

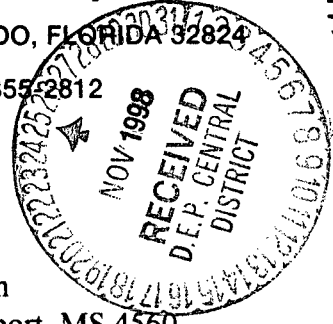
Chemical Conservation Corporation

10100 ROCKET BOULEVARD • ORLANDO, FLORIDA 32824

(407) 859-4441 • FAX (407) 855-2812

November 23, 1998

Mr. Doug Outlaw
Florida Department of Environmental Protection
Office of Waste Management, Engineering Support, MS 4560
2600 Blair Stone Road
Tallahassee, Florida 32399-2400



Bill
Bob

FLD 980-559-728

Dear Mr. Outlaw:

I am writing this letter to formalize the offer that I made to you during a telephone conversation held on November 18, 1998. I offered you to visit the Chemical Conservation Corporation facility in Orlando to study the effects proposed regulations may have in protecting health and the environment. The proposed regulations referenced above are the "off-site consequence rules" discussed in workshops held in Jacksonville, Tampa and West Palm Beach on November 9, 10 and 12, 1998, respectively.

We will learn more about the level of protection the proposed rules may offer to human health and the environment if we study them on a setting that reflects actual operation conditions. At the same time, we will be able to determine the implications that may be encountered in implementing the rules in question. Also, DEP's permitting engineers and regulated TSDs will have a better understanding on how to apply and comply with the proposed requirements. I believe that such a visit will provide an exceptional opportunity to test the strength and the weakness of those regulations.

The visit to our facility may be scheduled at a date and time that you find more convenient. Please advise me of the decision made by the Florida Department of Environmental Protection about accepting this offer.

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

Sincerely,

CHEMICAL CONSERVATION CORPORATION

Armando I. Gonzalez
Armando I. Gonzalez

cc: Vivian F. Garfein - DEP, Orlando
Satish Kastury - DEP, Tallahassee
John M. Ruddell - DEP, Tallahassee
Patrick Sullivan - Chem-Con

Date: 7/30/98 1:06:00 P
From: John White ORL
Subject: Chem Con Biennial Report

Since I have not heard back from Armando at Chemical Conservation Corp. about the biennial report, I gave him a call. He was out, so I left a message on his voice mail.

I indicated I drafted a letter regarding the biennial report and that it contained a 45 day time frame to submit a complete biennial report.

I also indicated that would mean the report would be no more than 6 and a half months late. I told him that number was our choice since they have not given us an estimate.

JACK - I know that sounds like a long time, however, since they have not been able to get it right yet, it may be necessary.

I also indicated that it was very important that he get back with me because this issue may affect the issuance of the permit - since they are already in violation of permit conditions.

I expect a call by the end of today.

jw

Date: 7/28/98 11:35:11
From: John P. (Jack) Griffith TAL
Subject: Re: Chem Con's Biennial Report

John said:

I contacted Armando and asked how things were going with the biennial report. Armando indicated that they had fired the original computer person a year and a half ago. The new computer guy was not up to standards. Armando indicated they had submitted the biennial report, however, it was not correct. I asked Armando how long it would be before the biennial report was submitted, he indicated that was not for him to say, but that he would get back with me about noon, today.

Jack is going to provide information on what is wrong with the submittals and possible suggestions on what can be done to correct the information, if possible.

John:

Problems with the Chem Con BRS report include but are not limited to:

1. Waste reported as shipped off-site to themselves.(hundreds)
2. Waste reported as received from themselves. (10-20)
3. waste streams with no waste codes(hundreds)
4. Waste reported as shipped off-site to Bad IDs (2-3)
5. waste streams with no waste description(hundreds)
6. Inorganic solid and liquid wastes sent offsite to be fuel blended.(hundreds)
7. wastes received from Bad IDs like TNDECONOAUTO, NCDECONO#29,GAG000040564, etc.(hundreds)
8. waste received with no waste codes(hundreds)
9. waste received with no description (hundreds)

I talked to a lady from Chem Con in Orlando who helped to verify that the report was pulled improperly from the data and was basically meaningless. The source data is complex and not well defined. The previous Data administrator did not document the data structures or leave instructions on preparing any reports. I have seen parts of the source data and it could be used to generate a report if all the data was available. Rick Brown of their home office sent all the data, but he was unable to transmit it correctly. It would take 3-4 weks for a good professional data man to get in there and straighten out the BRS mess. It would take 2-3 years for a good professional data man with a LOT of authority to get their data problems straightened out. They literally don't know what they did or who they did it to at this point.

Jack G

Date: 7/28/98 10:34:29
From: John White ORL
Subject: Chem Con's Biennial Report

I received a telephone call from Jack Griffith this morning. It seems Chem Con is having trouble submitting a complete (correct) biennial report. Jack's last conversation with Armando, Chem Con, was to the effect that they were not going to be able to submit the biennial report this year.

I contacted Armando and asked how things were going with the biennial report. Armando indicated that they had fired the original computer person a year and a half ago. The new computer guy was not up to standards. Armando indicated they had submitted the biennial report, however, it was not correct. I asked Armando how long it would be before the biennial report was submitted, he indicated that was not for him to say, but that he would get back with me about noon, today.

Jack is going to provide information on what is wrong with the submittals and possible suggestions on what can be done to correct the information, if possible.

I will draft a letter with the information, requesting the submittal within a specified time frame, following which we should consider per day penalties for failure to comply.

jw