



February 19, 2021

Mr. Bradley Buselli  
Environmental Specialist III  
Florida Department of Environmental Protection  
Hazardous Waste Program and Permitting  
Post Office Box 3070  
Tallahassee, FL 32315-3070

RE: Letter of Transmittal  
RCRA Facility 60-Day Partial Closure Notification  
Perma-Fix of Florida, Inc.  
1940 NW 67<sup>th</sup> Place  
Gainesville, FL 32653  
Facility I.D. Number: FLD 980711071  
Hazardous Waste Treatment and Storage Facility Operating Permit Number: 17680-012-HO

Dear Mr. Buselli:

On behalf of Perma-Fix of Florida, Inc. (PFF), Trihydro Corporation (Trihydro) hereby submits notification of intent to replace select components of the existing thermal desorption and/or chemical oxidation/reduction waste treatment unit (PF-II<sup>®</sup> process) located in the Treatment and Operations Building (TOB) at the PFF facility located at 1940 NW 67th Place in Gainesville, Florida. The facility is currently operating as a commercial waste bulking, storage, and treatment facility for hazardous, industrial, universal, biomedical, mixed, radioactive-only, and non-hazardous waste under a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Construction and Operation Facility Permit, which was issued by the Florida Department of Environmental Protection (FDEP) on June 3, 2020 and expires on June 8, 2025.

Based upon the intent to replace select components of the PF-II<sup>®</sup> process, this transmittal serves as 60-day prior notification of planned partial closure of the related components and is hereby submitted to the FDEP as specified under 40 CFR 264.112(d). Note that under separate cover, a RCRA Class 1 Minor Permit Modification will be transmitted to the FDEP, listing the intended in-kind replacement components, component specifications, and applicable text and content revisions to the Part B Permit.

PFF intends to remove the following existing waste treatment processing components located in the TOB, as previously described in the 2019 Part B Permit Renewal Application for this facility:

- 317-Gallon Reactor Vessel (Plough Share Thermal Desorption Unit)



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- 120-Gallon Accumulator Tank
- 30-Gallon Adsorber Tank
- 16-Gallon Condenser and Heat Exchanger
- 25 Hp Steam Boiler
- 20-Ton Cooling Tower
- Ancillary Vacuum Pump

These components are currently located inside a quonset hut in the TOB, as depicted on enclosed **Figure I-6**. The process flow and process schematic diagrams identifying the specific existing components to be removed are depicted on enclosed **Figures I-7** and **I-11**.

PFF intends to dispose of the decommissioned components noted above, as hazardous waste. Therefore, in accordance with Part II Subpart B.1.10. of Permit 17680-012-HO for this facility, treated waste and other residues from the treatment unit and relevant ancillary equipment will be removed. The select components will then be disconnected from the remaining process elements, dismantled, manifested and disposed as hazardous waste. Since the former components are planned for disposal as hazardous waste and in-kind equipment is planned for installation to replace the former components and facilitate resumed operation of the full PF-II® processing unit, localized standard cleaning efforts associated with new equipment connections will be performed as provided under ancillary equipment replacement procedures in Part-II, Section K.7.1.3 of the 2019 RCRA Part B Permit Renewal. However, full decontamination of the removed components or the remaining process elements currently in place is not considered applicable for this partial closure effort.

Perma-Fix of Florida, Inc. appreciates the agency's consideration in reviewing this notification. If you have any questions, comments, or concerns related to this matter, please contact Mr. Randy Self (Perma-Fix of Florida, Inc.) at (352) 395-1368 or Mr. Brad Pekas (Trihydro Corporation) at (904) 513-9748.

Sincerely,  
Trihydro Corporation

Brad Pekas, P.E.  
Project Manager

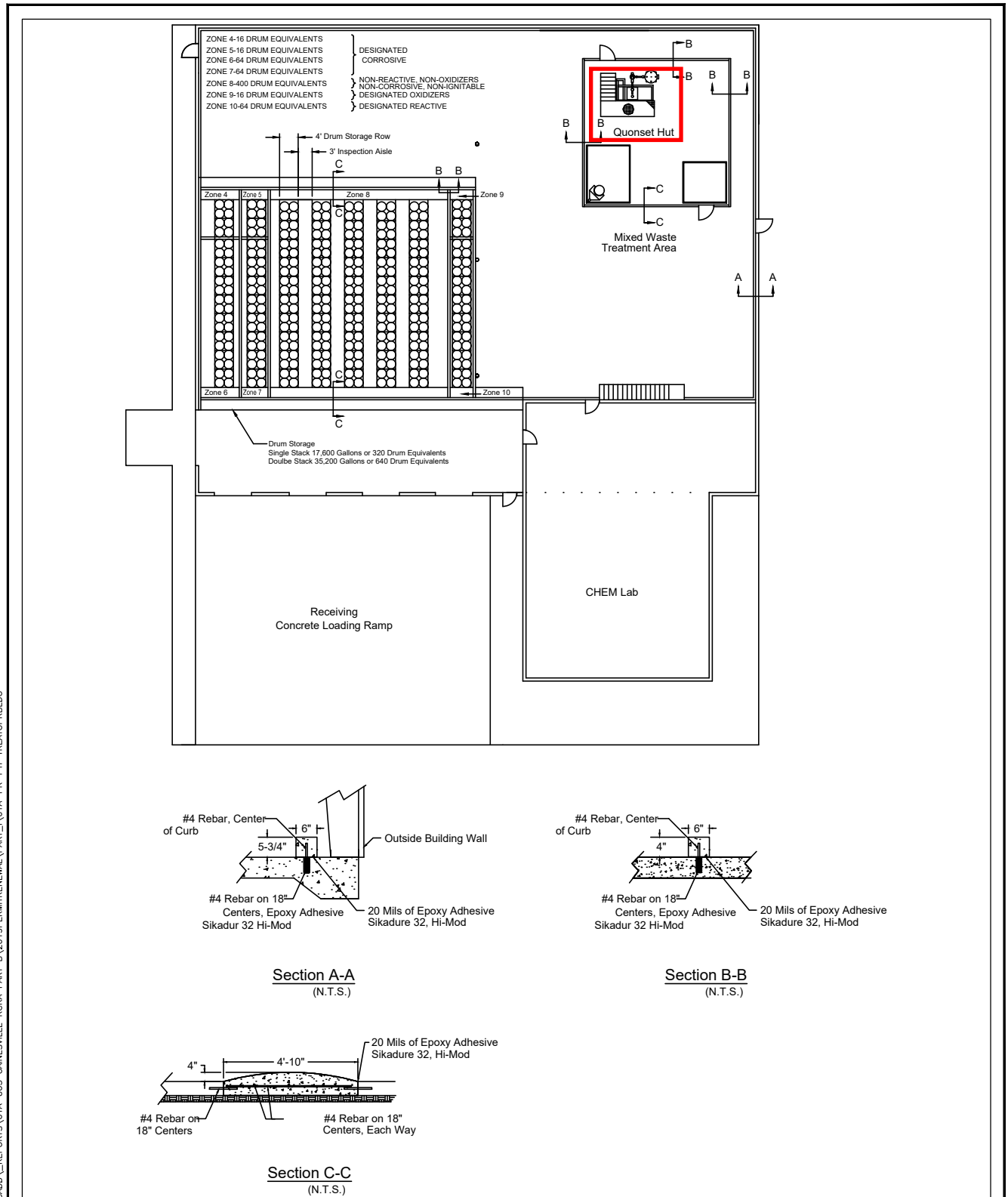


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## Enclosure

cc: Randy Self, Perma-Fix of Florida, Inc.  
Kevin Schmuggerow, Perma-Fix of Florida, Inc.  
William Kelly, Trihydro Corporation  
Waste and Air Resources Management Administrator, FDEP Northeast District  
Brian Bastek, EPA Region 4

## FIGURES



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**FIGURE I-6**

**PART I  
TREATMENT AND OPERATIONS BUILDING**

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

Source: Perma-Fix, 2014

Drawn By: REP

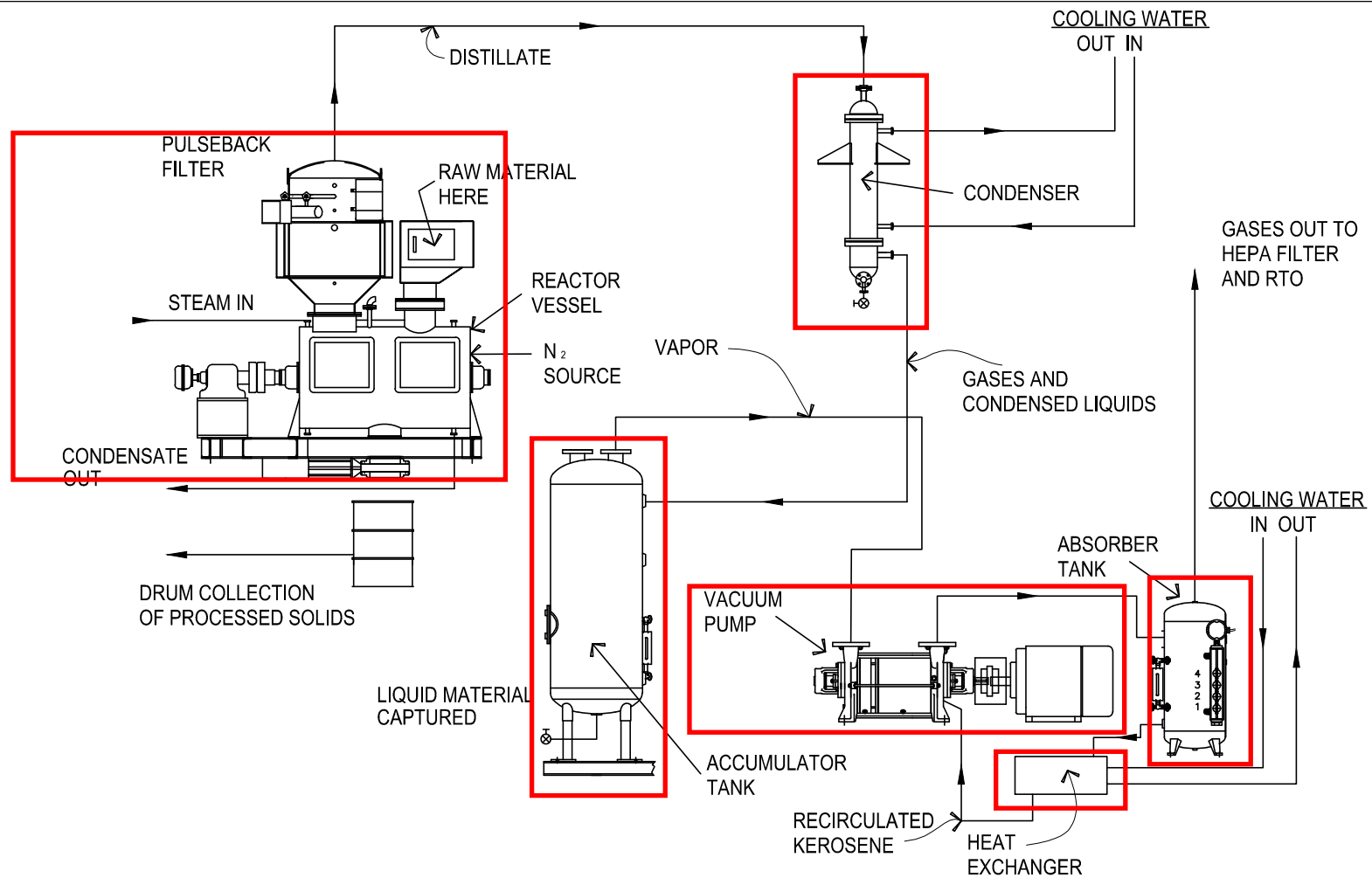
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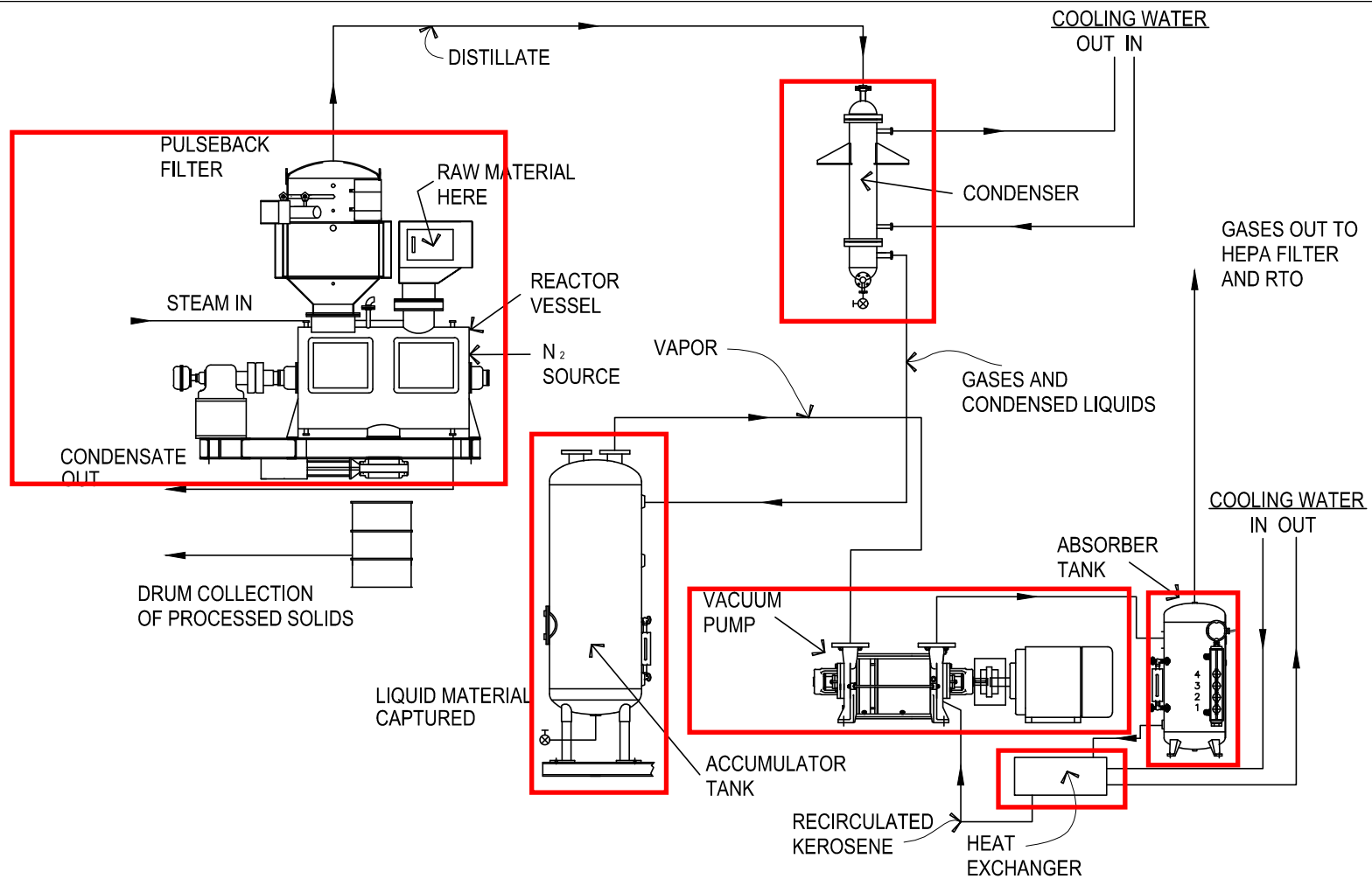
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**FIGURE I-7**  
**PART I**  
**PF-I AND PF-II**  
**PROCESS FLOW DIAGRAM**  
**PERMA-FIX OF FLORIDA, INC.**  
**1940 NW 67TH PLACE**  
**GAINESVILLE, FLORIDA**

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**NOTE:**  
PROCESS SCHEMATIC FOR PF-II PROCESS

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**FIGURE I-11**

**PART I  
PROCESS SCHEMATIC**

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

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/2/2019	File: 61A-PR-PTI-PROCESSSCHEM
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