

Thursby, Kim

From: Victor SanAugustin [vsanagustin@perma-fix.com]
Sent: Thursday, September 06, 2007 12:11 PM
To: Epost HWRS
Cc: Kantor, Karen E.; jlennon@perma-fix.com; Prusty, Rabin; Kothur, Bheem
Subject: RE: Perma-Fix Environmental Services, Inc.;FLD 981 018 773

Dear Epost,

We received the email and attached letter below and will prepare and submit a response within the requested time frame.

Victor L. San Agustn
Perma-Fix Environmental Services, Inc.
cell 407/341-3351

-----Original Message-----

From: Epost HWRS [mailto:EpostHWRS@dep.state.fl.us]
Sent: Tuesday, September 04, 2007 8:11 AM
To: vsanagustin@perma-fix.com
Cc: Kantor, Karen E.; Raoul.Clarke@dep.state.fl.us; Wick, Fred; jlennon@perma-fix.com; lmcnamara@perma-fix.com; Bahr, Tim; Prusty, Rabin; Kothur, Bheem
Subject: Perma-Fix Environmental Services, Inc.;FLD 981 018 773

In an effort to provide a more efficient service, the Florida Department of Environmental Protection's Hazardous Waste Regulation 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. 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.

Please note that our documents are sent virus free. However, if you use Norton Anti-virus software, a warning may appear when attempting to open the document. Please disregard this warning.

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

Tim Bahr
Environmental Administrator
Hazardous Waste Regulation
Department of Environmental Protection
E-Mail Address: epost_hwrs@dep.state.fl.us



Florida Department of Environmental Protection

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

Charlie Crist
Governor

Jeff Kottkamp
Lt. Governor

Michael W. Sole
Secretary

September 4, 2007

SENT VIA EMAIL

vsanagustin@perma-fix.com

Victor L. San Agustin, P.E., C.H.M.M.
Director of Compliance
Perma-Fix Environmental Services, Inc.
3701 SW 47th Avenue, Suite 109
Davie, Florida 33314

RE: Perma-Fix Environmental Services, Inc.
EPA I.D. No. FLD 981 018 773
Used Oil Processing Facility Permit

Dear Mr. San Agustin:

The Florida Department of Environmental Protection (the Department) has received your permit application dated July 23, 2007 to operate a Used Oil and Solid Waste Processing Facility at 3670 SW 47th Avenue, Davie, Florida 33314.

The review of the permit application indicates that it is incomplete. Please provide the information requested in the enclosed summary. In preparing your response, the Department recommends that you identify each comment followed by your response and also provide your revised pages of the application. The revised pages are to include the new revision date.

Further action on processing your application is temporarily held in abeyance pending receipt of your complete response. Please submit three copies of your written response within 30 days of receipt of this notice. If you cannot submit this information within 30 days, you must formally request an extension and provide a schedule, with dates, indicating when this information will be submitted.

Victor L. San Agustin, P.E., C.H.M.M.
September 4, 2007
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Should you like to arrange a meeting or if you have any questions, please contact Rabin Prusty at (850) 245-8780 or via e-mail: rabin.prusty@dep.state.fl.us.

Sincerely,



Bheem Kothur, P.E. III
Hazardous Waste Regulation

BK/rp

Enclosure

cc: Karen Kantor, DEP/West Palm Beach, karen.e.kantor@dep.state.fl.us
Raoul Clarke, DEP/Tallahassee, raoul.clarke@dep.state.fl.us
Fred Wick, DEP/Tallahassee, fred.wick@dep.state.fl.us
John Lennon, Perma-Fix, jlennon@perma-fix.com
Larry McNamara, Perma-Fix, lmcnamara@perma-fix.com

ATTACHMENT
September 04, 2007
Perma-Fix Environmental Services, Inc.
EPA I.D. No. FLD 981 018 773
Notice of Deficiency

1. **Attachment A, UOP Application:** Section C, Operating Information, Items 3-10 reference the incorrect Attachments per the Table of Contents (examples: # 3 should refer to Attachment C, not A; item # 4 should refer to Attachment D, not B, and so on...). Please review and revise as appropriate.
2. **Attachment C, Brief Description of Facility Operations:** Perma-Fix has specified that Perma-Fix is a hazardous waste transporter and 10 day hazardous waste transfer facility. Perma-Fix must specify that the facility is in compliance with the site location standards for 10 day hazardous waste transfer facility in accordance with Rule 62-730.170. Perma-Fix must also submit a written closure plan for a hazardous waste transfer facility that satisfies the requirements of the closure performance, notification, and decontamination standards of 40 CFR 265.111, 265.112, 265.114 and 265.115. The facility must also comply with 40 CFR 265 Subpart B, Subpart C, Subpart D, and subpart I. The closure plan must include closure cost estimate.
3. **Attachment E, Waste Analysis Plan:** Please correct the typographical error on page 18 of 45, Section 12.0, "Prohibited Waste".

Perma-Fix must specify the frequency of sludge removal for the tanks in the application.

Perma-Fix must provide an inspection schedule for the tanks.

4. **Attachment I, Contingency Plan and Emergency Procedures:** Perma-Fix must specify address of emergency coordinators in the application. Please revise the application.
5. **Attachment N, Figures:** Please provide an electronic version of map (8 ½ "x 11") in PDF format clearly identifying the Tanks and Solid Waste Processing Area. This map will be attached to the renewal permit. Please send the map via e-mail.