

Memorandum

Florida Department Of Environmental Protection

CENTRAL DISTRICT

TO: HW File Perma-Fix of Orlando, Inc. 10100 Rocket Blvd

FROM: Tom Lubozynski

DATE: December 22, 2004

SUBJECT: RCRA Permitting Meeting, Dec 14, 2004

1. On December 14, 2004 I attended a meeting at the Perma-Fix facility at 10100 Rocket Blvd. Doug Outlaw and John Griffin from DWM had scheduled the meeting to discuss Perma-Fix's TSD permit. Chris Waechter and Jim Kreger from Perma-Fix hoisted the meeting. Besides discussing the operation, we toured the facility to better understand the proposed changes.

2. John Griffin stressed the permit must reflect the "worst case" with regard to the amount of hazardous waste materials that may be on the site at one time. This becomes the basis for the financial assurance requirements. Also, he wants a detailed description of what materials are expected in which areas. He wants the permit to be easily understood by the workers at Perma-Fix and easily enforceable by our inspectors.

3. The following information was offered during the visit:

- a. The warehouse area is now organized by DOT tables, ensuring non-compatibles will not mix if a spill occurs.
- b. From the warehouse, not everything is shipped as a hazardous waste. Some materials may be designated for disposal as non-hazardous material, for waste-to-energy recovery, or sent to special site for treatment or disposal.
- c. In the consolidation area, the length of time it takes to fill a drum depends upon the material. For a paint drum, the barrel is filled within a day; for mercury, the container may take 60 days to be filled. The amount of solid waste and universal waste handled in this area is a small percentage of the entire waste.
- d. All waste comes to 10100 Rocket Blvd. It is sorted. Only non-hazardous solids and liquids and used oil are taken to the Solid Waste Facility at 10225 General Dr.
- e. Perma-Fix is a used oil hauler. They use 10100 Rocket Blvd for the address since everything comes through that facility and that is where their administrative office is located. (They need to obtain a separate EPA ID number for 10225 General Dr since they will be seeking a Used Oil Processing Facility for that location.)

4. The following was observed during the tour of the facility:

- a. On the loading dock, there were drums that stored that did not have the labels facing out so they could be easily read. It appeared that each drum did have a label.
- b. In the warehouse, the storage and organization looked good. Aisle space was maintained; labels were readily visible. Perma-Fix does need to ensure the amount of containment for each bay is appropriate for the type and amount of containers. For example, one bay had 4 large totes being stored; it is not readily apparent whether the containment could hold the entire contents of one of the totes.

c. In the solid holding area all outside storage containers (trucks, roll offs, etc.) were covered minimizing the probably of rainwater contacting the waste.

d. The west side of the site is essentially all paved. The rainwater would flow to the northwest corner of the property. There is a low curb with pipes sticking through the curb. The pipes had valves that were open. Water flowing through or over the curb would drain into a storm water grate in the northw4est corner of the property. According to Chris Waechter the storm drain goes to the holding pond, which is along the north part of the property. Outside the curb, there was buildup of dirt essentially eliminating retention volume outside the curbing. When asked, Chris stated the dirt had never been tested to ensure it had not become contaminated to be classified as a hazardous waste. Perma-Fix needs to review its spill contingency plan and ensure the curbing performs its function of holding back spill contaminated waters. Also, they need to make sure contaminated rainwater is not released into the storm water retention pond.

e. The storm water retention pond looked good. There was no evidence of distressed vegetation or oil sheen.

5. I mentioned that we were considering allowing Perma-Fix to do a PiE project as part of its settlement for hazardous waste violations. One idea is to install a roof over the roll-offs that are used for staging and stabilizing waste on north side of the property. This would ensure rainwater does not leach contaminants into the storm water pond. Doug Outlaw stated the TSD permit does not have to be modified before Central District approves of the settlement. Eventually, the roof does have to be reflected in the TSD permit but that can be done as part of the next modification.

Attached:

Drawing of the Facility Layout