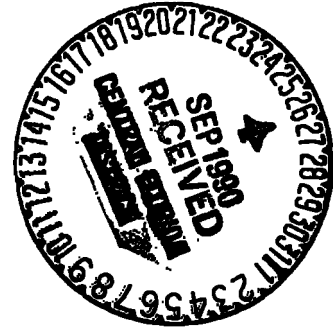


CROSSTESSITORE & ASSOCIATES, P.A.

4763 S. CONWAY ROAD, SUITE F
ORLANDO, FLORIDA 32812
407/851-1484

FDER

September 24, 1990



Mr. James H. Scarbrough
Branch Chief-RCRA and Federal Facilities Section
United States EPA Region IV
345 Courtland Street NE
Atlanta, GA 30365

RE: **Modification of TSDF Permit # OCF-HW-87-0308 to Accept Newly Created TCLP Waste Codes at Chemical Conservation Corporation, Orlando, Florida, EPA I.D. # FLD 980559728; C/TA C05.141**

Dear Mr. Scarbrough,

The following submittal has been prepared as a Class I Permit Modification for Chemical Conservation Corporation of Orlando, Florida, to amend the list of approved waste codes to include the newly created waste codes identified under the "Identification and Listing of Hazardous Waste; Toxicity Characteristics Revisions; Final Rule".

In accordance with 40 CFR 272.42 and based upon (1) Hazardous Waste Management System: Identification and Listing of Hazardous Waste; Toxicity Characteristics Revisions; Final Rule; as published in the Federal Register on Thursday, March 29, 1990, and (2) conversations with State of Florida Department of Environmental Regulation and EPA Region IV representatives; the following information is submitted in support of a request for a Class I permit modification.

Requested Modification

Chemical Conservation Corporation hereby requests a Class I permit modification to add the newly created waste types included in the Identification and Listing of Hazardous Waste; Toxicity Characteristics Revisions, Final Rule, to the facility's list of approved waste types. No other changes to the existing permit conditions are requested.

As required by 40 CFR 270.42(g), Chemical Conservation Corporation is a permitted facility in existence on or before the effective date of the final rule and is compliance with 40 CFR 265. Therefore, addition of the newly created TCLP waste types can be made following the procedures for a Class I permit modification.

A list of existing waste types, as well as, the additional waste types being requested are included in the revised Part A Permit application attached to this request. In accordance with 40 CFR 270.42(a), Chemical Conservation Corporation will begin receiving wastes identified with the newly created TCLP waste codes on September 25, 1990, and will continue accepting the newly created TCLP waste codes unless requested otherwise by EPA or the State of Florida Department of Environmental Regulation.

Justification for Requested Modification

Chemical Conservation Corporation is a permitted hazardous waste storage facility located in Orlando, Florida. A significant quantity of waste handled through this facility is D001 waste (Characteristic of Ignitability). Chemical Conservation Corporation currently holds at least one nation wide contract to collect, transport, and store D001 wastes. Under the new TCLP standards, the same waste streams handled as D001 wastes in the past will most likely be given new EPA waste codes after September 25, 1990. Without a Class I permit modification to add the newly created TCLP waste codes on the facility's list of approved waste codes, a large quantity of these wastes could not be received at the facility.

Since waste containers are not opened or otherwise processed at the facility, the addition of the newly created waste codes will not require any changes to existing operations or procedures at the facility. With the exception of the list of approved waste types, this requested modification will not require any other changes to the existing permit application or existing permit conditions.

Additional Submittals

In accordance with 40 CFR 270.42(a), the applicable information required by 40 CFR 270.13 through 270.21, 270.62 and 270.63 is discussed below.

The contents of the Part A permit application, as specified in 40 CFR 270.13, have been revised to reflect the addition of the newly created TCLP waste codes and are attached to this request for a Class I permit modification. Since the applicable information in 40 CFR 270.14 through 270.21, 270.62 and 270.63 has been adequately addressed in the facility's existing permit application and will not be changed as a result of the requested Class I permit modification, this information is submitted by reference to the exiting facility permit application dated October 15, 1986 and existing facility permit dated on March 27, 1990, as issued by the Florida Department of Environmental Regulation.

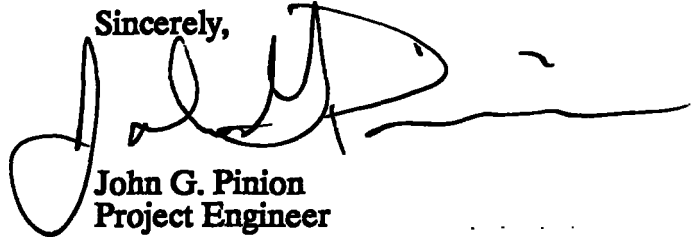
Notification of Facility Modification(s)

As required by 40 CFR 270.42(a)(ii), Chemical Conservation Corporation will request a copy of the facility mailing list from the Florida Department of Environmental Regulation. A notice identifying the implemented modification will be mailed to each person on the facility mailing list within 90 days of September 25, 1990.

I have included two copies for your use. One of the copy's contains original signatures and the other copy is a xerox copy of the original signatures. I have also sent two copies to the State of Florida Department of Environmental Regulation. One of the states' copies also contains original signatures.

Please review the request for a Class I permit modification described above. If you have any questions or comments regarding this request, please forward them to Mr. William Labadie of Chemical Conservation Corporation at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Pinion", with a long horizontal flourish extending to the right.

John G. Pinion
Project Engineer

CC: William F. Labadie
Laxime Lavin, Florida Department of Environmental Regulation
C7088.DOC

Application for a Hazardous Waste Facility Permit

Part I - General

To Be Completed By All Applicants

Please Type or Print

A. General Information

1. Type of Facility:

Disposal <input type="checkbox"/>	Landfill <input type="checkbox"/>	Land Treatment <input type="checkbox"/>	Surface Impoundment <input type="checkbox"/>	Miscellaneous Units <input type="checkbox"/>
Storage <input checked="" type="checkbox"/>	Containers <input checked="" type="checkbox"/>	Tanks <input type="checkbox"/>	Piles <input type="checkbox"/>	Surface Impoundment <input type="checkbox"/>
Treatment <input type="checkbox"/>	Tanks <input type="checkbox"/>	Piles <input type="checkbox"/>	Incineration <input type="checkbox"/>	Surface Impoundment <input type="checkbox"/>
				Miscellaneous Units <input type="checkbox"/>
2. Type of Application: TOP Construction Operation Closure RD&D
3. Application Submittal: New Revised
4. Date current operation began (or is expected to begin): January 1985
5. Facility Name: Chemical Conservation Corporation
6. EPA/DER I.D. No.: FLD 980559728
7. Facility location or street address: 653 Rocket Blvd., Orlando, Florida 32824
8. Facility mailing address: 653 Rocket Blvd., Orlando, Florida 32824
Street or P.O. Box City State Zip
9. Contact person: William F. Labadie Telephone: (407) 859-4441
 Title: Vice President
- Mailing address: 653 Rocket Blvd., Orlando, Florida 32824
Street or P.O. Box City State Zip
10. Operator's name: Chemical Conservation Corporation Telephone: (407) 859-4441
11. Operator's address: 653 Rocket Blvd., Orlando, Florida 32824
Street or P.O. Box City State Zip
12. Facility owner's name: Thomas P. Sullivan
13. Facility owner's address: 18550 Allen Road, Wyandotte, MI 48192
Street or P.O. Box City State Zip
14. Legal structure: Corporation Non-Profit Corporation Partnership Individual
 Local Government State Government Federal Government Other _____
15. If an individual, partnership, or business is performed under an assumed name, specify county and state where name is registered.
 County: Orange State: Florida
16. If a corporation, indicate state of incorporation Florida

17. If an individual or partnership, list owners:

Name: Thomas P. Sullivan

Address: 18550 Allen Road, Wyandotte, MI 48192
Street or P.O. Box City State Zip

Name: _____

Address: _____
Street or P.O. Box City State Zip

Name: _____

Address: _____
Street or P.O. Box City State Zip

Name: _____

Address: _____
Street or P.O. Box City State Zip

18. Site ownership status: Owned To be purchased To be leased _____ years
 Presently leased: Expiration date _____ If leased, give:

Land owner's name _____

Land owner's address _____
Street or P.O. Box City State Zip

19. Engineer: Frank L. Cross, Jr. Registration No.: 7916

Address: 4763 South Conway Road, Orlando, Florida 32812
Street or P.O. Box City State Zip

Associated with: Cross/Tessitore & Associates, P.A.

20. Facility located on Indian land: Yes No

21. Existing or pending environmental permits: (Attach a separate sheet if necessary)

Name of Permit	Agency	Permit Number	Date Issued	Expiration Date
None				

B. Site Information SEE ATTACHMENT 1

Facility location: County: Orange Nearest community: Taft

Latitude: 28° 25' 04" N Longitude: 81° 23' 10" W

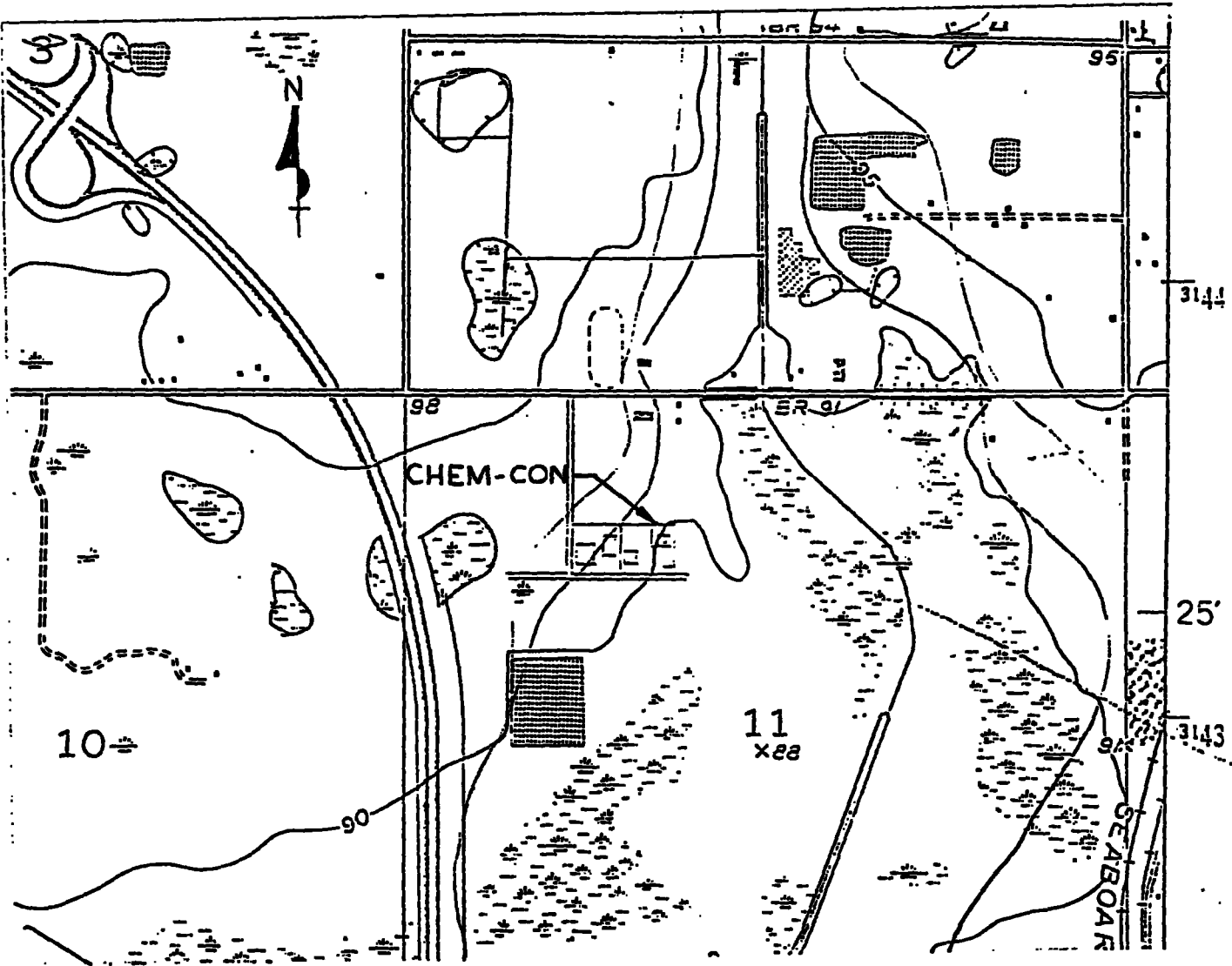
2. Area of facility site (acres): 1.2

3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Also show the hazardous wastes traffic pattern including estimated volume and control.

4. Attach topographic map which shows all the features indicated in the instruction sheet for this part.

5. Is the site located in a 100-year flood plain? Yes No

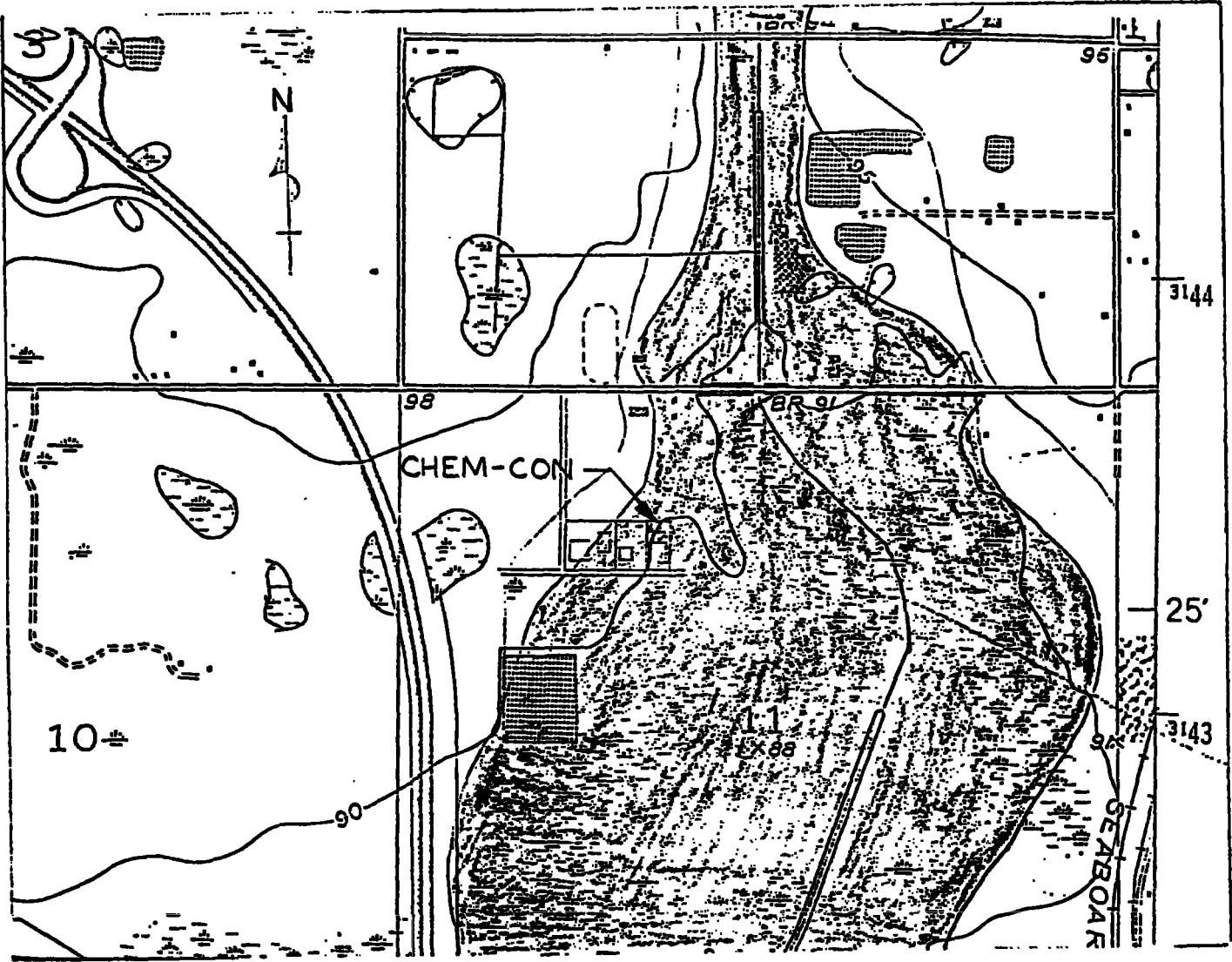
ATTACHMENT 1



SCALE: 1"=1400'
MAP DATE: 1980

Facilty Map with 5' Contour Intervals
of Elevation (ft-MSL)

PIB-4



SCALE: 1"=1400'
MAP DATE: 1980

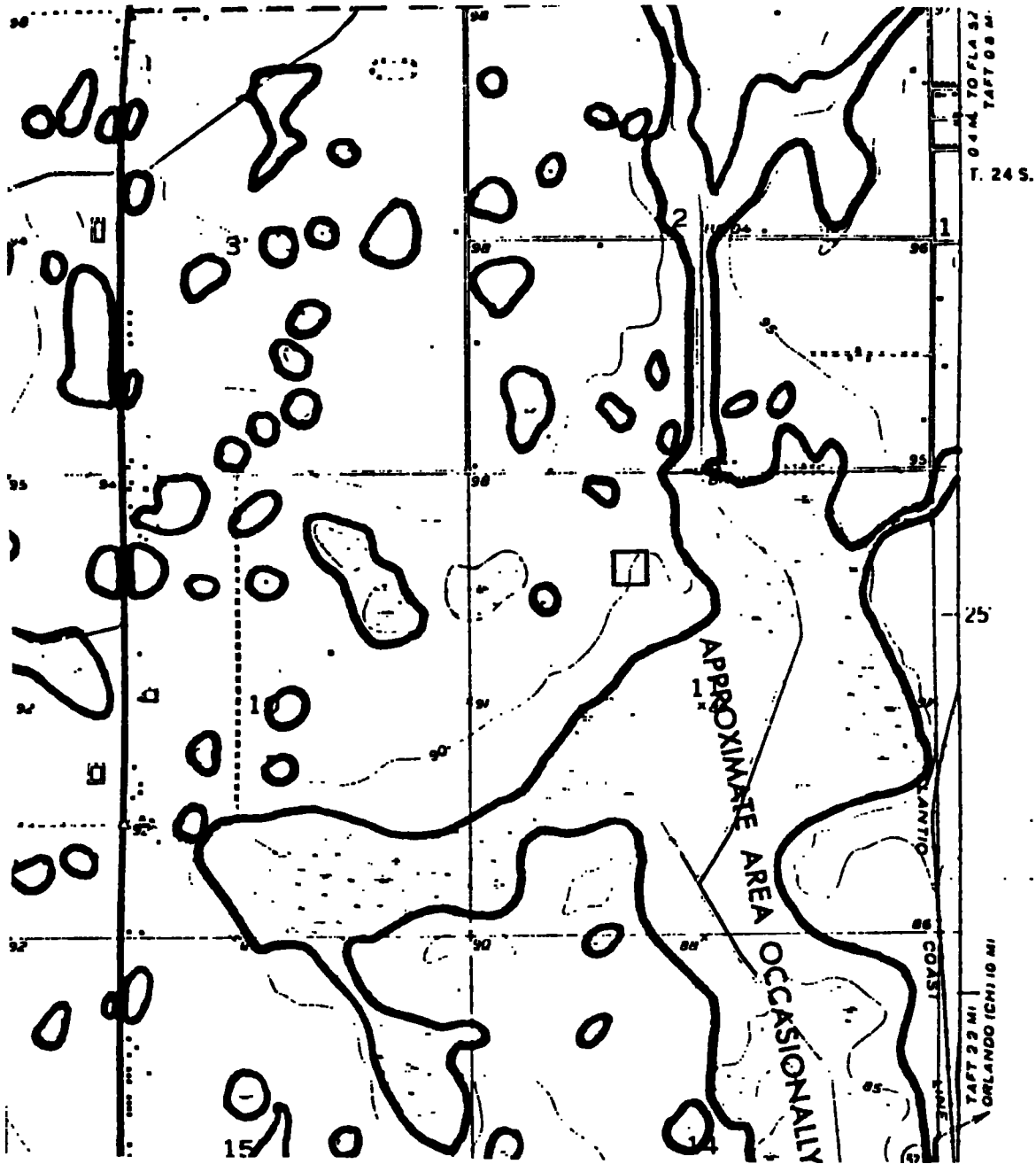
Facility Map Showing 100-yr
and 500-yr Floodplain

PART I/SECTIONB/ITEM 3

ITEM 1.

According to the South Florida Water Management District, there are no drinking wells within 1/4 mile of the facility. There are no streams, springs, or lakes within 1/4 mile of the facility (See U.S.G.S. Location Map).

FIGURE PIB-3
PART I/SECTION B/ITEM 3



SCALE 1:24,000

U.S.G.S. MAP
Lake Jessamine, Florida

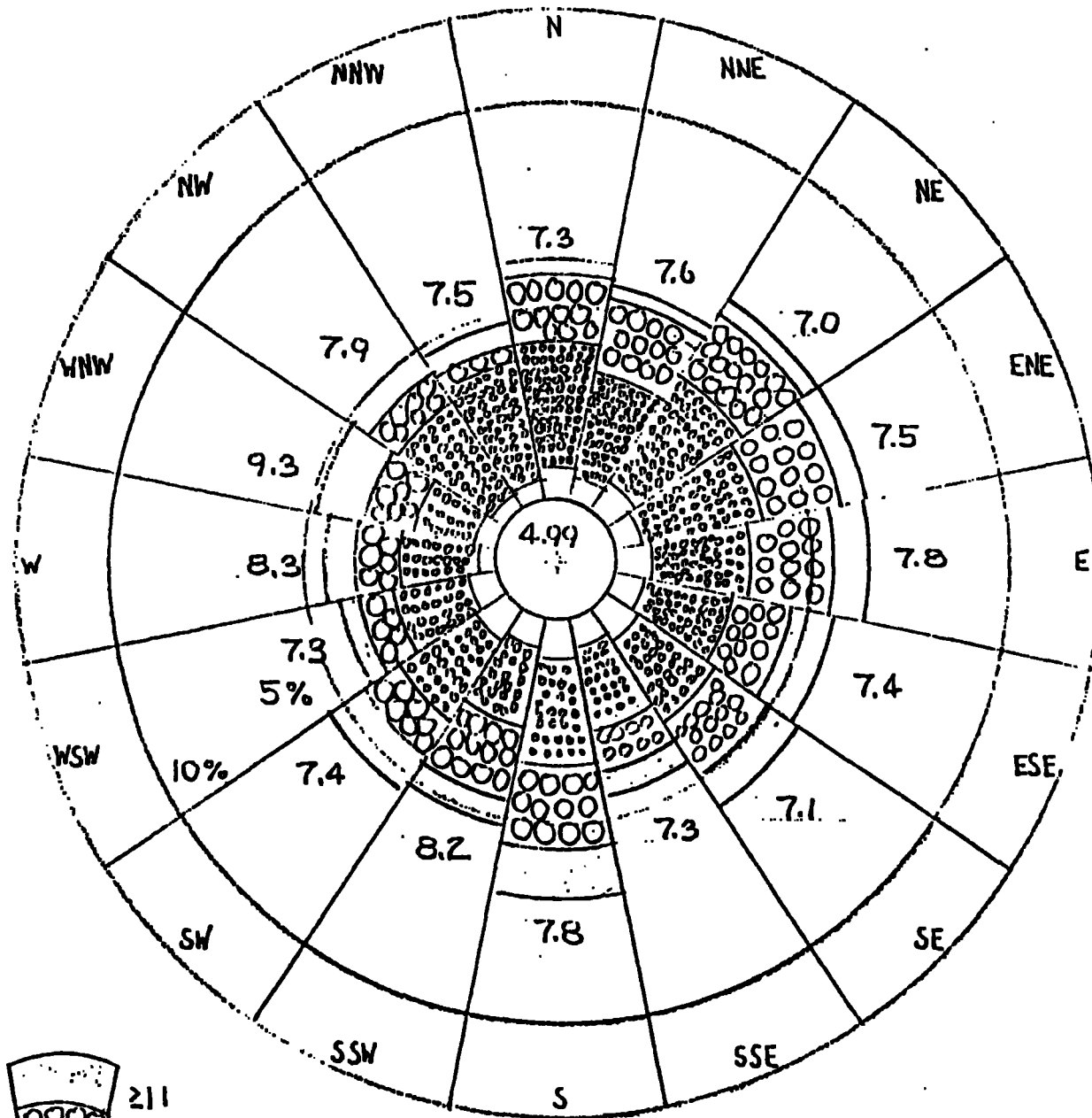
CHEMCON FACILITY LOCATION (SECTION 11)

PART I/SECTION B/ITEM 3

ITEM 2.

There are no injection wells, intake or discharge structures within 1 mile of the facility property boundary.

WIND ROSE



WIND SPEED, knots

WINDS ARE FROM INDICATED DIRECTIONS
 NUMBER AT END OF ROSE IS MEAN WIND SPEED

ANNUAL WIND ROSE FOR ORLANDO, FLORIDA
 1948-1978

SOURCE: NATIONAL WEATHER SERVICE AT HERNDON AND MCCOY AIRPORT

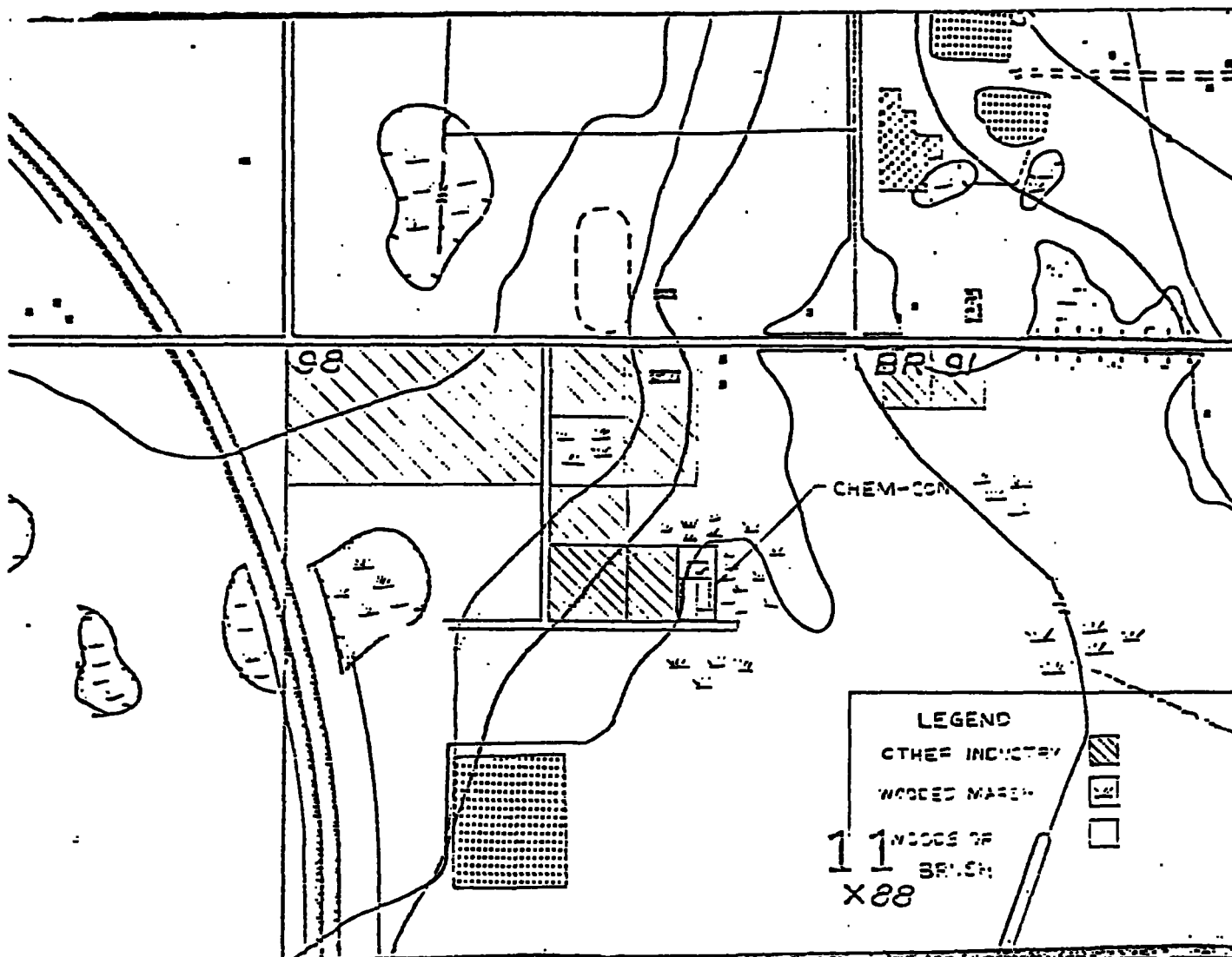
C. Land Use Information SEE ATTACHMENT 2

1. Present zoning of the site? Industrial
 2. If a zoning change is needed, what should new zoning be? N/A
 3. Present land use of site Industrial
-

ATTACHMENT 2

FIGURE PIC-1

PART I/SECTION C/ITEM 3: LAND USE



SCALE: 1"=900'
MAP DATE: 1980

ChemCon Facility and Surrounding
Land Use

PIC-3

D. Operating Information **SEE ATTACHMENT 3**

1. Is waste generated on site? Yes No List the SIC codes (4-digit)

2. Attach a brief description of the facility operation, nature of the business, and activities that generate, treat, store or dispose of hazardous waste.

3. Using the following table and codes provided, specify, (1) each process used for treating, storing, or disposing of hazardous waste (including design capacities) at the facility, and (2) the hazardous waste (or wastes) listed or designated in 40 CFR Part 261 including the annual quantities, to be treated, stored, or disposed by each process at the facility. (See instructions for list of process codes and units).

Process Code	Process Design Capacity and Units of Measure	Hazardous Waste Code	Annual Quantity of Hazardous Waste and Units of Measure
	SEE ATTACHED LIST UNDER		
	ATTACHMENT D		

ATTACHMENT 3

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF EXISTING WASTE TYPES APPROVED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
D001	Solid waste that exhibits the characteristic of ignitability but is not listed as a hazardous waste	20,000	D	S01
D004	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Arsenic	Included in F, D, or K Wastes	D	S01
D005	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Barium	Included in F, D, or K Wastes	D	S01
D006	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Cadmium	Included in F, D, or K Wastes	D	S01
D007	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Chromium	Included in F, D, or K Wastes	D	S01
D008	F Listed Wastes, K Listed Wastes, of D001 Wastes which also exhibit characteristics of for TCLP for Lead	Included in F, D, or K Wastes	D	S01
D009	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Mercury	Included in F, D, or K Wastes	D	S01
D010	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Selenium	Included in F, D, or K Wastes	D	S01
D011	F Listed Wastes, K Listed Wastes, or D001 Wastes which also exhibit characteristics of for TCLP for Silver	Included in F, D, or K Wastes	D	S01

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF EXISTING WASTE TYPES APPROVED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
F001	Spent halogenated solvents used in degreasing: Tetrachloroethylene, trichloroethylene methylene chloride, 1,1,1-trichloroethane, carbon tetrachloride, and chlorinated fluorocarbons; all spent solvent mixtures/blends used in degreasing containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures	500	D	S01
F002	Spent halogenated solvents; Tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-Tri-chloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene trichlorofluoroethane, and 1,1,2-trichloroethane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above halogenated solvents or those solvents listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures	500	D	S01
F003	Spent non-halogenated solvents; Xylene, acetone ethyl acetate, ethyl benzene, ethyl ether methyl isobutyl ketone, n-butyl alcohol, cyclohexanone and methanol; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures	2,000	D	S01

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF EXISTING WASTE TYPES APPROVED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
F005	Spent non-halogenated solvents; Toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene 2-ethoxyethanol, and 2-nitropropane; all spent solvent mixtures/blends containing, before use, a total of ten percent or more (by volume) of one or more of the above non-halogenated solvents or those solvents listed in F001, F002, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures	2,000	D	S01
K048	Dissolved air flotation (DAF float from the petroleum refining industry)	50	D	S01
K049	Slop oil emulsion solids from the petroleum refining industry	50	D	S01
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry	50	D	S01
K051	API separator sludge from the petroleum refining industry	50	D	S01
K052	Tank bottoms (leaded) from the petroleum refining industry	50	D	S01

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF WASTE TYPES APPROVED FOR STORAGE ON THE EAST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes	
D002	Solid waste that exhibits the characteristic of corrosivity but is not listed as a hazardous waste	500	D	S01	
D004	Arsenic	50	D	S01	
D005	Barium	500	D	S01	
D006	Cadmium	1000	D	S01	
D007	Chromium	1500	D	S01	
D008	Lead	1500	D	S01	
D009	Mercury	1000	D	S01	
D010	Selenium	250	D	S01	
D011	Silver	500	D	S01	
F006	Wastewater treatment sludges from electro plating operations	1000	D	S01	
F008	Plating bath sludges from the bottom of plating baths from electroplating operations	50	D	S01	
F009	Spent stripping and cleaning bath solutions from electroplating operations	50	D	S01	
K061	Dust/sludge from electric steel furnaces	100	D	S01	(1)
K062	Spent pickle liquor from steel finishing operation	500	D	S01	(1)

PID-9c

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF WASTE TYPES APPROVED FOR STORAGE ON THE EAST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes	
K086	Solvent washes and sludges, Caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink, from pigments, driers, soaps, and stabilizers containing Chromium and Lead	250	D	S01	(1)

PID-Ad

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF NEWLY CREATED TCLP WASTES TYPES
PROPOSED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
D018	Benzene-Waste with TCLP extract containing in excess of 0.5 mg/l Benzene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D019	Carbon Tetrachloride-Waste with TCLP extract containing in excess of 0.5 mg/l Carbon Tetrachloride but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D020	Chloradane-Waste with TCLP extract containing in excess of 0.03 mg/l Chloradane but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D021	Chlorobenzene-Waste with TCLP extract containing in excess of 100 mg/l Chlorobenzene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D022	Chloroform-Waste with TCLP extract containing in excess of 6.0 mg/l Chloroform but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D023	o-Cresol-Waste with TCLP extract containing in excess of 200 mg/l o-Cresol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D024	m-Cresol-Waste with TCLP extract containing in excess of 200 mg/l m-Cresol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01

PID-5

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF NEWLY CREATED TCLP WASTES TYPES
PROPOSED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
D025	p-Cresol-Waste with TCLP extract containing in excess of 200.0 mg/l p-Cresol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D026	Cresol-Waste with TCLP extract containing in excess of 200.0 mg/l Cresol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D027	1,4-Dichloroethylene-Waste with TCLP extract containing in excess of 7.5 mg/l 1,4-Dichloroethylene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D028	1,2-Dichloroethane-Waste with TCLP extract containing in excess of 0.5 mg/l 1,2-Dichloroethane but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D029	1,1-Dichloroethylene-Waste with TCLP extract containing in excess of 0.7 mg/l 1,1-Dichloroethylene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D030	2,4-Dinitrotoluene-Waste with TCLP extract containing in excess of 0.13 mg/l 2,4-Dinitrotoluene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D031	Heptachlor (and its hydroxide)-Waste with TCLP extract containing in excess of 0.008 mg/l Heptachlor (and its hydroxide) but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01

PID -5a

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF NEWLY CREATED TCLP WASTES TYPES
PROPOSED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
D032	Hexachlorobenzene-Waste with TCLP extract containing in excess of 0.13 mg/l Hexachlorobenzene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D033	Hexachloro-1,2-butadiene-Waste with TCLP extract containing in excess of 0.5 mg/l Hexachloro-1,2-butadiene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D034	Hexachloroethane-Waste with TCLP extract containing in excess of 3.0 mg/l Hexachloroethane but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D035	Methyl ethyl ketone-Waste with TCLP extract containing in excess of 200 mg/l Methyl ethyl ketone but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D036	Nitrobenzene-Waste with TCLP extract containing in excess of 2.0 mg/l Nitrobenzene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D037	Pentachlorophenol-Waste with TCLP extract containing in excess of 100 mg/l Pentachlorophenol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D038	Pyridine-Waste with TCLP extract containing in excess of 5.0 mg/l Pyridine but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01

PID-5b

CHEMICAL CONSERVATION INCORPORATED, ORLANDO, FLORIDA
LIST OF NEWLY CREATED TCLP WASTES TYPES
PROPOSED FOR STORAGE ON THE WEST PAD

EPA ID Number	General Description	Estimated Annual Quantity Of Waste	Unit of Measure	Process Codes
D039	Tetrachloroethylene-Waste with TCLP extract containing in excess of 0.7 mg/l Tetrachloroethylene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D040	Trichloroethylene-Waste with TCLP extract containing in excess of 400 mg/l Trichloroethylene but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01
D041	2,4,5-Trichlorophenol-Waste with TCLP extract containing in excess of 400 mg/l 2,4,5-Trichlorophenol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D042	2,4,6-Trichlorophenol-Waste with TCLP extract containing in excess of 2.0 mg/l 2,4,6-Trichlorophenol but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	200	D	S01
D043	Vinyl Chloride-Waste with TCLP extract containing in excess of 0.2 mg/l Vinyl Chloride but is not otherwise listed as a hazardous waste in 40 CFR Part 261.30	500	D	S01

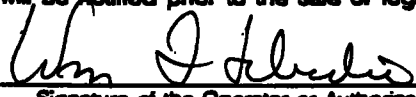
PID-5c

Application for a Hazardous Waste Facility Permit Certification

To be completed by all applicants

1. Operator

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. Further, I agree to comply with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Regulation. It is understood that the permit is only transferable in accordance with Section 17-730, FAC, and, if granted a permit, the Department of Environmental Regulation will be notified prior to the sale or legal transfer of the permitted facility.



 Signature of the Operator or Authorized Representative*

William F. Labadie, Vice President
 Name and Title (Please Type or Print)
 Date: Sept. 24, 1990 Telephone No. (407) 859-4441

*Attach a letter of authorization

2. Facility Owner

This is to certify that I understand this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. As owner of the facility, I understand fully that the facility operator and I are jointly responsible for compliance with the provisions of Chapter 403, Florida Statutes, and all rules and regulations of the Department of Environmental Regulation.


 Signature of the Facility Owner or Authorized Representative*

Thomas P. Sullivan, President
 Name and Title (Please Type or Print)
 Date: 9/24/90 Telephone No. (313) 282-9250

*Attach a letter of authorization

3. Land Owner

This is to certify that I, as land owner, understand that this application is submitted for the purpose of obtaining a permit to construct, operate, or close a hazardous waste management facility on the property as described. For hazardous waste disposal facilities, I further understand that I am responsible for providing the notice in the deed to the property required by 40 CFR §264.119 and §265.119, as adopted by reference in Chapter 17-730, FAC.

N/A
 Signature of the Facility Owner or Authorized Representative*

 Name and Title (Please Type or Print)
 Date: _____ Telephone No. (____) _____

*Attach a letter of authorization

4. Professional Engineer Registered In Florida (Where Required by Chapter 471, F.S. or not exempted by Rule 17-730.220(5), F.A.C.)

This is to certify that the engineering features of this hazardous waste management facility have been designed/examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgment, this facility, when properly constructed, maintained and operated, or closed, will comply with all applicable statutes of the State of Florida and rules of the Department of Environmental Regulation.


 Signature

Frank L. Cross, Jr., P.E.
 Name (Please Type)

Florida Registration No.: 7916

Mailing address: 4763 S. Conway Rd., Suite F
 Street or P.O. Box
Orlando, Florida 32812
 City State Zip

(Please Affix Seal)

Date: Sept. 24, 1990 Telephone No. (407) 851-1484