subsequent revisions, and shown in Attachment D of this Permit. The TOB container storage area contains seven (7) zones for storage of hazardous waste in containers meeting D.O.T. specifications and in size of 718 gallons (B-25 box) or less. The permit authorizes the storage of a maximum volume of 35,200 gallons of hazardous waste in the TOB storage area. The container storage area includes a containment system that consists of concrete curbing at least 4 inches high to prevent run-off. Exhaust and fugitive emissions from treatment operations within the TOB must be treated through an air pollution control system consisting of a regenerative thermal oxidizer (RTO)/HEPA filter system. The hazardous waste codes for treatment permitted in the TOB and waste permitted to be stored in this area are listed in Attachment A of this Permit.

2. The following hazardous waste treatment units are located in the TOB. The following treatment must be conducted in the TOB:

    a. PF-I process (treatment in containers) as described in the permit application and/or subsequent revisions. The PF-I process is a two-step process for the permanent stabilization and/or solidification of hazardous and mixed waste conducted primarily in 55-gallon drums.
    b. Existing PF-II process (miscellaneous treatment unit) as described in the permit application and/or subsequent revisions. The PF-II process consists of thermal desorption and/or chemical oxidation/reduction in a treatment unit. The existing PF-II treatment equipment is planned to be replaced with continuous PF-II treatment equipment and feed preparation equipment in the TOB as described in the permit application and/or subsequent revisions.
    c. Lab Pack decommissioning as described in the permit application and/or subsequent revisions.
    d. Fuel blending activity as described in the permit application and/or subsequent revisions.
    e. Mercury amalgamation as described in the permit application and/or subsequent revisions.
    f. Non-elementary neutralization as described in the permit application and/or subsequent revisions (Appendix I-E).
    g. Deactivation process as described in the permit application and/or subsequent revisions.
    h. Treatment using a Drum Rotator as described in the permit application and/or subsequent revisions.
    i. Oxidation/reduction treatment in containers.
    j. Solvent Recycling as described in Condition 10 below.

3. The existing PF-II treatment equipment is planned to be replaced with newly constructed, continuous PF-II treatment equipment and feed preparation equipment in the TOB as described in the permit application and/or subsequent revisions (Appendix II-I-1). This proposed treatment process will replace the existing PF-II process described in item 2.b. above. Specific conditions for these changes are noted in Part II Subpart B.5 of this Permit.

4. To operate a container storage area, located in the Processing and Storage Building (PSB), illustrated in the permit application and/or subsequent revisions, and in Attachment E of this Permit. The PSB container storage area contains three (3) zones for storage of hazardous waste in containers meeting D.O.T. specifications and in size of 718 gallons (B-25 box) or less. The permit authorizes the storage of a maximum volume of 72,105 gallons of hazardous waste in the PSB storage area. The storage area is covered and has a containment system consisting of 6-inch wide concrete curbing at least 2.5 inches high and two sumps to prevent both run-on and run-off. The hazardous waste codes for the waste permitted to be stored in this area are listed in Attachment A of this Permit.

5. To conduct the following hazardous waste activities located in the PSB:

    a. Fuel-blending operations including phase separation treatment, decanting and bulking in this area, as described in the permit application and/or subsequent revisions.
    b. Lab Pack decommissioning as described in the permit application and/or subsequent revisions.

c. Storage and bulking of chemotherapy and pharmaceutical waste as described in the permit application and/or subsequent revisions.
d. Chemical precipitation, chemical reduction, neutralization, filtration, flocculation and physical treatment (i.e., sorting and segregation) in containers as described in the permit application and/or subsequent revisions.
e. Tank storage as described in condition 6 below.
f. Non-elementary neutralization and chemical extraction as described in in the permit application and/or subsequent revisions (Appendix I-E).

6. To operate a 3,000-gallon horizontal, aboveground storage tank illustrated in the permit application and/or subsequent revisions and in Attachment E of this Permit. The storage tank is used for the accumulation and storage of radioactive mixed waste containing ethanol, toluene and xylene that is generated from Liquid Scintillation Vial (LSV) processing. This tank is located within secondary containment inside the PSB.

7. To operate one (1) hazardous waste container treatment unit for hazardous waste debris treatment in the LSV Processing and Waste Storage Warehouse, described in the permit application and/or subsequent revisions. The unit is comprised of an approximately 250-gallon stainless steel portable vat, equipped with an emission control hood. This unit is located within the 5-3/4" x 6" concrete curbing containment of the LSV Processing Area within the LSV Processing and Waste Storage Warehouse. In certain cases, debris treatment may be performed in the TOB area. Exhaust and fugitive emissions from debris treatment operations within the LSV area will be treated through an air pollution control system consisting of HEPA filters and a regenerative thermal oxidizer. The hazardous waste codes for treatment permitted in the LSV Processing Area are listed in Attachment A of this Permit.

8. To operate a container storage area, located in the LSV Processing and Waste Storage Warehouse, described in the permit application and/or subsequent revisions, and in Attachment C of this Permit. The LSV container storage area stores hazardous waste in containers meeting D.O.T specifications and in size of 718 gallons (B-25 box) or less. The permit authorizes the storage of a maximum volume of 54,340 gallons of hazardous waste in the LSV Processing and Waste Storage Warehouse area. The storage area is covered and has a containment system consisting of at least 2.75” high x 5.5” concrete curbing and rollover berms. The hazardous waste codes for the waste permitted to be stored in this area are listed in Attachment A of this Permit.

9. To conduct the additional following hazardous waste activities located in the LSV / Waste Storage Warehouse:

a. LSV Processing as described in the permit application and/or subsequent revisions.
b. Repackaging as described in the permit application and/or subsequent revisions.
c. Chemical extraction, physical extraction and micro-encapsulation including debris treatment as described in the permit application and/or subsequent revisions.
d. Lab Pack decommissioning as described in the permit application and/or subsequent revisions.

e. Solid Waste Management as described in the permit application and/or subsequent revisions.
f. Miscellaneous Waste Storage and Transfer as described in the permit application and/or subsequent revisions.
g. Fuel Blending as described in permit application and/or subsequent revisions.
h. Mercury Amalgamation as described in the permit application and/or subsequent revisions.
i. Non-elementary neutralization as described in the permit application and/or subsequent revisions (Appendix I-E).
j. Treatment using a drum rotator as described in the permit application and/or subsequent revisions.
k. Deactivation of D003 waste as described in the permit application and/or subsequent revisions.
l. Solvent Recycling as described in Condition 10 below.

10. To conduct proposed solvent recycling activities, exempt from RCRA permitting requirements per 40 CFR 261.6(c)(1), as described in Part 1 Section D.2.1 and Part II.R of the revised permit application. A distillation unit was purchased in 1997 for a one-time operation and has not been used since that time. The distillation unit has been retained at the facility and will be located in either the LSV radioactive control area (RCA) or the TOB RCA. The emissions from this unit are subject to Subpart AA and would be managed through the air pollution control equipment at either location.

The Permittee is required to investigate any releases of contaminants to the environment at the facility regardless of the time at which waste was placed in a unit and to take appropriate corrective action for any such releases. Pursuant to 40 Code of Federal Regulations (CFR) 260.10 [as adopted by reference in Subsection 62-730.020(1), F.A.C.], the corrective action requirements of this RCRA permit extend to all property under control of the Permittee (see Attachment A, a map of the property boundaries of the land under the Permittee's control) and to all contamination that originated from discharges at the property under control of the Permittee.

This permit is based on the premise that information and reports submitted by the Permittee prior to issuance of this permit are accurate. Any inaccuracies found in this information or information submitted as required by this permit may be grounds for termination or modification of this permit in accordance with Section 403.727(3)(a) F.S. and Rule 62-730.290, F.A.C., and potential enforcement action.

The facility is located at 1940 NW 67th Place, Gainesville, Florida.

The following documents were used in the preparation of this permit:

1. Permit # 17680-011-HO and all documents references therein, issued May 27, 2015.
2. Permit Application dated December 11, 2019.
3. Request for Additional Information (RAI) dated December 30, 2019.
4. Responses to RAI / Supplemental Information dated March 25, 2020.

TABLE OF CONTENTS

Part I – General and Standard Conditions 6
Part II – Operating Conditions 14
Part II Subpart A – General Operating Conditions 14
Part II Subpart B – Specific Operating Conditions 17
Part II Subpart B.1-Miscellaneous Treatment Units 17
Part II Subpart B.2-Container Storage Areas/Units 20
Part II Subpart B.3-Tanks 22
Part II Subpart B.4-Air Emissions Standards 24
Part II Subpart B.5-Construction Requirements 24
Part II Subpart C – Closure Conditions 25
Part III – Postclosure Conditions 27
Part IV – Environmental Monitoring Conditions 27
Part V – Corrective (Remedial) Action Conditions 27
Part V Subpart A – General Corrective Action Conditions 27
Part VI – Remedy Selection and Implementation 28
Part VI Subpart A – General Remedy Selection and Implementation Conditions 28
Part VI Subpart B – Selected Remedies 29
Appendix A - Summary of Facility Sites - Solid Waste Management Units (SWMUs) and Areas of Concern (AOC) 30
Attachment A-Permitted Waste Codes for Storage and Treatment (except for tank storage) 35
Attachment B-Consolidated Data from Tables 5 and 8 36
Attachment B-Consolidated Data from Tables 5 and 8 (cont.) 37
Attachment B-Consolidated Data from Tables 5 and 8 (cont.) 38
Attachment B-Consolidated Data from Tables 5 and 8 (cont.) 39
Attachment C-LSV Processing and Waste Storage Warehouse 40
Attachment D-Treatment and Operations Building 41
Attachment E-Processing and Storage Building 42
Attachment F-Buildings Layout 43
Attachment G-Property 44
Attachment H-SWMU / AOC Map 45

PART I – GENERAL AND STANDARD CONDITIONS

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit are "permit conditions" and are binding and enforceable pursuant to Sections 403.141, 403.727, or 403.859 through 403.861, F.S. The Permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.

2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

3. As provided in Sections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the Permittee from liability for harm or injury to human health or welfare, animal or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the Permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The Permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the Permittee to achieve compliance with the conditions of this permit, as required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. This permit or a copy thereof shall be kept at the work site of the permitted activity. In the event that there is no building or reasonable repository for such a copy at the work site, an alternate location must be approved by the Department in writing.

8. The Permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted for the activities below. Reasonable time may depend on the nature of the concern being investigated.

a. Have access to and copy any records that must be kept under conditions of the permit.
b. Inspect the facility, equipment, practices, or operations regulated or required under this permit.
c. Sample or monitor any substances or parameters at any time or location reasonably necessary to assure compliance with this permit or Department rules.

9. The conditions in this permit shall take precedence over the permit application documents where there are differences between those documents and the permit conditions.

10. In accepting this permit, the Permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of the permitted activity which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted activity arising under the Florida Statutes or Department rules, except where such use is prescribed by Section 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

11. The Permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the Permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in Rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

12. The Permittee shall comply with the following notification and reporting requirements:

    a. If for any reason the Permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the Permittee shall immediately provide the Department's RCRA Manager with the following information:

        (1) A description of and cause of noncompliance.
        (2) The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The Permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

    b. The Permittee will report any event requiring emergency response or noncompliance that may endanger human health or the environment from fires and explosions or releases of hazardous waste that may endanger public drinking water supplies. The Permittee will report to the Department's RCRA Manager verbally within 24 hours and provide a written report of the incident to the Hazardous Waste Program & Permitting Section at the address in Part I.15 or by alternate means *(e.g.*, e-mail) as approved by the Department, within five calendar days. It is the responsibility of the Permittee to ensure receipt of the written report. The Department of Environmental Protection's 24-hour emergency telephone number is (850) 413-9911 or (800) 320-0519. During normal business hours, the Hazardous Waste Program & Permitting

Section in Tallahassee may be contacted at 850-245-8707, or the DEP District Office may be contacted at (904) 256-1700 (Jacksonville).

(1) The verbal report shall include the following information:

(a) The name, address, I.D. number, e-mail address, and telephone number of the facility and its owner or operator.
(b) The date, time, and type of incident.
(c) The identity and quantity of materials involved.
(d) The extent of any injuries.
(e) An assessment of actual or potential hazards.
(f) The estimated quantity and disposition of recovered materials.

(2) The written report shall include all of the information in the verbal report and the following information:

(a) A description and cause of the noncompliance.
(b) If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance.

c. Within 15 calendar days of discovery per Part V.A.1.b, the Permittee shall notify the Department' RCRA Manager in writing of any newly discovered release(s) of contaminant(s) to the environment resulting in a de Minimis cleanup (Part V.A.4) or a suspected new AOC(s) and/or SWMU(s) discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means.

(1) The notification shall include, at a minimum, the location of the release, AOC or SWMU (hereinafter referred to collectively as "site"), and all relevant information (*e.g.*, location of site(s) on a map of appropriate scale; general dimensions of affected area; media affected; hazardous constituents released; and magnitude of release).
(2) The Department may conduct, or require that the Permittee conduct, confirmatory sampling in order to determine whether contamination is present (Part V.A.3). The Department will notify the Permittee in writing of the final determination as to the status of the newly discovered or suspected site.
(3) Depending upon the type of discovery, notification requirements of Part I.12.b may also be required.

d. The Permittee shall comply with the "Notices" provisions of Rules 62-780.220, F.A.C., and 62-730.225, F.A.C.

(1) Prior to performing field activities.
(2) When contamination beyond the facility boundary is confirmed by laboratory analysis.
(3) When a Temporary Point of Compliance (TPOC) is established beyond the boundary of the source property in conjunction with monitored natural attenuation or active remediation.
(4) When a fifth-year update to the status of a TPOC is issued.

(5) By placing warning signs at facilities where there may be a risk of exposure to the public of environmental media contaminated with hazardous waste.

e. The Permittee shall give written notice to the Department's RCRA manager at least 15 days prior to physical alterations or additions to the facility that could affect activities covered by this permit. The notice shall include a summary description of the project, an evaluation of the effect it will have on: the operation of a hazardous waste facility, postclosure care, the ability to investigate contamination at or from a contaminated site, and an evaluation of the effect it might have on the known or suspected contamination.

f. Operating and Postclosure Permittees that generate hazardous waste, and all HSWA Corrective Action Permittees that are also a large quantity generator (LQG) of hazardous waste, shall submit a Biennial Report covering facility activities during the previous calendar year by March 1 of each even numbered year pursuant to Chapter 62-730, F.A.C.

13. The Permittee shall comply with the following recordkeeping requirements:

a. Upon request, the Permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.

b. The Permittee shall hold all information required by the permit at the facility or other location designated by this permit. This includes records of all monitoring information (including all calibration and maintenance records and all original recordings for continuous monitoring instrumentation); copies of all reports; records of all data used to complete the permit application; and all monitoring data required by 40 CFR Part 264 and Part IV and when applicable, Part VI of this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule. Any Remedial Action Plan as applicable for each contaminated site and associated cost estimate(s) shall be held until a Site Rehabilitation Cleanup Order is issued.

c. Records of monitoring information shall include all required items in Chapter 62-160, F.A.C., and the following information:

(1) The date, exact place, and time of sampling or measurements.
(2) The person responsible for performing the sampling or measurements.
(3) The dates that analyses were performed.
(4) The person responsible for performing the analyses.
(5) The analytical techniques or methods used.
(6) The results of such analyses.

d. If the Permittee generates hazardous waste, the Permittee shall retain a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced to comply with land disposal restrictions (40 CFR Part 268 and Rule 62-730.183, F.A.C.) for at least three years from the date that the waste which is the subject of such documentation was last sent to an on-property or off-property facility for treatment, storage, or disposal, or until remedial activity is completed, whichever date is later. These periods may be extended by request of the Department at any

time and are automatically extended during the course of any unresolved enforcement action regarding this facility.

14. Within the timeframe requested by the Department, the Permittee shall furnish any information required by law which is needed to determine compliance with the permit. If the Department's request does not include a timeframe, the time of response is 30 days. If the Permittee becomes aware that the relevant facts were not submitted or were incorrect in the permit application or any report submitted to the Department, such facts or information shall be corrected promptly.

15. Except as otherwise specifically provided in this permit, all submittals in response to permit conditions shall be provided as described below. Submittals may be directed to alternative addresses (*i.e.* electronic submittal) and will not require a permit modification. Technical submittals (*e.g.* workplans, reports) provided in digital format must be in optical media format (Cd or DVD) or through a secured internet port (*i.e.* username/password encryption) when one is available.

    Environmental Administrator
    Hazardous Waste Program and Permitting, M.S. 4560
    Department of Environmental Protection
    2600 Blair Stone Road, Tallahassee, Florida 32399-2400

    In addition to copies sent to Hazardous Waste Program and Permitting in Tallahassee, submittals in response to postclosure or operating permit conditions shall be sent to:

    Waste & Air Resource Program Administrator
    Department of Environmental Protection – Northeast District
    8800 Baymeadows Way West, Suite 100
    Jacksonville, Florida 32256

16. All documents submitted pursuant to the conditions of this permit shall be accompanied by a cover letter stating the name and date of the document submitted, the number(s) of the Part(s) and Condition(s) of the permit affected, the E.P.A. I.D. number, and the permit number and project name of the permit involved.

17. All documents proposing modifications to the approved permit and involving the practice of engineering must be submitted to the Department for review and be signed, sealed, and certified by a Professional Engineer registered in the State of Florida, in accordance with Chapter 471, F.S., and Subsection 62-730.220(9), F.A.C. All submittals incorporating interpretation of geological data shall be signed and sealed by a Professional Geologist registered in the State of Florida in accordance with Chapter 492, F.S., and Subsection 62-730.220(10), F.A.C.

18. All work plans, reports, schedules and other documents ("submittals") required by this permit are subject to approval by the Department prior to implementation. The Department will review the submittals and respond in writing. Upon written approval by the Department, the Permittee shall implement all work plans, reports and schedules as

provided in the approved submittal. If the Department disapproves a submittal, the Department will do one of the following:

a. The Department will notify the Permittee in writing of the reason(s) why the submittal does not contain information adequate to support the conclusion, alternative, plan, proposal or recommendation, or why the conclusion, alternative, plan, proposal or recommendation is not supported by the applicable criteria. In this case, the Permittee shall submit a revised submittal within 60 days of receipt of the Department's disapproval unless an alternative deadline is approved in writing by the Department.
b. The Department will revise the submittal, or approve the submittal with conditions, and notify the Permittee of the revisions or conditions. In the case of work plans, the Department may notify the Permittee of the start date of the schedule within the revised or conditionally approved work plan.

19. The Permittee shall revise "Part I – General" of the Application for a Hazardous Waste Facility Permit [DEP Form 62-730.900(2)(a)] and submit the revised form to the Department within 30 days of any changes in the Part I information. Changes in the Part I information may also require changes to the Department's 8700-12FL form.

20. The Permittee may claim that any information required to be submitted by this permit is confidential in accordance with Chapter 403.73, F.S.

21. This permit is transferable only upon written Department approval in accordance with Rule 62-4.120 and Subsection 62-730.290(6), F.A.C., as applicable. The Permittee shall be liable for any noncompliance of the permitted activity until the transfer is approved by the Department. Before transferring ownership or operation of this facility during the term of this permit, the Permittee must notify the new owner or operator in writing of the requirements of 40 CFR Part 264 and Chapter 62-730, F.A.C.

22. The following conditions apply to renewal, modification and revocation of this permit:

a. The Permittee shall submit a complete application for the renewal of this permit a minimum of 180 calendar days before the expiration of the permit. The permit renewal application shall be submitted in accordance with Rules 62-4 and 62-730, F.A.C.
b. The Department may modify, revoke, reissue, or terminate for cause this permit in accordance with Chapters 62-4 and 62-730, F.A.C.
c. The Permittee may submit any permit modification to the Department for approval. The filing of a request for a permit modification, revocation, reissuance, termination, notification of planned changes, or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.
d. The Permittee shall submit the application for a permit renewal or modification to the addresses in Part I.15.

(1) The Permittee shall submit a fee with the permit renewal or modification application that meets the requirements of Rule 62-730.293, F.A.C. A

Permittee choosing to pay the fee on an annual basis shall submit the annual fee payment no later than the anniversary date of permit issuance.

(2) The Permittee shall submit a copy of the cover letter accompanying the permit renewal or modification application and the fee to the following address:

Florida Department of Environmental Protection
Hazardous Waste Program and Permitting
Post Office Box 3070, Tallahassee, Florida 32315-3070

(3) The Permittee shall also submit notification of fee submittal, or notification of annual fee submittal, to the addresses in Part I.15.a., or by an alternate means (*e.g.,* e-mail) as approved by the Department.

(4) The permit renewal or modification application fee may alternately be submitted electronically. If the Permittee intends to submit the application fee electronically, the Permittee shall obtain instructions from the Department on the proper procedures, and shall follow such instructions in making the electronic submittal. Notification per Part I.22.d.(3) is still required.

e. The timeframes for permit review begin on the date when the Department has received both the permit renewal or modification application and the application fee.
f. If the Permittee allows this permit to expire prior to Department acceptance of the certification of postclosure and termination of all corrective action, the Permittee must reapply for a permit in accordance with DEP Form 62-730.900(2), F.A.C.
g. Any request to modify a permit for the treatment, storage, or disposal of hazardous waste generated off-site shall include an evaluation of the applicability of, and Permittee's compliance with, the siting criteria of Section 403.7211, F.S., and Rule 62-730.182, F.A.C.

23. If and when the Permittee intends to transfer parcels to third parties, the Permittee may remove a parcel from the Facility covered by this permit, and the Department will approve the removal of the parcel so long as the parcel never contained a contaminated site, or so long as any contamination associated with the contaminated site has been addressed to the satisfaction of the Department. The Department will approve the transfer or removal of a parcel in writing.

a. The satisfaction of the Department may be conditioned on a sale with certain legal restrictions on the future use and/or remedial activity requirements on the parcel being transferred.
b. Following the legal transfer of the property, a permit modification request to transfer the parcel from the permit must be made per Part I.22 within 30 days. A new facility map denoting the current property boundary and new property boundary legal description shall be submitted with the permit modification request.
c. Even though a parcel is no longer defined as part of the facility as a result of the permit modification (using the minor modification requirements of Subsection 62-730.290(4), F.A.C.), in the event that a previously unknown contaminated site is found on the parcel, and such contamination resulted from activities which occurred prior to the sale, the Permittee will be responsible for any corrective action along with

any other persons who may have legal responsibility for the contamination (see Part V.A.1.b. regarding discovery of a new SWMU).

24. The following conditions apply to land disposal (placement) of hazardous wastes:

    a. 40 CFR Part 268 and Rule 62-730.183, F.A.C., identify hazardous wastes that are restricted from land disposal and defines those limited circumstances under which an otherwise prohibited waste may continue to be placed on or in a land treatment, storage, or disposal unit. The Permittee shall maintain compliance with the requirements of 40 CFR Part 268. Where the Permittee has applied for an extension, waiver, or variance under 40 CFR Part 268, the Permittee shall comply with all restrictions on land disposal under this Part pending final written approval of such application.
    b. Waste identified in 40 CFR Part 268 Subpart C may not be placed in a land disposal unit without treatment unless the requirements of 40 CFR Part 268 Subparts C and/or D are met.
    c. The storage of hazardous wastes restricted from land disposal in 40 CFR Part 268 is prohibited unless the requirements of 40 CFR Part 268 Subpart E are met.

25. The Permittee is not relieved of responsibility to clean up a release that has migrated beyond the facility boundary where off-property access is denied or revoked.

    a. The Permittee shall use all reasonable efforts, including but not limited to correspondence, telephone calls, personal contacts, drafting and redrafting agreements, and payment of a fee, to obtain access to real property necessary for work to be performed in the implementation of this permit.
    b. If necessary access cannot be obtained by the Permittee, or if obtained, is revoked by owners or entities controlling access to the properties to which access is necessary, the Permittee shall notify the Department within five business days of such refusal or revocation. The Department may at any time thereafter seek to obtain such access as is necessary to implement the terms of this permit.
    c. The Permittee shall reimburse the Department for any expenses that the Department is ordered to pay, or that the Department incurs in connection with its efforts to obtain necessary access to said property. The Permittee shall pay these sums to the Department, or arrange a payment schedule with the Department, within 30 days of demand by the Department. Payments shall be performed in accordance to Part I.22.d.

26. The Permittee shall maintain compliance with 40 CFR Part 264, Subpart H - Financial Requirements and Subsection 62-730.180(6), F.A.C. Financial assurance shall be based on estimates of the costs to close the facility and to implement postclosure care and/or corrective action (including the assessment phase and interim measures - collectively referred to hereinafter as “remedial activities”) for a continuing (rolling) period of 30 years, unless this period is shortened or increased by the Department in a permit renewal or modification. Federal and State of Florida facilities are exempt from financial assurance requirements.

a. The cost estimates must be based on the cost to the owner or operator of hiring a third party to conduct remedial activities.
b. The Permittee shall include cost estimates with every work plan required by this permit. Cost estimates are subject to review and written approval by the Department
c. In the event the total cost estimate for all remedial activities exceeds the amount provided by Permittee, the financial assurance instrument(s) must be increased accordingly within 60 days of the exceedance, or, for those facilities using a financial test, in the next scheduled submittal.
d. If the cost estimate increase causes the inability of the facility to provide financial assurance through its currently selected mechanism, alternate financial assurance must be provided within 60 days.
e. All submittals relating to financial assurance shall be submitted to the following address. Where financial institutions allow digital submissions, alternate submittal mechanisms may be used without requiring a permit modification.

Financial Assurance
Hazardous Waste Program and Permitting, M.S. 4560
Department of Environmental Protection
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

27. Any dispute resolution will be conducted in accordance with Chapter 120, F.S. (Administrative Procedure Act), Chapter 28-106, F.A.C., and the Department's existing rules and procedures.

PART II – OPERATING CONDITIONS

Part II Subpart A – General Operating Conditions

1. The Permittee shall comply with those sections of 40 CFR Part 124 specified in Subsection 62-730.200(3), F.A.C., 40 CFR Parts 260 through 268, and 40 CFR Part 270 as adopted in Chapter 62-730, F.A.C., until all hazardous waste permitting operations have ceased and the facility has been closed and released from postclosure care requirements and all facility-wide corrective action requirements.

2. The Permittee shall comply with the manifest requirements of 40 CFR 264.71 and 264.72. All manifests, both electronic and paper, must be submitted to EPA's Hazardous Waste Electronic Manifest (e-Manifest) System. The Permittee must document the reconciliation of any manifest discrepancies.

3. The Permittee shall comply with the import and export provisions of 40 CFR 262 Subpart H, the notification requirements of 40 CFR 264.12, and maintain all applicable records for Department inspection.

4. The owner or operator of a facility that is authorized by the Department to receive hazardous waste from an off-site source (except where the owner or operator is also the generator) must inform the generator in writing that he has the appropriate permit(s) for, and will accept, the waste the generator is shipping.

a. The Permittee that receives hazardous waste from an off-site source shall comply with the following notification and reporting requirements:

(1) Unmanifested Waste Report: The Permittee shall submit an Unmanifested Waste Report to the Department within 15 days of receipt of unmanifested waste.
(2) Manifest Discrepancy Report: If a significant discrepancy in a manifest is discovered, the Permittee shall attempt to rectify the discrepancy. If not resolved within 15 days after the waste is received, the Permittee shall immediately submit a letter report, including a copy of the manifest, to the Department.

5. Sampling and analysis of permitted and new hazardous wastes shall be conducted in accordance with the Waste Analysis Plan of the permit application.

a. The Permittee is liable for waste profiles supplied by generators.
b. Prior to acceptance of new waste codes, a permit modification per Condition I.22 is required. The need for a substantial modification should be evaluated using the criteria in Subsection 62-730.182(4), F.A.C.

6. The Permittee shall comply with 40 CFR 264.17, 264.176, and 264.198, with respect to ignitable and reactive wastes. The Permittee shall comply with 40 CFR 264.17, 264.177 and 264.199, with respect to incompatible wastes.

7. If this facility has suspected or confirmed environmental contamination where there may be a risk of exposure to the public, then upon direction from the Department the Permittee must comply with the warning sign requirements of Section 403.7255, F.S. and Rule 62-780.220, F.A.C. The Permittee is responsible for supplying, installing and maintaining the warning signs.

8. The Permittee shall comply with the security provisions of 40 CFR 264.14 and the facility security provisions of the permit application.

9. Facility personnel must successfully complete the approved training program indicated in the permit application, within six months of employment or assignment to a facility or to a new position at the facility. Verification of this training must be kept with the personnel training records and maintained at the facility. Personnel shall not work unsupervised until training has been completed. The training must be reviewed by facility personnel at least annually. The Permittee shall maintain an updated list of personnel handling hazardous waste and their respective job titles at the facility.

10. The Permittee shall maintain and operate the facility to minimize the possibility of fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

11. The Permittee shall comply with the following conditions concerning preparedness and prevention:

a. At a minimum, the Permittee shall have the equipment available at the facility which is described in the Prevention and Preparedness Plan (PPP) of the permit application. The Permittee shall visually inspect and maintain the facility emergency and safety equipment (40 CFR 264.32) listed in the PPP, in accordance with 40 CFR 264.15, 40 CFR 264.33 and the permit application, during permitted activities. The Permittee shall remedy any deterioration or malfunction discovered by an inspection, in accordance with the requirements of 40 CFR 264.15(c). A schedule for the inspection of the facility emergency and safety equipment must be maintained in the operating record of the facility. Changes, additions, or deletions to the schedule must be approved in writing by the Department.
b. The Permittee shall maintain immediate access to an internal communications or alarm system, fire protection equipment, spill control equipment and decontamination equipment.
c. The Permittee shall maintain arrangements with State and local authorities as required by 40 CFR 264.37, and with local medical facilities and emergency response personnel. If State or local officials refuse to enter into preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record. Authorities/facilities include local fire and police departments, sheriff's office, state police, hospitals, ambulance services and emergency medical technicians, and state and local emergency response centers.
d. The Permittee shall maintain aisle space, as required pursuant to 40 CFR 264.35, to allow the unobstructed movement of personnel, fire protection, and emergency response equipment to any area of the facility.

12. The Permittee shall comply with the following conditions concerning the Contingency Plan (CP):

a. The Permittee shall immediately carry out the provisions of the permit application, and follow the emergency procedures described by 40 CFR 264.56, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which threatens or could threaten human health or the environment. The Permittee shall give proper notification if an emergency situation arises and, within five calendar days, must submit to the Department's RCRA Manager a written report which includes all information required in Condition I.12.b.
b. The Permittee shall comply with the requirements of 40 CFR 264.53. Electronic copies of the CP must be submitted to the authorities/facilities in Condition II.A.11.c., provided the entity has the capability to receive electronic submittals.
c. Within seven calendar days of meeting any criterion listed in 40 CFR 264.54(a), (b) or (c), the Permittee shall amend the plan and submit the amended plan for Department approval. Any other changes to the plan must be submitted to the Department within seven days of the change. Amendments to the plan must be approved in writing by the Department. All approved amendments or plans must be distributed to the State and local authorities in Condition II.A.11.c.
d. The Permittee shall comply with the requirements of 40 CFR 264.55, concerning the emergency coordinator.

e. The Permittee shall perform at a minimum, an annual review of the Contingency Plan to ensure that it is up to date and contains current information. The date of review should be noted in the written operating record at the facility.

13. The Permittee shall develop and maintain a Waste Minimization Program Plan. The Permittee shall maintain copies of the certification required by this Condition in the facility operating record for a minimum of three years. The Permittee must certify, no less often than annually, the following:

    a. The Permittee has a program in place to reduce the volume and toxicity of hazardous waste generated to the degree determined by the Permittee to be economically practicable.
    b. The proposed method of treatment, storage or disposal is the most practicable method available to the Permittee, which minimizes the present and future threat to human health and the environment.

14. The Permittee shall keep a written operating record at the facility that includes the following:

    a. The results of any waste analysis.
    b. Copies of hazardous waste manifests for three years. For e-manifests, this condition is satisfied by the retention of the facility's electronic manifest copies in its account on the e-Manifest system, provided such copies are readily available for viewing and production if requested by the Department inspector.
    c. The results of inspections.
    d. The closure plan, postclosure plan, and remedial action (corrective measures) plans as applicable for each contaminated site, along with cost estimates for each plan.
    e. Inspections of emergency and safety equipment.
    f. Biennial reports.
    g. Personnel training records.
    h. The Waste Minimization Program Plan and annual certification of waste minimization.
    i. The description and quantity of each hazardous waste received or generated.
    j. The location and quantity of each hazardous waste within the facility.
    k. Notices to generators as specified in 40 CFR 264.12(b).
    l. A log of dates of operations and unusual events.
    m. A summary report and details of incidents that require implementation of the contingency plan.
    n. The date of annual review of the Contingency Plan.
    o. Monitoring and test data for 40 CFR 264 Subparts AA, BB, and CC requirements.
    p. Documentation that local officials have refused to enter into preparedness prevention arrangements with the Permittee, when applicable.

Part II Subpart B – Specific Operating Conditions

Part II Subpart B.1-Miscellaneous Treatment Units

1. The Permittee shall conduct the Perma-Fix I® Process (PF-I) and Perma-Fix II® Process (PF-II) treatment in accordance with specifications and procedures described in the permit application and/or subsequent revisions.

2. The Permittee shall not treat in the PF-II process more than 3,000 pounds on any single day. The maximum quantity of hazardous waste treated in any single batch shall not exceed 85 gallons for the existing PF-II process.

3. The Permittee is allowed to treat, in the PF-II reactor vessel, wastes contaminated with the volatile organic hazardous constituents up to the maximum concentrations, listed in Table 1 in the Air Toxic Modeling Report dated August 2005 and Table 1 Proposed Waste Codes in the Substantial Modification Demonstration dated December 2009. The waste codes permitted for treatment are listed in Table 1 of Appendix II-A-4 of the permit application and/or subsequent revisions and Attachment A of this Permit.

4. The Permittee shall only conduct hazardous debris treatment, as described in Appendix I.H. of the permit application and/or subsequent revisions. Also, the Permittee shall capture all solids and liquid residuals generated from the debris treatment activities inside the primary containment vat unit and manage them as described in the permit application and/or subsequent revisions.

5. The Permittee is allowed to treat only hazardous debris with the waste codes listed in Attachment A of this Permit. Also, the extent of treatment shall achieve compliance with 40 CFR 268.45.

6. The Permittee shall not conduct hazardous debris treatment with any equipment that the facility uses in the LSV Process. Furthermore, the Permittee shall not commingle any non-liquid waste from the hazardous debris unit into the LSV Process.

7. The Permittee shall comply with waste compatibility requirements of 40 CFR 264.17(b).

8. All treatment of the hazardous waste shall be conducted by qualified trained personnel, experienced in handling such material. [40 CFR 264.16]

9. The Permittee shall verify and record in the operating records, that the Air Emission Control System (AECS) is engaged and operating properly prior to performing any hazardous waste or hazardous debris treatment activities, including opening, loading or unloading waste containers. Additionally, the Permittee shall verify and record in the operating records that the Treatment and Operations Building (TOB) is under negative pressure prior to performing PF-II treatment. The AECS shall remain in operation and the primary chamber temperature be maintained at 1,300°F to 1,500°F while treatment operations are conducted.

10. The Permittee shall remove treated waste and other residues from the treatment unit(s) and ancillary equipment, and decontaminate the equipment, in accordance with the deactivation and decontamination procedures described in Appendix I-F of the permit application and/or subsequent revisions.

11. The Permittee shall not store more than twenty (20) drums, 55-gallons or less in size, in the TOB processing area at any time, as listed in Part II, Table II-7 of the permit application and/or subsequent revisions. The Permittee is authorized to store wastes in totes, B-12 containers, or B-25 containers in the TOB processing area in a single stack as long as these containers do not significantly affect the capacity of secondary containment in the TOB processing area (e.g., containers provided with legs/supports). The Permittee shall remove all treated waste and treatment residues from the treatment areas of the TOB and hazardous debris unit areas within twenty-four (24) hours of completion of the treatment event. Furthermore, staging of waste containers for treatment in the treatment areas of the TOB or hazardous debris unit area will be limited to twenty-four (24) hours prior to beginning treatment. The Permittee shall not store any waste in the treatment unit areas for a period greater than forty-eight (48) hours, including treatment time.

12. The Permittee shall maintain a written record of the date, time, and number of all waste containers being transferred in and out of the TOB treatment area or hazardous debris unit treatment area and shall record this information in the facility operating record.

13. The Permittee shall provide adequate fire protection to ensure confinement and control of any fire resulting from operation, as specified in the Contingency Plan of the permit application, and/or subsequent revisions.

14. The Permittee shall maintain an operational record describing treatment activities for PF-I, PF-II and Debris treatment processes. The operational record shall be kept as part of the operating records for a period of 3 years and shall include the following information:

    a. Description and quantity of each hazardous waste received and treated at the unit(s) and dates of treatment;
    b. Concentration of volatile organic hazardous constituents for each waste stream placed in the PF-II reactor vessel, pursuant to the Specific Condition 3 of this Part. The Permittee may use generator knowledge (e.g., land ban notifications) or analytical data for the purpose of this record keeping requirement;
    c. List of personnel present during each treatment operation on a given day;
    d. Operating conditions of the Air Emission Control System including flow rate and temperature recorded once per day during treatment operation after the proposed PF-II process is implemented. Until then, the Regenerative Thermal Oxidizer (RTO) temperature will be recorded on a daily basis on each day treatment is performed; and
    e. Details of any problems discovered during inspections conducted pursuant the Specific Conditions 15 and 16 of this Part and details of remedial actions taken.

15. The Permittee shall conduct internal inspections of the PF-II reactor vessel and accumulator tank, as specified in the permit application and/or subsequent revisions, for the existing process. The Permittee shall also inspect the thermal oxidizer and calibrate the temperature in the primary chamber at least once a year, in accordance with 40 CFR 264.1088. The Permittee shall conduct an internal inspection of the proposed PF-II reactor vessel at least once a year unless the reactor vessel is out of service. In that case, the reactor vessel shall be inspected prior to being returned to service.

16. The Permittee shall conduct inspections of the miscellaneous unit(s) on each day treatment is conducted in accordance with the permit application and/or subsequent revisions for the existing PF-II process. Inspection of the proposed PF-II process will be conducted on each day treatment is performed, in accordance with the permit application and/or subsequent revisions. If a significant deterioration of the concrete pad, joint sealant material or protective coating (due to accidental spills) is noted in these inspections, the Permittee shall re-evaluate the need for a more resistant protective coating or seal material. All the inspection reports including corrective actions must be recorded and kept as part of the operating records [40 CFR 264.15].

17. The Permittee shall implement appropriate remedial actions for the problems discovered during the inspections conducted pursuant to the Specific Condition 15 and 16 of this Part. For problems that cannot be remedied within forty-eight (48) hours, the Permittee shall notify the Department within three (3) working days and follow up with a written report within fourteen (14) days of discovering such problems. The report must include descriptions of the remedy actions taken. The Permittee shall cease operation of the miscellaneous treatment unit until completion of the necessary repairs.

18. The Permittee shall provide a written report to the Department within thirty (30) days of removing any component of the PF-II treatment unit or its ancillary equipment from service and shall include a description of the decontamination procedures. The Permittee shall follow the facility Closure Plan, Appendix II-K-1 (and Section K of Part II) of the permit application and/or subsequent revisions, for the decontamination procedures.

Part II Subpart B.2-Container Storage Areas/Units

1. The Permittee is allowed to store the wastes listed in Attachment A of this permit only in the Processing and Storage Building (PSB), Treatment and Operations Building (TOB), and in the Liquid Scintillation Vial (LSV) Processing and Waste Storage Warehouse. Containers must conform to D.O.T. requirements. If a container holding hazardous waste is not in good condition, or begins to leak, the waste shall be transferred to another container that is in good condition [40 CFR 264.171] or it will be over-packed. Containers shall be kept closed, except when adding or removing waste and be handled in a manner that will not allow the containers to rupture or leak [40 CFR 264.173].

2. The Permittee shall not store any hazardous waste which is not listed in Specific Condition 1 of this Part. Non-hazardous waste, or raw materials/products are authorized to be stored in the permitted container storage areas as long as the total storage does not exceed the permitted capacity.

3. The Permittee shall not store, in a single container, chemical constituents above the quantities listed in the third column “Maximum Container Quantity (lbs)” of Attachment B. The attachment was developed from Tables 5 and 8 from the “Final Report Offsite Consequence Analysis and Air Modeling” dated January 2006 and from Tables 5 and 8 from the “Substantial Modification Demonstration” revised March 2010. If a constituent was present in both tables the more restrictive data, (i.e. the small number in the “amount released” column) was listed in Attachment B of this Permit.

4. The Permittee shall use only those containers made of or lined with materials which will not react with and are otherwise compatible with the waste to be stored in them [40 CFR 264.172].

5. The Permittee shall conduct daily, visual inspections of the permitted container storage area for each working day, to detect leakage in the hazardous waste areas or their associated loading/unloading zones [40 CFR 264.174]. Inspections shall be documented on a weekly basis, at a minimum in accordance with 40 CFR 264.174. If, in spite of the inspections, a significant deterioration of the concrete pad or joint sealant material is noted, the Permittee shall re-evaluate the need for a protective coating or more resistant seal material.

6. The Permittee shall remove spilled or leaked waste and accumulated precipitation from the secondary containment areas in as timely a manner as is necessary to prevent overflow of the secondary containment, per the requirements of 40 CFR 264.175.

7. The Permittee shall comply with the waste compatibility requirements of 40 CFR 264.177 as indicated in the permit application and/or subsequent revisions.

8. The Permittee shall comply with the following conditions concerning operation of the PSB, TOB, and LSV container storage areas:

    a. The Permittee shall maintain and operate the facility as required by 40 CFR 264.175 and in accordance with the permit application and/or subsequent revisions.
    b. The Permittee shall store a maximum of 35,200 gallons of waste in containers in sizes up to 718 gallons (B-25 box) or less, in the TOB storage area as shown in the permit application and/or subsequent revisions. The containers shall meet D.O.T. specifications.
    c. The Permittee shall store a maximum of 72,105 gallons of waste in containers and in sizes up to 718 gallons (B-25 box) or less, in the PSB storage area as shown in the permit application and/or subsequent revisions. The containers shall meet D.O.T. specifications.
    d. The Permittee shall store a maximum of 54,340 gallons in containers in sizes up to 718 gallons (B-25 box) or less, in the LSV Processing and Waste Storage Warehouse, as shown in the permit application. The containers shall meet D.O.T. specifications.
    e. The Permittee must place the drums on standard pallets when they are single stacked. The Permittee must use pallets and banding when drums are double stacked, except for the storage inside the chemotherapy and pharmaceutical wastes in the Cage in the PSB.
    f. For storage of drums larger than fifty-five gallons, the Permittee shall not place more than three (3) drums per pallet and shall not stack them more than two high.

9. The Permittee shall keep all containers and associated equipment used for the fuel blending and phase separation activities inside the secondary containment area of the PSB.

10. All fuel blending and phase separation activities shall be conducted by qualified personnel experienced in handling such material. [40 CFR 264.16].

11. The Permittee shall maintain a written record for tracking the date and quantity of all waste processed in the fuel blending and phase separation activities and include quantity of waste solvent transferred out of the LSV 3000-gallon storage tank for use in the fuel blending operation. This information shall be entered in the facility operating record.

Part II Subpart B.3-Tanks

1. The Permittee is allowed to operate one (1) Aboveground Storage Tank (AST) in accordance with the design plans and specifications in the permit application and/or subsequent revisions.

2. The Permittee is authorized to store only radioactive mixed waste in the AST that is generated from the Liquid Scintillation Vials (LSV) process wastes as described in the permit application and/or subsequent revisions.

3. The Permittee shall store a maximum of 3,000 gallons of waste in the tank.

4. The Permittee shall notify the Department when the volume of waste stored in the tank reaches ninety-five (95) percent capacity of the tank, i.e., 2,850 gallons. An electronic notification is acceptable.

5. The Permittee shall not place ignitable or reactive waste in the tank system unless the waste is stored in such a way that it is protected from any material or conditions that may cause the waste to ignite or react. [40 CFR 264.198(a)]

6. The Permittee shall comply with the protective distance requirements for the tank placement as set forth in The Florida Fire Prevention Code (January 2015) and any subsequent revisions [40 CFR 264.198(b)].

7. The Permittee shall handle incompatible wastes in accordance with the requirements of 40 CFR 264.199, by not introducing hazardous waste into the tank system, which previously held incompatible waste or material, until the tank system is adequately decontaminated.

8. For new tank components which may be required by the repair options of 40 CFR 264.196(f), the Permittee must submit a written assessment, reviewed and certified by an independent professional engineer registered in the State of Florida, which attests to the component's structural integrity. This assessment shall meet the requirements of 40 CFR 264.192.

9. The Permittee shall prevent the release of hazardous waste or hazardous constituents to the environment. The secondary containment system shall be maintained according to the permit and/or subsequent revisions and shall comply with the requirements of 40 CFR 264.193, including the requirements set forth below:

a. All new components shall have secondary containment as required by parts (b) and (c) of this condition prior to being placed into service.

b. Pursuant to 40 CFR 264.193, the secondary containment system shall be:

(1) Maintained to prevent any migration of wastes or accumulated liquid to the soil, groundwater or surface waters;
(2) Capable of detecting and collecting releases and run-on until the collected material is removed;
(3) Lined with materials compatible with the waste to be stored and have sufficient structural strength to sustain the stresses induced by a failure of the primary containment system as well as other stresses, which may be induced by the environment;
(4) Placed on a foundation or base capable of providing support to the secondary containment system;
(5) Provided with a leak detection system designed and operated to detect failure of either the primary or secondary containment structures or the presence of any release within 24 hours;
(6) Sloped or otherwise designed and operated to drain or remove liquids resulting from leaks, spills, or precipitation; and
(7) Designed and operated, to contain 110% of the capacity of the largest tank within its boundary.

c. Ancillary equipment shall be provided with secondary containment, except as provided for in 40 CFR 264.193(f).

10. Pursuant to the general operating requirements of 40 CFR 264.194, the Permittee shall:

a. Not place hazardous wastes in the tank system if the possibility exists that this may cause the tank system to fail;
b. Use appropriate controls and practices to prevent spills and overflows;
c. Follow the operating procedures described in the permit application and/or subsequent revisions; and
d. Comply with the requirements of 40 CFR 264.196 if a leak or spill occurs from the storage tank system.

11. The Permittee shall inspect the tank system in accordance with the permit application and/or subsequent revisions, as required by 40 CFR 264.195.

12. The Permittee shall follow the procedures outlined in the permit application and/or subsequent revisions and satisfy the requirements of 40 CFR 264.196 when a tank system or secondary containment system produces a leak or spill, or is determined to be unfit for use. As required by 40 CFR 264.196, these requirements shall include following items:

a. Cessation of use; prevention of flow or addition of waste;
b. Removal of waste from tank system or secondary containment system;

c. Containment of visible releases to the environment;
d. Notifications, reports;
e. Provision of secondary containment, repair or closure; and
f. Certification of major repairs.

13. The Permittee shall decontaminate any ancillary equipment including pumps, pipes and valves, within thirty (30) days of removing it from service or if the Permittee fails to repair the ancillary equipment within that time. The decontamination shall be in accordance with the closure plan in the permit and/or subsequent revisions and entered into the facility operating record.

14. The facility shall provide a written report to the Department within forty-five (45) days of removing the AST unit or ancillary equipment from service and shall include a description of the decontamination procedures.

Part II Subpart B.4-Air Emissions Standards

1. The Permittee shall inspect, maintain and operate all the facility and equipment including tanks, pumps, compressors, pressure relief devices, flanges and valves as described in Sections R and S of Part II of the permit application and/or subsequent revisions, in accordance with 40 CFR 264 - Subpart AA and BB requirements.

2. The Permittee shall operate the facility in accordance with 40 CFR 264 – Subpart CC requirements.

3. The Permittee shall keep, as part of its operating records, results of inspections, monitoring reports, repairs, and other documents required by 40 CFR 264 Subparts AA, BB, and CC for a minimum of three years.

4. The Permittee shall submit a report of noncompliance, if applicable, with the exemption provisions of 40 CFR 264, Subpart CC outlined at 40 CFR 264.1082(c)(1) or (c)(2) within fifteen (15) calendar days of becoming aware of such noncompliance [40 CFR 264.1090(a)].

Part II Subpart B.5-Construction Requirements

1. The Permittee is authorized to construct/replace the PF-II treatment process as described in the permit application. The Permittee will initiate partial closure activities as provided for under the facility Closure Plan, Appendix II-K-1 (and Section K of Part II in the permit application) for the closure of the existing PF-II treatment process.

2. Within thirty (30) days of completion of construction of any new storage or treatment unit, the Permittee shall submit to the Department by certified mail or hand delivery, a certification signed by both the Permittee and an independent professional engineer registered in the State of Florida, stating the construction has been completed in accordance with the design parameters specified in the permit application and/or subsequent revisions. The Certification shall include as-built drawings and a report

describing any changes made during construction, with the seal and signature of a professional engineer registered in the State of Florida.

3. The Permittee may begin to operate constructed storage and/or treatment unit(s) twenty (20) days after submitting the as-built certification, required pursuant Specific Condition 2 of this Part, unless the Department notifies the Permittee not to begin operation.

4. The closure cost for the facility will be revised after construction of the continuous PF-II process equipment prior to its operation.

Part II Subpart C – Closure Conditions

1. The Permittee shall close any storage or treatment unit in a manner that minimizes or eliminates, to the extent necessary to protect human health and the environment, postclosure escape of hazardous waste, hazardous waste constituents, hazardous waste decomposition products, contaminated leachate or run-off to the groundwater, surface waters, or to the atmosphere (40 CFR Part 264.111).

2. The Permittee shall have a written Closure Plan as required by 40 CFR 264.112(a). The Closure Plan and all revisions to the plan must be kept at the facility until closure is completed, certified in accordance with 40 CFR 264.115, and accepted by the Department.

3. Modifications to the approved Closure Plan shall be in accordance with the requirements of 40 CFR 264.112(c) and Rule 62-730.290, F.A.C.

4. The Permittee shall notify the Department within seven calendar days of any determination that actions undertaken as part of closure or associated monitoring programs no longer satisfy the requirements set forth in this permit. If the Department determines that a modification of the permit is required, the Permittee shall, within 60 calendar days of notice by the Department, submit an application for a permit modification in accordance with Part II.C.3.

5. Within 90 days after receiving the final volume of hazardous waste or upon notification by the Department that closure of a unit is required, the owner or operator must treat or remove from the unit all hazardous waste.

6. The Permittee shall complete closure activities within 180 days after notification to the Department of closure and in accordance with the closure schedule in the permit application. Any changes in the time allowed for closure activities or reporting requirements shall require prior written Department approval. At least 30 calendar days prior to initiating physical closure activities, the Permittee shall prepare and submit a Closure Activities Report.

    a. The Closure Activities Report will be in columnar format (*i.e.* a table or spreadsheet) with columns for “closure activity,” “schedule date,” and “completed date.”
    b. The Closure Activities Report shall be maintained and updated by the Permittee throughout the closure period, with copies submitted monthly to the Department, unless an alternate submittal schedule is approved by the Department in writing.

Each report must be submitted to the Department by the tenth day of each month for the preceding month until the acceptance of physical closure by the Department. These reports can be submitted electronically.

c. Any deviation from the schedule or described tasks shall be fully documented in the Closure Activities Report.

7. The Permittee shall notify the Department 45 days prior to the date on which the Permittee expects to begin partial or final closure of a unit(s).

8. The Permittee shall properly decontaminate or dispose of all equipment, structures, and residues used during or resulting from the closure activities.

9. The Permittee shall manage all hazardous wastes, residues, sludges, spilled or leaked waste, or contaminated liquids and soils removed during closure of the unit(s) in accordance with the applicable provisions of 40 CFR Parts 260 through 268, including the manifest requirements. A copy of each manifest required as a result of closure activities shall be submitted to the Department with the Closure Certification.

10. The Permittee shall provide opportunities for site inspections by the Department by informing the Department at least seven days in advance of any major physical closure activity (*e.g.,* unit decontamination or removal, cap installation, soil sampling, soil removal, etc.).

11. Within 30 days of determining that all contaminated soil cannot be practically removed or decontaminated, the Permittee shall notify the Department of such determination. Within 90 days of the determination the Permittee shall submit an application for permit modifications to close the facility as a landfill (land disposal unit) and perform postclosure care as required by 40 CFR 264.

12. Within 60 calendar days of the completion of closure, the Permittee shall submit to the Department, by certified mail or hand delivery, a Closure Certification Report signed by the Permittee and an independent Professional Engineer registered in the State of Florida, stating that the unit has been closed in compliance with the Closure Plan and the conditions of this permit. The Closure Certification must be based on the Professional Engineer's own observation and knowledge of the closure activities. The Closure Certification Report must include, but not be limited to the following:

    a. Environmental sampling data to verify closure activities.
    b. Decontamination data.
    c. Copies of manifests or other appropriate shipping documents for removal of all hazardous wastes and all contaminated residues.
    d. A description of final closure activities.
    e. A final Closure Activities Report (Condition II.C.6 of this Subpart).

13. Within 30 calendar days of submitting a Closure Certification Report for a land disposal unit, including a land disposal unit identified under Part II.C.11, the Permittee shall submit to the Department and to the local zoning authority, or the authority with jurisdiction over local land use, a survey plat indicating the type, location, and quantity of hazardous wastes disposed of within the unit with respect to permanently surveyed

benchmarks in accordance with 40 CFR 264.116. For hazardous wastes disposed of before January 12, 1981 the owner or operator must identify the type, location, and quantity of the hazardous wastes to the best of the Permittee's knowledge and in accordance with any existing records. This notice is in addition to the requirement to execute a formal land use control (*e.g.,* a restrictive covenant) in order to obtain a site rehabilitation completion order based on restricted exposure risk assumptions under Chapter 62-780, F.A.C.

PART III – POSTCLOSURE CONDITIONS

1. Not applicable at this time.

PART IV – ENVIRONMENTAL MONITORING CONDITIONS

1. Not applicable at this time.

PART V – CORRECTIVE (REMEDIAL) ACTION CONDITIONS

Part V Subpart A – General Corrective Action Conditions

1. The Conditions of this Part apply to the following:

   a. The SWMUs and AOCs identified in Appendix A.
   b. Any additional SWMUs or AOCs discovered during the course of groundwater monitoring, field investigations, environmental audits, or other means. As used in this Part, the terms "discover", "discovery", or "discovered" refer to the following:

      (1) The date the Permittee visually observes evidence of a new SWMU or AOC.
      (2) The date the Permittee visually observes evidence of a previously unidentified release of contaminant(s) to the environment.
      (3) The date the Permittee receives information from a credible source of the presence of a new release of contaminant(s) to the environment.

   c. Contamination that has migrated beyond the facility boundary, if applicable.

2. The Permittee shall comply with the notification requirements for the discovery of a new SWMU in Part I.12.c.

3. Upon notification by the Department, the Permittee shall prepare and submit a Confirmatory Sampling (CS) Work Plan for known, suspected, or newly discovered sites. The Work Plan shall be submitted within 60 calendar days of notification by the Department unless the notification letter establishes a different time frame.

   a. The CS Work Plan shall include schedules for implementation and completion of specific actions necessary to determine whether or not contamination has occurred in any potentially affected media. In order to partly or wholly satisfy the CS requirement, previously existing data may be submitted with the work plan for the Department's consideration.

b. In accordance with the schedule in the approved CS Work Plan, or no later than 60 calendar days after Department's written approval of a CS Work Plan, the Permittee shall submit a Confirmatory Sampling Report identifying those sites that are contaminated and those sites that are not contaminated. The CS Report shall include an analysis of the analytical data to support all determinations. Based on the results of the CS Report, the Department will determine the need for further investigation at sites covered in the CS Report and notify the Permittee in writing.

4. De Minimis discharge is a release of a contaminant(s) that is removed from the soil, sediment, surface water, and groundwater to cleanup target levels or background concentrations within 30 days of discovery of the release. If the Permittee intends to treat a discharge under the De Minimis discharge provision of Rule 62-780.550 or Rule 62-780.560 F.A.C., the Permittee must meet the notification requirements of Part I.12.c and inform the Department's RCRA Manager that a De Minimis action is underway. A De Minimis Remediation Report must be submitted to the Department within 90 days of discovery of the release. The report must include a description of all actions taken in response to the discharge and the information required by the Interim Source Removal Report pursuant to Subsection 62-780.500(6)(a), F.A.C.

5. If contamination is confirmed by the Confirmatory Sampling Report, the Department will notify the Permittee to commence site rehabilitation in accordance with Rule 62-730.225 and Chapter 62-780, F.A.C., for all SWMUs and/or AOCs ("contaminated sites") identified in the notification. The Permittee shall commence and complete site assessment in the manner and within the time limits set forth in Rule 62-780.600, F.A.C., unless the notification letter specifically establishes a different time frame to commence or complete site assessment. An alternative schedule can be implemented with written Department approval.

6. The Permittee shall conduct Emergency Response Actions in accordance with Subsections 62-730.225 and 62-780.500, F.A.C. The Permittee may, or upon notification by the Department, shall conduct an Interim Source Removal action in accordance with Subsections 62-730.225 and 62-780.500 F.A.C. for any release, SWMUs, or AOCs determined necessary to minimize or prevent further migration of contaminants or to limit human or environmental exposure to contaminants.

7. If the Department or the Permittee at any time determines that any approved work plan no longer satisfies the requirements of Rule 62-730.225 or Chapter 62-780, F.A.C. or this permit for prior or continuing releases of contaminant(s) to the environment, the Permittee shall submit an amended work plan to the Department within 60 calendar days of such determination.

PART VI – REMEDY SELECTION AND IMPLEMENTATION

Part VI Subpart A – General Remedy Selection and Implementation Conditions

1. Within 90 calendar days of Department approval of a Site Assessment Report or Site Assessment Report Addendum the Permittee shall submit a Remedial Action Plan developed in accordance with Chapters 62-780 and 62-730, F.A.C. Remedial Action

Plans may be performance based, including remediation options to be implemented based on changing conditions at the site.

2. The Permittee shall apply for a permit modification in accordance with Part I.22. of this permit within 30 days of a Department approved final remedy unless an alternative permit modification schedule has been approved by the Department. Final approval of remedial action which is achieved through interim measures shall be in accordance with this condition.

3. The Remedial Action Plan shall include a provision for the Permittee to submit periodic Remedial Action Status Reports in accordance with Subsection 62-780.700(12), F.A.C. The intent to implement a different approved remedy in a performance based Remedial Action Plan can be provided in the Remedial Action Status Report. Proposals to modify a previously approved remedy in a performance based Remedial Action Plan can be provided in the Remedial Action Status Report and implemented with written Department approval. The Remedial Action Status Reports may be combined with any Environmental Monitoring Report required by Part IV.

4. When site rehabilitation (remedial action) is complete, the Permittee shall submit to the Department a Site Rehabilitation Completion Report in accordance with Subsection 62-780.750(6), F.A.C. Site Rehabilitation Completion Reports can be part of a combined document with the Remedial Action Status Report.

5. For site rehabilitation involving the cleanup of groundwater contaminated by a release from a designated regulated unit, the Permittee must demonstrate that the concentration of constituents of concern remain below cleanup goals for three consecutive years after active remediation has ceased as per 40 CFR 264.100(f).

6. When appropriate, the Department will approve completion of site rehabilitation by inclusion in a permit renewal, permit modification, or separate Site Rehabilitation Completion Order.

Part VI Subpart B – Selected Remedies

7. Not applicable at this time.

APPENDIX A - SUMMARY OF FACILITY SITES - SOLID WASTE MANAGEMENT UNITS (SWMUS) AND AREAS OF CONCERN (AOC)

A.1 List of SWMUs / AOCs requiring Confirmatory Sampling				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment and Basis for Determination	Dates of Operation	Potentially Affected Media
There are no units identified as requiring Confirmatory Sampling at this time pursuant to this permit.				

A.2 List of SWMUs / AOCs requiring a Site Assessment (a/k/a RCRA Facility Investigation [RFI]) or a Risk Assessment				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment and Basis for Determination	Dates of Operation	Potentially Affected Media
There are no units identified at this time as requiring a Site or Risk Assessment.				

A.3 List of SWMUs / AOCs requiring a Remedial Action Plan or Natural Attenuation with Monitoring Plan (a/k/a RCRA Corrective Measures Study [CMS])				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment and Basis for Determination	Dates of Operation	Potentially Affected Media
There are no units identified at this time requiring a Remedial Action Plan or a Natural Attenuation with Monitoring Plan.				

A.4 List of SWMUs / AOCs implementing a Remedial Action Plan or Natural Attenuation Monitoring Plan (a/k/a Corrective Measures Implementation [CMI]				
SWMU/AOC Number/Letter	SWMU/AOC Name	SWMU/AOC Comment and Basis for Determination	Dates of Operation	Potentially Affected Media
There are no units identified at this time undergoing a Remedial Action Plan or a Natural Attenuation with Monitoring Plan.				

A.5 List of SWMUs / AOCs at which Site Rehabilitation Completion Determinations With Controls have been made		
SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA
There are no units identified at this time at which Site Rehabilitation Completion Determinations with controls have been made.		

A.6 List of SWMUs / AOCs at which Site Rehabilitation Completion Determinations Without Controls have been made		
SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA
SWMU 23	North Drainage Ditch	June 27, 1990 RFA; & NFA December 2, 2019 (formalized in Permit 17680-012-HO) for January 2017 Roll-Off Incident.

A.7 List of SWMUs / AOCs where No Further Action Determinations have been made based on no suspected or confirmed contamination (*i.e.* not 'contaminated sites' as defined by 62-780 F.A.C.)		
SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA
SWMU 1[a]	North Unloading Area	June 27, 1990 RFA
SWMU 2[a]	South Unloading Area	June 27, 1990 RFA
SWMU 3	Temporary Holding Area	June 27, 1990 RFA
SWMU 5[c]	Incoming Bulk Waste Transfer Station	June 27, 1990 RFA
SWMU 7	Tanker/Liquids Loading Station Within PSB	June 27, 1990 RFA
SWMU 8	Outdoor Staging Area	June 27, 1990 RFA
SWMU 9	LSV Processing Area, formerly Indoor Staging Area	June 27, 1990 RFA
SWMU 9a[c]	Roller Conveyors in LSV Processing Area	June 27, 1990 RFA
SWMU 9b[c]	Lift in LSV Processing Area	June 27, 1990 RFA
SWMU 9c[c]	In-Feed Hopper in LSV Processing Area	June 27, 1990 RFA
SWMU 9d[c]	Shaker Table in LSV Processing Area	June 27, 1990 RFA
SWMU 9e[c]	Crusher/Shredder in LSV Processing Area	June 27, 1990 RFA
SWMU 9f[c]	Rinse Basket Trough in LSV Processing Area	June 27, 1990 RFA
SWMU 9g[c]	Three Chamber Rinse in LSV Processing Area	June 27, 1990 RFA
SWMU 9h[c]	Drain Table in LSV Processing Area	June 27, 1990 RFA

SWMU 9i	LSF Holding Tanks in LSV Processing Area	June 27, 1990 RFA
SWMU 10	Processing Area Ventilation System-HEPA Filter	June 27, 1990 RFA
SWMU 11	Carbon Adsorption System	June 27, 1990 RFA
SWMU 12	LSF Pipe	June 27, 1990 RFA
SWMU 13[c]	Packing Material Wastes Drum Holding Area	June 27, 1990 RFA
SWMU 14	Empty Drums Holding Area	June 27, 1990 RFA
SWMU 15[c]	Crushed Glass/Plastic Vials Drum Holding Area	June 27, 1990 RFA
SWMU 16[c]	Crushed Vials Final Drainage Station	June 27, 1990 RFA
SWMU 17[c]	Drained Crushed Vials Drum Holding Area	June 27, 1990 RFA
SWMU 18	Gondolas (10)	June 27, 1990 RFA
SWMU 19[c]	Dumping Trailers	June 27, 1990 RFA
SWMU 20	Waste Handling Routes	June 27, 1990 RFA
SWMU 21	North Retention Pond	June 27, 1990 RFA
SWMU 22	East Retention Pond	June 27, 1990 RFA
SWMU 24	East Drainage Ditch	June 27, 1990 RFA
SWMU 25[c]	Former Glass/Plastic Shredder Unit	June 27, 1990 RFA
SWMU 26[c]	Field Trailers Service Area	June 27, 1990 RFA
SWMU 27[c]	PCB Drummed Waste Storage Area	June 27, 1990 RFA
SWMU 28[c]	Freon Distillation Waste Collection Unit	June 27, 1990 RFA
SWMU 29[c]	Sand and Grit Drum Storage Area	June 27, 1990 RFA
SWMU 30[c, d]	Laboratory Wastes Accumulation Area	June 27, 1990 RFA
SWMU 31[c, d]	Laboratory Specimens Storage Building	June 27, 1990 RFA
SWMU 32[c, d]	PCB Decontamination Test Site	June 27, 1990 RFA

SWMU 33	Laboratory	June 27, 1990 RFA
SWMU 36	East Loading Dock	June 27, 1990 RFA
SWMU 37	Clothes Washing Room	June 27, 1990 RFA
SWMU 39	Freon Distillation Unit	June 27, 1990 RFA
SWMU 40 (formerly SWMUs 1 and 2)	North-South Unloading Area	June 27, 1990 RFA
AOC A	Spray Paint Booth Area	NFA/Permit 17680-009-HC, 9/15/06 & 17680-010-HC, 9/16/10
AOC B	Equipment Laydown and Temporary Storage Area	NFA/Permit 17680-009-HC, 9/15/06& 17680-010-HC, 9/16/10
AOC C	Soil Mound Area[e]	NFA/Permit 17680-009-HC, 9/15/06& 17680-010-HC, 9/16/10

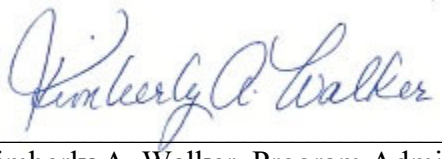
[a] Per October 28, 2000 *VSI conducted Sept. 14 & 15, 2000*, these two SWMUs were combined into SWMU-40.
[b] Formerly used to denote a Permitted Unit; relocated to Table A.8 of this Appendix (see below), effective as of Permit 17680-012-HO issuance.
[c] Unit Identified in Final RFA dated June 27, 1990; but determined to be no longer in use after Supplemental VSI conducted September 14 and 15, 2000 (dated October 28, 2000).
[d] SWMU no longer part of Perma-Fix facility.
[e] September 15, 2006 and September 16, 2010 permits and call it "Print Shop Area". Supplemental VSI conducted September 14 and 15, 2000 (dated October 28, 2000) called it "Print Shop Area-Mound in northwest corner of site."

A.8 List of SWMUs / AOCs designated as "Permitted Units" which will be closed under a closure plan (also includes the NFA Determinations criteria of Table A.7 above).

SWMU/AOC Number/Letter	SWMU/AOC Name	Unit Comment and Basis for NFA
SWMU 4	Container Storage Shed now known as Processing and Storage Building (PSB)	June 27, 1990 RFA; This permitted unit will be closed under a closure plan.
SWMU 6	3,000-Gallon Waste Liquids Tank	June 27, 1990 RFA; This permitted unit will be closed under a closure plan.
SWMU 9k	Grinder Crusher in LSV Processing Area	This unit will be closed under a closure plan.
SWMU 9m	Fines Removal System (FRS) in LSV Processing Area	This unit will be closed under a closure plan.
SWMU 34	Treatment and Operations Building (TOB), formerly West Warehouse	This permitted unit will be closed under a closure plan.

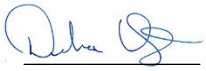
SWMU 35	Liquid Scintillation Vial (LSV) Warehouse, formerly East Warehouse	This permitted unit will be closed under a closure plan.
SWMU 38	Treatment Operations Building (TOB) Loading Ramp	This permitted unit will be closed under a closure plan.
SWMU 41	LSV Hazardous Waste Storage Area	This permitted unit will be closed under a closure plan.
SWMU 42	PCB Commercial Storage Area	This EPA permitted storage unit will be closed under its own closure plan.

EXECUTION AND CLERKING
Executed in Tallahassee, Florida.
STATE OF FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Kimberly A. Walker, Program Administrator
Permitting & Compliance Assistance Program
2600 Blair Stone Road, MS 4550
Tallahassee, Florida 32399-2400

FILING AND ACKNOWLEDGMENT
FILED on this date pursuant to Section 120.52(11), Florida Statutes, with the designated Department Clerk, receipt of which is hereby acknowledged.



June 3, 2020
Clerk **Date**

ATTACHMENT A-PERMITTED WASTE CODES FOR STORAGE AND TREATMENT (EXCEPT FOR TANK STORAGE)

Permitted Waste Codes for Storage and Treatment (except for tank storage)											
D001	D039	K062	P030	P074	P122	U020	U060	U099	U140	U179	U221
D002	D040	K086	P031	P075	P123	U021	U061	U101	U141	U180	U222
D003	D041	K156	P033	P077	P127	U022	U062	U102	U142	U181	U223
D004	D042	K157	P034	P078	P128	U023	U063	U103	U143	U182	U225
D005	D043	K158	P036	P081	P185	U024	U064	U105	U144	U183	U226
D006	F001	K159	P037	P082	P188	U025	U066	U106	U145	U184	U227
D007	F002	K161	P038	P084	P189	U026	U067	U107	U146	U185	U228
D008	F003	K169	P039	P085	P190	U027	U068	U108	U147	U186	U234
D009	F004	K170	P040	P087	P191	U028	U069	U109	U148	U187	U235
D010	F005	K171	P041	P088	P192	U029	U070	U110	U149	U188	U236
D011	F006	K172	P042	P089	P194	U030	U071	U111	U150	U189	U237
D012	F007	P001	P043	P092	P196	U031	U072	U112	U151	U190	U238
D013	F008	P002	P044	P093	P197	U032	U073	U113	U152	U191	U239
D014	F009	P003	P045	P094	P198	U033	U074	U114	U153	U192	U240
D015	F010	P004	P046	P095	P199	U034	U075	U115	U154	U193	U243
D016	F011	P005	P047	P096	P201	U035	U076	U116	U155	U194	U244
D017	F012	P006	P048	P097	P202	U036	U077	U117	U156	U196	U246
D018	F019	P007	P049	P098	P203	U037	U078	U118	U157	U197	U247
D019	F020	P008	P050	P099	P204	U038	U079	U119	U158	U200	U248
D020	F021	P009	P051	P101	P205	U039	U080	U120	U159	U201	U249
D021	F022	P010	P054	P102	U001	U041	U081	U121	U160	U202	U271
D022	F023	P011	P056	P103	U002	U042	U082	U122	U161	U203	U278
D023	F026	P012	P057	P104	U003	U043	U083	U123	U162	U204	U279
D024	F027	P013	P058	P105	U004	U044	U084	U124	U163	U205	U280
D025	F028	P014	P059	P106	U005	U045	U085	U125	U164	U206	U328
D026	F032	P015	P060	P108	U006	U046	U086	U126	U165	U207	U353
D027	F034	P016	P062	P109	U007	U047	U087	U127	U166	U208	U359
D028	F035	P017	P063	P110	U008	U048	U088	U128	U167	U209	U364
D029	F037	P018	P064	P111	U009	U049	U089	U129	U168	U210	U367
D030	F038	P020	P065	P112	U010	U050	U090	U130	U169	U211	U372
D031	F039	P021	P066	P113	U011	U051	U091	U131	U170	U213	U373
D032	K001	P022	P067	P114	U012	U052	U092	U132	U171	U214	U387
D033	K048	P023	P068	P115	U014	U053	U093	U133	U172	U215	U389
D034	K049	P024	P069	P116	U015	U055	U094	U134	U173	U216	U394
D035	K050	P026	P070	P118	U016	U056	U095	U135	U174	U217	U395
D036	K051	P027	P071	P119	U017	U057	U096	U136	U176	U218	U404
D037	K052	P028	P072	P120	U018	U058	U097	U137	U177	U219	U409
D038	K061	P029	P073	P121	U019	U059	U098	U138	U178	U220	U410
											U411

ATTACHMENT B-CONSOLIDATED DATA FROM TABLES 5 AND 8

Constituent	Waste Code	Maximum Container Quantity (lbs)
Allyl alcohol	P005	32
Thiophenol	P014	6,415
Dichloromethyl ether; Chloromethyl ether	P016	1.08
Bromoacetone	P017	46.5
Acetaldehyde, chloro-; Chloroacetaldehyde	P023	380
Benzyl chloride	P028	730
Aziridine; Ethyleneimine	P054	18.5
Fluorine	P056	16.1
Methane, isocyanato-; Methyl isocyanate	P064	0.25
Aziridine, 2-methyl-; 1,2-Propylenimine	P067	156
Methyl hydrazine	P068	9.3
2-Methyllactonitrile; Acetone cyanohydrin	P069	195
Nickel carbonyl	P073	1.35
Nitrogen dioxide	P078	96
N-nitrosodimethylamine	P082	105
Parathion; Phosphorothioic acid, O,O-diethyl O-(4-nitrophenyl) ester	P089	11
Phosgene	P095	3
Phosphine	P096	4.9
Propargyl alcohol	P102	38
Tetraethyldithiopyrophosphate; Thiodiphosphoric acid, tetraethyl ester; Ethyl butyrate, TEDP	P109	10.5
Diphosphoric acid, tetraethyl ester; Tetraethyl pyrophosphate, TEPP	P111	5.5
Tetranitromethane	P112	17.8
Acetyl chloride	U006	0.32
Acrylic acid	U008	1,895
Acrylonitrile	U009	710
Benzenesulfonyl chloride	U020	1,105

ATTACHMENT B-CONSOLIDATED DATA FROM TABLES 5 AND 8 (CONT.)

Constituent	Waste Code	Maximum Container Quantity (lbs)
Bis(2-chloroethoxy)methane	U024	235
Dichloroethyl ether; Ethane, 1,1'-oxybis [2-chloro-	U025	830
Carbon oxyfluoride; Carbonyl fluoride	U033	55.3
Trichloroacetaldehyde (Chloral)	U034	750
Epichlorohydrin, 1-chloro-2,3-epoxy propane	U041	1,007
Chloromethane (methyl chloride)	U045	2,000
Chloromethyl methyl ether (methyl chloromethyl ether)	U046	3.75
2-Chlorophenol	U048	523
1,2-Dibromo-3-chloropropane	U066	0.25
Ethylene dibromide (1,2-dibromomethane)	U067	4500
1,2-Benzenedicarboxylic acid, dibutyl ester; Dibutyl phthalate	U069	1,385
1,4-Dichloro-2-butene	U074	70
Dichlorodifluoromethane	U075	1,000,000
1,2-Dichloroethylene	U079	22,000
1,3-Dichloropropene	U084	125
1,2,3,4-Diepoxybutane; Diepoxybutane; 2,2-Bioxirane	U085	19
Diethyl phthalate	U088	6,636
Dimethylamine	U092	1,900
Cumene hydroperoxide	U096	6,122
Dimethylcarbamoyl chloride	U097	95
1,1-Dimethylhydrazine	U098	40.7
1,2-Dimethylhydrazine	U099	40.8
1,2-Benzenedicarboxylic acid, dimethyl ester; Dimethyl phthalate	U102	138
Dimethyl sulfate	U103	19
Di-n-octyl phthalate	U107	2,218
Ethyl acrylate	U113	1,970

ATTACHMENT B-CONSOLIDATED DATA FROM TABLES 5 AND 8 (CONT.)

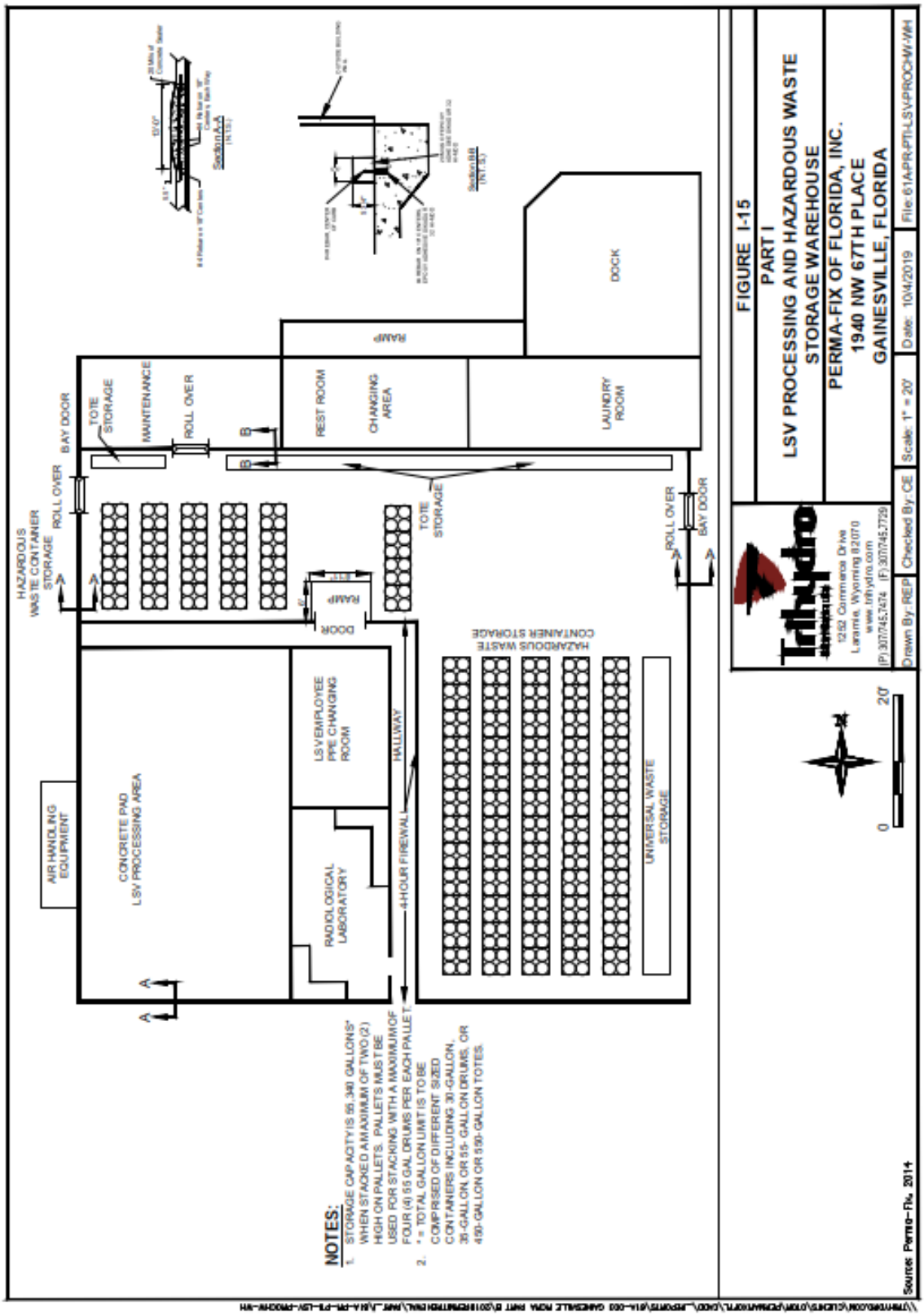
Constituent	Waste Code	Maximum Container Quantity (lbs)
Ethylene oxide	U115	555
Ethyl methacrylate	U118	815
Formic acid	U123	64
Furfural	U125	391
Glycidylaldehyde	U126	8
Hydrazine	U133	32.2
Hydrogen fluoride	U134	108.8
Hydrogen sulfide	U135	104.5
Methane, iodo-; Methyl iodide	U138	5,100
Isosafrole	U141	6,696
Methacrylonitrile; Methylacrylonitrile	U152	280
Methyl Mercaptan; Thiomethanol; Methanethiol	U153	825
Methyl Chlorocarbonate; Methyl chloroformate	U156	5
Methyl methacrylate	U162	6,300
Paraldehyde	U182	710
Pentachloroethane	U184	8,900
1,3-Pentadiene	U186	2,000
2-Picoline	U191	5,638
n-Propylamine	U194	4,287
Toluene-2,4-di-isocyanate	U223	1.55
Toluene-2,6-di-isocyanate	U223	1.55
Bromoform (tribromomethane)	U225	75.1
Triethylamine	U404	65

ATTACHMENT B-CONSOLIDATED DATA FROM TABLES 5 AND 8 (CONT.)

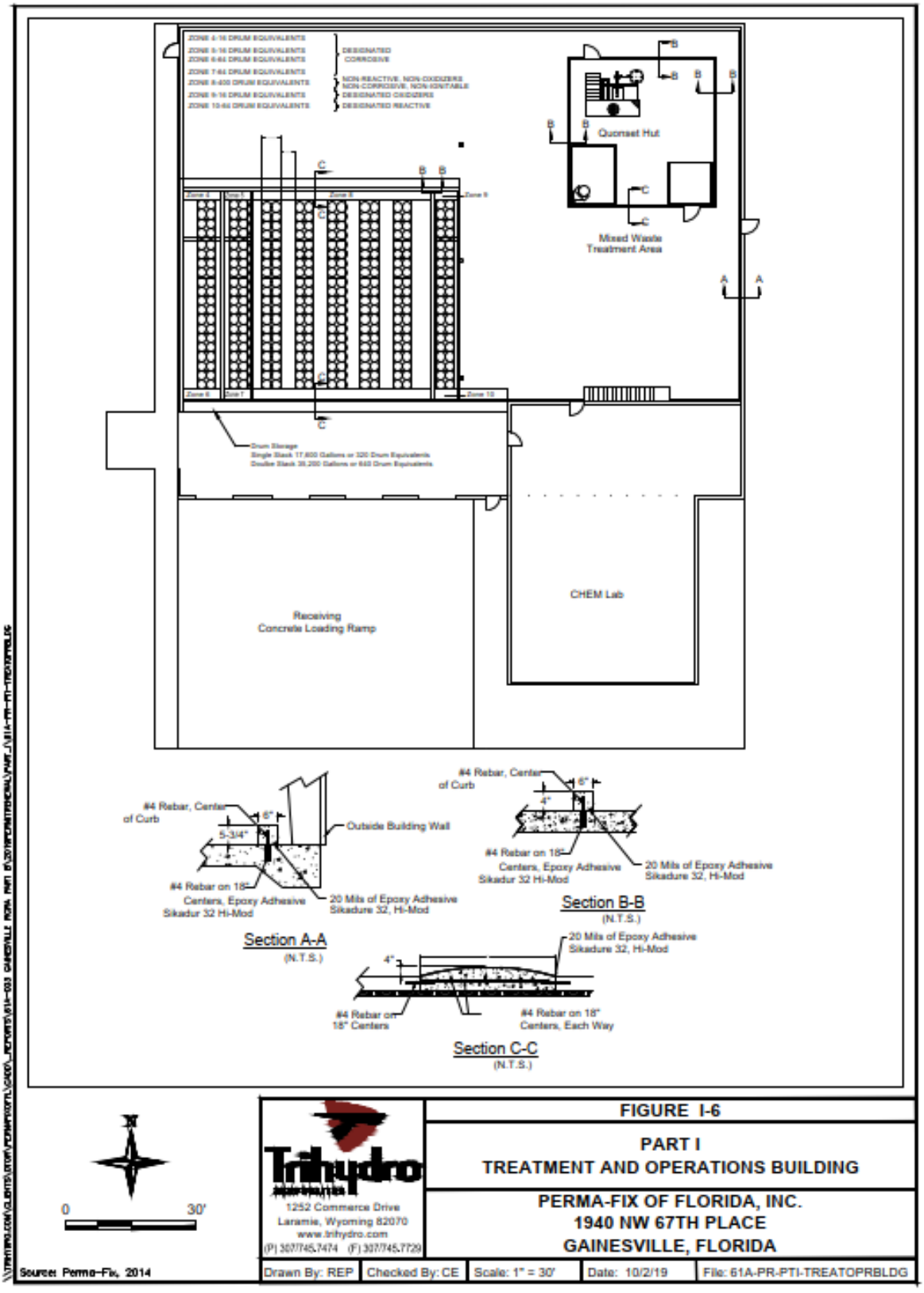
Constituent	Waste Code	Maximum Container Quantity (lbs)
O-Chlorophenol (2-Chlorophenol)	K001	10,000
Ethyl Benzene	K048	10,000
Carbon Disulfide (Carbon bisulfide)	K049	7,000
Acetone	K086	3,600
Butyl Benzyl Phthalate	K086	2,750
Cyclohexanone	K086	3,175
Ethyl Acetate	K086	4,300
Methanol	K086	4,861
Methyl Ethyl Ketone (2-butanone, ethyl methyl ketone)	K086	3,300
Methyl Isobutyl Ketone (Hexone)	K086	3,100
Methylene Chloride	K086	10,000
N-Butyl Alcohol	K086	3,125
Nitrobenzene	K086	10,000
O-Dichlorobenzene (1,2-Dichlorobenzene)	K086	10,000
1,1,1-Trichloroethane (Methyl Chloroform)	K086	10,000
Trichloroethylene	K086	10,000
Acetonitrile	K156	1,475
Aniline	K156	10,000
Chlorobenzene (Benzene Chloride)	K156	4,000
Chloroform	K156	10,000
Pyridine	K156	3,375
Carbon Tetrachloride	K157	10,000
Ethyl Benzene	F037	2,750

This attachment was generated from Tables 5 and 8 from the *Final Report Offsite Consequence Analysis and Air Modeling* dated January 2006 and *Substantial Modification Demonstration* dated December 2009. If a constituent was present in both tables the more restrictive data (*i.e.*, the smaller number in the "amount released" column) was listed in this table.

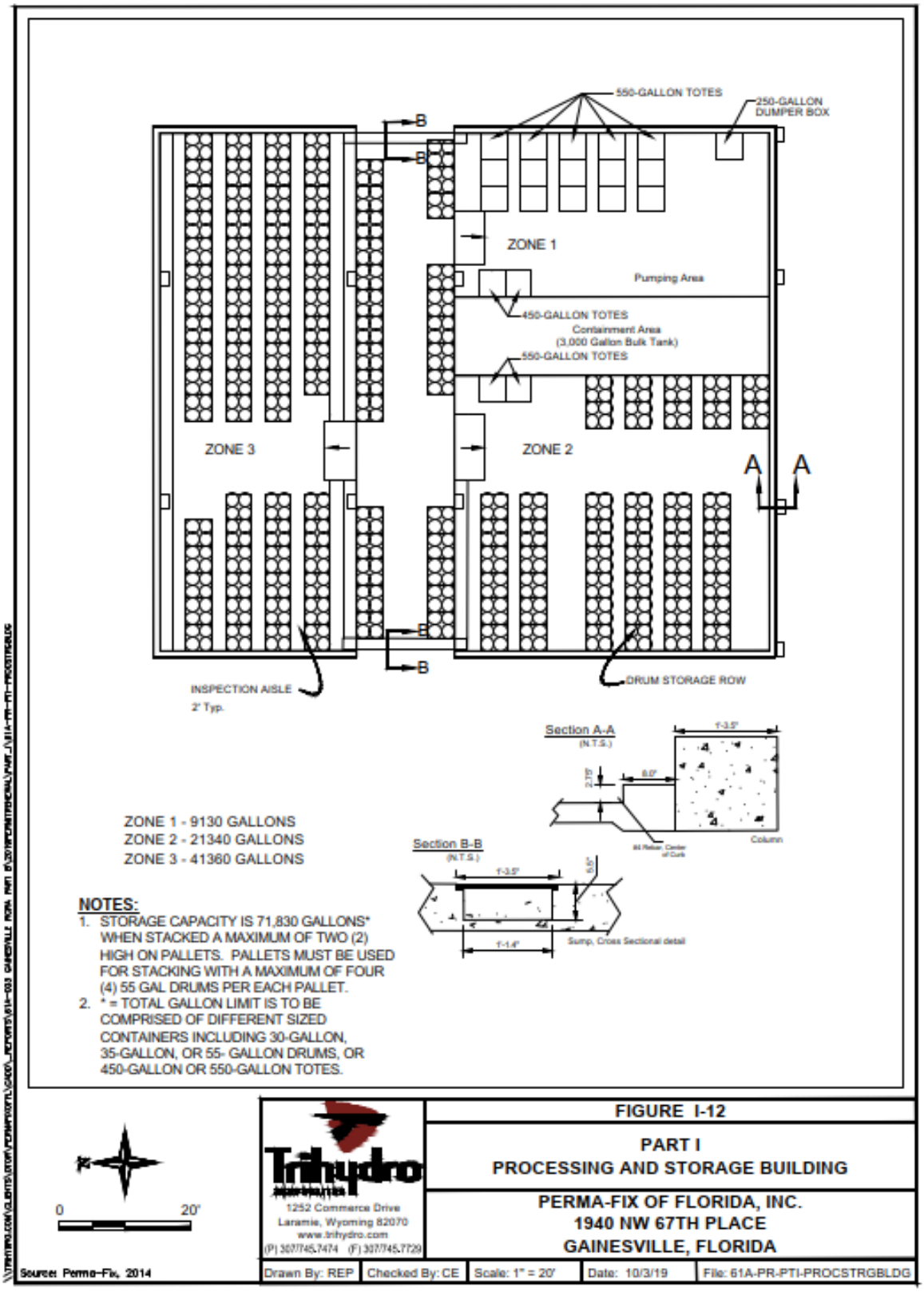
ATTACHMENT C-LSV PROCESSING AND WASTE STORAGE WAREHOUSE



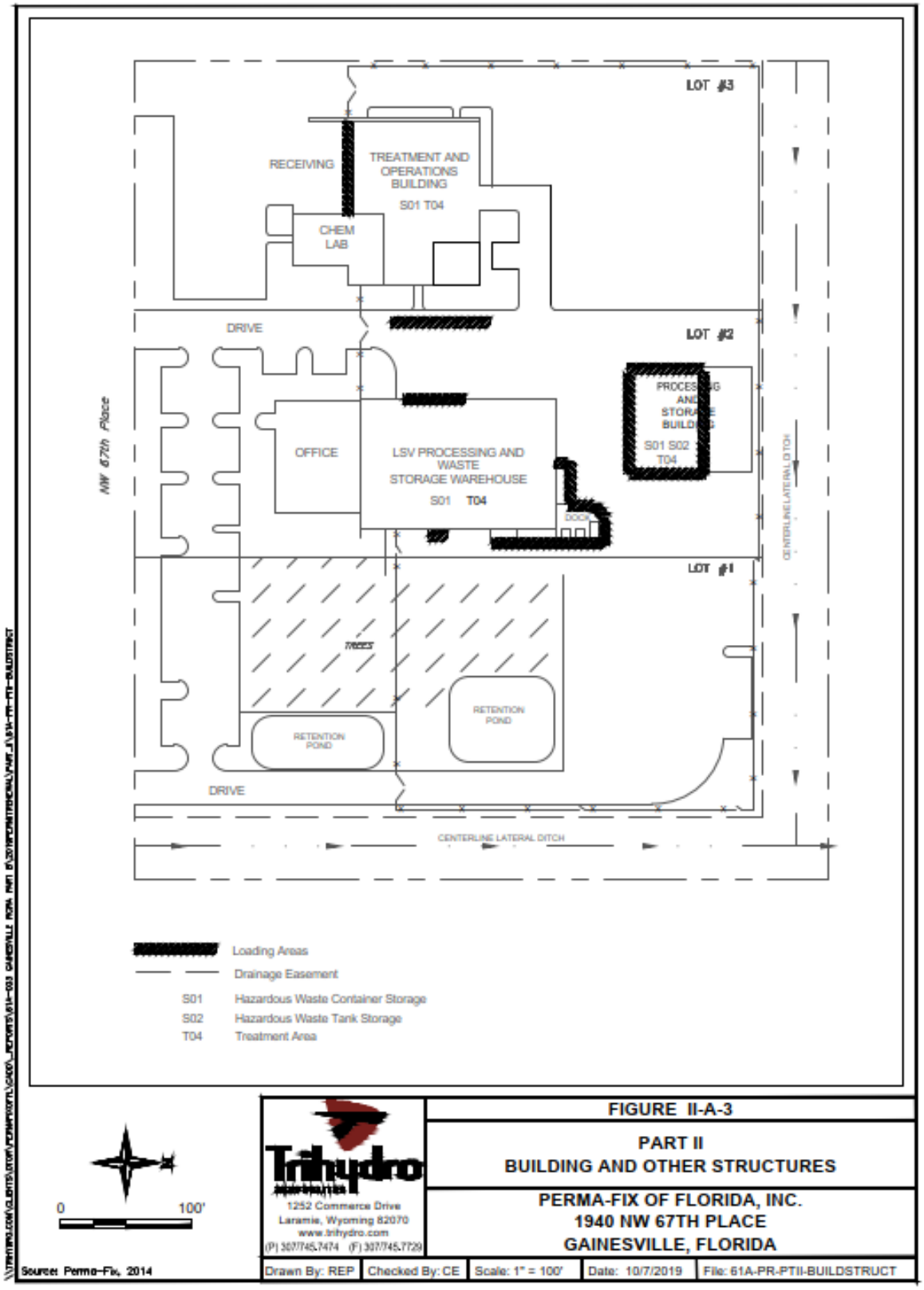
ATTACHMENT D-TREATMENT AND OPERATIONS BUILDING



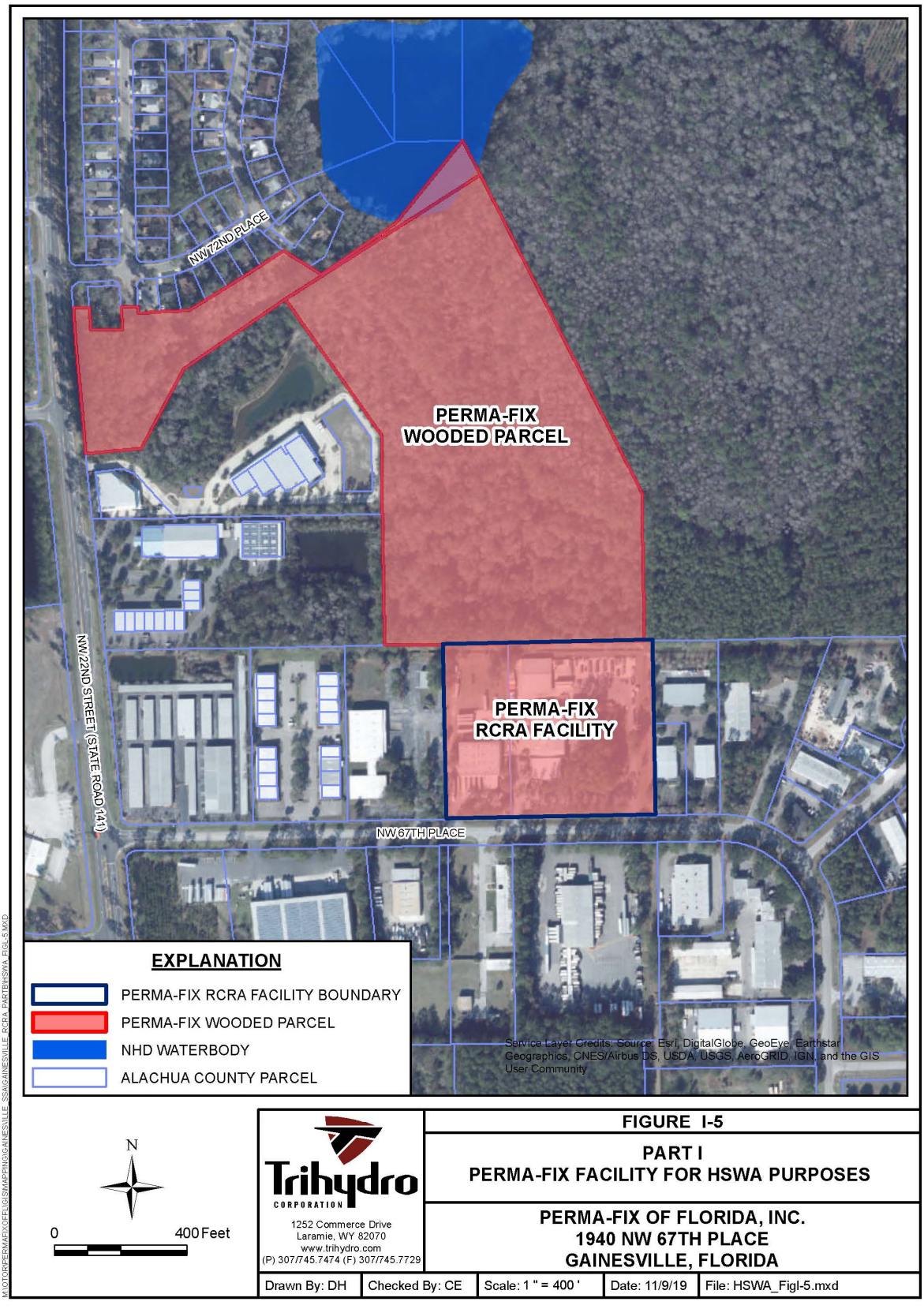
ATTACHMENT E-PROCESSING AND STORAGE BUILDING



ATTACHMENT F-BUILDINGS LAYOUT



ATTACHMENT G-PROPERTY



ATTACHMENT H-SWMU / AOC MAP

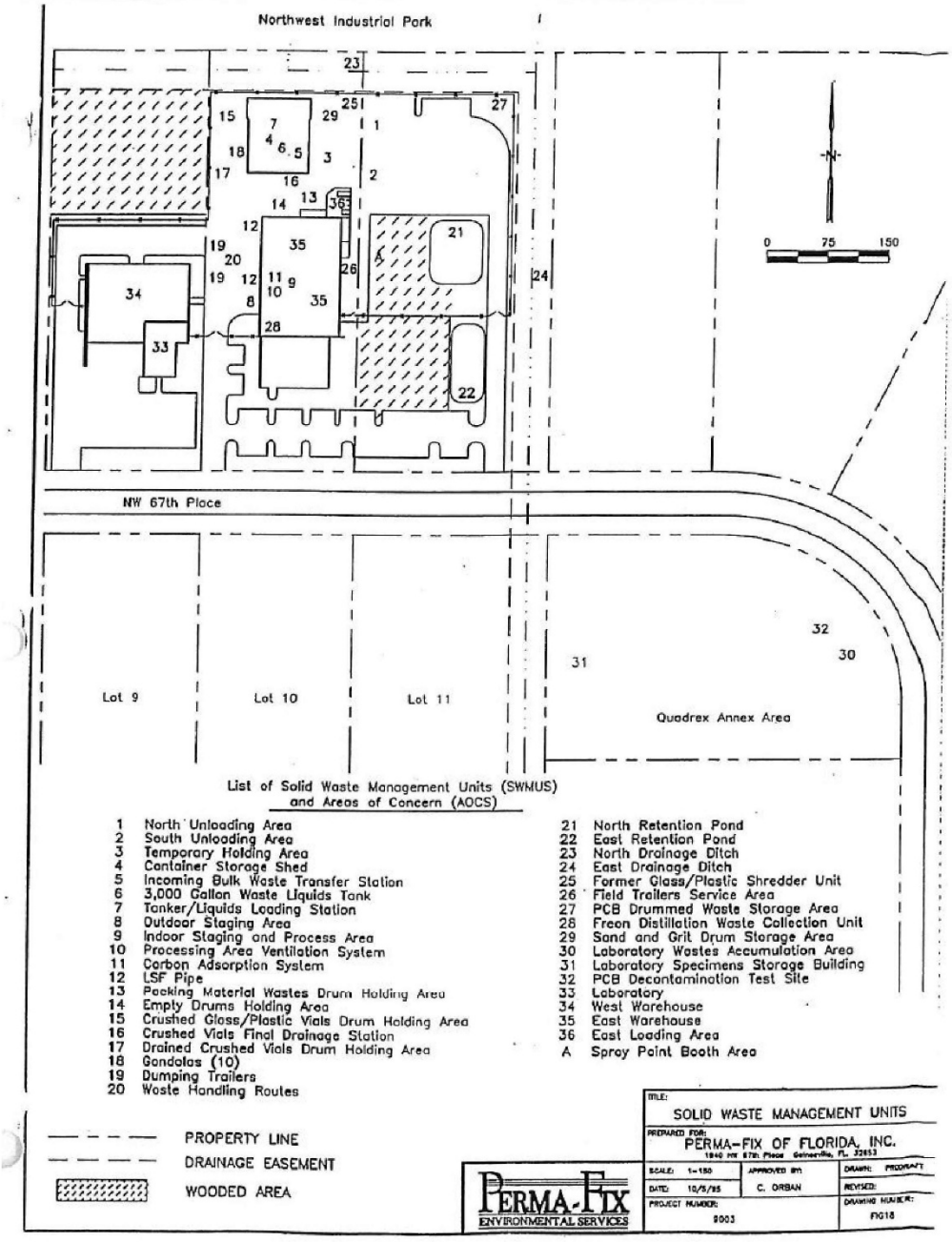


FIGURE II-Q-1

PART II
SWMU LOCATION MAP

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Trihydro CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/16/19	File: 61A-PR-PTII-SWMU-LOCMAP

V:\CTOR\PERMAFIX\T\CADD_REPORTS\61A-003 GAINSVILLE RCRA PART B\2019PERMITCONTAIN\PART_II\61A-PR-PTII-SWMU-LOCMAP