

**Perma-Fix Environmental Services, Inc.**

3701 S.W. 47th Avenue #109

Davie, Florida 33314

(305) 583-3795

Fax: (305) 583-8017

**fax** t r a n s m i t t a l

to:

Vincent Peluso

fax:

407 681-6770

from:

Michael HAYNES

date:

6-12-96

re:

Attached

pages:

5 including cover sheet.

**NOTES:**

**PERMA-FIX**  
ENVIRONMENTAL SERVICES

June 12, 1996

Mr. Vincent Peluso  
Florida Department of Environmental Protection  
Southeast District  
P.O. Box 15425  
West Palm Beach, Florida 33416

**CERTIFIED MAIL**

Dear Mr. Peluso:

Thank you for your time Monday discussing the deficiencies associated with Perma-Fix's used oil general permit application. I found our conversation beneficial and productive. I have enclosed a copy of our response to deficiencies identified in the FDEP's used oil processors checklist. Upon your review of these responses, I would like to schedule a meeting to discuss any further issues or concerns you may have.

Thank you for your time. If you have any questions, please do not hesitate to contact me.

Sincerely yours,

**PERMA-FIX ENVIRONMENTAL SERVICES**



Michael J. Haynes  
Vice President / Southeast Regional Manager

**RESPONSE TO DEFICIENCIES  
USED OIL PROCESSORS CHECKLIST**

**Comment 1. Oil Filter Processing Standards -- Processor Standards**

3. Are records maintained on FDEP Form 62-710.900(2) or equivalent that include:  
[62-710.850(5)(a)]

Destination or end use of the processed filters ?  
Name and street address of each destination or end user ?  
Are copies kept at the facility's street address for 3 years ?

**Response 1.** The used oil recordkeeping form provided in the general permit application was included as an example. The example sheet shows oil filters received from generators and shipped to Perma-Fix of Ft. Lauderdale for processing. Used oil and related material processed by Perma-Fix and subsequently shipped off-site for disposal are reported on the same form. However, the form indicates the disposal facilities in the same format as generators. Over a year ago, Perma-Fix installed this customized computer system to satisfy the reporting and recordkeeping requirements of the FDEP, Broward County DNRP, Dade County DERM, and our general accounting. Prior to the installation Perma-Fix requested and subsequently received approval of the new used oil recordkeeping format by the FDEP. Please refer to Attachment I of the general permit application. As a means of responding to this comment and satisfying the used oil reporting requirements, Perma-Fix will include in the recordkeeping reports a list of all used oil disposal sites. The addition of this list should satisfy FDEP's requirements without the enormous cost associated with rewriting the customized computer program.

The second sentence on page 3, No. 3 states that "records are maintained at the facility for three years".

NOTE: All references to maintaining records at the facility also include the storage of records at the administration office located across the street from the facility.

**Comment 2. General facility Standards - 279.52**

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure ?  
[279.52(a)(2)(iii)]

**Response 2.** Perma-Fix does not have any sprinklers, water hoses, or foam producing equipment, other than fire extinguishers. However, there is adequate water volume and pressure available at the facility in the event of a fire. Refer to Appendix C of Perma-Fix's Contingency Plan which illustrates the location of two on-site fire hydrants. A third fire hydrant is located at the facility entrance.

**RESPONSE TO DEFICIENCIES  
USED OIL PROCESSORS CHECKLIST**

**Comment 1. Oil Filter Processing Standards -- Processor Standards**

3. Are records maintain on FDEP Form 62-710.900(2) or equivalent that include:  
[62-710.850(5)(a)]

Destination or end use of the processed filters ?  
Name and street address of each destination or end user ?  
Are copies kept at the facility's street address for 3 years ?

**Response 1.** The used oil recordkeeping form provided in the general permit application was included as an example. The example sheet shows oil filters received from generators and shipped to Perma-Fix of Ft. Lauderdale for processing. Used oil and related material processed by Perma-Fix and subsequently shipped off-site for disposal are reported on the same form. However, the form indicates the disposal facilities in the same format as generators. Over a year ago, Perma-Fix installed this customized computer system to satisfy the reporting and recordkeeping requirements of the FDEP, Broward County DNRP, Dade County DERM, and our general accounting. Prior to the installation Perma-Fix requested and subsequently received approval of the new used oil recordkeeping format by the FDEP. Please refer to Attachment I of the general permit application. As a means of responding to this comment and satisfying the used oil reporting requirements, Perma-Fix will include in the recordkeeping reports a list of all used oil disposal sites. The addition of this list should satisfy FDEP's requirements without the enormous cost associated with rewriting the customized computer program.

The second sentence on page 3. No. 3 states that "records are maintained at the facility for three years".

NOTE: All references to maintaining records at the facility also include the storage of records at the administration office located across the street from the facility.

**Comment 2. General facility Standards - 279.52**

6. If sprinklers, water hoses or foam producing equipment is part of the facility fire control equipment, is water available at adequate volume and pressure ?  
[279.52(a)(2)(iii)]

**Response 2.** Perma-Fix does not have any sprinklers, water hoses, or foam producing equipment, other than fire extinguishers. However, there is adequate water volume and pressure available at the facility in the event of a fire. Refer to Appendix C of Perma-Fix's Contingency Plan which illustrates the location of two on-site fire hydrants. A third fire hydrant is located at the facility entrance.

**Comment 3. Contingency Plan and Emergency Responses -- 279.52(b)**

3. Does the plan include:

Fire response procedures: [compare to 279.52(b)(6)]  
Explosion response procedures

**Response 3.** In review, it appears that Perma-Fix contingency plan meets the requirements of 40 CFR 279.52(b)(6). If my interpretation of this regulatory citation is in error, please provide specific regulatory citations. With respect to a fire or explosion, Perma-Fix's standard policy is to implement the facility contingency plan and evacuate the facility immediately.

**Comment 4. Contingency Plan and Emergency Responses -- 279.52(b)**

4. Is the plan up to date, with no changes in the list of emergency equipment, list of emergency coordinators, applicable regulations or contingency plan failures since the last revision? [279.52(b)(4)]

**Response 4.** Perma-Fix's contingency plan has been revised to reflect the new state and federal phone numbers. Additionally, all appropriate phone numbers have been revised to reflect the new (954) area code. However, these revisions are not required pursuant to 40 CFR 279.52.

**Comment 5. Rebuttable Presumption and Analysis Plan -- 279.53, 279.55**

3. Have any analysis showed exceedances of the 1,000 ppm level?

If so, was the oil managed as hazardous waste?

If not, was the oil exempt? Describe basis for presumption rebuttal in narrative. (analysis, refrigerant oil, etc.)

**Response 5.** The characterization of used oil and oily waste is managed in accordance with Perma-Fix's waste analysis plan which is provided in Attachment F of the permit application. For management standards applicable to this comment, refer to sections 2.1 (page 1), 2.3.1.1 (page 2), 2.3.1.3 (page 3).

**Comment 6. Rebuttable Presumption and Analysis Plan -- 279.53, 279.55**

Are all oil processing residues managed as used oil, reclaimed or used as asphalt manufacture feedstock? (279.59)

If not, has the processor conducted a hazardous waste determination? [279.10(e)]

**Response 6.** Refer to page 3 of Perma-Fix's general permit application which has been revised as follows:

"40 CFR 279.59 - Management of Residues

Residue from the processing of used oil are managed in accordance with 40 CFR 279.10(c) and characterized in accordance with Perma-Fix's Waste Analysis Plan."

**Comment 7.** Recordkeeping and Reporting -- 270.57, 62-710.510-520 F.A.C.

Do used oil delivery records include: [279.56(b), also check marketers requirements]

EPA ID# or receiving facility ? (burner, processor or disposal site)

EPA ID# of Transporter ?

End use of the oil ? [62-710.510(1)(e)]

**Response 7.** Refer to Attachment H of Perma-Fix's general permit application for a revised used oil delivery ticket. The revised delivery ticket contain the transporter's (i.e., Perma-Fix's) and burner facility's EPA ID #.

With respect to the end use of used oil, Perma-Fix shall revise the recordkeeping procedures as discussed in the response to Comment 1.

**Comment 8.** Closure -- 62.710.800(30 F.A.C. and 279.54(h)

\* Facility closure plan should be more specific. Specifically, which sampling procedures will be used.

**Response 8.** The following text has replaced the text for section 3.3 of the closure plan:

**3.3 Environmental Monitoring & Analysis**

At the time of closure, groundwater monitoring wells located in the vicinity of used oil management activities shall be sampled in accordance with SW-846 protocols and tested for the presents of used oil by methods 601, 602, 610, and 418.1 (or their equivalent). Additionally, four soil samples shall be obtained from areas in the vicinity of the used oil management activities. Samples shall be taken in accordance with SW-846 protocols and tested by methods 8010, 8020, 8270, and 418.1 ( or their equivalent). If the test results from groundwater and soil samples do not exceed regulatory levels, "clean closure" will be assumed.

If the test results from these samples exceed regulatory levels, Perma-Fix shall contact the Florida Department of Environmental Protection and re-evaluate the closure process.