

Chemical Conservation Corporation

10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 855-2812



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October 1, 1997

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FDEP-CENTRAL DISTRICT
HAZARDOUS WASTE

Mr. Robert Snyder, P.E.
Section Manager
Hazardous Waste Program
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
3319 Maguire Boulevard
Suite 232
Orlando, Florida 32803-3767

Re: Chemical Conservation Corporation FLD 980 559 728
Meeting of October 1, 1997

Dear Mr. Snyder:

This letter contains a list of steps that Chemical Conservation Corporation (CCC) will take to prevent recurrence of gas releases or other type of incidents that may result from bulking acid liquids at the facility.

1. A procedure that simulates the bulking operation will be implemented to test the compatibility of every waste before it is bulked into tote tanks and tankers.
2. The compatibility test result for every waste tested will be documented in a log that identifies the waste container and indicates changes in temperature, bubbling action and gas generation observed.
3. Waste will be tested for compatibility before it is bulked into tote tanks and, then, tested again for compatibility before it is bulked into a tanker.
4. Bulking operations into tote tanks and tankers will not begin unless the plant manager authorizes them by signing the log that documents the compatibility test results for the waste involved.
5. Personnel involved in bulking operations will be trained in conducting the compatibility test and their training will be documented by the trainees and the trainer.
6. A system to control fumes generated by bulking of acid liquids will be installed at the facility.
7. Vents of tote tanks and tankers will be connected to a working system to control fumes during bulking operations.
8. Chromic acid will not be bulked with other materials.
9. CCC will report to DEP and the NRC spills of any size that occur at the facility.

Mr. Robert Snyder, P.E.

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DEP will be notified when the steps listed above are in place and ready for you to verify that they meet the appropriate specifications.

If you have any questions, please call me at (407) 859-4441.

Sincerely,

CHEMICAL CONSERVATION CORPORATION

A handwritten signature in black ink, appearing to read 'Armando I. Gonzalez', with a stylized flourish at the end.

Armando I. Gonzalez
Compliance Officer

cc: William F. Labadie
Patrick Sullivan