



December 11, 2019

Mr. Bradley Buselli
Environmental Specialist III
Florida Department of Environmental Protection
Hazardous Waste Program and Permitting
Post Office Box 3070
Tallahassee, FL 32315-3070

RE: Letter of Transmittal
Permit Renewal for RCRA Activities
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653
(FLD 980711071)

Dear Mr. Buselli:

On behalf of Perma-Fix of Florida, Inc., we hereby present for your review, the enclosed RCRA Hazardous Waste Facility Permit Renewal Application for Perma-Fix of Florida, Inc. located at 1940 NW 67th Place in Gainesville, Florida. The facility is currently operating as a commercial waste bulking, storage, and treatment facility for hazardous, industrial, universal, biomedical, mixed, radioactive-only, and non-hazardous waste under a RCRA Hazardous Waste Construction and Operation Facility Permit, which was issued by the Florida Department of Environmental Protection on May 27, 2015 and expires on May 27, 2020.

Enclosed please find two hard copies and an electronic copy of the following:

1. Hazardous Waste Facility Permit Application Form (DEP Form 62-730.900(2)(a)), which is an attachment to this letter.
2. Part I General Facility Information
3. Part II Specific Facility Information
4. Part I and II General Permit Application Review Checklists

There have been no changes to the facility since the December 2015 permit application. However, the certifying engineer, flood map and wind rose have been updated.



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The requisite permit fee will be submitted in conjunction with this application. Perma-Fix of Florida, Inc. appreciates the agency's consideration in reviewing this application. If you have any questions or comments, please contact Mr. Randy Self (Perma-Fix of Florida, Inc.) at (352) 395-1368 or Mr. William Kelly (Trihydro Corporation) at (904) 513-9742.

Sincerely,
Trihydro Corporation

William C. Kelly, P.G.
Senior Project Manager

Attachment

cc: Randy Self, Perma-Fix of Florida, Inc. (1 copy)
Florida Department of Environmental Northeast District (2 copies)
Brian Bastek, EPA Region 4 (1 copy)

ATTACHMENT A

DEP FORM 62-730.900(2)(A) APPLICATION FOR HAZARDOUS WASTE PERMIT

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**APPLICATION FOR A HAZARDOUS WASTE PERMIT
PART I – GENERAL
TO BE COMPLETED BY ALL APPLICANTS**

Please Type or Print

A. General Information [40 CFR Part 270.13 (a)]

1. Type of Facility in accordance with Part 270.13(a)

■ TREATMENT

- ☒ Tanks ☐ Piles ☐ Surface Impoundment
☐ Incineration ☐ Containment Building
☐ Boiler / Industrial Furnace Type of Unit _____
☒ Miscellaneous Unit Type of Unit _____

■ STORAGE

- ☒ Containers ☒ Tanks ☐ Piles
☐ Surface Impoundment ☐ Containment Building
☐ Miscellaneous Unit Type of Unit _____

□ DISPOSAL

- ☐ Landfill ☐ Land Treatment ☐ Surface Impoundment
☐ Miscellaneous Units Type of Unit _____

2. Type of application [40 CFR Part 270.13 (a)]:

- ☐ Construction Permit
☐ Operation Permit
☒ Construction & Operation Permit
☐ Research, Development & Demonstration (RD&D) Permit
☐ Postclosure Permit
☐ Clean Closure Plan
☐ Subpart H Remedial Action Plan
☐ Corrective Action

3. Revision Number: 1

4. Date Current Operation Began, or is expected to begin: 10 / / 1983

5. Facility Name [40 CFR Part 270.13 (b)] Perma-Fix of Florida, Inc.

6. EPA/DEP I.D. No. FLD 980711071

7. Facility Location or Street Address [40 CFR Part 270.13 (b)] 1940 NW 67th Place
Gainesville, FL 32653

8. Facility Mailing Address 1940 NW 67th Place

	Street or P.O. Box
<u>Gainesville</u>	<u>FL 32653</u>
City	State Zip

9. Contact Person Kevin Schmuggerow Telephone (404) 989-1665

Title Vice President Southeast Operations

Mailing Address 1940 67th Place

	Street or P.O. Box
<u>Gainesville</u>	<u>FL 32653</u>
City	State Zip

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If leased, indicate land owner's name. _____

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

E-mail address _____

17. Name of Engineer Brad Pekas Registration No. 46867

Address 3740 St. Johns Bluff Rd., Suite 14, Jacksonville, FL 32224
Street or P.O. Box City State Zip

Associated with: Trihydro Corporation

18. Is the facility located on Tribal land [40 CFR Part 270.13 (f)]? ☐ Yes ☒ No

19. Existing or pending environmental permits (attach a separate sheet, if necessary):
[40 CFR Part 270.13 (k)]

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
SEE TABLE I-1				

B. Site Information [40 CFR Part 270.13 (b)]

1. The facility is located in Alachua county.

The nearest community to the facility is Gainesville.

Latitude 29.71711 N Longitude 82.34931 W

Method and datum Center of the facility

2. The area of the facility site is 7.67 acres.

3. Attach a scale drawing and photographs of the facility showing the location of all past, present, and future treatment, storage and disposal areas. Include photographs and the locations of all Solid Waste Management Units and Areas of Concern. Also, show the hazardous wastes traffic pattern including estimated volume and control [40 CFR Part 270.13 (h)].

4. Attach a topographic map which shows all the features indicated in the instructions for this part.

5. Is the facility located in a 100-year flood plain? ☐ Yes ☒ No

6. The facility complies with the wellhead protection requirements of Chapter 62-521, F.A.C.

☒ Yes ☐ No

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C. Land Use Information

- The present zoning of the site is I-1 (Industrial).
- If a zoning change is needed, what should the new zoning be? N/A.

D. Operating Information

- Is waste generated on-site? ☒ Yes ☐ No
- List the NAICS codes (5 to 6 digits) [40 CFR Part 270.13 (c)] 562211
- Use the codes and units provided in the instructions to complete the following table. Specify [40 CFR Part 270.13 (i and j)]:
 - Each process used for treating, storing or disposing of hazardous waste (including design capacities) at the facility, and;
 - The hazardous waste(s) listed or designated in 40 CFR Part 261, including the annual quantities, to be treated, stored, or disposed by each process at the facility.

PROCESS CODE	PROCESS DESIGN CAPACITY AND UNITS OF MEASURE	HAZARDOUS WASTE CODE	ANNUAL QUANTITY OF HAZARDOUS WASTE AND UNITS OF MEASURE
S01	161,370 gallons	See Table I-6	2,127,715 gallons
S02	3,000 gallons	D001, F001, F002, F003, F005	110,400 gallons
See Table I-4 for additional codes			

- A brief description of the facility [40 CFR Part 270.13 (m)]:

See page 16 of application.
- For hazardous debris, a description of the debris category(ies) and contaminant category(ies) to be treated, stored or disposed of at the facility [40 CFR Part 270.13 (n)]:

See page 342 of application - section 2.2 of Appendix II-A-4 Waste Analysis Plan.



March 25, 2020

Mr. Bradley Buselli
Environmental Specialist III
Florida Department of Environmental Protection
Hazardous Waste Program and Permitting
Post Office Box 3070
Tallahassee, FL 32315-3070

RE: First Request for Additional Information Response to Comments
Permit Renewal for RCRA Activities
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, FL 32653
(FLD 980711071)

Dear Mr. Buselli:

On behalf of Perma-Fix of Florida, Inc. (Perma-Fix), Trihydro Corporation submitted a RCRA Hazardous Waste Facility Permit Renewal Application for the facility located at 1940 NW 67th Place in Gainesville, Florida to the Florida Department of Environmental Protection (FDEP) on December 11, 2019. The facility is currently operating as a commercial waste bulking, storage, and treatment facility for hazardous, industrial, universal, biomedical, mixed, radioactive-only, and non-hazardous waste under a RCRA Hazardous Waste Construction and Operation Facility Permit, which was issued by the FDEP on May 27, 2015 and expires on May 27, 2020.

In a letter dated December 30, 2019, Perma-Fix received a First Request for Additional Information (RAI) from FDEP. Additional comments from the United States Environmental Protection Agency (USEPA) were provided in email correspondence dated January 27, 2020. On February 21, 2020 an extension to the response to comment submittal was requested until March 29, 2020, which was approved by the FDEP on February 24, 2020. Individual written responses to FDEP and USEPA comments are provided below. Edited permit text excerpts, figures, and tables are attached with reference to corresponding page numbers from the original submittal.

RESPONSES TO FDEP COMMENTS DATED DECEMBER 30, 2019

FDEP Comment 1

Part I.D, Summary of Site Processes: The application describes a non-elementary neutralization (N-EN) process performed in a portable 300-gallon tank; this activity is further described in Appendix I-E. Please note that this tank is listed under Part II, Section K.2.1 of the application as a RCRA permitted unit.



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- a. *Appendix I-E, Section I.1, Process Description: This section appears to indicate that both elementary neutralization and N-EN processes may be performed using the 300-gallon tank. While elementary neutralizations are exempt from RCRA permitting, the N-EN process is not because it involves mixed wastes. Therefore, the language of this section should be revised to clarify the distinction between the two processes; noting that the tank is considered a permitted unit, and not exempt from RCRA permitting. The Department recommends that the facility consider the use of separate tanks or units for each process, if for instance the process were to be performed on a non-mixed waste stream. The utilization of one unit for RCRA-exempt elementary neutralizations and another for N-EN avoids any potential issues of regulated sludges or residues passing into the neutralized liquid.*

Response to FDEP Comment 1

The 300-gallon tank described in the permit application was a proposed neutralization method that was never enacted. A modified portion of text from Part I.D.2.1 and the complete Appendix I-E text have been updated to reflect the following current practices that address the above comments (see Attachment A-1).

The processing of the radioactive corrosives is done in the as-received container, which may range from a 5-gallon to 55-gallon poly drum dependent on the lab pack volumes. Therefore, there is no mixing of RCRA-exempt and non-exempt waste in the same container. Waste is processed in the container in which it is received.

FDEP Comment 2

Part I, Figure I-15: The area on the figure marked for “Universal Waste Storage” has not been observed to be used for this type of storage since the 2017 District inspection. Additionally, facility personnel during the 2017, 2018 and 2019 inspections stated that the area was no longer used for UW storage. The area observed during these inspections that is now used for UW storage is on the east side of the warehouse, the aisle closest to the outside wall. If a defined area for UW storage is not consistently utilized, then the figure should be revised to either indicate all possible locations or to remove the area designation and clarify the possible location(s) within the application text.

Response to FDEP Comment 2

The area previously marked for “Universal Waste Storage” is no longer used for this type of storage. Figure I-15 has been revised to reflect the current location of UW storage as the east side of the warehouse closest to the outside wall (see Attachment A-2).



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FDEP Comment 3

Part II.A.1, General Information: The application provides a description of the scale for Figure II-A-1, however this is not noted in the figure itself. Several other figures throughout the application do not have a map scale listed. Please review and update all figures in the application to provide the map scale, as appropriate.

Response to FDEP Comment 3

Figures have been reviewed and those requiring a scale have been updated to include the appropriate scale (see Attachment A-3).

FDEP Comment 4

Part II.I.1, Description of Miscellaneous Units: The Department acknowledges that the current PF-II process may be replaced with a continuous thermal desorption unit, and that information was also included / reviewed in the previous permit renewal application. According to Appendix II-I-1, several existing components will be incorporated into the new process and as-built written certification for any new PF-II process components or updates to equipment lists will be submitted when the changes are completed. The Department recommends that, if available, any additional information be provided within the text, tables, or figures of the permit application that could facilitate the operational transition to the new continuous PF-II process without the need to subsequently modify the permit after these activities are completed.

Response to FDEP Comment 4

The specifics of a new thermal desorber have yet to be determined. Perma-Fix understands a permit modification and all the necessary supporting as-built and other engineering requirements will be required prior to resuming these specific operations. Part II.I.1 Description of Miscellaneous Units of the application text has been revised accordingly; the modified text excerpt is included with this letter (see Attachment A-4).

FDEP Comment 5

Part II.Q, RCRA Facility Assessment: The Department acknowledges that SWMUs 30, 31 & 32 are not part of the facility. However, the tables located in Appendix A of the Permit (and future permit applications) must continue to denote these units for historical tracking purposes, because these were previously identified in the Final RFA dated June 27, 1990.



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Response to FDEP Comment 5

Part II.Q RCRA Facility Assessment text has been revised to delete the sentence regarding SWMUs 30, 31, and 32. The modified text excerpt has been included as Attachment A-5.

FDEP Comment 6

Part II.R, Process Vents: Paragraph 3 of this section indicates (as well as other sections of the permit application) that the planned solvent recycling activities (distillation) are exempt from RCRA permitting requirements. Please revise this section to include the specific exemption citation and clarify how this process relates to the current / future PF-II thermal desorption process and overall operations within the TOB. Is the proposed / RCRA exempt solvent distillation process planned to take place within a non-exempt permitted unit that manages other wastes? Also, please see Comment 7b below.

Response to FDEP Comment 6

Part I Section D.2.1 Treatments and Operation Building and Part II.R Process Vents text have been updated to reference exemption citation 40 CFR 261.6(c)(1). These sections have been revised to clarify the process and how they relate to the current/future PF-II thermal desorption process. Solvent recycling is planned to take place in a non-exempt area and will therefore be subject to Subpart AA. The PF-II process is currently performed in the treatment and operations building, a non-exempt area, and is subject to Subpart AA as detailed in a modified portion of Part II.R text (see Attachment A-6 for modified portions of Part I Section D.2.1). See Attachment B-1 for the modified Part II.R text.

Solvent recycling activities (distillation) are exempt per 40 CFR 261.6(c)(1). A distillation unit was purchased in 1997 for a one-time operation. However, the unit has not been used since that time. PFF proposes to keep the distillation unit in inventory and place it in one of the two following non-RCRA exempt buildings: the liquid scintillation vial (LSV) radioactive control area (RCA) or treatment and operations building (TOB) RCA. The emissions from this process would be routed through the same air pollution control equipment used for one of these buildings.

FDEP Comment 7

Part II, Appendix II-A-2, Contingency Plan:

- a. The plan does not have a Quick Reference Guide as required by 40 CFR 262.262(b).
- b. *Section 2, Paragraph 3:* This paragraph indicates that the facility has planned to perform solvent recycling activities (distillation). The text references that complete details of the process can be found in Part II Section I of the permit application dated November 2014. Upon review of this reference, it appears that this section of the prior permit renewal application does not reference



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solvent recycling activities, but specifically addresses potential changes to the PF-II thermal desorption process described in Comment 3 above. Please clarify / update the reference and update any other parts of the current permit application that discuss these activities, as appropriate. In addition, should these operational changes modify any existing permitted units, then a permit modification may be required, if adequate detail is not provided within the current permit application.

- c. Section 4.5.2: This section says that “Facility records available for review include manifests, and waste analysis data on-site kept at the file cabinets in the hallway next to the copy room for at least three years, and then kept off-site...” However, Part II, A-7 (Operating Record/Biennial Report) of the application states that: “Copies of the manifests and operating records will be maintained on-site for at least one year. After that, all records may be transferred to an off-site...” Please reconcile these two sections as to records that are kept on-site and that would be accessible during an emergency.*
- d. Table 2: This table does not include the address information for Emergency Coordinators as required by 40 CFR 264.52(d).*
- e. Figure 5: Legend entry is missing for “Points of Egress” as shown in other figures.*
- f. Figure 8: This figure indicates the “hazards” and includes the term “hazardous wastes” on both the PSB and LSV building, but not the TOB, which also contains hazardous wastes. Please discuss the reason for this omission.*

Response to FDEP Comment 7

Comment 7.a

The Contingency Plan has been updated to include a Quick Reference Guide as required by 40 CFR 262.262(b) (see Attachment A-7).

Comment 7.b

Section 2, Paragraph 3 of the Contingency Plan has been revised to refer to the most recent permit application date and to reference Part I Section D.2.1 Solvent Recycling. Pema-Fix understands that any operational changes to permitted units in the future will require a permit modification (see Attachment A-7).

Comment 7.c

Section 4.5.2 has been updated to state that manifests and waste analysis data will be available for review on-site for at least three years and then transferred to an off-site storage facility. Part II Section A.7 of the permit application has been revised to reconcile the previous difference in sections (see Attachment A-7).



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Comment 7.d

The address information for Emergency Coordinators is provided in Attachment CP-1 of the updated Contingency Plan (see Attachment A-7).

Comments 7.e and 7.f

Figures 5 and Figure 8 of the Contingency Plan have been updated to reflect required changes (see Attachment A-7).

FDEP Comment 8

Part II, Appendix II-T, DEP Form 62-730.900(2)(d): The Facility Operator (MR. Randy Self, Operations Manager) has signed all sections of this form, including the Facility and Land Owner certifications. If the Facility Operator is an authorized representative, please attach / provide a letter of authorization as indicated on the certification form. Otherwise, these certifications should be resubmitted with an authorized signature.

Response to FDEP Comment 8

FDEP form 62-730.900(2)(d) has been updated with an authorized signature (see Attachment A-8). Due to recent personnel changes, FDEP form 62-730.900(2)(a) Application for a Hazardous Waste Permit has been updated and is included in Attachment A-8 as well as an updated Organization Chart to replace the existing Part II Appendix II-A-3 Personnel Training Program Figure 1. An updated version of Part II Appendix II-P FDEP Form 62-730.900(2)(c) Information Regarding Potential Releases from Solid Waste Management Units has been included in Attachment A-8.

RESPONSES TO USEPA COMMENTS DATED JANUARY 27, 2020

EPA Comment 1

II-35 Monitoring and Inspections, PFF inspection plan mentioned. Please include a reference of its location within the permit application.

Response to EPA Comment 1

Reference to Table II-6 Inspection Schedule has been added to the text on page II-35 Monitoring and Inspections (see Attachment B-1).

EPA Comment 2

Page II-55 says "Hence, Subpart AA will apply to operation of each of these three units when hazardous waste of at least 10 ppm organic content by weight is processed." However, the Subpart AA regulations are applicable to the operations that manage hazardous waste with an organic concentration of at least



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10 ppmw. The regulations are applicable at all times that the hazardous waste of at least 10 ppmw is in the system regardless of whether it is in operation or in process (triple rinsing would/should be required if the waste managed in the equipment changed that dramatically). Additionally, the organic concentration should be clarified through out to be at least 10 ppmw throughout this section.

Response to EPA Comment 2

Page II-55 Section R has been revised to state that Subpart AA will apply to each of these three units when they contain hazardous waste of at least 10 ppmw organic content whether they are in operation or in process. The text has been updated to state parts per million by weight (ppmw) throughout this section (see Attachment B-1).

EPA Comment 3

Page II-56 discusses the equipment that is potentially subject to the Subpart BB regulations. No discussion of when the equipment is subject is provided. Additionally, if the facility is relying on the organic concentration of the waste being less than 10% by weight then a triple rinse will need to be conducted prior to utilizing the equipment for waste less than 10% by weight. Additional justification for the processing of such a waste (less than 10% by weight) may be required, some cost benefit or recovery and reuse explanation. In the second full paragraph on Page II-57 the equipment in these areas is discussed as subject to the Subpart BB requirements.

Response to EPA Comment 3

Page II-56 has been revised to delete the word ‘potentially’. Page II-57 includes a discussion of when equipment is exempt from Subpart BB based on 40 CFR 264.1050(e) and 40 CFR 264.1050(f). The text has been revised to clarify that the facility does not rely on the organic concentration of waste being less than 10 ppmw; the facility presumes that incoming waste streams contain greater than 10 ppmw based on historical average concentrations. The text has been updated to state that triple rinsing of the equipment will be performed should the waste managed in the equipment change in order to confirm ppmw organic content (see Attachment B-1).

Page II-56 has been updated to list only the areas with equipment that are subject to 40 CFR 264, Subpart BB as the liquid scintillation vial (LSV) area, hazardous waste transfer area, and mixed waste transfer to larger containers area. Pursuant to 40 CFR 264.1050(f), the 3,000-gallon tank, debris treatment area, mixed waste tanker loading area, PF-II treatment area, and all other equipment in contact with hazardous waste for less than 300 hours per calendar year is exempt from the Subpart BB requirements.

See response for EPA comment 4 for equipment excluded under 40 CFR 264.1050(e).



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EPA Comment 4

Page II-57 first full paragraph discusses the PF-II Treatment equipment being excluded under 40 C.F.R. 264.1050(e) (equipment under vacuum service). This excluded equipment should be clearly identified in the permit application. No equipment identified in tables II-11, II-12, or II-13 has been identified as excluded under this exemption. No table is given for the PF-II area. Adequate detail of the vacuum service is not provided in this discussion or the earlier discussion of the process.

Response to EPA Comment 4

Table II-11 has been modified to provide a comprehensive list of the PF-II treatment vacuum equipment and reference exemption under 40 CFR 264.1050(e). Table II-12 no longer lists equipment for the LSV area since there are no longer connected plumbing or pumps in the LSV area. Table II-12 has been revised to list equipment for the hazardous waste transfer area (see Attachment B-2).

EPA Comment 5

Page II-57 last paragraph, states “The Facility storage tank is exempt from Subpart CC tank requirements because the 3,000-gallon tank is used to receive mixed waste.” 40 C.F.R. 264.1080(b)(6) states that the requirements of Subpart CC are not applicable to a waste management unit that is used solely for the management of radioactive mixed waste in accordance with all applicable regulations under the authority of the Atomic Energy Act and the Nuclear Waste Policy Act. If the tank solely manages mixed waste it must be stated in the previously quoted sentence. Additionally, without having reviewed the applicable Radioactive Material License and any other permit or license applicable to the unit the applicability cannot be properly accessed.

Response to EPA Comment 5

Page II-57 has been revised to cite 40 CFR 264.1080(b)(6) as exemption from Subpart CC requirements and to clarify that the tank is used solely to manage mixed radioactive waste per radioactive material license 2598-1 listed on Table I-1 Current and Pending Permits (see Attachment B-1).

Note, the facility storage tank has not been used since 1999. However, the tank has been retained in the permit application for potential future use.

EPA Comment 6

Page II-57 seventh line from the bottom, the citation 40 CFR 1086(f), is found. Please revise this to the appropriate citation.



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Response to EPA Comment 6

Text has been revised to reflect the correct citation of 40 CFR 264.1086(f) (see Attachment B-1).

EPA Comment 7

Page II-58 Pumps in light liquid service and designated as no detectable emissions must be tested for compliance with the requirements for no detectable emission prior to its initial designation, annually, and at any other times as requested by FLDEP or EPA. The discussion should be altered to include these requirements.

Response to EPA Comment 7

Text has been revised to state the following: ‘tested prior to initial designation, annually, and at any other times as requested’ (see Attachment B-1).

EPA Comment 8

Page II-58 Pressure Relief Devices in Gas/Vapor Service this discussion states that the requirements of 40 CFR 264.1054 do not apply. Please include the citation of the exemption (40 CFR 264.1054(c)?) and a discussion of the requirements of that exemption including any references to other portions of the application as appropriate.

Response to EPA Comment 8

Text has been revised to reference 40 CFR 264.1054(c) and that these devices are exempt from 40 CFR 264.1054(a) and (b) since each of these pressure relief devices is part of a closed vent system capable of capturing and transporting leakage from a pressure relief device to a control device (see Attachment B-1).

EPA Comment 9

Page II-58, all pumps, pressure relief devices, and open ended valves or lines, and valves should be clearly identified in the P&ID and equipment lists. These lists and P&IDs should be clearly referenced in the discussion found on Page II-58. No clear identification of open ended valves or lines is seen in Tables II-11 through II-13.

Response to EPA Comment 9

Table II-11 has been modified to provide a comprehensive list of the PF-II treatment vacuum equipment and reference exemption under 40 CFR 264.1050(e). Table II-12 no longer lists equipment for the liquid scintillation vial (LSV) area since there is no longer connected plumbing or pumps in the LSV area. Table II-12 has been revised to list equipment for the hazardous waste



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transfer area. Open ended valves have been identified on Table II-12 and Table II-13. These equipment list tables are clearly referenced in the text of Part II Section S Open-ended Valves or Lines (see Attachments B-1 and B-2).

EPA Comment 10

Page II-59 Recordkeeping Requirements Section, item 3: This discussion appears to be in direct conflict to the discussion of the potentially subject to the Subpart BB requirements discussion found on Page II-56 and previously discussed above. Percent-by-weight determinations will be required for all equipment that the facility manages multiple waste streams in and for all equipment that the facility claims is not applicable for that reason.

Response to EPA Comment 10

Item 3 has been deleted and a statement has been added to clarify that all incoming waste is presumed to contain greater than 10 ppmw organic concentration. Therefore, percent by weight determinations are not performed (see Attachment B-1).

EPA Comment 11

Page II-59 Recordkeeping Requirements Section identifies the information that will be maintained at the facility. Items 1-4, this information should be included in the application. Preferably in the Tables II-11 through II-13. Most of the information is already included. Please review. Additionally, all the requirements of 40 CFR 264.1064 are not discussed in this section or in the previous sections. For example, 40 CFR 264.1064(g)(2)(i) requires a list of all the equipment that has been designated for no detectable emissions. This information does not appear in the table provided. Only a statement in the discussion on page II-58 discusses that all the pumps in certain areas are designated for no detectable emissions. This is only one example of several. Please review the regulation.

Response to EPA Comment 11

Perma-Fix uses the hours of service exemption from 40 CFR 264.1050 and issues a work order annually to track hours of service for each potentially subject piece of equipment. Table II-11 has been modified to provide a comprehensive list of the PF-II treatment vacuum equipment and reference exemption under 40 CFR 264.1050(e). Table II-12 no longer lists equipment for the liquid scintillation vial (LSV) area since there is no longer connected plumbing or pumps in the LSV area. Table II-12 and Table II-13 have been updated to reference the correct exemption for each subject piece of equipment as 40 CFR 264.1050(f) (see Attachments B-1 and B-2).



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The requirements of 40 CFR 264.1064 are listed on Page II-60. A reference to choosing the exemption provided in 40 CFR 264.1050(f) is included on Page II-64 of the permit application.

EPA Comment 12

Page II-60 Delay of Repair Section: The individual sections discussing the standards for each piece of equipment do not include repair timeframes. These should be included or referenced clearly. The Delay of Repair section must include references and conform to the requirements found in the regulations.

Response to EPA Comment 12

Regulatory reference to 40 CFR 264.1059 for repair recordkeeping has been added to the text. The Delay of Repair section has been updated to state that all detected leaks will be repaired as soon as practicable, but not later than 15 days for all equipment after detection unless the following conditions arise as described in 40 CFR 264.1059 (see Attachment B-1).

EPA Comment 13

Lastly, some clarification was requested on the preconditioning process discussion (Page II-26) and the solvent recycling process (Page I-5) with regard to waste drained / remaining in the catch pan / drum; specifically, the regulatory status of the accumulation tank and AA/BB/CC applicability to both processes. As I understand, there is some form of closed-ventilation system that covers this area; additional details could be included in the permit application language (or in the FDEP Response), as needed, to convey this information.

Response to EPA Comment 13

The following text has been added to Page II-26 Waste Treatment:

‘All treatment activities that take place in the treatment operations building (TOB) and the Liquids Scintillation Vial (LSV) processing areas are conducted under negative air with fugitive emissions directed to the regenerative thermal oxidizer (RTO).’

The text has been updated to state that there is no plumbing associated with the pre-conditioning process and that the drum tumbler and catch pan are not subject to Subpart AA/BB/CC requirements.

Waste from the proposed solvent recycling will be placed into a drum. The accumulation tank of recovered solvents would be exempt from Subpart AA/BB/CC/ requirements (see Attachment B-1).



Response to Comments
Permit Renewal for RCRA Activities
Perma-Fix of Florida, Inc.
Gainesville, FL
(FLD 980711071)
March 25, 2020
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Perma-Fix of Florida, Inc. appreciates the agency's consideration in reviewing this application. If you have any questions or comments, please contact Mr. Dan Cain (Perma-Fix of Florida, Inc.) at (352) 395-1347 or Mr. William Kelly (Trihydro Corporation) at (904) 513-9742.

Sincerely,
Trihydro Corporation

William C. Kelly, P.G.
Senior Project Manager

61A-003-001

Attachments

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Kevin Schmuggerow, Perma-Fix of Florida, Inc., kschmuggerow@perma-fix.com



March 4, 2022

Mr. Bradley Buselli
Environmental Specialist III
Florida Department of Environmental Protection
Hazardous Waste Program and Permitting
Post Office Box 3070
Tallahassee, FL 32315-3070

RE: Letter of Transmittal
Class 1 Minor Permit Modification Request
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, FL 32653
(FLD 980711071)

Dear Mr. Buselli:

On behalf of Perma-Fix of Florida, Inc. (PFF), we hereby present for your review, an enclosed Resource Conservation Recovery Act (RCRA) Permit Class 1 Modification Request for PFF located at 1940 NW 67th Place in Gainesville, Florida. The facility is currently operating as a commercial waste bulking, storage, and treatment facility for hazardous, industrial, universal, biomedical, mixed, radioactive-only, and non-hazardous waste under a RCRA Hazardous Waste Construction and Operation Facility Permit, which was issued by the Florida Department of Environmental Protection on June 3, 2020 and expires on June 8, 2025.

PFF is primarily submitting this modification request to facilitate a replacement of a thermal desorption unit, which is a part of the PF-II disposal process. The modification can be classified pursuant to 40 Code of Federal Regulations (CFR) 270.42 Appendix I, which categorizes "Equipment replacement or upgrading with functionally equivalent components" as a Class 1. The new unit will consist of batch fed thermal desorption treatment equipment in the Treatment and Operations Building. The new equipment will be approximately the same size and in the same location as the equipment being removed. The replacement of the unit is considered an "in-kind" replacement which will have an output of equal to or less than the current unit. The secondary containment dimensions, and associated calculations and closure costs will not change. The old desorption equipment will be destroyed and disposed of as hazardous waste, and as such, will not require partial closure. Text, tables, figures, and appendices, in the current permit application, have been modified as appropriate. The figures associated with the Class 1 Modification Request have been updated to reflect the requested modifications.

PFF has also provided additional information regarding pharmaceutical waste handling, per discussions with the FDEP, in Part I Section D.2.2. Pharmaceutical wastes are not treated at PFF; PFF consolidates,



Letter of Transmittal
Class 1 Permit Modification Request
Perma-Fix of Florida, Inc.
Gainesville, FL
(FLD 980711071)
March 4, 2022
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stores, and ships waste to a third party permitted treatment/disposal facility. Since waste is not treated onsite, PFF does not meet definition of a reverse distributor per 40 CFR 266.501(f).

Attached please find an electronic copy of the following:

Part I General Facility Information (revised excerpts)

Part II Specific Facility Information (revised excerpts)

Summary of Permit Modifications

Part I.D.2.1, Treatment and Operations Building (TOB):

Treatment: Text was revised to reflect the changes in the PF-II process equipment.

Mercury Amalgamation: Text was revised to reflect the changes in the PF-II process equipment.

Part I.D.2.2, Processing and Storage Building:

Chemotherapy/Pharmaceutical Waste: Text was expanded to confirm that wastes are received and processed for transport to a permitted third-party treatment/disposal facility for disposal.

Part I.D.4, Waste Types:

Wastes Managed and Waste Management Activities: Text was revised to reflect changes to the PF-II process equipment.

Table I-1:

Permit references updated.

Figure I-6-B:

Revised TOB to reflect changes in the PF-II process equipment in the Mixed Waste Treatment Area.

Figure I-7-B:

Revised PF-I and PF-II Flow Diagram to reflect changes in the PF-II process equipment.

Figure I-11-B:

Revised Process Schematic to reflect changes in the PF-II process equipment.



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Perma-Fix of Florida, Inc.
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Figure I-24-B:

Revised Equipment Layout for PF-I and PF-II to reflect changes in the PF-II process equipment.

Figure I-25-B:

Revised Equipment Layout for PF-I and PF-II Process to reflect changes in the PF-II process equipment.

Figure I-26-B:

Revised Equipment Layout for PF-I and PF-II to reflect changes in the PF-II process equipment.

Part II.A.4, Facility Security:

Description of Procedures, Structures, or Equipment to Prevent Hazards, etc.: Text was revised to reflect the changes in the PF-II process equipment in the TOB processing and storage areas.

Part II.I.1, Description of Miscellaneous Units:

The following text sections were revised to reflect changes to the PF-II process equipment:

Thermal Desorption

Chemical Oxidation

Decontamination Procedures, Reactor Vessel

Condenser

Accumulator

Absorber

Boiler (deleted).

Part II.I.2, Environmental Performance Standards:

The following text sections were revised to reflect changes to the PF-II process equipment:

Prevention of Releases to Groundwater or Subsurface Environment

Prevention of Releases to Air

Air Emissions Control System.

Part II.I.4, Effectiveness of Perma-Fix II Process:

Text was revised to reflect changes to the PF-II process equipment.

Part II.K.1, Introduction:

Closure schedule reference changed to Table II-9.



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Perma-Fix of Florida, Inc.
Gainesville, FL
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Part II.K.2.1, Identification of RCRA Permitted Units:

Treatment and Operations Building: Text was revised to reflect changes to the PF-II process equipment.

Part II.K.3, Maximum Closure Inventory:

Inventory tabulation changed to Table II-8.

Part II.K.8, Closure Cost Estimate:

Text was revised to reflect changes to the PF-II process equipment, noting “in-kind” replacement.

Part II.S, Requirements for Equipment:

Pressure Relief Devices in Gas/Vapor Service: Text was revised to reflect changes to the PF-II process equipment.

Table II-6:

Revised Inspection Schedule to reflect changes in the PF-II process equipment.

Figure II-I-1:

Revised PF-II Layout to reflect changes in the PF-II process equipment in the Mixed Waste Treatment Area.

Figure II-I-2:

Revised Process Flow Diagram PF-I and PF-II Processes to reflect changes in the PF-II process equipment.

Figures II-S-10 and II-S-11:

Previous PF-II Reactor Vessel and Pulseback Filter Connections were deleted to reflect changes in the PF-II process equipment.

Appendix II-A-1, Financial Assurance Documentation:

Updated.

Appendix II-A-2, Contingency Plan:

Contingency Plan Table 1. Emergency Coordinators updated.

Personnel Training Program Figure 1:

Organization Chart updated.



Letter of Transmittal
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Perma-Fix of Florida, Inc.
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Appendix II-I-1, Proposed Perma-Fix II® Process:

The following text in Sections were revised to reflect changes to the PF-II process equipment:

- 1.0 Proposed Perma-Fix II® Process
- 1.1 Process Description
 - 1.1.1 Pug Mills (former 1.1.1 Vibrating Screen has been deleted)
 - 1.1.2 Thermal Desorption (former 1.1.2 Crusher has been deleted)
 - 1.1.3 Shredder (deleted)
- 2.0 PF-II Equipment List and Description
 - 2.1 Reactor Vessel
 - 2.2 Condensers and High Temperature Filter
 - 2.3 Condensate Tanks
 - 2.4 Mist Eliminator Filter
- 3.2 Prevention of Releases to Groundwater or Subsurface Environment
- 6.4 Descriptions of Feed Systems, Safety Cut-Offs, Bypass Systems, and Pressure Controls.

Appendix II-I-4, PF-II Equipment List and Description:

The following text in Sections were revised to reflect changes to the PF-II process equipment:

Equipment Required
Equipment Specifications



Letter of Transmittal
Class 1 Permit Modification Request
Perma-Fix of Florida, Inc.
Gainesville, FL
(FLD 980711071)
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Page 6

The requisite permit fee has been submitted in conjunction with this modification request. Perma-Fix of Florida, Inc. appreciates the agency's consideration in reviewing this application. If you have any questions or comments, please contact Mr. Randy Self (Perma-Fix of Florida, Inc.) at (352) 395-1368 or Mr. William Kelly (Trihydro Corporation) at (904) 513-9742.

Sincerely,
Trihydro Corporation



William C. Kelly, P.G.
Senior Project Manager

61A-004-001

Attachments

cc: Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Pam Cosgrove, DEP Northeast District, pamela.cosgrove@floridadep.gov
Cheryl Mitchell, DEP Northeast District, cheryl.l.mitchell@floridadep.gov

PART I



PART I
REVISED RCRA PERMIT APPLICATION
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA 32653

March 4, 2022

Project #: 61A-004-001

SUBMITTED BY: Trihydro Corporation

3740 St. Johns Bluff, Suite 14, Jacksonville, Florida 32224

ENGINEERING SOLUTIONS. ADVANCING BUSINESS.

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I. PART I

PFF, a subsidiary of Perma-Fix Environmental Services, Inc. operates a Resource Conservation and Recovery Act (RCRA) commercial waste bulking, storage, and treatment facility (Facility) in Gainesville, Florida. Waste managed on-site includes a wide variety of hazardous, industrial, universal, biomedical waste, mixed, radioactive-only and non-hazardous wastes. Currently, the Facility blends hazardous, non-hazardous, and mixed wastes into fuels for use in off-site facilities, such as incinerators and industrial furnaces and boilers. The Facility also consolidates, repackages, and sorts waste for shipment off-site for treatment and/or disposal. Current activities at the Facility also include the receipt and non-permanent storage of radioactive (or mixed) wastes pursuant to a license issued by the Florida Department of Health, Bureau of Radiation Control. PFF also manages Polychlorinated Biphenyls (PCBs) in accordance with EPA's Approval to Commercially Store PCBs.

The Part I portion of this application has been organized based on the structure found in Florida Department of Environmental Protection (DEP) Form 62-730.900(2)(a). This section includes the requisite supporting information for the DEP Form 62-730.900(2)(a), including additional descriptions of site information, tables, figures, and attachments, which are included below.

A GENERAL INFORMATION

The DEP Form 62-730.900(2)(a) Item A.19 includes a list of existing or pending environmental permits and relevant information, but is continued on Table I-1 due to space.

B SITE INFORMATION

Figure I-1 shows the location of all past, present, and future treatment, storage, and disposal areas. Photo documentation of the facility is included as Appendix I-A.

A FEMA flood zone map for the site property and surrounding area is included as Figure I-2. Figure I-3 displays the Topographic Map and associated information for the property. A current zoning map displays surrounding land use in Figure I-4.

PFF owns the contiguous property consisting of a wooded parcel and the property used for the RCRA facility as shown in Figure I-5. Based on the RCRA definition of "Facility" at 40 CFR 260.10, this entire contiguous property is considered the "facility" for Federal Hazardous and Soil Waste Amendments (HSWA) purposes. However, only the

area consisting of the property actually used for RCRA purposes (i.e., area marked “Perma-Fix RCRA Facility”) will be subject to the RCRA permit conditions and/or RCRA regulations (except for HSWA permit conditions/regulations).

C LAND USE INFORMATION

A current zoning map displays surrounding land use in Figure I-5.

D OPERATING INFORMATION

In addition to the general description of facility operations included in the permit application, below are additional details regarding the various waste management activities at the facility, including:

- Process Information
- Description of Operations by Buildings
- Estimated Operational Life of Facility
- Waste Types

D.1 SUMMARY OF SITE PROCESSES

Current treatment processes at the Facility include thermal desorption, fuel blending (including phase separation), chemical and physical extraction, chemical oxidation/reduction, stabilization, fixation, microencapsulation, lab pack decommissioning, Perma-Fix processes (i.e., PF-I® and PF-II®), treatment of hazardous debris in accordance with certain alternative treatment standards specified in 40 CFR 268.45, non-elementary neutralization, mercury amalgamation, treatment in drum rotators, and deactivation processes. A summary of the treatment methods and storage locations is included as Table I-2. The Facility also conducts transfer facility operations for used oil regulated under Chapter 62-710, F.A.C. (and 40 CFR 279) and for mercury- containing devices regulated under Chapter 62-737, F.A.C. The treatment codes are listed in Table I-3. The process codes are listed in Table I-4.

D.2 DESCRIPTION OF OPERATIONS BY BUILDING

D.2.1 TREATMENT AND OPERATIONS BUILDING (TOB)

Container Storage

The Facility receives and stores up to 640 drum equivalents (or 35,200 gallons) of hazardous and/or mixed waste in the Treatment and Operations Building. See Figure I-6 for the container storage configuration. Additional details regarding container management practices are provided in Part II Section B of this permit application. The Facility



may store non-hazardous wastes and radioactive-only wastes in this container storage area provided the wastes are compatible and their quantities are counted against the total permitted hazardous waste storage capacity.

Treatment

Mixed wastes may be treated in the Treatment and Operations Building via either one or both of two proprietary processes known as the Perma-Fix I® (PF-I) process (stabilization and fixation) and Perma-Fix II® (PF-II) process (thermal desorption and/or chemical oxidation/reduction). See Figure I-6 for the general layout of the Treatment and Operations Building. The following provides a general description of the treatment processes. Additional details regarding the treatment processes are provided in Part II Section I of this permit application. See Figure I-7 for a detailed illustration of the Perma-Fix treatment processes.

The PF-I process is a two-step procedure for permanent stabilization and/or solidification of hazardous and mixed wastes. As indicated in Figure I-8, the inorganic wastes that do not contain organic hazardous constituents in excess of applicable land disposal restriction levels are target waste streams for the PF-I process. First, the waste is evaluated for specific chemical characteristics in order to identify the appropriate proprietary treatment "recipe" for converting the key waste constituents to a more chemically stable and insoluble form. After receiving chemical stabilization treatment, the waste is in a form that meets the waste acceptance criteria of the authorized disposal facility.

Once subjected to the PF-I process, the treated waste is sampled to determine whether it meets the desired treatment standards (e.g., whether the waste no longer exhibits a hazardous waste characteristic and/or meets applicable land disposal restrictions). Typically, the PF-I process is applied to wastes in drums. However, larger or smaller containers may be used, depending upon the nature of the waste to be treated. In any event, the waste is usually stabilized in the same container to be used to ship the waste off site for disposal. In some instances, the addition of treatment additives will increase volume such that the stabilized waste must be transferred to an additional or larger container prior to disposal.

The PF-I process will generate relatively small quantities of secondary waste consisting primarily of personal protective equipment (PPE) and plastic sheeting used to collect any incidental spillage of the treated waste or waste treatment materials. Secondary waste will be appropriately characterized, treated, and/or disposed. Additional details regarding the PF-I process are provided included in Appendix I-B.

The PF-II process consists of three primary steps used to treat organic-contaminated soils, sludge, or other process waste (e.g. waste media not classified as debris or <60mm particle size). As indicated in Figure I-9, target waste streams for the PF-II process are organic-contaminated media (i.e., soils and sludges). Wastes selected for PF-II

treatment require compliance with the treatment standards identified in 40 CFR Parts 268.48 or 268.49 prior to land disposal. Dependent upon waste code assignment on the waste "as received" from a generator or upon discovery during process control analyses, PF-II treated waste may require PF-I treatment to ensure total compliance with the identified regulations.

The first step of the PF-II process may involve pre-conditioning of the waste. Select solvents (as determined through preliminary data review or bench testing) are added to the waste and mixed to remove soluble organics that typically prohibit successful thermal operations. This activity is conducted using the pneumatic drum tumbler and later decanted.

The pneumatic dual drum tumbler is an end-over-end rotation device that can accommodate 55- or 85-gallon steel containers (Figure I-10). Approximately 1/3 of the tumbling vessel is filled with PF-II waste. An equivalent volume quantity of a select solvent is added to the vessel. The tumbling vessel is closed appropriately using the typical bung-top lid. A pressure-relief device accommodates the two-inch bunghole. The waste and solvent are tumbled for a predetermined amount of time (to support sufficient solvent extraction). The vessel's bung-top lid is removed and replaced with a perforated lid. The vessel is drained into a catch pan. A single drum rotator may also be used in lieu of or in addition to the dual drum tumbler.

The process is repeated with a follow-up pre-conditioning step using a solvent with an opposing chemical polarity. Effective solvents are selected through bench testing. Solvent extraction using a drum rotator may also be performed on wastes that may not undergo PF-II treatment.

The second step (sometimes conducted initially without going through the first step described above, depending on the waste matrix) to PF-II processing involves thermal desorption. Thermal desorption is used to remove the remaining volatile, semi-volatile, and other organic constituents from the waste matrix. Historical performance monitoring has shown pre-conditioning as an extremely effective method resulting in thermal desorption as more of a polishing step to meet final LDR compliance objectives.

To begin the thermal desorption process, contaminated media (waste) and, if necessary, water are loaded into trays which are then loaded into the externally heated retort chamber. Heat is applied to the outside of the retort chamber to remove water and desorb the organic constituents from the contaminated media. The externally heated retort chamber vaporizes the water, volatile, and semi-volatile organic constituents. Vapors are condensed in a refrigerated condenser and collected in the accumulation tank. The small volume of non-condensable vapors that pass through the vacuum pumps downstream of the condenser, pass through High Efficiency Particulate Air (HEPA) filters, then emissions from

the process are vented to the regenerative thermal oxidizer. An inert atmosphere (e.g., nitrogen blanket) is provided for the process.

The third (optional) step is chemical oxidation/reduction to destroy or reduce any remaining organic compounds. Depending on the initial concentration, volatility, and solubility of the organic constituents, the final (optional) PF-II process treatment step (chemical oxidation/reduction) may not be required. Upon completion of the thermal desorption step, the temperature inside the reactor vessel is allowed to cool to below the boiling point of water, and an appropriate solution is added to chemically react with the residual organic constituents in the waste. Upon completion of the reaction, the reactor vessel is heated once again to the boiling point to destroy any residual treatment chemicals and dry the slurry as appropriate for further treatment and/or disposal. The oxidation/reduction treatment may also be conducted in containers at the facility.

All liquids (decant, condensate, and organic emission scrubbing solution) resulting from the PF-II processes are considered mixed waste. The liquid waste is containerized, blended in fuels bulking operations, and shipped to an authorized final treatment/disposal facility. Figures I-7, I-10, and I-11 illustrate the PF-II process.

Solvent Recycling

The following information is included for informational purposes only since spent solvent recycling/reclamation is exempt from RCRA permitting requirements or by activities conducted onsite (e.g., recovery of select solvents used in the PF-II process to minimize mixed waste generation) pursuant to 40 CFR 261.6(c)(1). The Facility plans to recycle spent solvents (e.g., Freon) generated by various industrial generators. A low-temperature still or distillation unit will be used to separate the re- useable solvents from contaminants. The reclaimed solvent will be returned to the generator for reuse, to a vendor for resale or kept in-house for further use. The separated contaminants will be containerized or managed in an on-site process. If hazardous, waste not managed on site will be shipped off-site for subsequent treatment and/or disposal by an authorized hazardous waste facility. Ancillary activities will be conducted, and equipment operated in accordance with applicable regulations. Applicable emissions control requirements are addressed in Part II Section R of this permit application. Vendor specifications for the planned distillation unit are enclosed in Appendix I-C for information purposes.

Lab Pack Decommissioning

Radioactive and mixed waste lab packs are decommissioned as follows depending upon the waste characteristic.

- Lab packs of compatible flammable, combustible, toxic, and/or non-hazardous liquids are processed (decommissioned) by un-packing the smaller containers, opening them, and pouring them (bulking) into larger containers. These larger containers are bulked into a tanker for shipment to a permitted disposal outlet.
- Lab packs of corrosives are neutralized and shipped to a permitted disposal outlet.
- Lab packs of oxidizers are treated to remove the oxidizing characteristic, and then shipped to a permitted outlet.
- Soluble solid wastes contained in lab packs are processed by first dissolving them in an appropriate solvent, and then bulked for shipment to a permitted disposal outlet.
- Insoluble solid wastes (e.g., soil samples) from lab packs are consolidated and processed through the PF-II treatment and/or PF-I treatment.

Fuel Blending Activity

Fuel blending of mixed waste is conducted as described in the subsection titled "Fuel Blending" for the Processing and Storage Building.

Treatment Using a Drum Rotator: This treatment is described in the PF-II Process of this section. The treatment pre-conditions the waste for the PF-II process or can treat wastes by solvent extraction to meet LDR standards.

Mercury Amalgamation: The PF-II process with high temperature and vacuum capability can be used to vaporize and condense mercury, which will be removed from the condenser in liquid elemental form. The process may be suitable for recycling, but if not suitable for recycling, the mercury will be amalgamated. This treatment will amalgamate liquid elementary mercury contaminated with radioactive materials, which results in a non-liquid amalgam that is non-RCRA regulated material. Amalgamation is specified in 40 CFR 268.40 as the technology-based land disposal treatment standard for certain hazardous wastes. The treatment will consist of mixing a small batch (i.e., up to five gallons) of waste with inorganic reagents such as copper, zinc, nickel, gold, and/or sulfur in a portable unit. A detailed description of this process is contained in Appendix I-D.

Non-elementary Neutralization: Perma-Fix has performed elementary neutralization of mixed wastes for several customers in the past. PFF performs non-elementary neutralization in a portable 300-gallon tank or in containers, if quantities to be treated are small. A detailed description of the process is contained in Appendix I-E.

Deactivation of D003 Wastes: This process will be conducted in a nitrogen atmosphere in a glove box for wastes highly dangerous to human health (e.g., highly radioactive waste). See Appendix I-F for process description. This

treatment will also be performed in small containers without using a glove box for wastes that do not pose a high health hazard.

D.2.2 PROCESSING AND STORAGE BUILDING

Fuel Blending

The majority of waste managed at the Facility is expected to be energy-bearing (organic) hazardous waste suitable for blending and use as a fuel in hazardous waste combustors such as boilers and cement kilns. PFF conducts phase separation and decanting activities at the Facility to allow for the blending of energy-bearing hazardous wastes that have significant water content.

Currently, the bulking of ignitable hazardous and mixed waste liquids from drums and other containers to tankers is performed in the Processing and Storage Building. PFF also performs phase separation (decanting) of water in addition to the bulking activities.

Currently, the method for bulking of hazardous and mixed waste fuels is to transfer "pumpable" liquids from containers into larger, DOT-approved containers or directly into a tanker truck using a pump and hose. The suction hose is attached to a metal wand that is immersed in the liquid waste. The discharge hose is fitted with an immersion wand that remains submerged in the larger container during transfer to reduce emissions.

PFF also performs phase separation. In this process, liquid hazardous waste containing excess water is transferred from smaller containers such as 55-gallon drums into larger DOT approved containers and allowed to sit until the excess water separates from the rest of the waste (approximately 3 to 5 hours). Then, the water is drawn from the containers using the previously described suction wand and pump, containerized, and treated or disposed of as a hazardous waste. The remaining hazardous waste is bulked into a tanker using the methods previously described. For containers with solids and/or sludge, the liquids will be decanted, and the solids containerized and sent off site for treatment per the LDR standards. Mixed waste solids recovered in the nuclear operations are managed on site using the PF-II process or are sent off-site. In certain cases, the Facility may elect to ship mixed waste fuels, in smaller containers, to the intended final treatment or disposal facility to minimize radiological exposure and maintain contamination control.

See Figure I-12 for the layout of the Processing and Storage Building.

Lab Pack Decommissioning

Some lab packs are received, stored, and then sent to a disposal facility without any additional work being performed to them by PFF.



Lab packs of commonly received nonhazardous or hazardous only materials such as acids, bases, or oxidizers are processed by combining compatible materials into a larger lab pack before shipping off-site for disposal. An example of this would be combining six 5-gallon lab packs of small containers of solid oxidizers (e.g. sodium nitrate, potassium permanganate) into a 30-gallon container. This provides a degree of waste minimization as well as disposal cost reduction.

Chemotherapy/Pharmaceutical Waste

Non-infectious medical waste is received and stored in Zone 2 of the Processing and Storage Building (see Figure I-12). The pharmaceutical waste received from healthcare facilities is not treated at PFF; PFF will consolidate the waste into larger DOT-approved containers and then ship the waste to a third-party permitted treatment/disposal facility. This waste stream will consist of unused U- and P-coded pharmaceuticals, non-regulated drugs, and contaminated debris (i.e., intravenous (IV) tubing, IV bags, gloves, wipes, etc.) packaged in pails/buckets having a capacity of up to 30 gallons. Based on these operations conducted at PFF, PFF is not considered a reverse distributor. PFF only receives and consolidates pharmaceutical waste from healthcare facilities. PFF merely manages these wastes for shipment offsite to a permitted third-party treatment/disposal facility for destruction. A waste profile is created by each healthcare facility shipping the pharmaceutical waste to PFF, which states the type of hazardous pharmaceutical waste PFF will be receiving and the proper disposal techniques as well as the generator status of the healthcare facility (e.g., very small quantity generator/small quantity generator). PFF will record its onsite inventory, including the name or national drug code, and respective quantities. Waste will be stored onsite up to, but not exceeding, 180 days. PFF will maintain these pharmaceutical waste records onsite for at least three years from the date the shipment arrives.

Once a profile is received PFF will create a unique plan for proper disposal. The pharmaceutical wastes are dated upon arrival and scanned, logged, and tracked through a PFF inventory tracking system. The tracking system also notes waste that has been shipped off-site for final disposal. Reports from the tracking system including location and time stored can be printed as needed. A work order which describes the steps taken at PFF while handling the waste can also be created from the inventory tracking system.

Thus, PFF will receive wastes from a healthcare facility to PFF and then ship them to an outside approved final treatment and disposal site. PFF profiles and issues manifests for all waste shipments to the appropriate disposal facilities. Disposal sites may change with the market pricing and capacity limitations. The final destination may include an incinerator.

Container Storage

The Facility will continue to receive and store up to 1,311 drum equivalents (or 72,105 gallons) of hazardous and/or mixed waste in the Processing and Storage Building. See Figure I-12 for the layout of the Processing and Storage Building and a typical container storage configuration. Additional details regarding container management practices are provided in Part II Section B of this permit application.

Tank Storage

A single, 3,000-gallon storage tank may be used to accumulate and store the fluids (waste only) collected from the processing of Liquid Scintillation Vials (LSVs). The waste is stored in the tank until arrangements are made to ship the waste to an authorized waste treatment and/or disposal facility. See Figure I-12 for the layout of the Processing and Storage Building and the location of the storage tank. Additional details regarding the tank storage practices are provided in Part II Section C of this permit application.

Other Processes

Chemical precipitation, chemical reduction, neutralization, filtration, flocculation, and physical treatment (i.e., sorting and segregation) will also be performed in containers. In addition, the non- elementary neutralization and the chemical extraction using the portable equipment as described in TOB will also be performed in this building.

D.2.3 LSV PROCESSING AND WASTE STORAGE WAREHOUSE

LSV Processing

Medical researchers and scientists conduct research using trace amounts of radioactive materials and a liquid scintillation counting detection system to analyze the results. After the research, the scintillation fluid (either a flammable solvent-based liquid or non-hazardous, biodegradable liquid), contaminated with the trace amount of radioactive material, is placed in a vial (hence, liquid scintillation vial) and accumulated in containers (usually 55-gallon drums) for subsequent treatment, disposal, or reuse as a waste-derived fuel.

Three types of radiological classifications are used at PFF for the scintillation fluid vials. The classifications are initially based on radiological determinations by the generator. PFF uses radiological analyses to verify the first two classifications prior to radiologically releasing these materials. The process residues are then handled as either hazardous or non-hazardous based on regulatory requirements. Items received as, or determined as mixed waste, are managed throughout their life cycle at PFF as radiologically licensed material. These materials are managed according to the regulatory requirements governing them. At the PFF Facility, drums containing LSVs are received at the LSV Processing and Storage Warehouse and processed as follows.

First, a drum of LSV is received in the processing room, the drum lid is removed, and the contents of the drum are visually examined to confirm its contents. Next, the drum is mechanically lifted, and the contents of the drum are dumped into a hopper and then onto a vibratory “Infeed Conveyor”. This vibratory conveyor separates the vials from any absorbent packing material. The packing material is collected into a 55-gallon drum and is either treated on-site or sent off-site for disposal. The LSVs continue along the vibratory conveyor and transfer to the “Hog Infeed Belt.” This belt feeds the “Knife Hog”, which is designed to break up the LSVs and separate solids and liquids. The liquids and crushed vials are discharged from the Knife Hog onto the “Outfeed Conveyor.” This outfeed system consists of a variable speed belt with perforations that allow the liquid scintillation fluid (LSF) to drain and collect in an approximately 110-gallon integral storage tank located beneath the outfeed conveyor unit. Crushed vials move up the outfeed conveyor and can be rinsed with appropriate solvent (e.g., ethanol) through the spray nozzles integral to the equipment. The solvent rinsate will also collect in the 110-gallon integral storage tank. The drained and crushed vials are then transferred from the Outfeed Conveyor into a 55-gallon container. The LSF is pumped out from the Outfeed Conveyor holding tank into a 275-gallon tote, where it is sampled and screened for radioactivity. The LSF is then pumped into containers up to 550-gallon capacity or into the 3,000-gallon storage tank in the Processing and Storage Building. From there, the LSF is shipped off site for use as a fuel or for treatment and/or disposal at an authorized waste facility. Depending upon the level of radioactivity, some LSF (and/or LSVs) may be containerized and stored on site to decay and attain the proper activity level before it may be shipped off site. LSF that is non-regulated radioactive is managed as a Hazardous Waste fuel.

During the rinsing process, the ethanol is continuously re-circulated through the system. Fines or small solid materials removed by the ethanol are accumulated in the Rinse Fines Removal System (RFRS), which consists of a holding tank, grinder screw, and ancillary piping. Solid materials collect at the bottom of the holding tank and are removed by a grinder screw. The solid materials from the RFRS are collected in a 55-gallon drum for off-site treatment by incineration or energy recovery.

At the end of a workday, or when the ethanol becomes spent and unusable, the ethanol is pumped from the RFRS holding tank to the 350-gallon holding/test tank where it is sampled and screened for radioactivity. As with the LSF, the ethanol rinsate is containerized and stored on site to decay or is transferred to the 3,000-gallon storage tank in the Processing and Storage Building for subsequent shipment to an authorized mixed waste facility.

As a result of the above process, the Facility generates clean glass and plastic, packing materials, plastic bags/container liners, miscellaneous trash, liquids, and empty containers. All of these items are tested for radioactivity to assure that radioactivity is at allowable levels or to determine if reprocessing, decay storage, or additional treatment is required.



After visually checking for fluids, the glass and plastic vials are bulked in trailers for shipment and subsequent treatment by incineration or energy recovery.

Alternative LSV Final Processing

In certain cases, radiological conditions exist that make final processing of generated LSV solids and liquid more prudent by conducting them manually. Conducting final processing steps manually drastically minimizes secondary waste generation involved with decontamination protocols.

LSV are processed (crushed) as dictated above; however, both the liquids and solids are collected in final containers and segregated per generator. The residual wastes are gravity drained, using a pneumatic drum lift and a perforated lid. Normal rinseate (e.g., ethanol) is added to the container (if hazardous initially), and the waste is again drained. This action is repeated until all visual signs of any original scintillation fluid are removed. Physically this is verified through the draining effort. The containers are maintained in an upright draining position until free liquids are removed to the best extent possible. The residual waste liquid and solid by-products are then managed in accordance with typical regulatory requirements outlined above.

See Figures I-13 and I-14 for an overview of the LSV processing operation. Figure I-15 illustrates the general layout of the LSV processing area. Equipment details for the LSV processing area are provided in Figures I-16, I-17, and I-18.

Technical/regulatory information regarding the sufficiency of the LSV equipment for its intended use, as well as containment calculations, is included as Appendix I-G and Table I-5, respectively.

Repackaging

Repackaging, such as lab pack processing and dry activated waste (DAW) consolidation, will also be conducted in the LSV processing area. The Storage Warehouse is currently used for storage of hazardous wastes, non-hazardous wastes, universal wastes received from off-site, and for used oil transfer operations.

Chemical Extraction, Physical Extraction, and Micro-encapsulation (Including Debris Treatment)

Chemical extraction, physical extraction, and micro-encapsulation (including debris treatment) will also be conducted occasionally on hazardous debris in the LSV Processing Area. These activities will consist of the use of high-pressure steam and water sprays or submersion baths, using surfactants, acids, bases, and detergents to remove hazardous contaminants from debris surfaces or to remove contaminated debris surface layers. Decontaminated materials will be shipped off site for reuse, reclamation, or disposal depending upon the nature of the material. The contaminated media or rinsate generated as a result of the decontamination process will be properly characterized, containerized, and, if

hazardous, manifested and shipped off site to an authorized treatment, storage, and/or disposal facility. If appropriate, contaminated media and/or treatment residuals may be subjected to microencapsulation or stabilization and fixation prior to shipment to an authorized disposal facility.

As indicated in Figure I-19, the appropriate debris treatment method depends on the physical characteristics of the debris to be treated. For example, debris with a porous surface would require chemical extraction, and non-porous debris is suitable for physical extraction. The debris treatment methods (alternative treatment standards) are technologically simple, performance- oriented, and specified at 40 CFR 268.45, Table 2. PFF will conduct all debris treatment in accordance with the applicable requirements of 40 CFR 268.45.

Appropriate containment is furnished for the above treatment activities. Additional details regarding debris treatment operations are provided in Appendix I-H.

Lab Pack Decommissioning

Some lab packs are received, stored, and then sent to an offsite TSD facility or stored for on-site treatment.

Lab packs of commonly received non-hazardous or hazardous only materials such as acids, bases, or oxidizers are processed by combining compatible materials into a larger lab pack before shipping off-site for disposal or for on-site treatment. An example of this would be combining six 5-gallon lab packs of small containers of solid oxidizers (e.g. sodium nitrate, potassium permanganate) into a 30-gallon container. This provides a degree of waste minimization as well as disposal cost reduction.

Solid Waste Management

Solid, non-hazardous wastes such as rags, paper, cardboard, plastic oily sludges, oil-contaminated absorbents, crushed glass, and plastic containers are also received at the Warehouse for bulking and shipment to an authorized off-site facility. These wastes are managed by simply bulking them into a roll-off container up to 30 cubic yards in size lined with 6-mil plastic sheeting. The roll-off containers are then covered with a tight tarpaulin and staged adjacent to the Process and Storage Building (PSB).

Miscellaneous Waste Storage and Transfer

Used oil, (including used oil regulated under 40 CFR 279), used oil filters, mercury-containing lamps (PFF is registered with the Florida Department of Environmental Protection to operate as a consolidation point for recyclable mercury-containing lamps and devices.), used antifreeze, and other miscellaneous non-hazardous wastes will be received, bulked, and stored in the Warehouse. Spent mercury-containing lamps will be managed in accordance with



Chapter 62-737, F.A.C. The mercury-containing lamp storage (Universal Waste Storage) location is indicated on Figure I-15.

Container Storage

PFF receives and stores up to 54,340 gallons (988 drum equivalents) in this area. See Figure I-15 for aisle and drum storage layout. Additional details regarding container management practices are provided in Part II Section B of this permit application. The Facility may store non-hazardous wastes and radioactive-only wastes in this container storage area.

Fuel Blending Activity

Fuel blending of mixed waste lab packs will be performed as described in the subsection titled "Fuel Blending" for the Process and Storage Building.

Mercury Amalgamation

This treatment will amalgamate liquid elementary mercury, which results in a non-liquid amalgam that is non-RCRA regulated material. Amalgamation is specified in 40 CFR 268.40 as the technology-based land disposal treatment standard for certain hazardous wastes. The treatment will consist of mixing a small batch (i.e., up to five gallons) of waste with inorganic reagents such as copper, zinc, nickel, gold, and/or sulfur in a portable unit (i.e., container). A detailed description of this process is contained in Appendix I-D.

Non-elementary Neutralization

Perma-Fix has performed elementary neutralization of mixed wastes for several customers in the past. PFF also performs non-elementary neutralization in a portable 300-gallon tank or in containers, if quantities to be treated are small. A detailed description of the process is contained in Appendix I-E.

Treatment Using a Drum Rotator

This treatment (i.e., solvent extraction) is described in the PF-II Process of this section. The treatment pre-conditions the waste for the PF-II process or is used to provide the alternate debris treatment standards under chemical extraction.

Deactivation of D003 Wastes

This process will be conducted in a nitrogen atmosphere in a glove box for highly dangerous waste to human health (e.g., highly radioactive wastes). See Appendix I-F for process description. This treatment will also be performed in small containers without using the glove box or nitrogen blanket for wastes that do not pose a high health hazard.

D.3 ESTIMATED OPERATIONAL LIFE OF FACILITY

It is anticipated that the PFF Facility will remain in operation at least until the year 2050.

D.4 WASTE TYPES

During the course of the waste management activities described in this section, PFF may generate a variety of hazardous wastes including spent solvent/water mixtures used to rinse and decontaminate equipment and debris, soiled personal protective equipment, treatment residuals, and other incidental wastes. PFF will comply with the applicable requirements of 40 CFR 260-268, 270 (hazardous waste) and 279 (used oil), as well as Chapter 62-710, F.A.C (used oil), Chapter 62- 730, F.A.C. (hazardous waste), and Chapter 62-740, F.A.C. (petroleum contact water) when managing these on-site generated wastes. The Facility will not engage in any waste generation activity other than that described in this and the preceding paragraphs. A list of permitted waste codes are included in Table I-6.

Definition of Mixed Wastes

Mixed wastes are wastes that are regulated by two separate federal agencies, the U.S. Environmental Protection Agency (EPA) and U.S. Nuclear Regulatory Commission (NRC). Mixed wastes contain hazardous waste subject to EPA regulation as well as radioactive materials that are regulated by the NRC. The DEP has been delegated authority to administer the RCRA program in the state. The NRC has an agreement with the State of Florida, Department of Health, Bureau of Radiation Control to carry out the regulatory functions regarding radioactive waste management, environmental concerns, and employee safety at this facility. There are several waste streams described in the hazardous waste permit (i.e., hazardous waste fuels, metals, etc.) that may also contain radioactive materials. PFF understands that these wastes must be handled according to applicable hazardous waste management requirements and Bureau of Radiation Control regulations for mixed wastes. For purposes of this permit application, references to hazardous wastes may also include mixed wastes. There are certain situations where mixed wastes are specifically addressed. These are as follows:

- a) The 3,000-gallon tank in which only mixed wastes will be temporarily blended and stored.
- b) The closure plan that includes provisions for disposal for mixed wastes.
- c) The authorized storage of mixed (hazardous/radioactive) wastes on-site longer than one year may occur pursuant to the facility's radioactive materials license. This license allows PFF to "decay" short-lived radioactive wastes and to perform research and work on the development of treatment options for mixed waste. These activities may take up to 3 years.

This initial discussion of hazardous and mixed wastes provides an overall definition of the potential wastes on site. For purposes of the review of this permit application, the term "hazardous wastes" or "wastes" includes mixed wastes unless otherwise specified.

PFF is submitting this permit application in order to:

1. Renew its current RCRA permit to conduct the waste management activities included in the previous application.
2. Obtain continuation of current authorization to store non-hazardous wastes in permitted container storage areas as long as permitted hazardous waste storage capacity is not exceeded after including the non-hazardous waste storage volume and the wastes are compatible.

Wastes Managed and Waste Management Activities

The waste managed at the facility will come from a variety of sources, including medical and research institutions, government agencies, paint and coatings manufacturers and users, solvent users, and other industries that generate hazardous wastes. Waste received will come from Large Quantity, Small Quantity, and Conditionally Exempt Small Quantity Generators, or from other treatment and storage facilities. In addition, waste collected during various county or other household hazardous waste collection campaigns will be managed at the Facility.

The following information generally describes the waste management activities that are being renewed pending permit approval. A summary of all treatment codes for treatment conducted by building is provided in Table I-3. Process codes are included in Table I-4.

- The Treatment and Operations Building (TOB) is used to receive, store, and treat mixed wastes via thermal desorption, chemical oxidation/reduction, solvent extraction, stabilization, blending, bulking, solidification and microencapsulation. Future solvent recycling (RCRA exempt) via a solvent recovery distillation unit is also planned for this area. The current PF-II treatment equipment will be replaced with a batch fed PF-II externally heated retort chamber thermal desorption unit, with an ability to reach a higher temperature and vacuum than the current unit. The new replacement PF-II unit is anticipated to have a similar 3,000 lbs./day waste processing rate.
- The Processing and Storage Building is used to receive, store, and blend hazardous and mixed waste into fuel for use at offsite facilities and to bulk wastes for transfer to offsite treatment and/or disposal facilities.
- The Liquid Scintillation Vials (LSV) Processing and Waste Storage Warehouse, in addition to the storage of hazardous and non-hazardous waste, is used to receive, empty, and decontaminate LSVs and other small containers, and to treat hazardous waste debris via chemical and physical extraction (e.g., water washing, liquid-phase solvent extraction).

- The Treatment and Operations Building, Processing and Storage Building, and LSV Processing and Waste Storage Warehouse are used to store hazardous and non-hazardous waste.

The conduct of these activities will be driven by the nature of the waste streams received at the Facility. Figures I-8, I-9, I-19, and I-20 are decision trees illustrating how incoming waste streams are evaluated and assignment made for their treatment and storage on-site and final disposal off-site.

As shown in Figure I-20 and addressed in detail in the Facility Waste Analysis Plan (include as Part II of this application), all incoming waste is subjected to inspection and/or sampling to verify conformance with the generator waste profile. The generator profile, the Land Disposal Restriction (LDR) form, and the inspection and/or sampling results performed by the Facility allow for the determination of the waste stream's acceptability and proper management at the Facility.

PART I

TABLES

**TABLE I-1. CURRENT AND PENDING PERMITS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

NAME OF PERMIT	AGENCY	PERMIT NUMBER	DATE ISSUED	EXPIRATION DATE
RCRA Permit	DEP	17680-010-HC	6/3/2020	6/8/2025
NPDES Stormwater Permit	DEP	FLR05B553-005	1/30/2021	1/29/2026
Air Permit	DEP	0010113-008-AO	2/3/2021	2/3/2026
Biomedical Waste Storage	FDOH	01-64-01666	10/1/2021	9/30/2022
Restricted Prescription Drug Distributor Permit - Destruction ^{Note A}	FDBPR Div DDC	5310	4/21/2020	5/31/2022
PCB Storage Approval	EPA	FLD980711071	7/24/2013	7/24/2023
Radioactive Material License	FDOH	2598-2	12/8/2021	2/29/2024

Notes:

- Corresponds with DEP Form 62-730.900(2)(a) Item A.19 Existing or Pending Environmental Permits

Note A - Chapter 499 FS Section 499.01 (h)(a)(b) allows the Florida Department of Business and Professional Regulation (FDBPR) Division of Drugs, Devices, and Cosmetics (Div DDC) to issue restricted permits for operations as either a Reverse Distributor or Destruction. Perma-Fix holds a permit for Destruction.

TABLE I-2. SUMMARY OF TREATMENT METHODS AND STORAGE LOCATIONS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Waste Description	PF-I®	PF-II®	Physical Extraction	Chemical Extraction	Micro- Encapsulation	Chemical Oxidation/ Reduction	Phase Separation	Deactivation	Mercury Amalgamation	Neutralization	Storage Location
Liquid Scintillation Fluid											T, TOB, LSW
Energy-Bearing Pumpable Liquid							X				PSB, LSW
Energy-Bearing Pumpable Liquid with High Water Content							X				PSB, LSW
Hazardous Wastewater											PSB, TOB, LSW
D002 Wastes	X				X					X	TOB, PSB, LSW
D003 Wastes	X	X						X			TOB, PSB, LSW
D004-D011 Aqueous Waste with No Organics >LDR Levels	X				X						TOB, PSB, LSW
Medical/Pharmaceutical Waste											PSB
D004-D011 Non Aqueous Waste with No Organics >LDR Levels	X				X						PSB, LSW, TOB
D004-D011 Wastes with Organics >LDR Levels (includes D012-D043 and F001-F005)	X	X									TOB, PSB, LSW
Debris (non-porous)			X								TOB, PSB, LSW
Debris (porous)				X							TOB, PSB, LSW
Debris Treatment Residuals	X	X			X						TOB, PSB, LSW
F, P, and U-Listed Flammable Liquids		X									PSB, LSW, TOB
F, P, and U-Listed Toxics	X	X	X	X	X	X	X	X		X	PSB, TOB, LSW
F, P, and U-Listed Corrosives	X									X	TOB, PSB, LSW
Mercury-Containing Wastes									X		TOB, LSW

Notes:
T - aboveground storage tank
PSB - Processing and Storage Building
TOB - Treatment and Operation Building
LSW - Liquid Scintillation Vials (LSV) Processing and Waste Storage Warehouse
See Figures 5, 8, and 11 for Part I.

**TABLE I-3. TREATMENT CODES AND FACILITY LOCATION FOR TREATMENT
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Treatment and Operations Building:

Quonset Hut:	T18 (Thermal Desorption)
Or	T21 (Chemical Fixation)
Future Perma-Con	T22 (Chemical Oxidation)
Building	T23 (Chemical Precipitation)
	T24 (Chemical Reduction) T27 (Cyanide Destruction) T31 (Neutralization)
	T38 (Decanting)
	T39 (Encapsulation)
	T40 (Filtration)
	T41 (Flocculation)
	T47 (Physical Treatment - Sort and Segregate; Size Reduction)
	T54 (Distillation)
	T66 (Physical Treatment - Solvent Extraction)
Drying Room:	T21 (Chemical Fixation)
Or	T22 (Chemical Oxidation)
Future Perma-Con	T23 (Chemical Precipitation)
Building	T24 (Chemical Reduction)
	T27 (Cyanide Destruction) T31 (Neutralization)
	T38 (Decanting)
	T39 (Encapsulation)
	T40 (Filtration)
	T41 (Flocculation)
	T47 (Physical Treatment - Sort and Segregate) T54 (Distillation)
	T66 (Physical Treatment - Solvent Extraction)

LSV Processing and Waste Storage Warehouse:

Debris Treatment Area:	T21 (Chemical Fixation)
	T22 (Chemical Oxidation)
	T23 (Chemical Precipitation)
	T24 (Chemical Reduction) T27 (Cyanide Destruction)
	T31 (Neutralization)
	T38 (Decanting)
	T39 (Encapsulation)
	T40 (Filtration)
	T41 (Flocculation)
	T47 (Physical Treatment - Sort and Segregate; Size Reduction)
	T54 (Distillation)
	T66 (Physical Treatment - Solvent Extraction)
LSV Processing Area:	
	T39 (Encapsulation)
	T47 (Physical Treatment - Other)
	T54 (Distillation)
	T66 (Physical Treatment - Solvent Extraction)

Processing and Storage Building:

Zones 1 and 2:	T23 (Chemical Precipitation)
	T24 (Chemical Reduction) T31 (Neutralization)
	T38 (Decanting)
	T40 (Filtration)
	T41 (Flocculation)
	T47 (Physical Treatment - Sort and Segregate) T50 (Blending)

**TABLE I-4. PROCESS CODES AND HAZARDOUS WASTE QUANTITIES
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Process Code	Design Capacity And U/M	Hazardous Waste Code	Annual Quantity of Hazardous Waste And U/M
T18 (Thermal Desorption)	220 gallons/day	See Table 6 for Part I	80,300 Gallons
T21 (Chemical Fixation)	550 gallons/day	See Table 6 for Part I	200,750 Gallons
T22 (Chemical Oxidation)	550 gallons/day	See Table 6 for Part I	200,750 Gallons
T23 (Chemical Precipitation)	550 gallons/day	See Table 6 for Part I	200,750 Gallons
T24 (Chemical Reduction)	550 gallons/day	See Table 6 for Part I	200,750 Gallons
T27 (Cyanide Destruction)	55 gallons/day	See Table 6 for Part I	20,075 Gallons
T31 (Neutralization)	150 gallons/day	See Table 6 for Part I	60,225 Gallons
T38 (Decanting)	220 gallons/day	See Table 6 for Part I	80,300 Gallons
T39 (Encapsulation)	550 gallons/day	See Table 6 for Part I	200,750 Gallons
T40 (Filtration)	220 gallons/day	See Table 6 for Part I	80,300 Gallons
T41 (Flocculation)	55 gallons/day	See Table 6 for Part I	20,750 Gallons
T47 (Sorting and Segregation)	1,100 gallons/day	See Table 6 for Part I	401,500 Gallons
T47 (Size Reduction and Mixing in Feed Preparation Area of New PF-I1 Process)	4,800 gallons/day	See Table 6 for Part I	281,050 Gallons
T50 (Blending)	1,500 gallons/day	See Table 6 for Part I	547,500 Gallons
T54 (Distillation)	110 gallons/day	See Table 6 for Part I	40,150 Gallons
T66 (Solvent Extraction, i.e., Drum Rotater & Debris Treatment)	550 gallons/day	See Table 6 for Part I	200,750 Gallons

TABLE I-5. LSV PROCESS AREA CONTAINMENT CALCULATIONS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

CRUSHER ROOM

GIVEN:

Base Area (a)	= 1,620 ft ²
Curb Height (h)	= 5.5 in = 5.5 in/12 = 0.46
100% Volume of Largest Tank (LT)	= 521 gal debris dip tank
100% Volume of All Tanks (TT)	= 906 gal [521 gal + 275 gal (Test Tank) + 110 gal (Outfeed Conveyor Holding Tank)]
100% Volume of Largest Container (LC)	= 55 gal
100% Volume of All (10) Containers (TC)	= 550 gal
100% Volume All Tanks + All Containers (T)	= 1,456 gal
10% of Total Volume (TV = 10% x T)	= 145.6 gal
25 year/24 hour Stormwater Collected (SC)	= 0 gal (LSV Area is in a building)

CONTAINMENT CAPACITY AVAILABLE (CCA):

$$\begin{aligned}\text{CCA} &= h \times a \times 7.48 \text{ gal/ft}^3 \\ &= 0.46 \text{ ft} \times 1,620 \text{ ft}^2 \times 7.48 \text{ gal/ft}^3 \\ &= 5,574 \text{ gal}\end{aligned}$$

VOLUME DISPLACED BY EQUIPMENT (VDP):

VDP = Equipment in this area is elevated; therefore, displacement is negligible = 0

NET AVAILABLE CONTAINMENT (NAC):

$$\begin{aligned}X &= \text{TV or LT whichever is greater} \\ \text{NAC} &= \text{CCA} - (X + \text{VDP} + \text{SC}) \\ &= 5,574 \text{ gal} - (521 \text{ gal} + 0 \text{ gal} + 0 \text{ gal}) \\ &= 5,053 \text{ gal}\end{aligned}$$

CONCLUSION:

The net available containment volume exceeds the containment capacity needs; i.e., 5,053 gallons of available containment is well over the volume of tank and container volumes.

Notes:

LSV - liquid scintillation vial

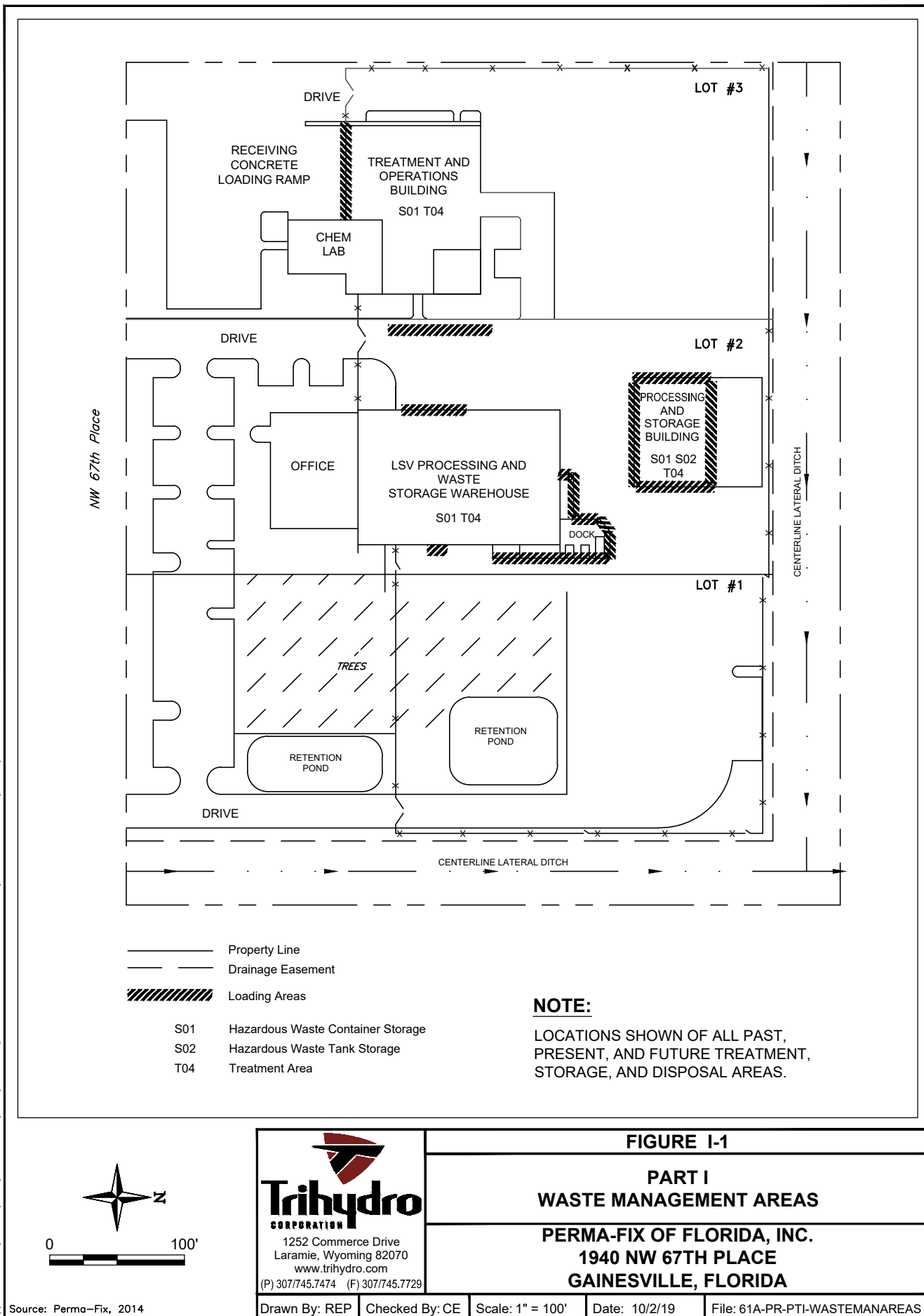
**TABLE I-6. PERMITTED WASTE CODES FOR STORAGE AND TREATMENT (EXCEPT FOR TANK STORAGE)
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

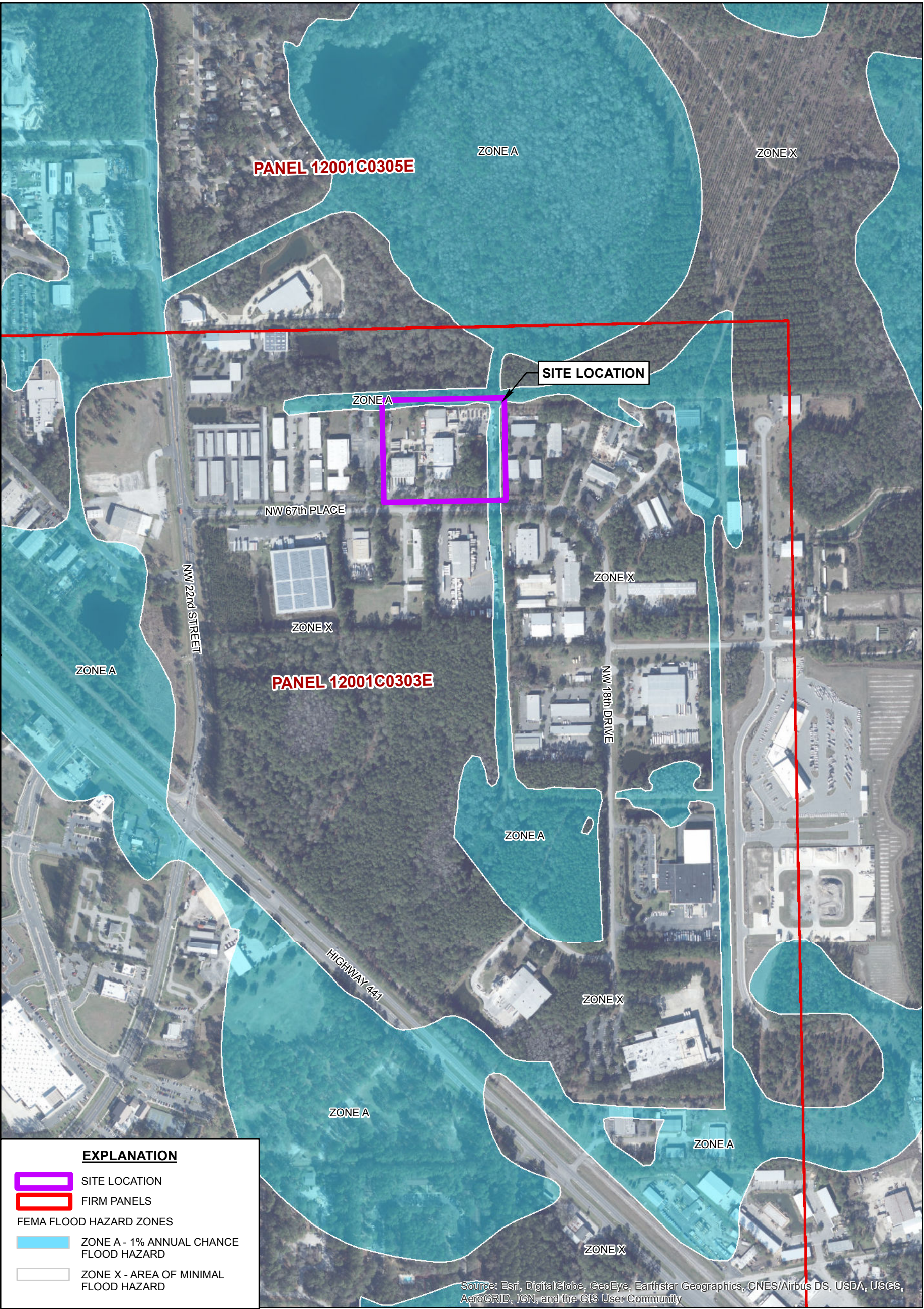
Permitted Waste Codes for Storage and Treatment (except for tank storage)											
D001	D039	K062	P030	P074	P122	U020	U060	U099	U140	U179	U221
D002	D040	K086	P031	P075	P123	U021	U061	U101	U141	U180	U222
D003	D041	K156	P033	P077	P127	U022	U062	U102	U142	U181	U223
D004	D042	K157	P034	P078	P128	U023	U063	U103	U143	U182	U225
D005	D043	K158	P036	P081	P185	U024	U064	U105	U144	U183	U226
D006	F001	K159	P037	P082	P188	U025	U066	U106	U145	U184	U227
D007	F002	K161	P038	P084	P189	U026	U067	U107	U146	U185	U228
D008	F003	K169	P039	P085	P190	U027	U068	U108	U147	U186	U234
D009	F004	K170	P040	P087	P191	U028	U069	U109	U148	U187	U235
D010	F005	K171	P041	P088	P192	U029	U070	U110	U149	U188	U236
D011	F006	K172	P042	P089	P194	U030	U071	U111	U150	U189	U237
D012	F007	P001	P043	P092	P196	U031	U072	U112	U151	U190	U238
D013	F008	P002	P044	P093	P197	U032	U073	U113	U152	U191	U239
D014	F009	P003	P045	P094	P198	U033	U074	U114	U153	U192	U240
D015	F010	P004	P046	P095	P199	U034	U075	U115	U154	U193	U243
D016	F011	P005	P047	P096	P201	U035	U076	U116	U155	U194	U244
D017	F012	P006	P048	P097	P202	U036	U077	U117	U156	U196	U246
D018	F019	P007	P049	P098	P203	U037	U078	U118	U157	U197	U247
D019	F020	P008	P050	P099	P204	U038	U079	U119	U158	U200	U248
D020	F021	P009	P051	P101	P205	U039	U080	U120	U159	U201	U249
D021	F022	P010	P054	P102	U001	U041	U081	U121	U160	U202	U271
D022	F023	P011	P056	P103	U002	U042	U082	U122	U161	U203	U278
D023	F026	P012	P057	P104	U003	U043	U083	U123	U162	U204	U279
D024	F027	P013	P058	P105	U004	U044	U084	U124	U163	U205	U280
D025	F028	P014	P059	P106	U005	U045	U085	U125	U164	U206	U328
D026	F032	P015	P060	P108	U006	U046	U086	U126	U165	U207	U353
D027	F034	P016	P062	P109	U007	U047	U087	U127	U166	U208	U359
D028	F035	P017	P063	P110	U008	U048	U088	U128	U167	U209	U364
D029	F037	P018	P064	P111	U009	U049	U089	U129	U168	U210	U367
D030	F038	P020	P065	P112	U010	U050	U090	U130	U169	U211	U372
D031	F039	P021	P066	P113	U011	U051	U091	U131	U170	U213	U373
D032	K001	P022	P067	P114	U012	U052	U092	U132	U171	U214	U387
D033	K048	P023	P068	P115	U014	U053	U093	U133	U172	U215	U389
D034	K049	P024	P069	P116	U015	U055	U094	U134	U173	U216	U394
D035	K050	P026	P070	P118	U016	U056	U095	U135	U174	U217	U395
D036	K051	P027	P071	P119	U017	U057	U096	U136	U176	U218	U404
D037	K052	P028	P072	P120	U018	U058	U097	U137	U177	U219	U409
D038	K061	P029	P073	P121	U019	U059	U098	U138	U178	U220	U410
											U411

PART I

FIGURES

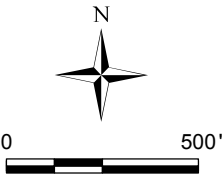
\\TRIHYDRO.COM\CLIENTS\OTOR\PERMAFIX\OTOR\PERMAFIX\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART\61A-PR-PTI-WASTEMANAREAS





NOTES:

- 1. FEMA = FEDERAL EMERGENCY MANAGEMENT AGENCY
- 2. FIRM = FLOOD INSURANCE RATE MAP
- 3. FIRM PANEL 12001C0303E EFFECTIVE 11/2/2018
- 4. 1-PERCENT ANNUAL CHANCE FLOOD HAZARD IS ALSO REFERRED TO AS THE BASE FLOOD OR 100-YEAR FLOOD





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FIGURE I-2

PART I
FLOOD ZONE MAP

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1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

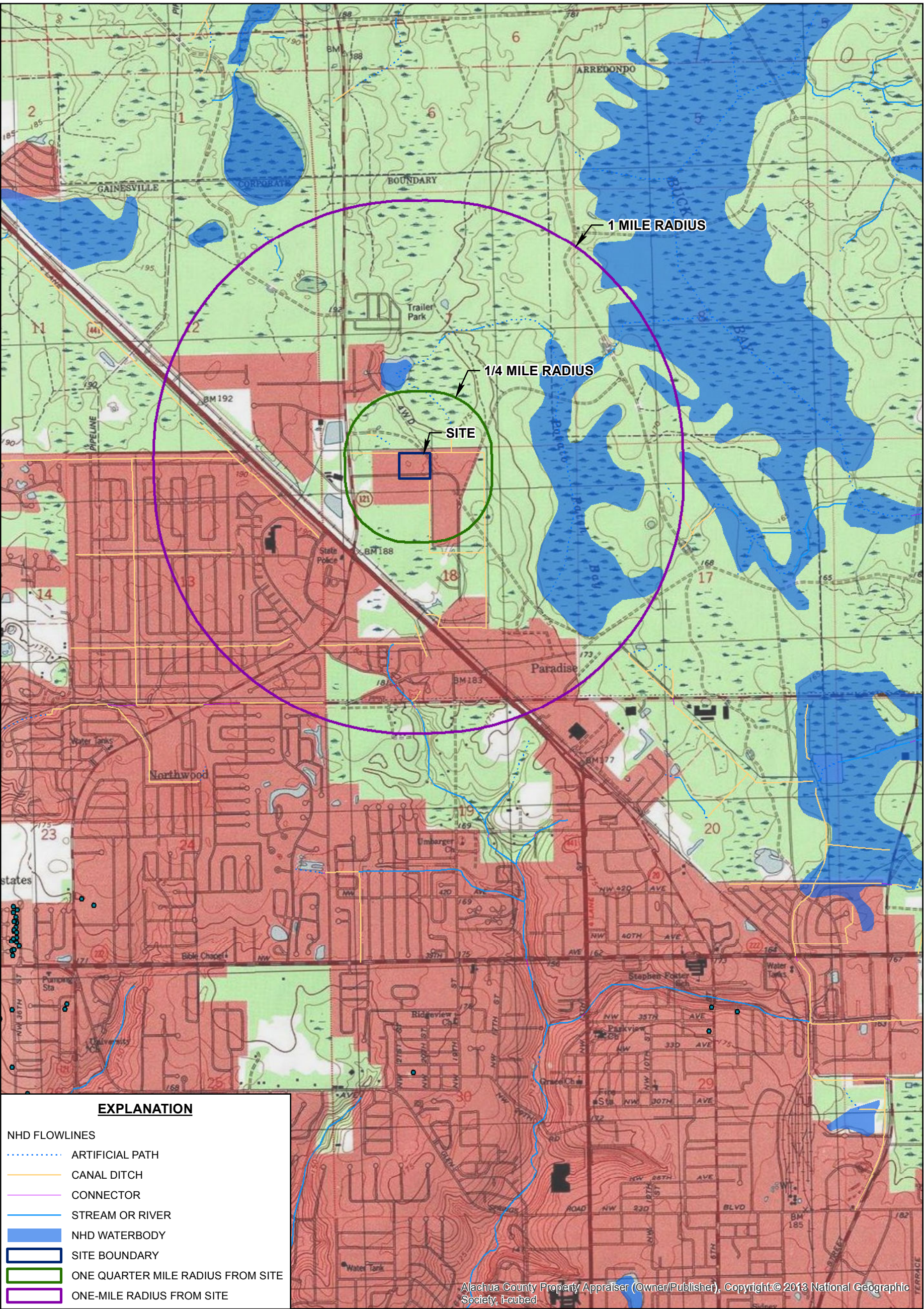


FIGURE I-3

PART I
TOPOGRAPHIC MAP

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA



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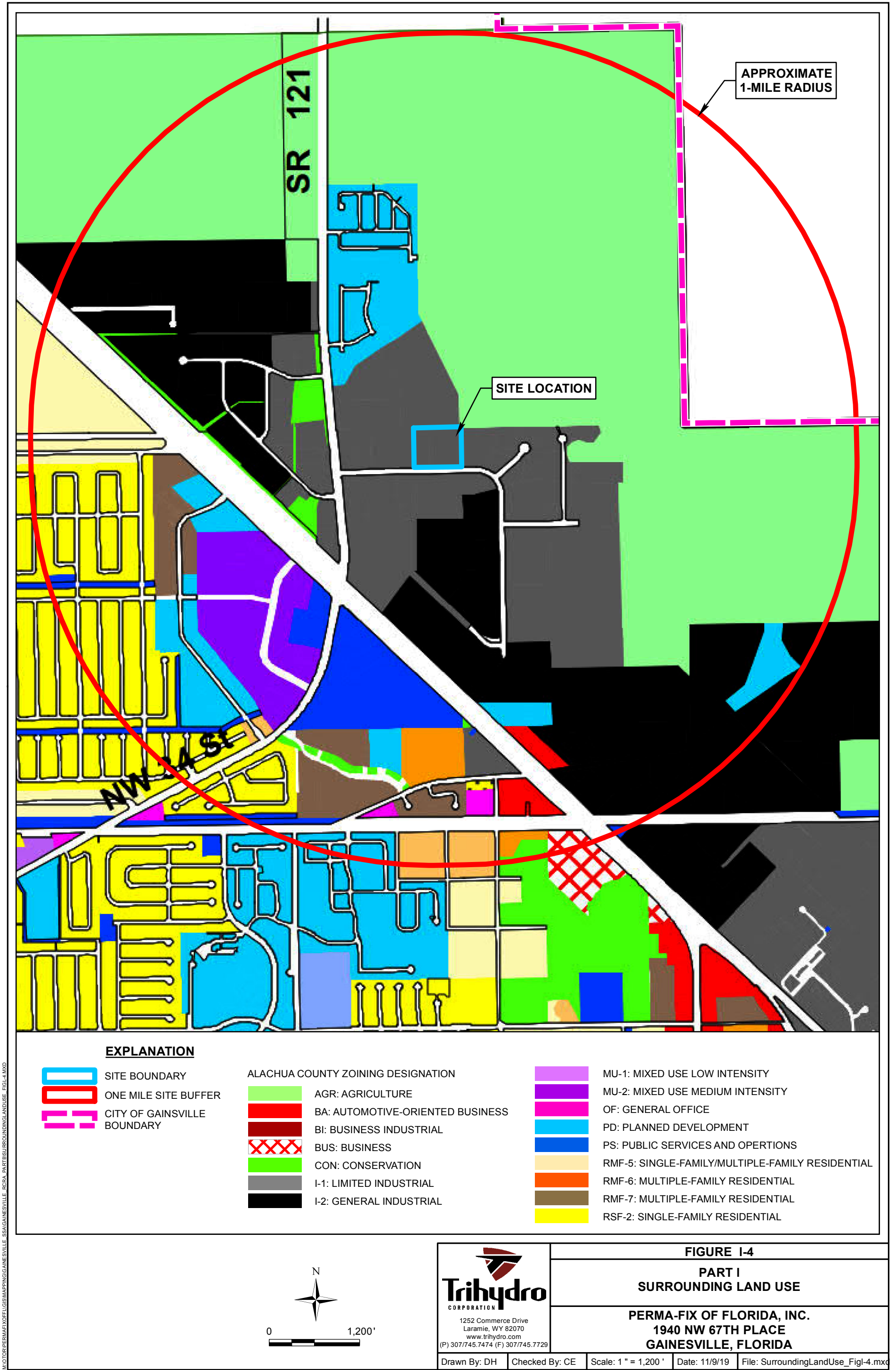
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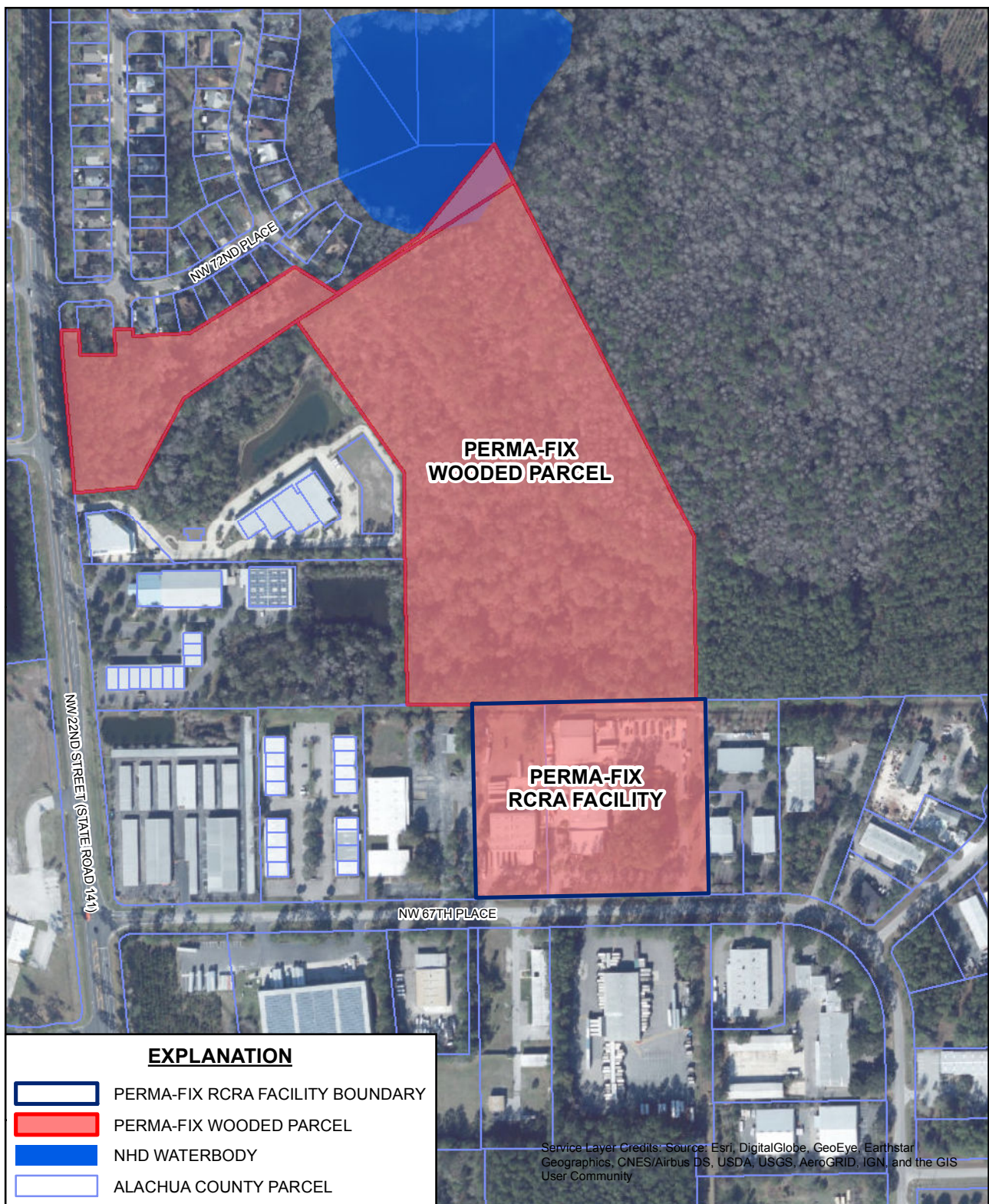
Checked By: CE

Scale: 1" = 2,000'

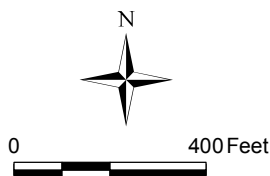
Date: 11/9/19

File: TopoMap_Figl-3.mxd





M:\OTORPERMAFIX\FG\GIS\MAPPING\GAINESVILLE_SSA\GAINESVILLE_RCRA_PARTI\HWSA_FIG-5.MXD



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FIGURE I-5

**PART I
PERMA-FIX FACILITY FOR HSWA PURPOSES**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Drawn By: DH Checked By: CE Scale: 1" = 400' Date: 11/9/19 File: HSWA_Fig1-5.mxd

M:\OTDR\PERMAFIX\FE\CAUD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\2021\FIGURES-A\61A-PR-PTI-TREATOPRBLDG-A

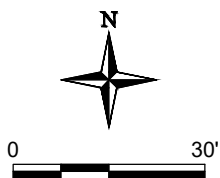
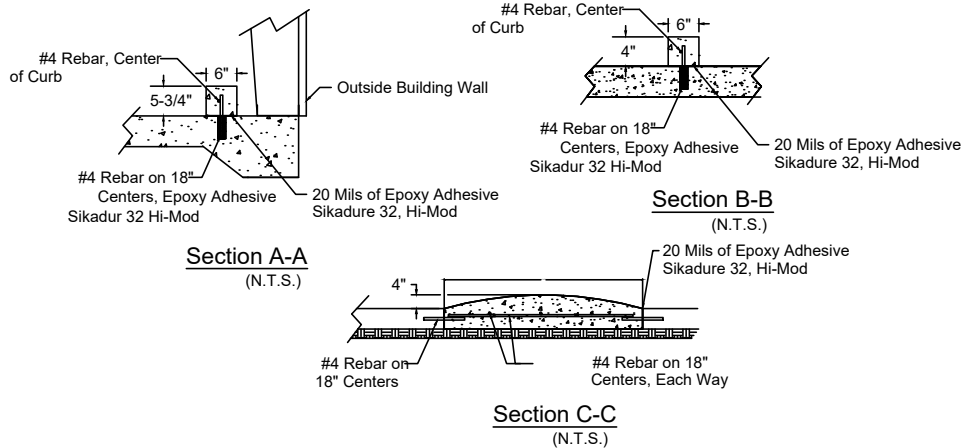
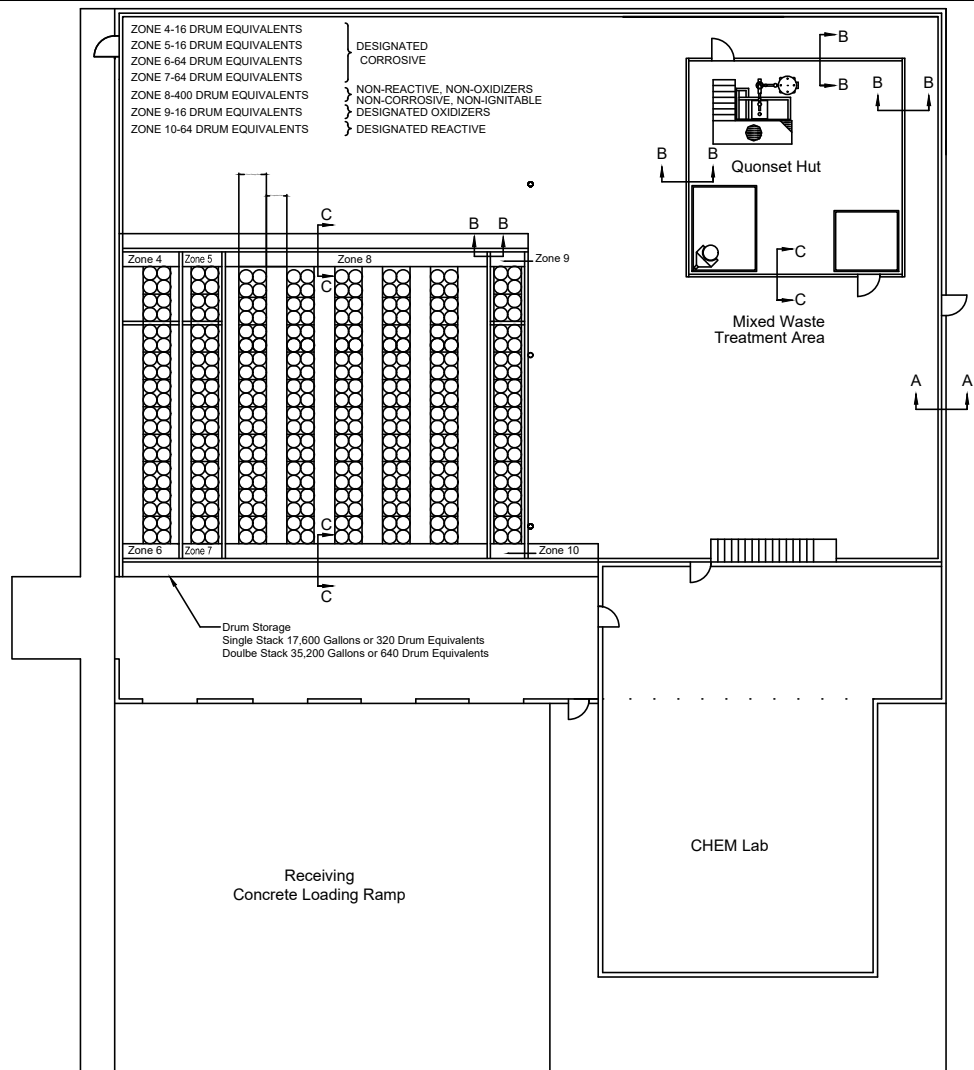


FIGURE I-6-A

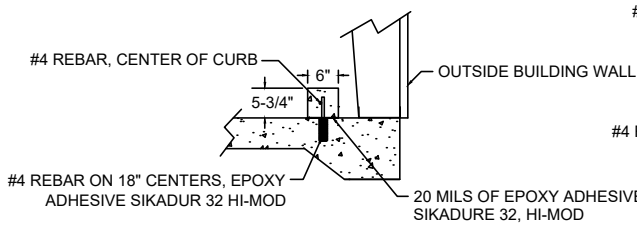
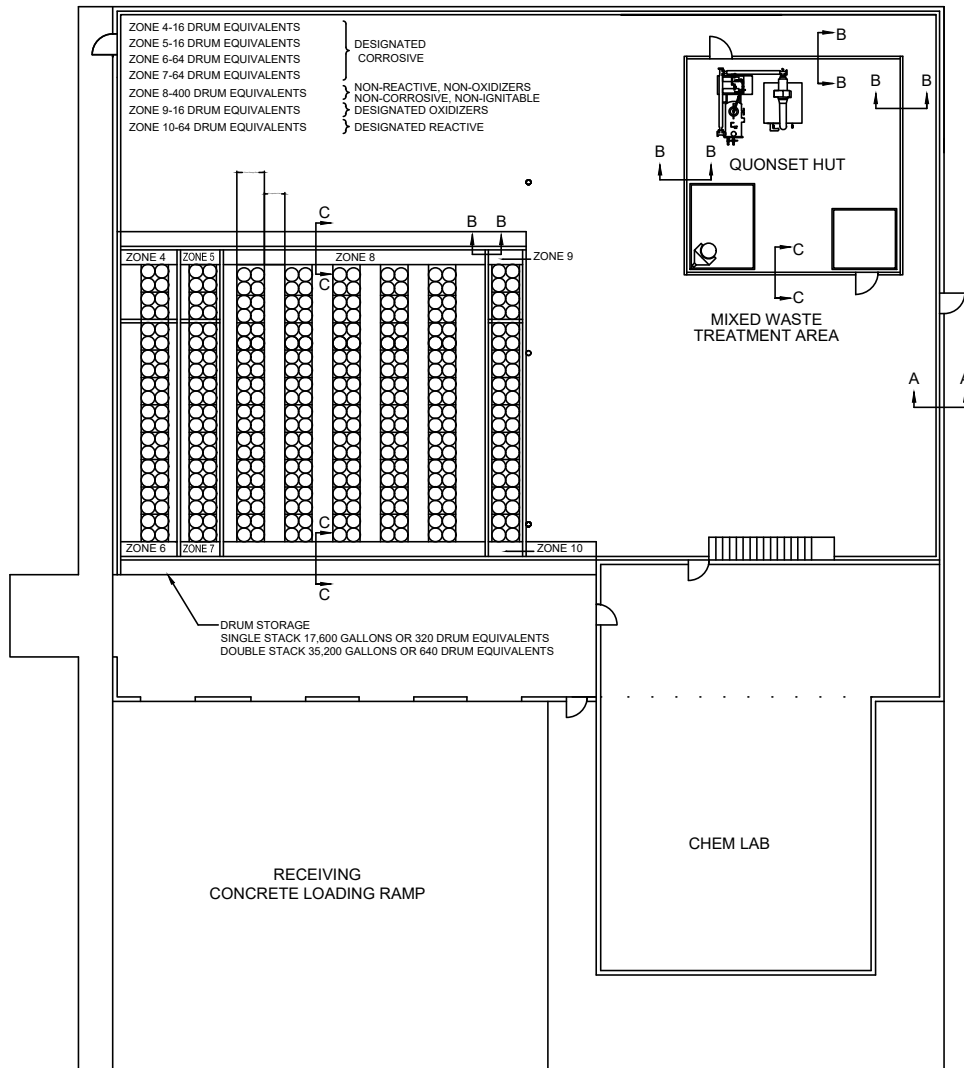
**PART I CURRENT
TREATMENT AND OPERATIONS BUILDING**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

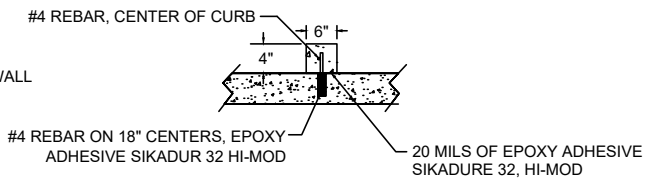
Source: Perma-Fix, 2014

Drawn By: REP Checked By: CE Scale: 1" = 30' Date: 4/29/2021 File: 61A-PR-PTI-TREATOPRBLDG-A

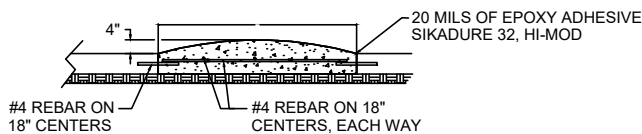
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SECTION A-A
(N.T.S.)



SECTION B-B
(N.T.S.)



SECTION C-C
(N.T.S.)

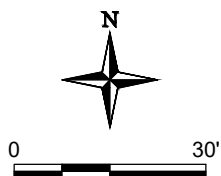


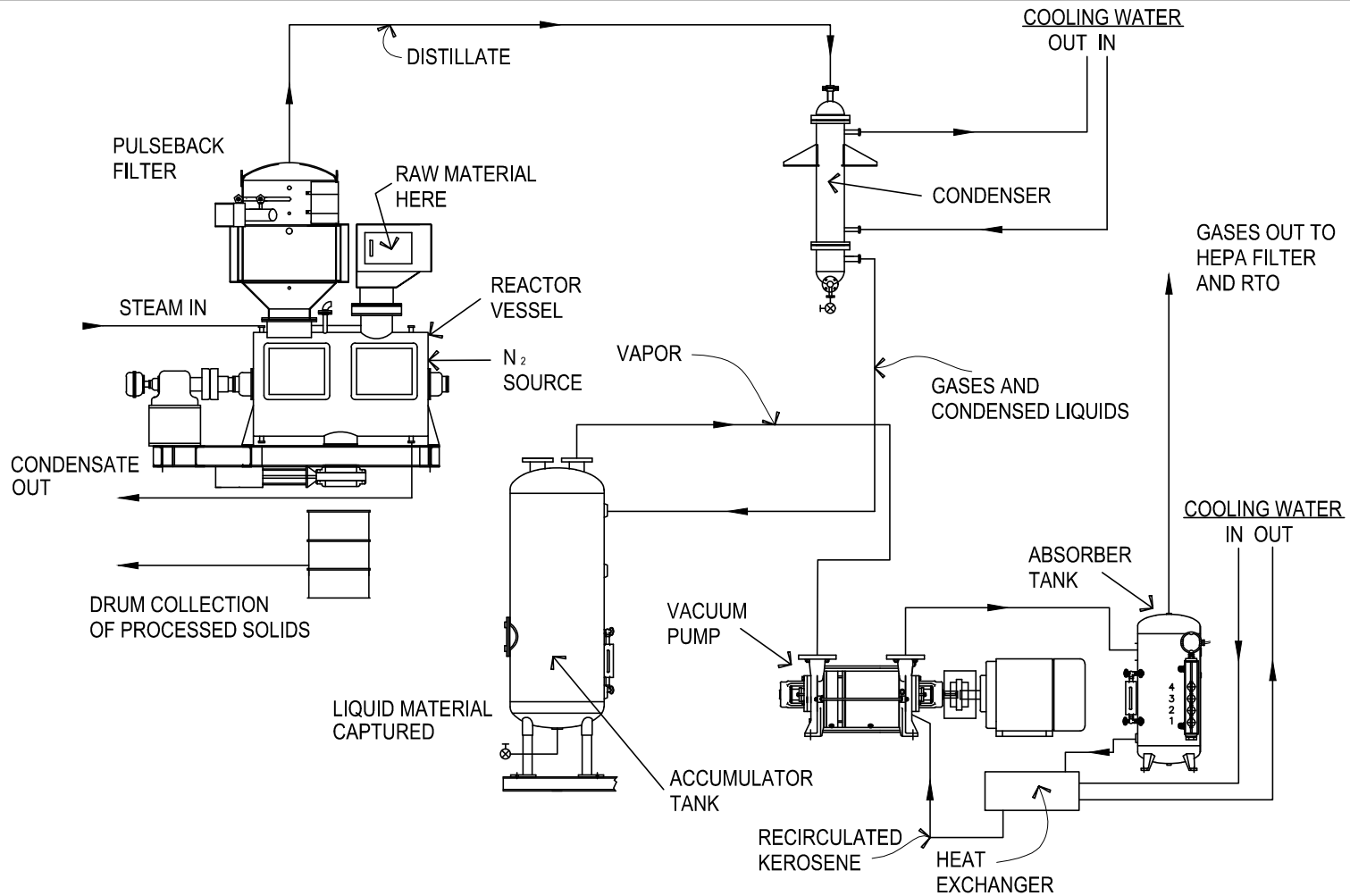
FIGURE I-6-B

**PART I PROPOSED
TREATMENT AND OPERATIONS BUILDING**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP Checked By: CE Scale: 1" = 30' Date: 4/30/2021 File: 61A-PR-PTI-TREATOPRBLDG-B

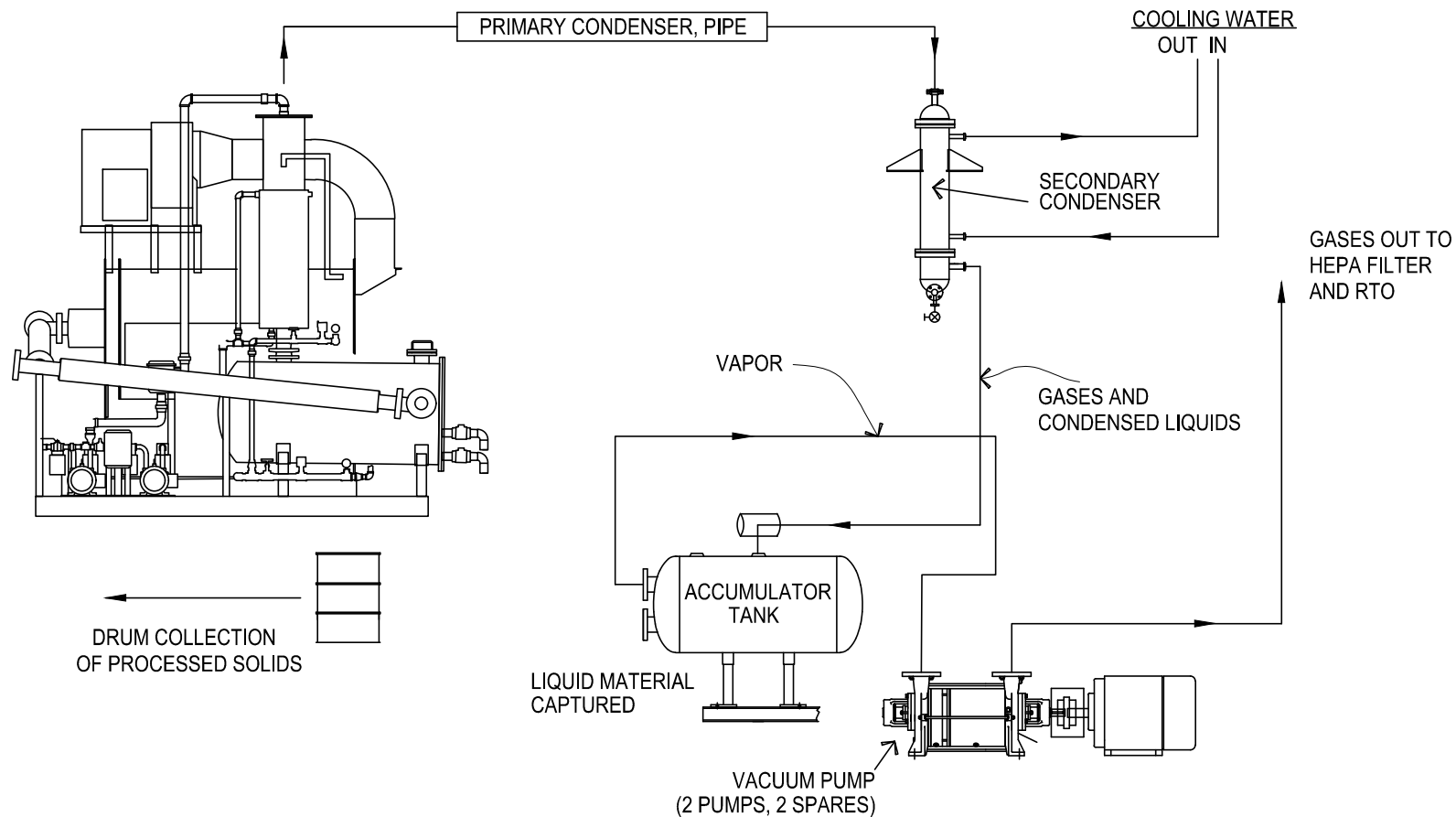


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FIGURE I-7-A
PART I CURRENT
PF-I AND PF-II
PROCESS FLOW DIAGRAM
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

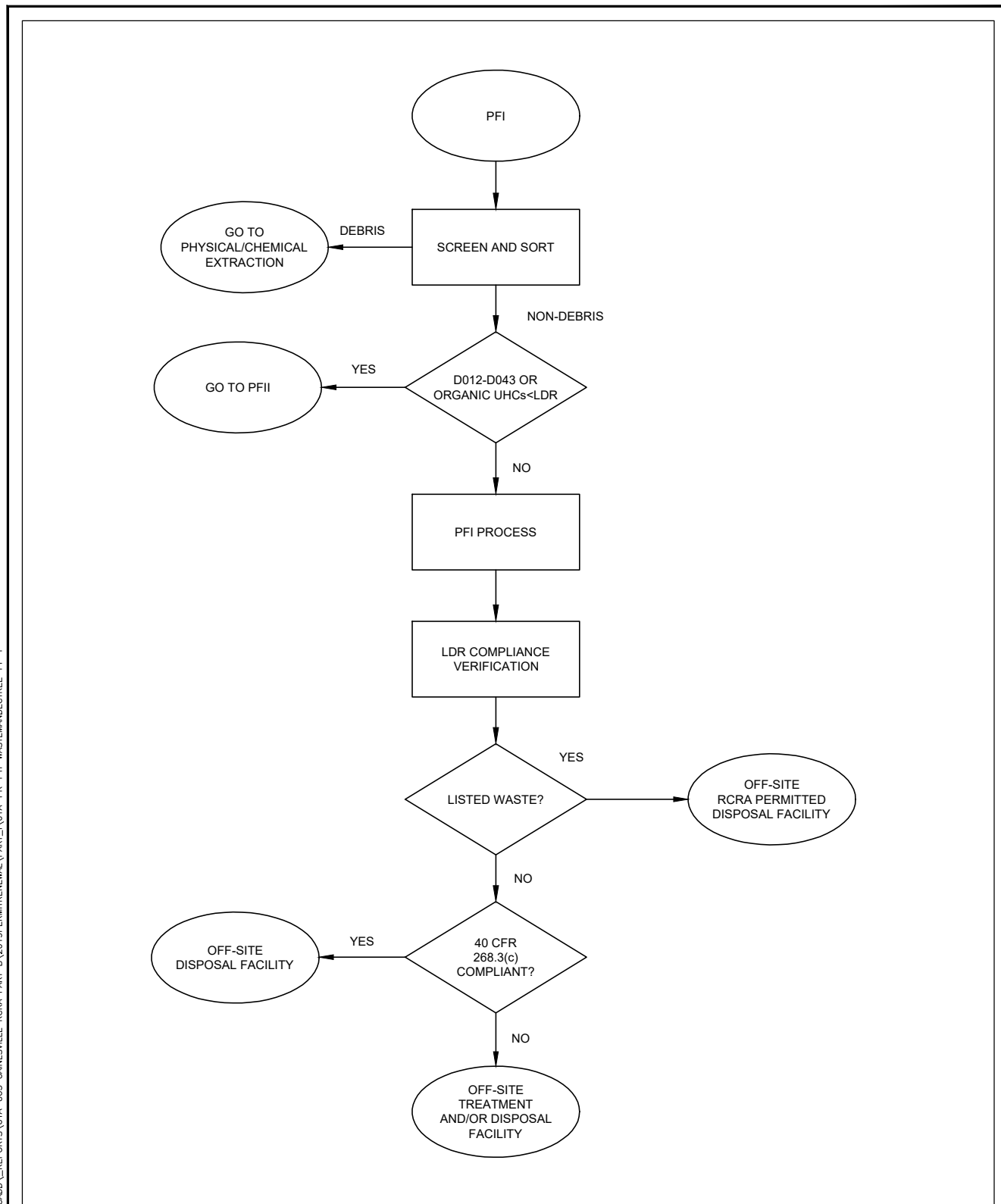
Drawn By: REP | Checked By: CE | Scale: NONE | Date: 4/29/2021 | File: 61A-PR-PTI-PFI-PFII-PFD-A



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FIGURE I-7-B
PART I PROPOSED
PF-I AND PF-II
PROCESS FLOW DIAGRAM
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Drawn By: REP | Checked By: CE | Scale: NONE | Date: 4/30/2021 | File: 61A-PR-PTI-PFI-PFII-PFD-B



NOTES:

1. UHCs = UNDERLYING HAZARDOUS CONSTITUENTS
2. LDR = LAND DISPOSAL RESTRICTION LEVELS



FIGURE I-8

**PART I
WASTE MANAGEMENT DECISION TREE: PF-I**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

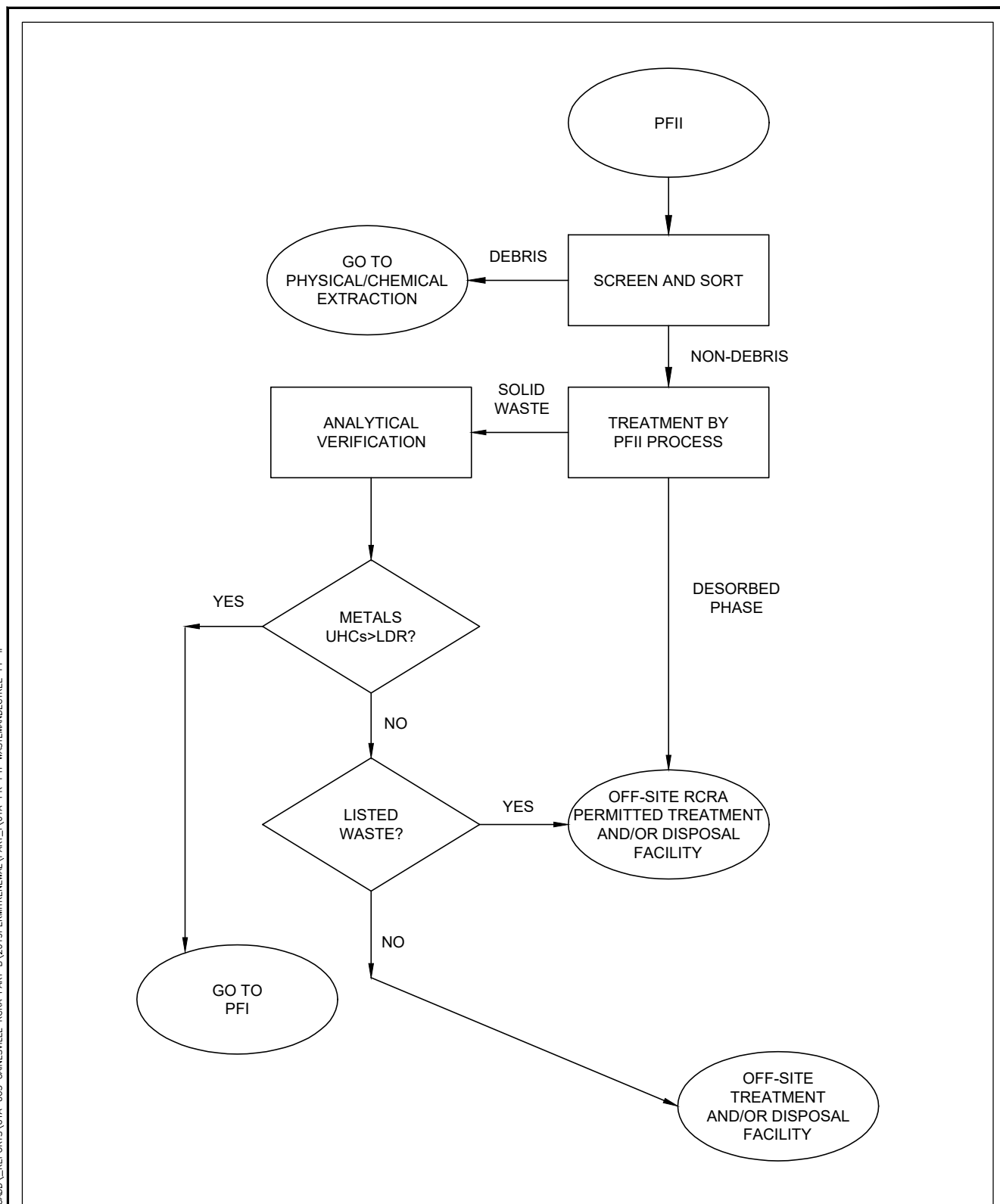
Drawn By: REP

Checked By: CE

Scale: NONE

Date: 10/4/19

File: 61A-PR-PTI-WASTEMANDECTREE-PF-I



NOTES:

1. UHCs = UNDERLYING HAZARDOUS CONSTITUENTS
2. LDR = LAND DISPOSAL RESTRICTION LEVELS



FIGURE I-9

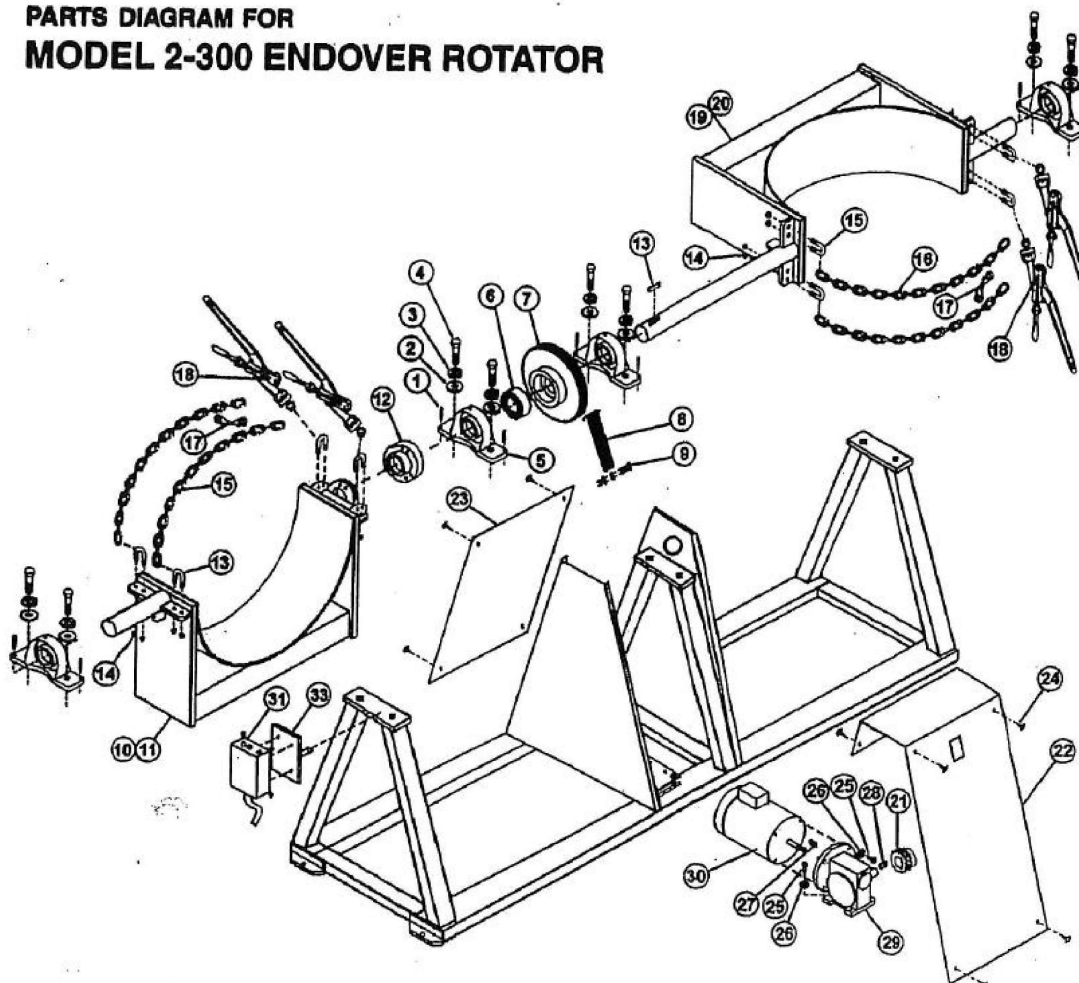
**PART I
WASTE MANAGEMENT DECISION TREE: PF-II**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**



2-300 SERIES ENDOVER ROTATOR

PARTS DIAGRAM FOR MODEL 2-300 ENDOVER ROTATOR



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727 West Manlius Street
P.O. Box 518
East Syracuse, NY 13057-0518
Phone: 315-437-8475
Fax: 315-437-1029 •
E-mail: service@morsemfgco.com
URL: www.morsemfgco.com

When ordering parts, specify
part number and description,
model number and serial number.
Find model number and serial number
on metal tag attached to Endover Rotator.

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Form PL2-300 (Updated 3/2000)



FIGURE I-10

PART I DUAL DRUM ROTATOR DETAILS

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP

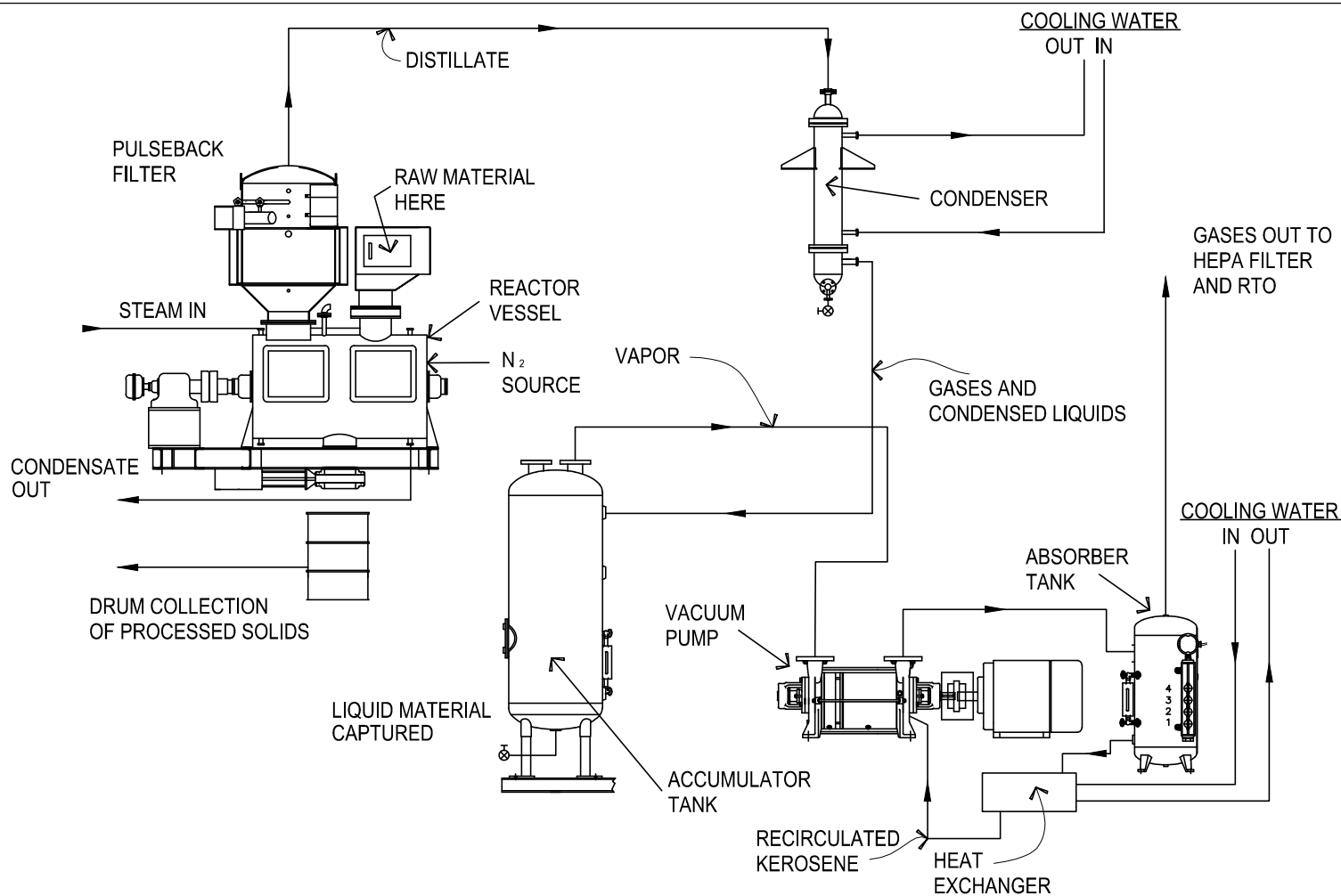
Checked By: CE

Scale: NONE

Date: 10/3/19

File: 61A-PR-PTI-DDROTATOR

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NOTE:
PROCESS SCHEMATIC FOR PF-II PROCESS

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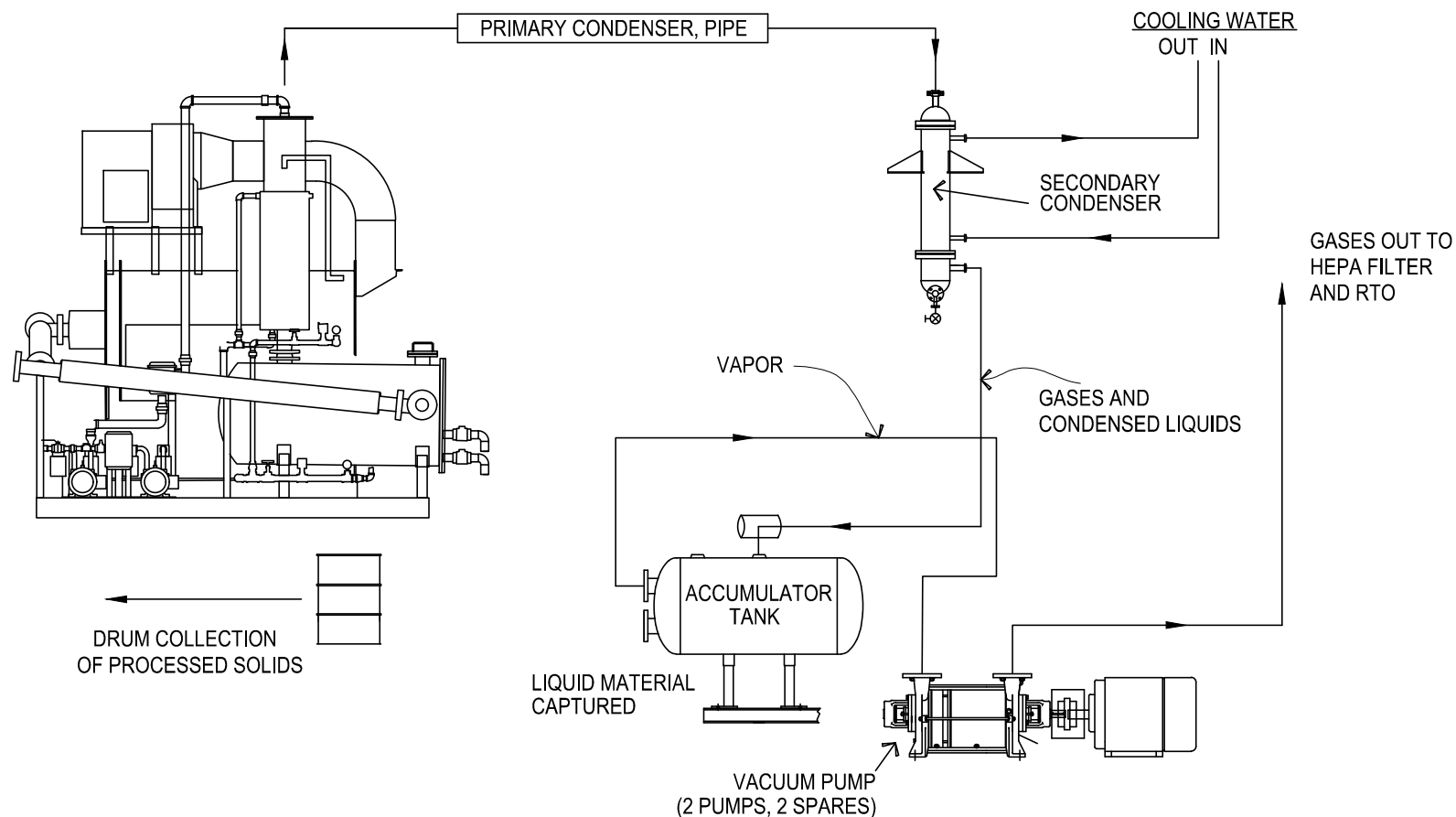
FIGURE I-11-A

**PART I CURRENT
PROCESS SCHEMATIC**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 4/29/2021	File: 61A-PR-PTI-PROCSCHM-A
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DRUM COLLECTION
OF PROCESSED SOLIDS

NOTE:
PROCESS SCHEMATIC FOR PF-II PROCESS

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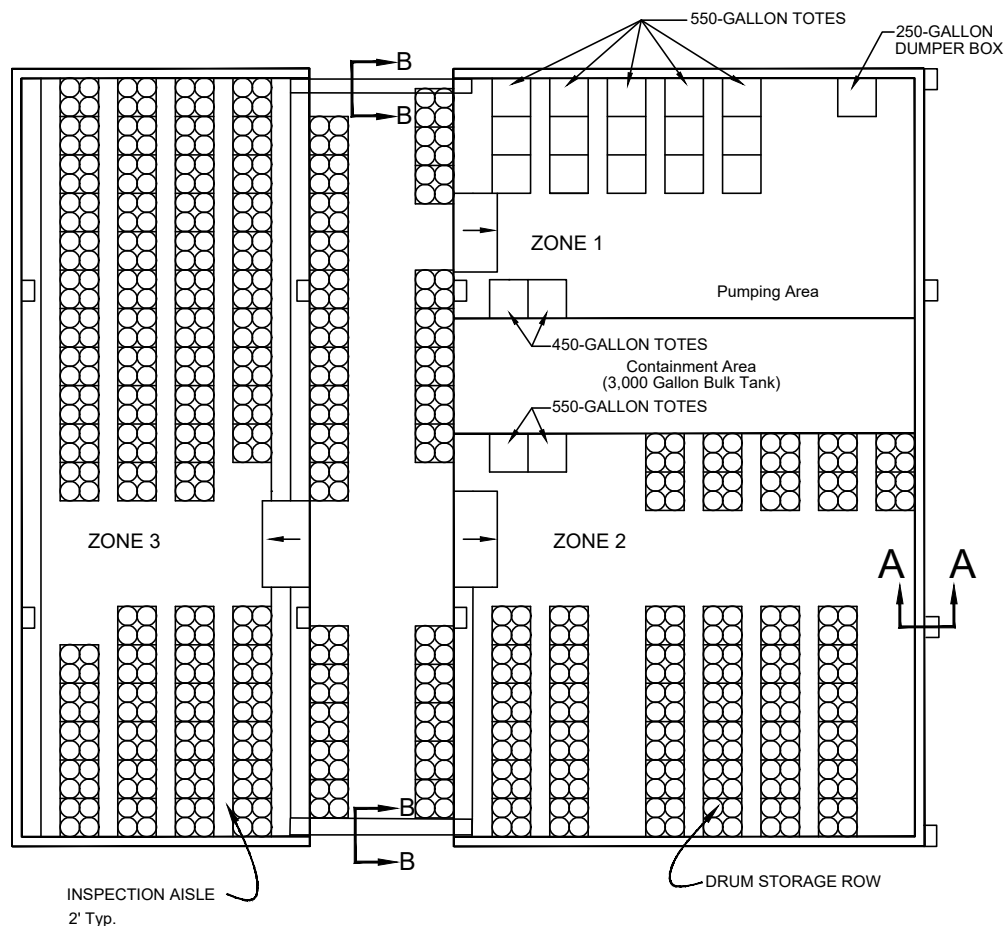
FIGURE I-11-B

**PART I PROPOSED
PROCESS SCHEMATIC**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Drawn By: REP | Checked By: CE | Scale: NONE | Date: 4/30/2021 | File: 61A-PR-PTI-PROSCHEM-B

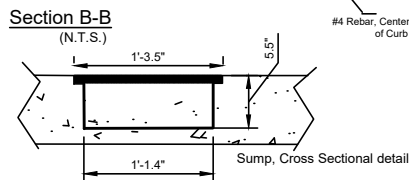
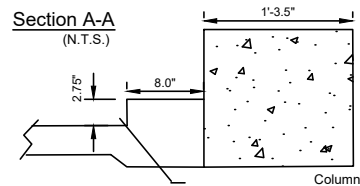
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ZONE 1 - 9130 GALLONS
ZONE 2 - 21340 GALLONS
ZONE 3 - 41360 GALLONS

NOTES:

1. STORAGE CAPACITY IS 71,830 GALLONS* WHEN STACKED A MAXIMUM OF TWO (2) HIGH ON PALLETS. PALLETS MUST BE USED FOR STACKING WITH A MAXIMUM OF FOUR (4) 55 GAL DRUMS PER EACH PALLET.
2. * = TOTAL GALLON LIMIT IS TO BE COMPRISED OF DIFFERENT SIZED CONTAINERS INCLUDING 30-GALLON, 35-GALLON, OR 55- GALLON DRUMS, OR 450-GALLON OR 550-GALLON TOTES.



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FIGURE I-12

**PART I
PROCESSING AND STORAGE BUILDING**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

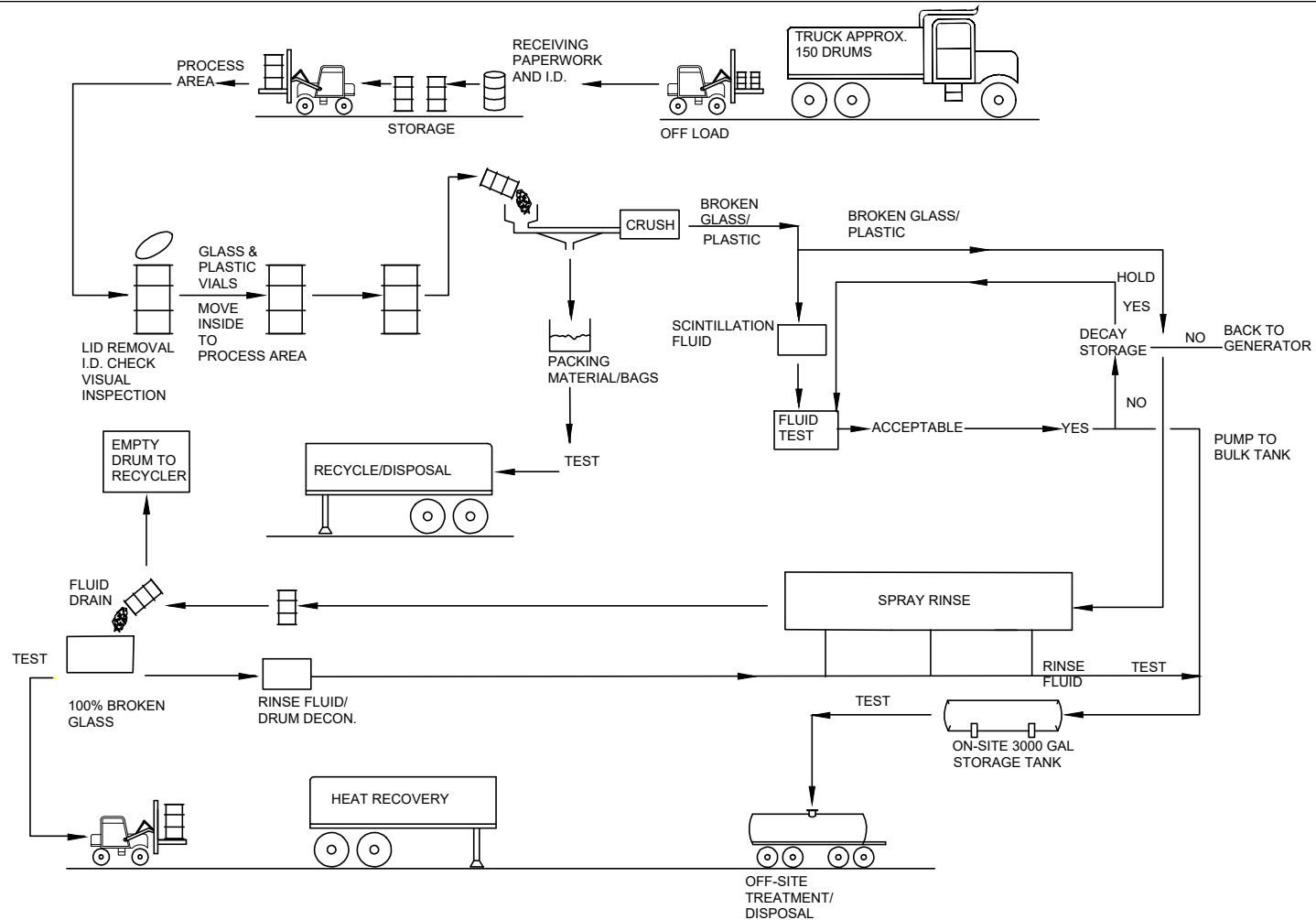
Drawn By: REP

Checked By: CE

Scale: 1" = 20'

Date: 10/3/19

File: 61A-PR-PTI-PROCSTRGBLDG



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FIGURE I-13

**PART I
LSV OPERATION PROCESS FLOW DIAGRAM**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTI-LSV-OPRPFD
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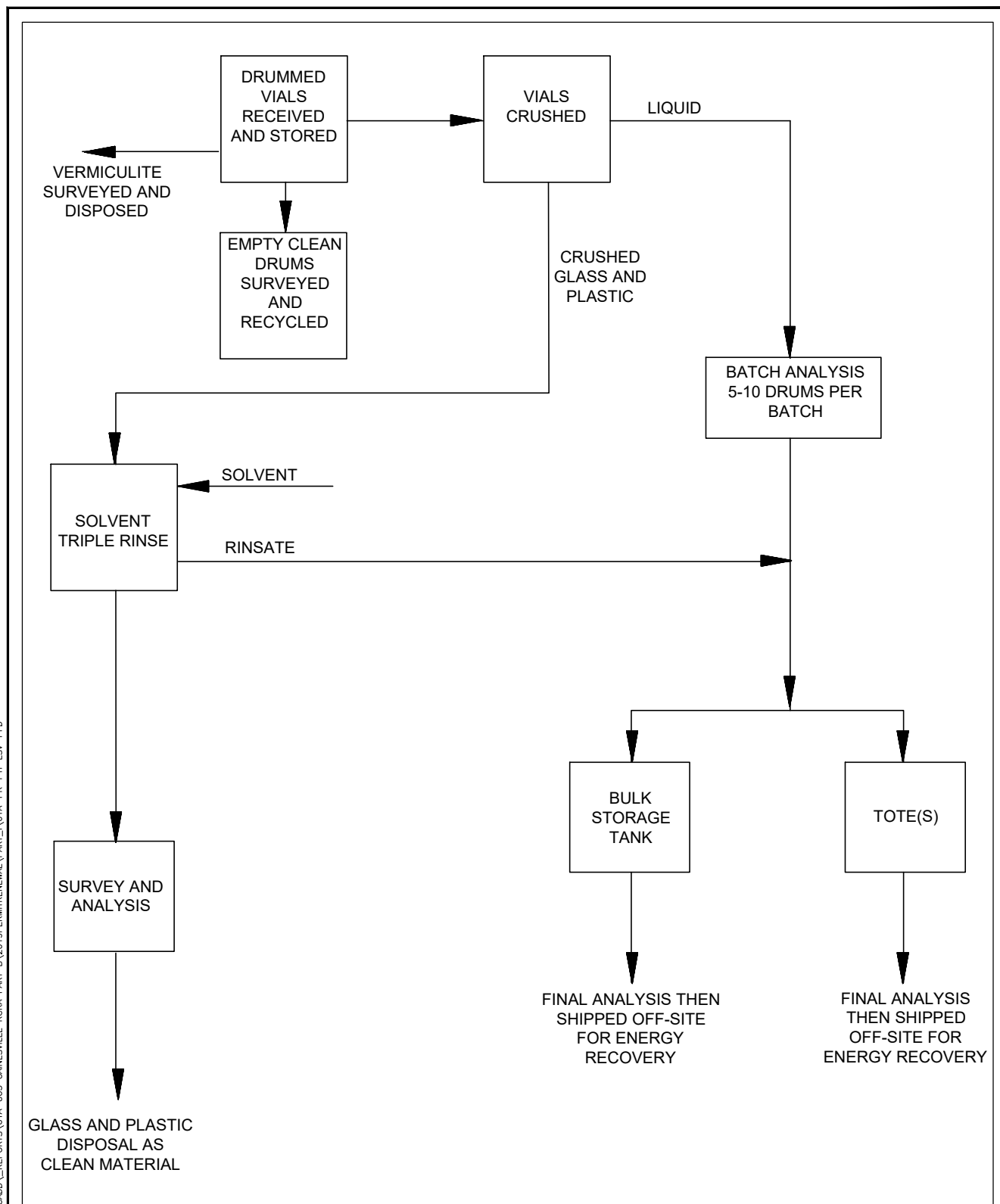


FIGURE I-14

**PART I
LSV PROCESS FLOW DIAGRAM**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP

Checked By: CE

Scale: NONE

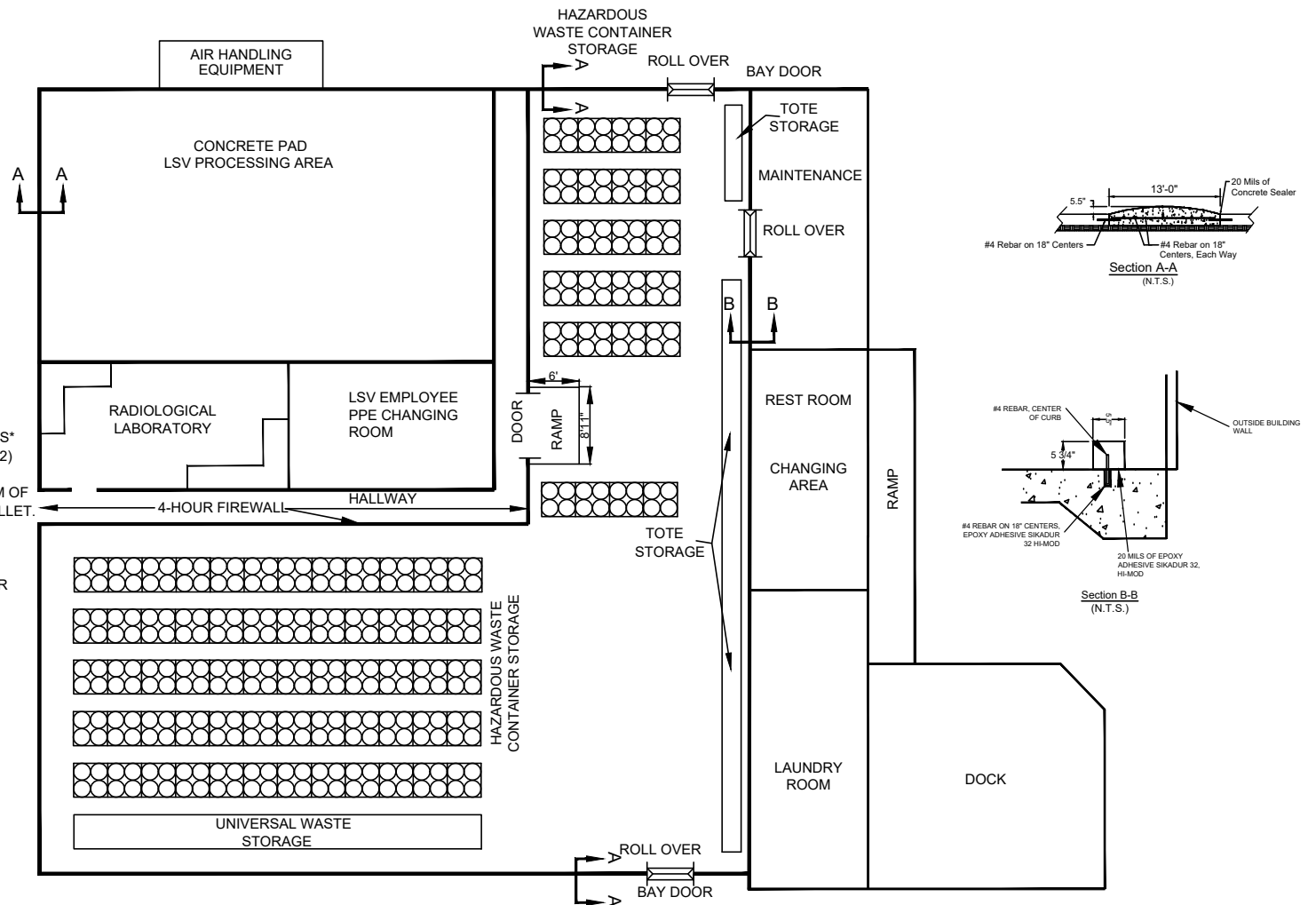
Date: 10/4/19

File: 61A-PR-PTI-LSV-PFD

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NOTES:

1. STORAGE CAPACITY IS 55,340 GALLONS* WHEN STACKED A MAXIMUM OF TWO (2) HIGH ON PALLETS. PALLETS MUST BE USED FOR STACKING WITH A MAXIMUM OF FOUR (4) 55 GAL DRUMS PER EACH PALLET.
2. * = TOTAL GALLON LIMIT IS TO BE COMPRISED OF DIFFERENT SIZED CONTAINERS INCLUDING 30-GALLON, 35-GALLON, OR 55- GALLON DRUMS, OR 450-GALLON OR 550-GALLON TOTES.



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FIGURE I-15

PART I

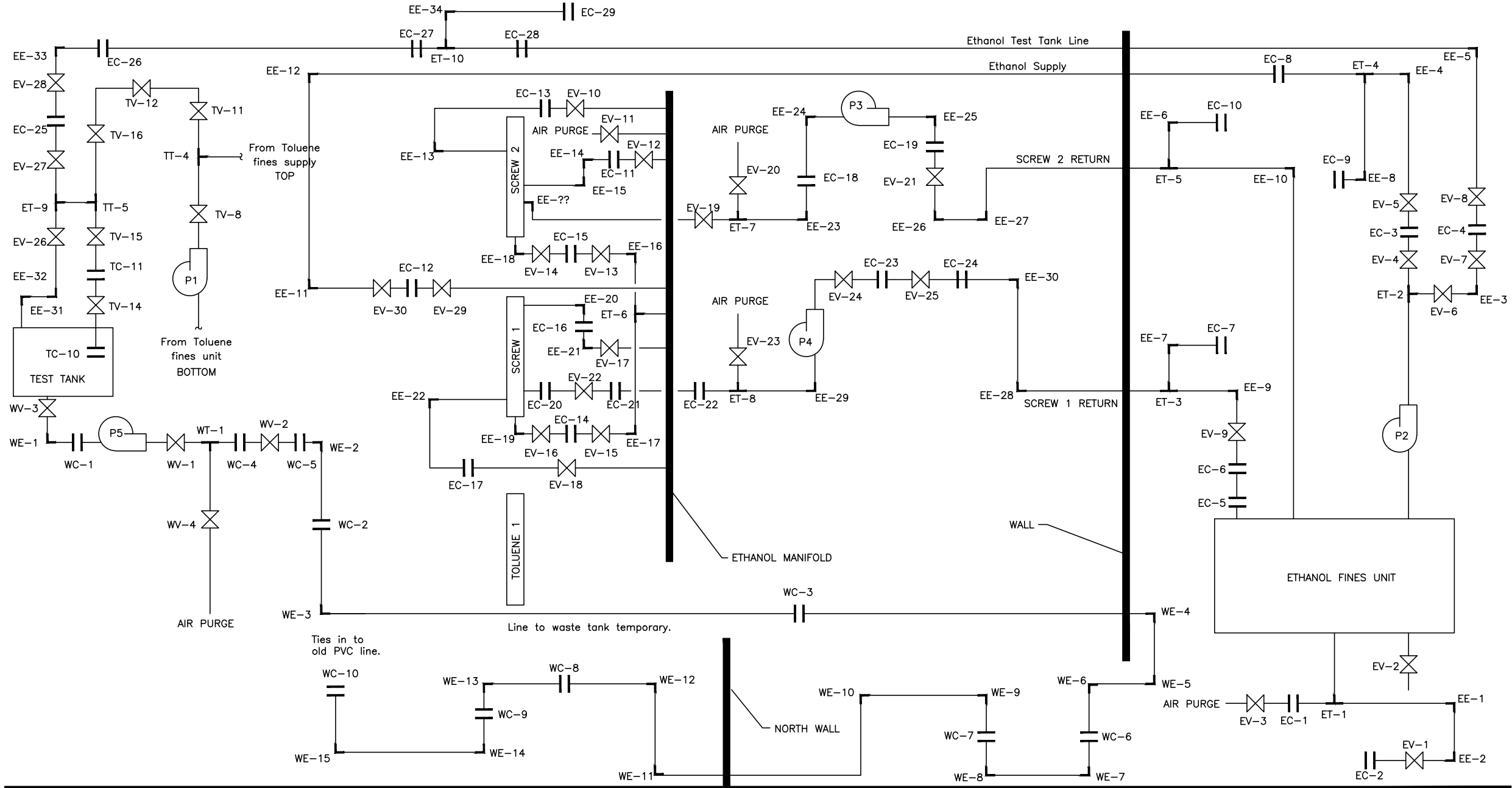
**LSV PROCESSING AND HAZARDOUS WASTE
STORAGE WAREHOUSE**

PERMA-FIX OF FLORIDA, INC.

**1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Drawn By: REP	Checked By: CE	Scale: 1" = 20'	Date: 10/4/2019	File: 61A-PR-PTI-LSV-PROCHW-WH
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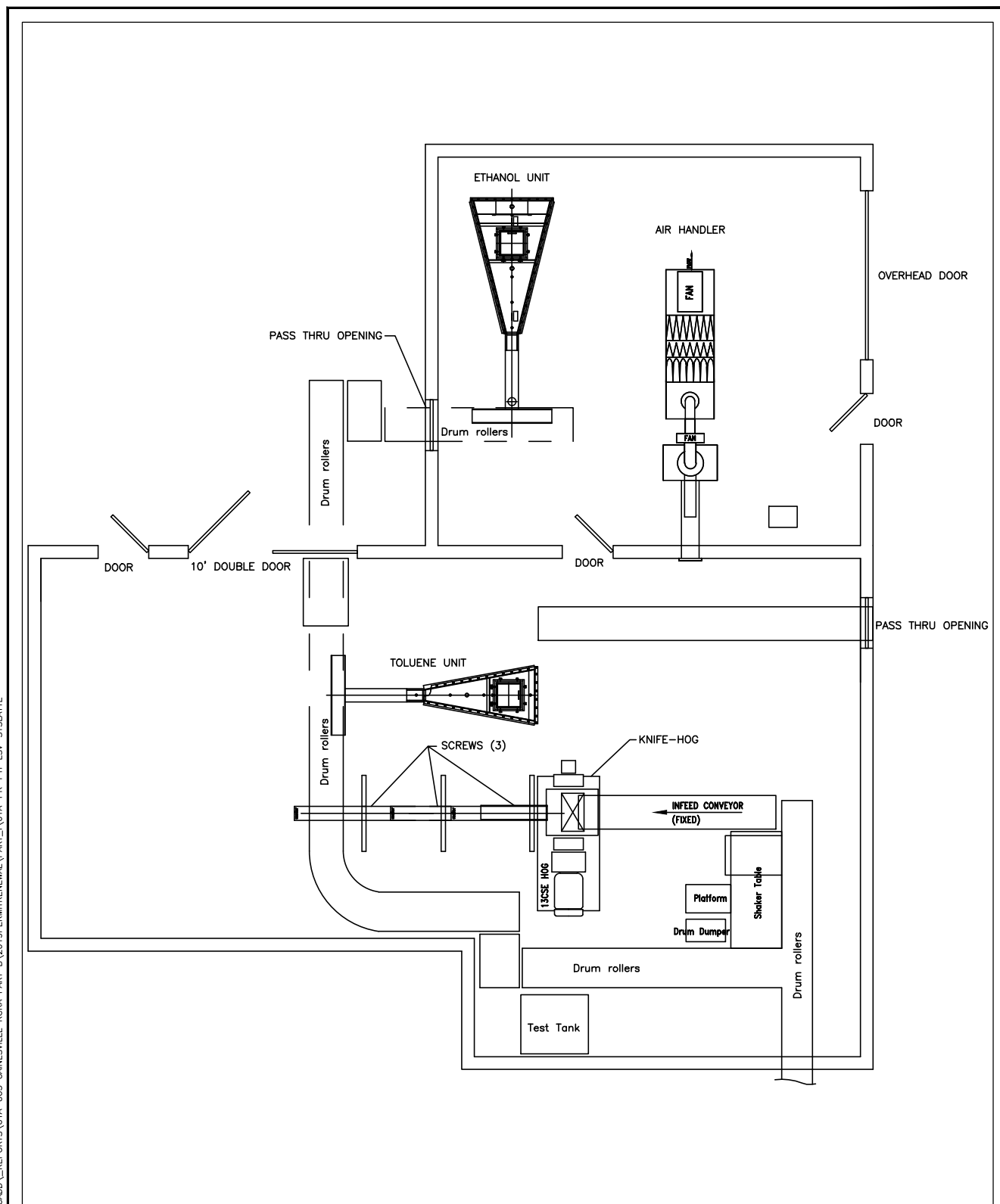
ETHANOL LEGEND	
	EV-1 ETHANOL VALVE
	P1 PUMP
	EE-1 ETHANOL ELBOW
	EC-1 ETHANOL CONNECTOR
	ET-1 ETHANOL TEE

TOLUENE LEGEND	
	TV-1 TOLUENE VALVE
	P1 PUMP
	TE-1 TOLUENE ELBOW
	TC-1 TOLUENE CONNECTOR
	TT-1 TOLUENE TEE

WASTE LEGEND	
	WV-1 WASTE VALVE
	P1 PUMP
	WE-1 WASTE ELBOW
	WC-1 WASTE CONNECTOR
	WT-1 WASTE TEE

FIGURE I-16
PART I
LSV PROCESSING AREA:
WASTE AND ETHANOL SYSTEMS
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

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FIGURE I-17

PART I
LSV SYSTEM LAYOUT: TOLUENE AND ETHANOL

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/19	File: 61A-PR-PTI-LSV-SYSLAYTE
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FIGURE I-18

**PART I
LSV PROCESS EQUIPMENT**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTI-LSV-PROSSEQUIP
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Source: Perma-Fix, 2014

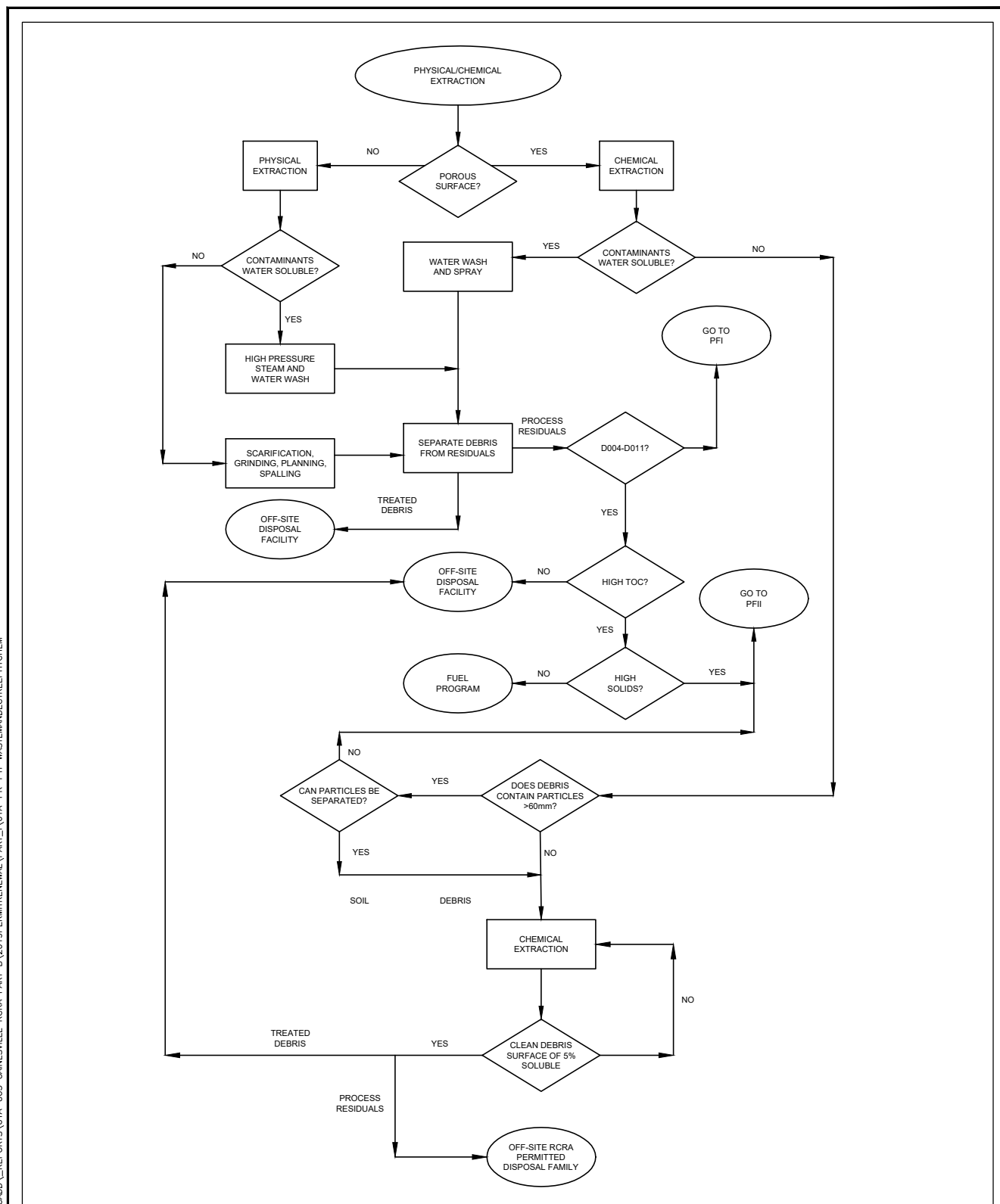


FIGURE I-19

PART I

WASTE MANAGEMENT DECISION TREE:
PHYSICAL/CHEMICAL EXTRACTION

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

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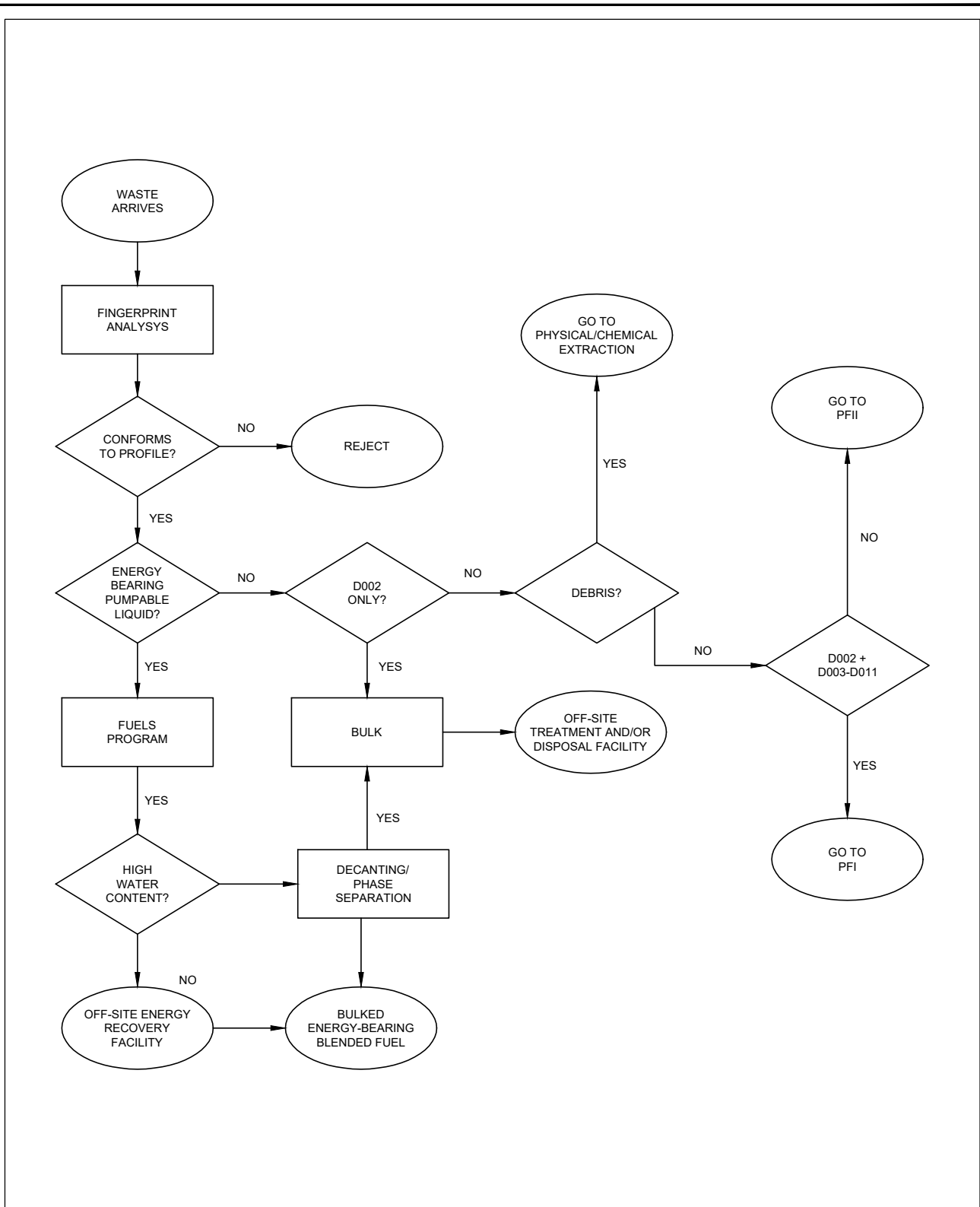


FIGURE I-20

**PART I
WASTE MANAGEMENT DECISION TREE**

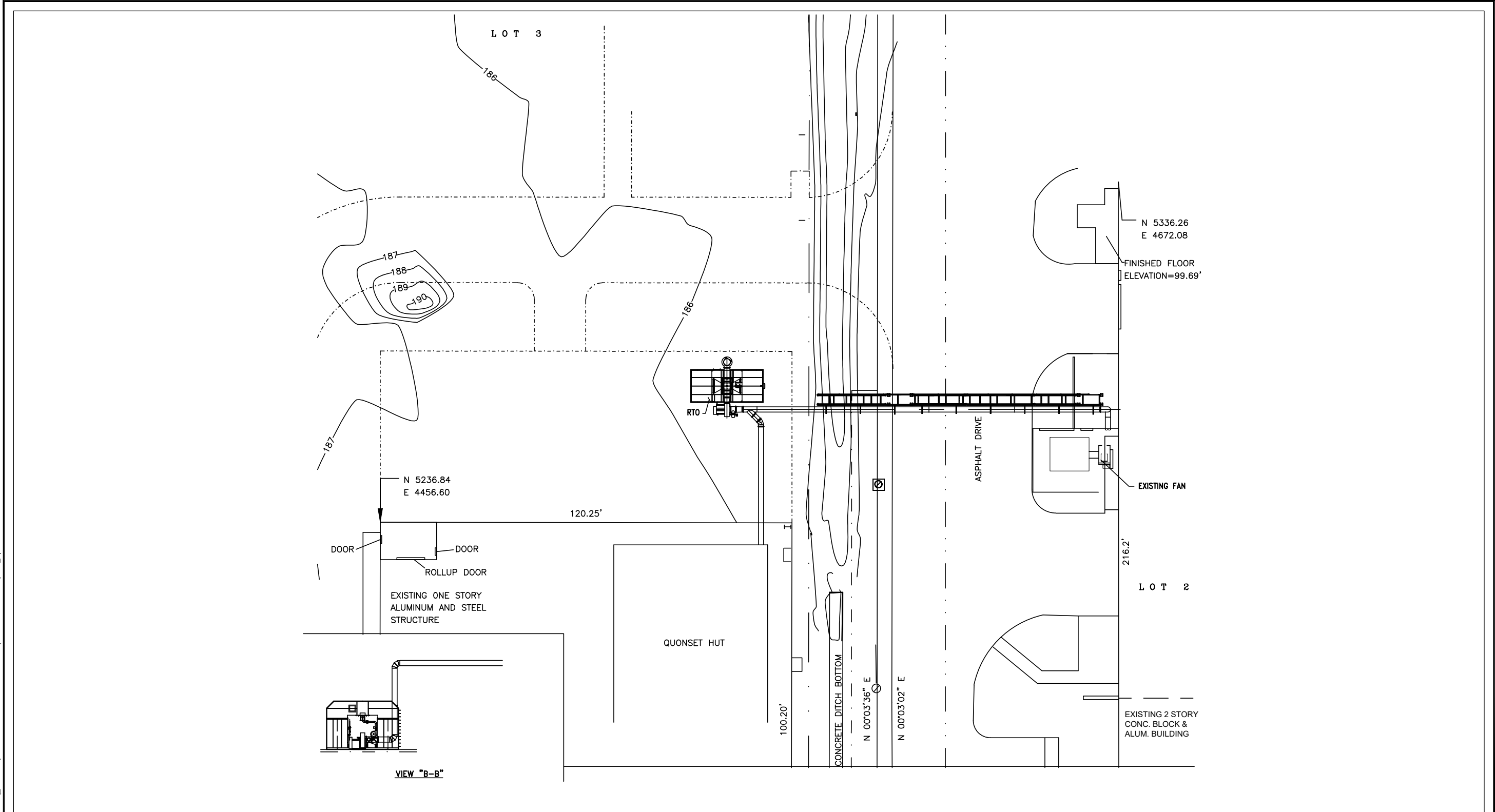
**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**



Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/19	File: 61A-PR-PTI-WASTEMANDECTREE
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\\TRIHYRO.COM\CLIENTS\OTOR\PERMAFIXOFF\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART_1\61A-PR-PTI-VOC-COLLSYSLAY



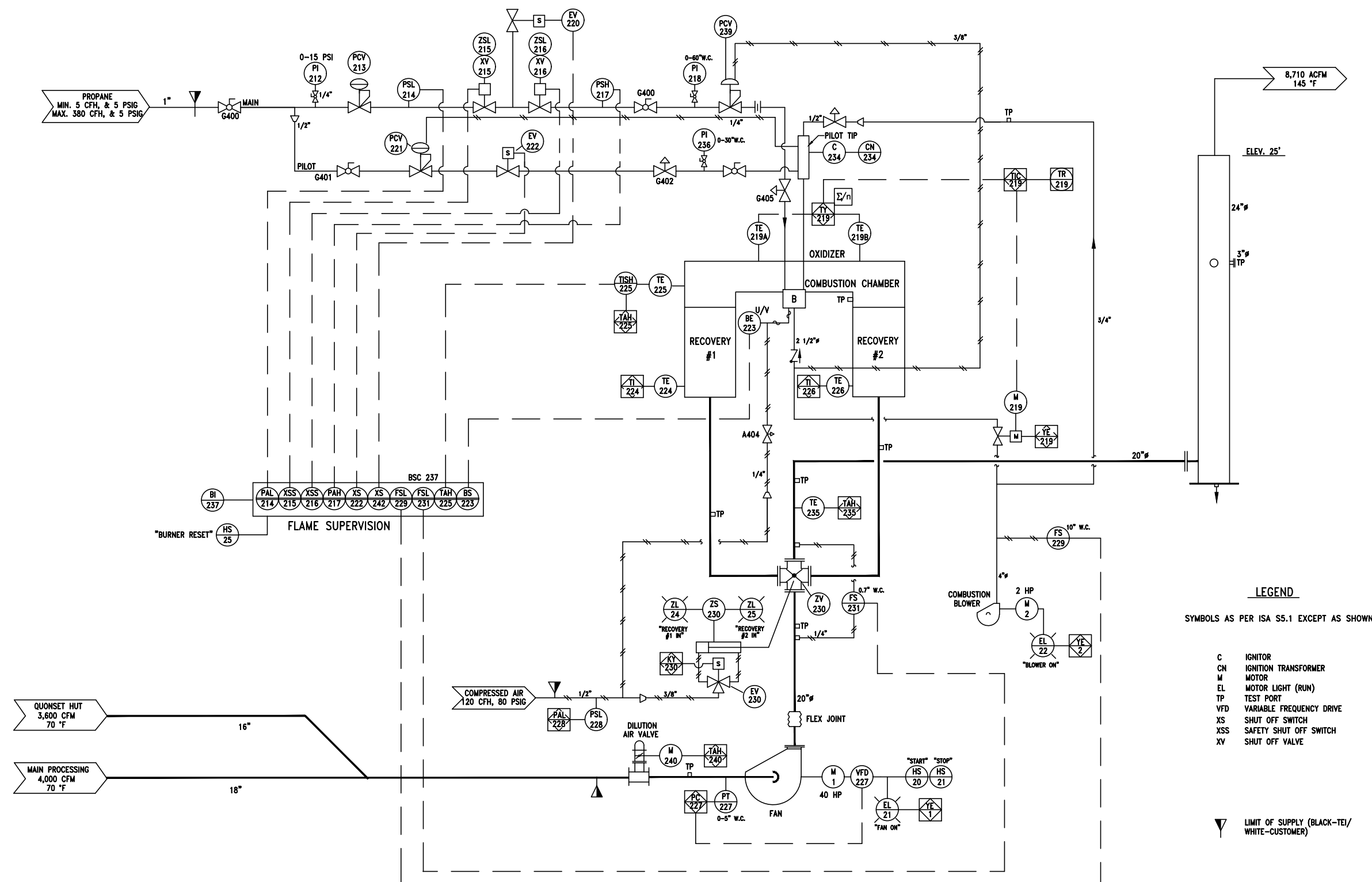
- NOTES:**
- 1. ALL DUCTWORK SS 304 WELDED, MIN. #16 GA. THICK
 - 2. DUCT FLANGES WELDED SS304 WITH VITON GASKETS



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FIGURE I-21			
PART I			
VOC COLLECTION SYSTEM: LAYOUT			
PERMA-FIX OF FLORIDA, INC. 1940 NW 67TH PLACE GAINESVILLE, FLORIDA			
Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019
File: 61A-PR-PTI-VOC-COLLSYSLAY			

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LEGEND

SYMBOLS AS PER ISA S5.1 EXCEPT AS SHOWN

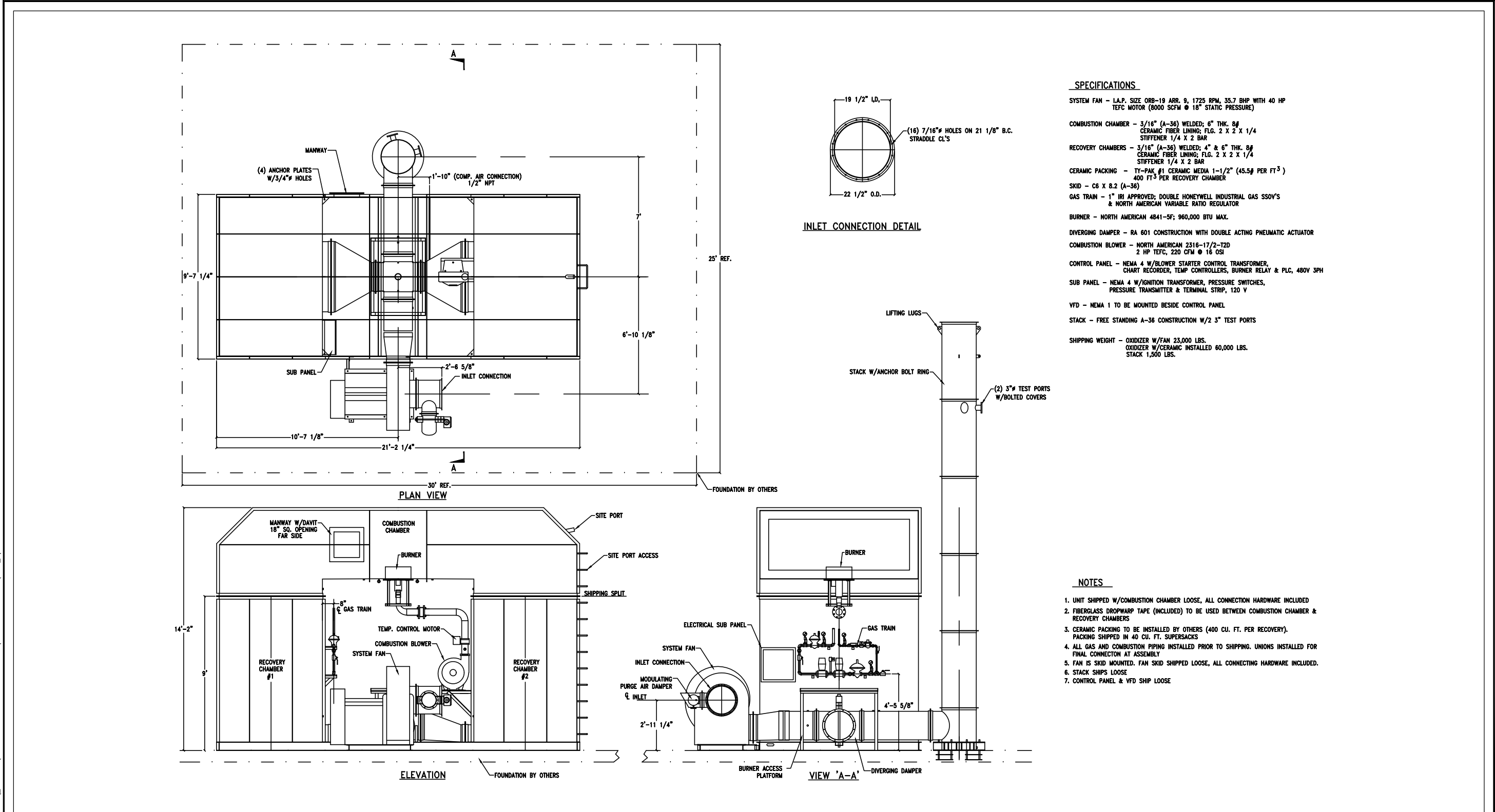
C IGNITOR
CN IGNITION TRANSFORMER
M MOTOR
EL MOTOR LIGHT (RUN)
TP TEST PORT
VFD VARIABLE FREQUENCY DRIVE
XS SHUT OFF SWITCH
XSS SAFETY SHUT OFF SWITCH
XV SHUT OFF VALVE

▼ LIMIT OF SUPPLY (BLACK-TEI/
WHITE-CUSTOMER)




FIGURE I-22
PART I
VOC COLLECTION SYSTEM:
P&ID
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

\\TRIHYRO.COM\CLIENTS\OTDR\PERMAFIXOFF\CAD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART_1\61A-PR-PTI-VOC-COLLSYSGENARG



Source: Perma-Fix, 2014

 1252 Commerce Drive Laramie, Wyoming 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729	FIGURE I-23			
	PART I			
	VOC COLLECTION SYSTEM:			
	GENERAL ARRANGEMENT			
PERMA-FIX OF FLORIDA, INC.				
1940 NW 67TH PLACE				
GAINESVILLE, FLORIDA				
Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTI-VOC-COLLSYSGENARG

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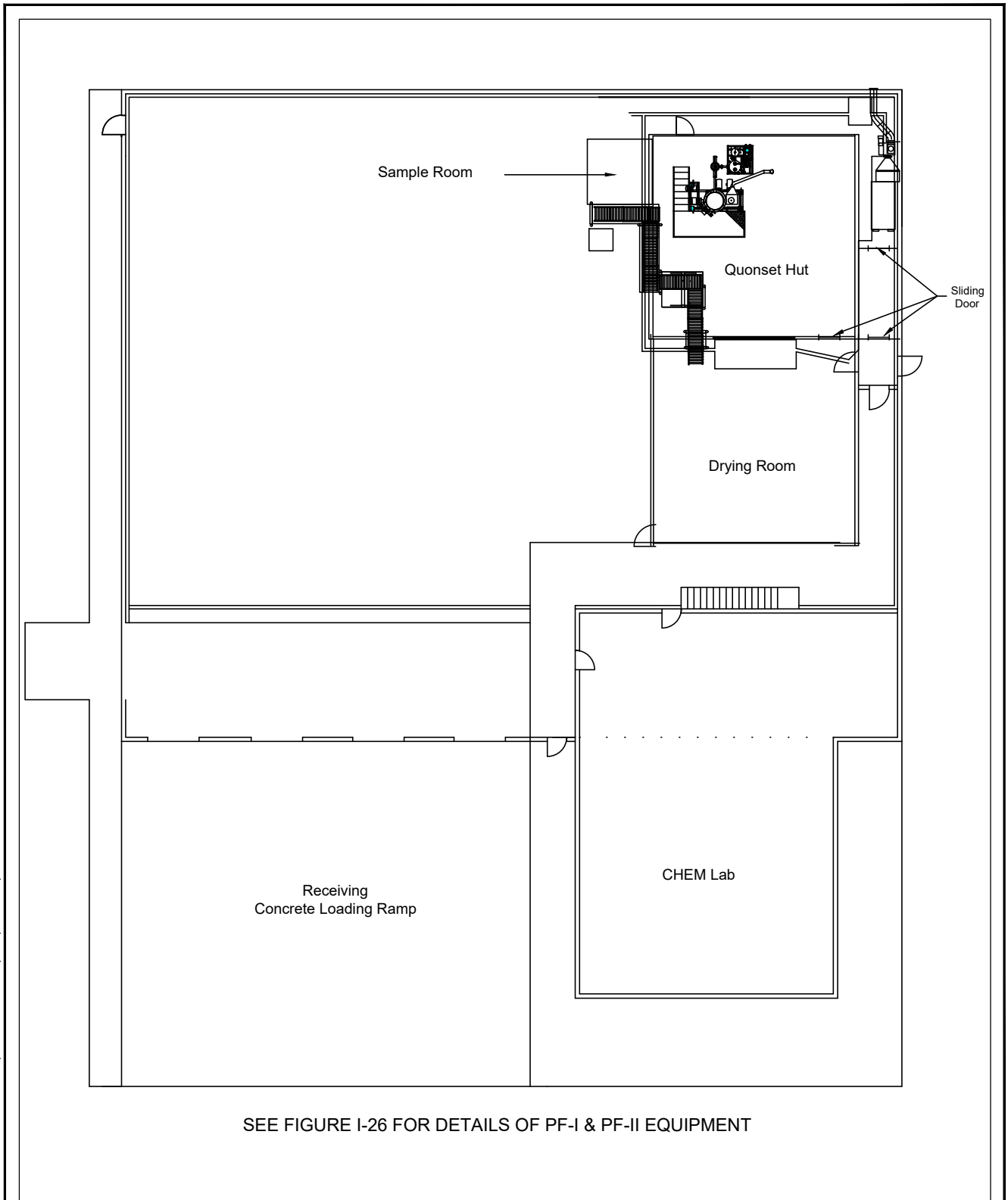


FIGURE I-24-A
PART I CURRENT
EQUIPMENT LAYOUT FOR PF-I AND PF-II
(PLAN VIEW)

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 5/5/21	File: 61A-PR-PTI-EQLAY-PF-PLANVIEW-A
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M:\OTDR\PERMAFIX\CAAD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\2021\FIGURES-B\61A-PR-PTI-EQLAY-PF-PLANVIEW-B

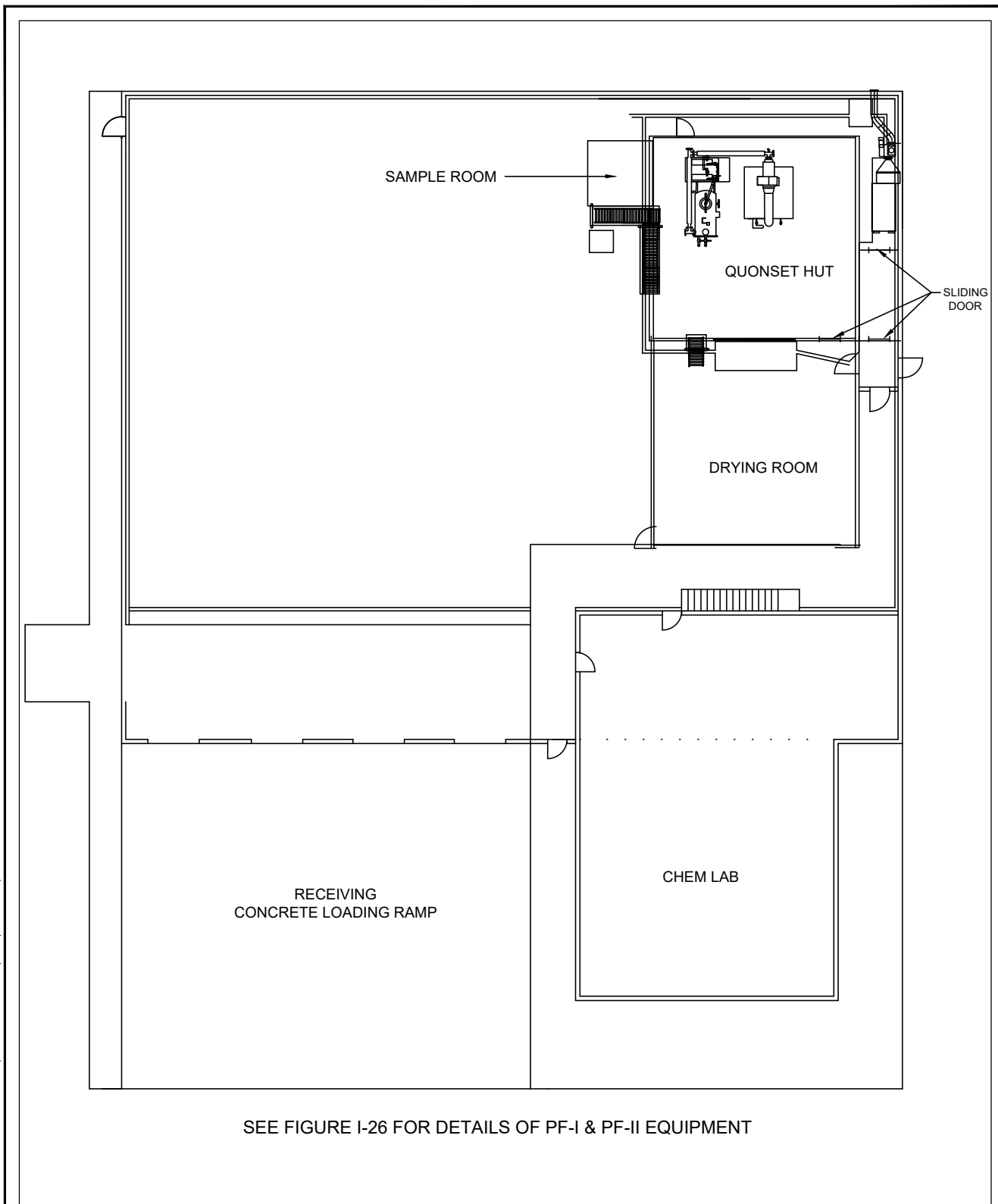


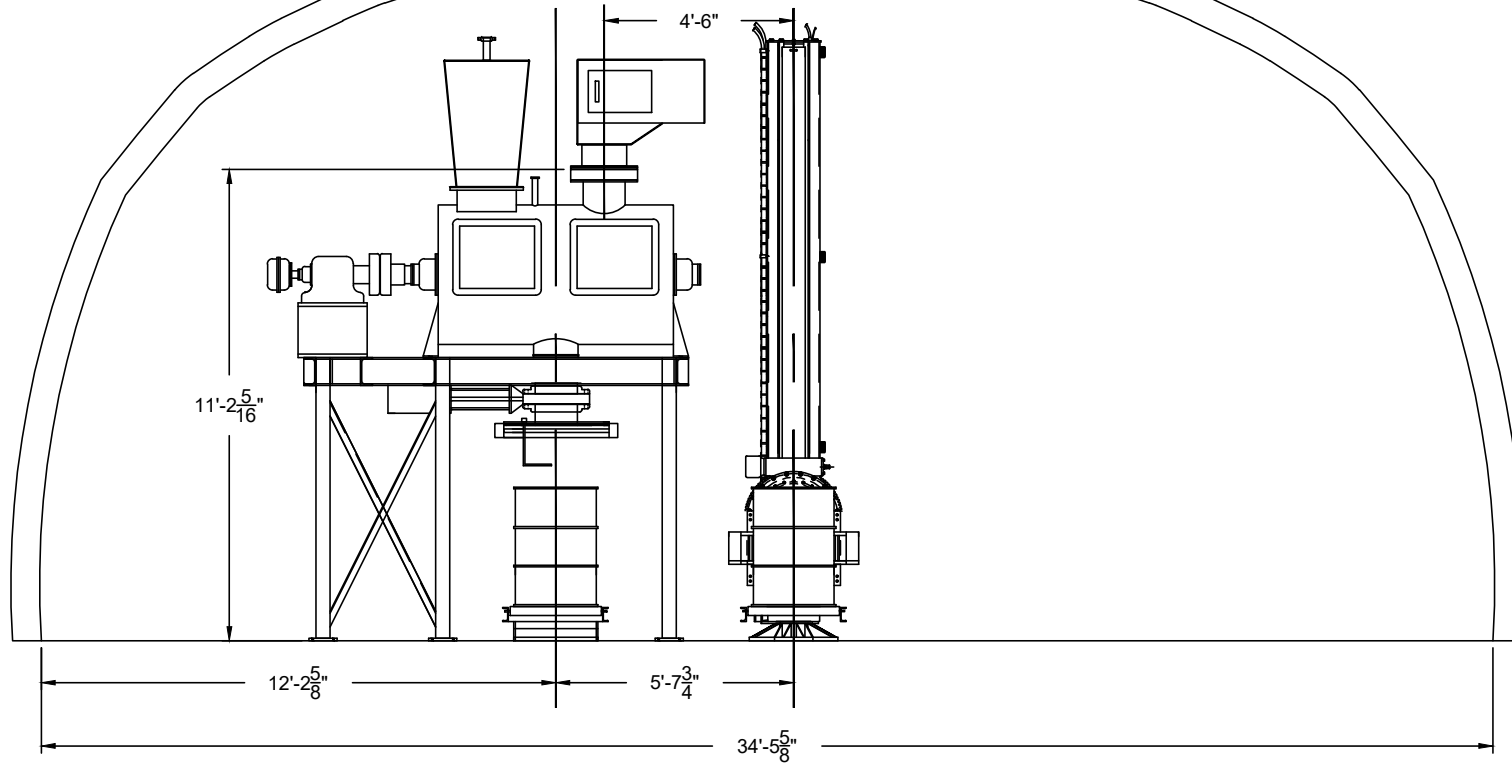
FIGURE I-24-B
PART I PROPOSED
EQUIPMENT LAYOUT FOR PF-I AND PF-II
(PLAN VIEW)

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 5/3/2021	File: 61A-PR-PTI-EQLAY-PF-PLANVIEW-B
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M:\OTOR\PERMAFIX\F\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\2021\FIGURES-A\61A-PR-PTI-EQLAY-PF-XSEC-A



Section A-A'

(Walkways and stairs left off for clarification)

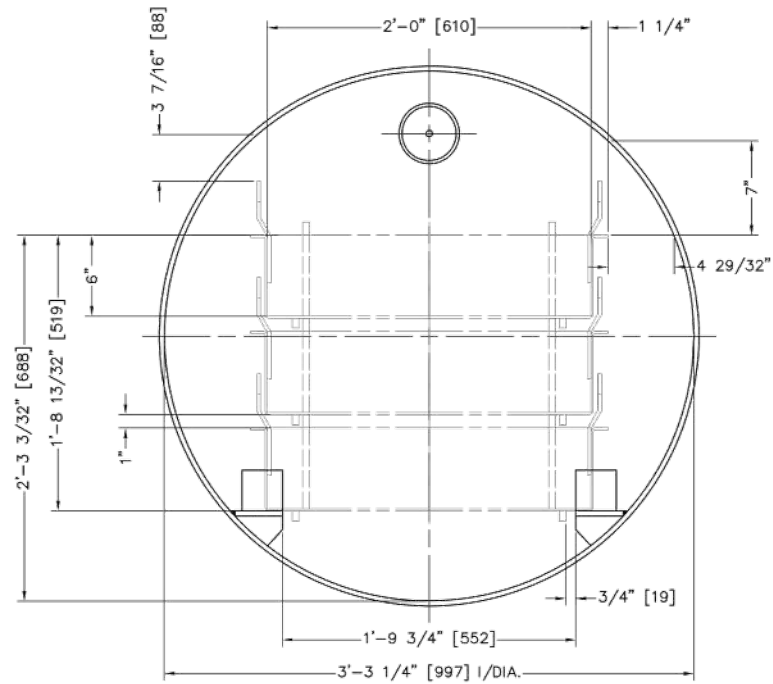


FIGURE I-25-A
PART I CURRENT
EQUIPMENT LAYOUT FOR PF-I AND PF-II PROCESS
(X-SECTION)
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

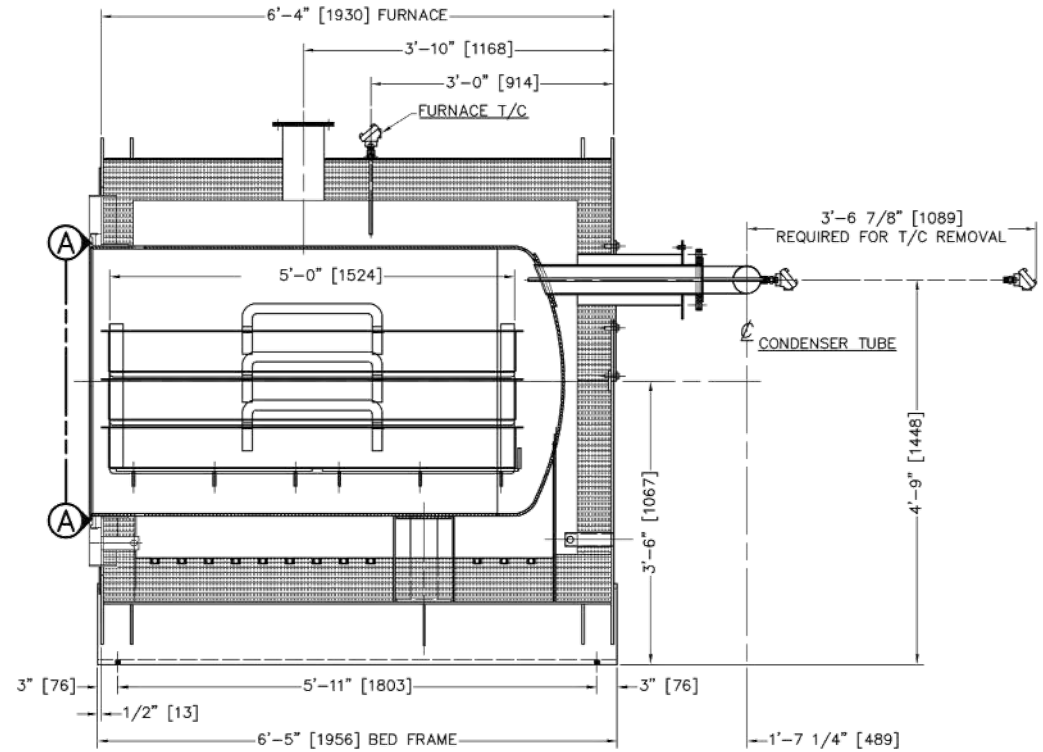
Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 4/29/2021	File: 61A-PR-PTI-EQLAY-PF-XSEC-A
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VIEW 'A-A'



SECTIONAL VIEW

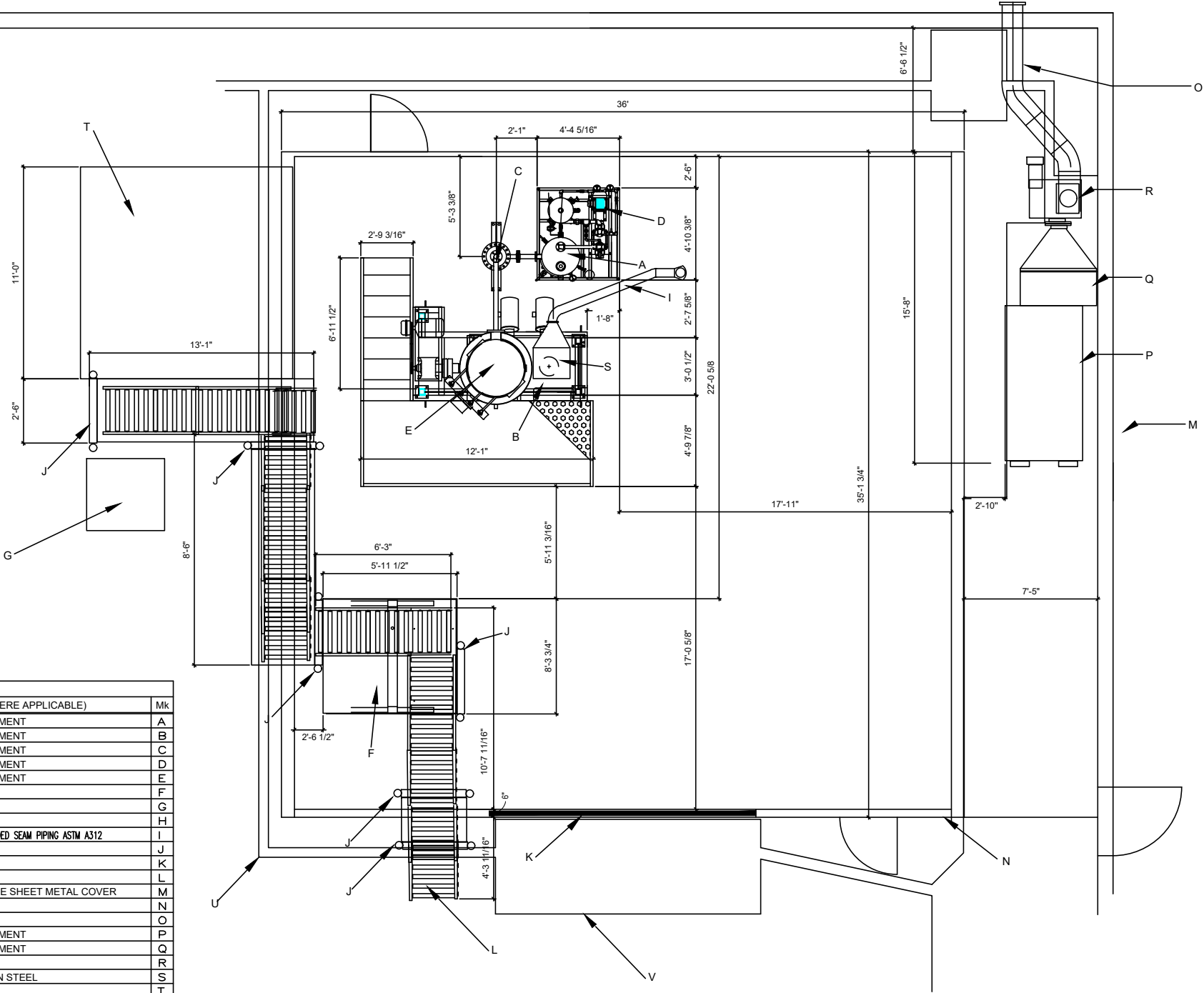


FIGURE I-25-B
PART I PROPOSED
EQUIPMENT LAYOUT FOR PF-I AND PF-II PROCESS
(X-SECTION)
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP | Checked By: CE | Scale: NONE | Date: 4/29/2021 | File: 61A-PR-PTI-EQLAY-PF-XSEC-B

LEGEND		
DESCRIPTION	MATERIAL(WHERE APPLICABLE)	Mk
ABSORBER TANK	SEE SUPPLEMENT	A
PLOUGH SHARE UNIT	SEE SUPPLEMENT	B
CONDENSER	SEE SUPPLEMENT	C
VACUUM PUMP SYSTEM	SEE SUPPLEMENT	D
PULSEBACK FILTER	SEE SUPPLEMENT	E
SKID MIXER FOR PF I	*	F
SCALE	*	G
SUPPLY AIR FAN	3000 CFM	H
TO EXHAUST FAN	6" T304SS WELDED SEAM PIPING ASTM A312	I
DRUM GUILLOTINE DOOR	*	J
ROLL UP DOOR	*	K
ROLLER CONVEYOR	*	L
MAIN BUILDING EXTERIOR	METAL FRAME SHEET METAL COVER	M
QUONSET HUT	*	N
CONNECTION TO RTO	*	O
OPTIFLO CARTRIDGE FILTER	SEE SUPPLEMENT	P
HEPA FILTER	SEE SUPPLEMENT	Q
EXHAUST FAN	4200 CFM	R
FEED HOPPER	16ga CARBON STEEL	S
SAMPLE ROOM	*	T
CONTAINMENT CURB	6" x 6"	U
CONTAINMENT BERM	6" x 14'	V
*	*	W
*	*	X
*	*	Y
*	*	Z





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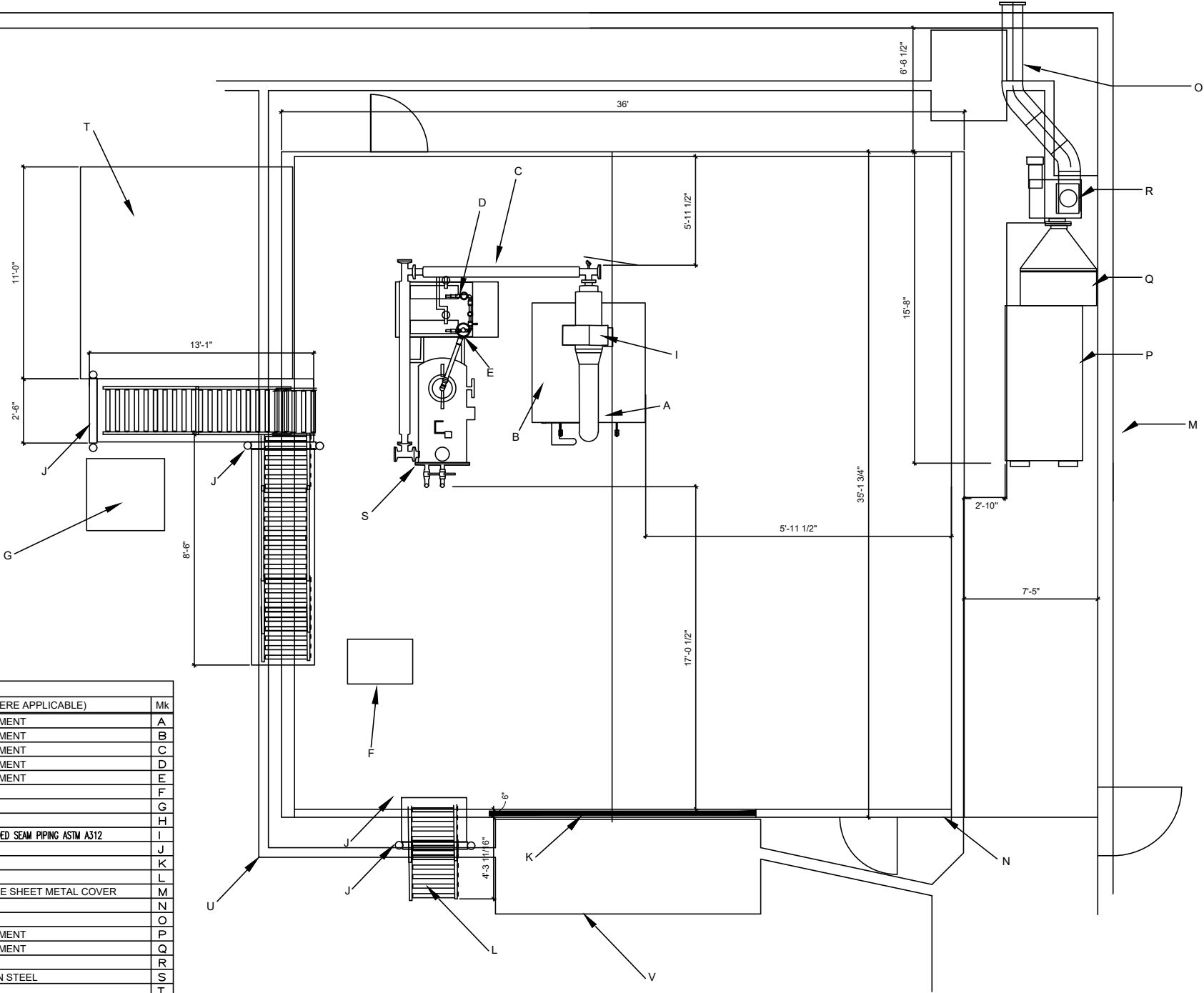
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FIGURE I-26-A
PART I CURRENT
EQUIPMENT LAYOUT FOR PF-I AND PF-II
(DETAIL - PLAN)

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

M:\OTOR\PERMAFIXOFFL\CADD\REPORTS\61A-003 GANESVILLE RCRA PART B\2019PERMITRENEWAL\2021\FIGURES-B\61A-PR-PTI-EQLAY-PF-XDETPLAN-B

LEGEND		
DESCRIPTION	MATERIAL(WHERE APPLICABLE)	Mk
RETORT	SEE SUPPLEMENT	A
FURNANCE	SEE SUPPLEMENT	B
CONDENSER	SEE SUPPLEMENT	C
VACUUM PUMP SYSTEM	SEE SUPPLEMENT	D
AIR FILTER	SEE SUPPLEMENT	E
SKID MIXER FOR PF I	*	F
SCALE	*	G
SUPPLY AIR FAN	3000 CFM	H
TO EXHAUST FAN	6" T304SS WELDED SEAM PIPING ASTM A312	I
DRUM GUILLOTINE DOOR	*	J
ROLL UP DOOR	*	K
ROLLER CONVEYOR	*	L
MAIN BUILDING EXTERIOR	METAL FRAME SHEET METAL COVER	M
QUONSET HUT	*	N
CONNECTION TO RTO	*	O
OPTIFLO CARTRIDGE FILTER	SEE SUPPLEMENT	P
HEPA FILTER	SEE SUPPLEMENT	Q
EXHAUST FAN	4200 CFM	R
FEED	16ga CARBON STEEL	S
SAMPLE ROOM	*	T
CONTAINMENT CURB	6" x 6"	U
CONTAINMENT BERM	6" x 14'	V
*	*	W
*	*	X
*	*	Y
*	*	Z





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FIGURE I-26-B
PART I PROPOSED
EQUIPMENT LAYOUT FOR PF-I AND PF-II
(DETAIL - PLAN)
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

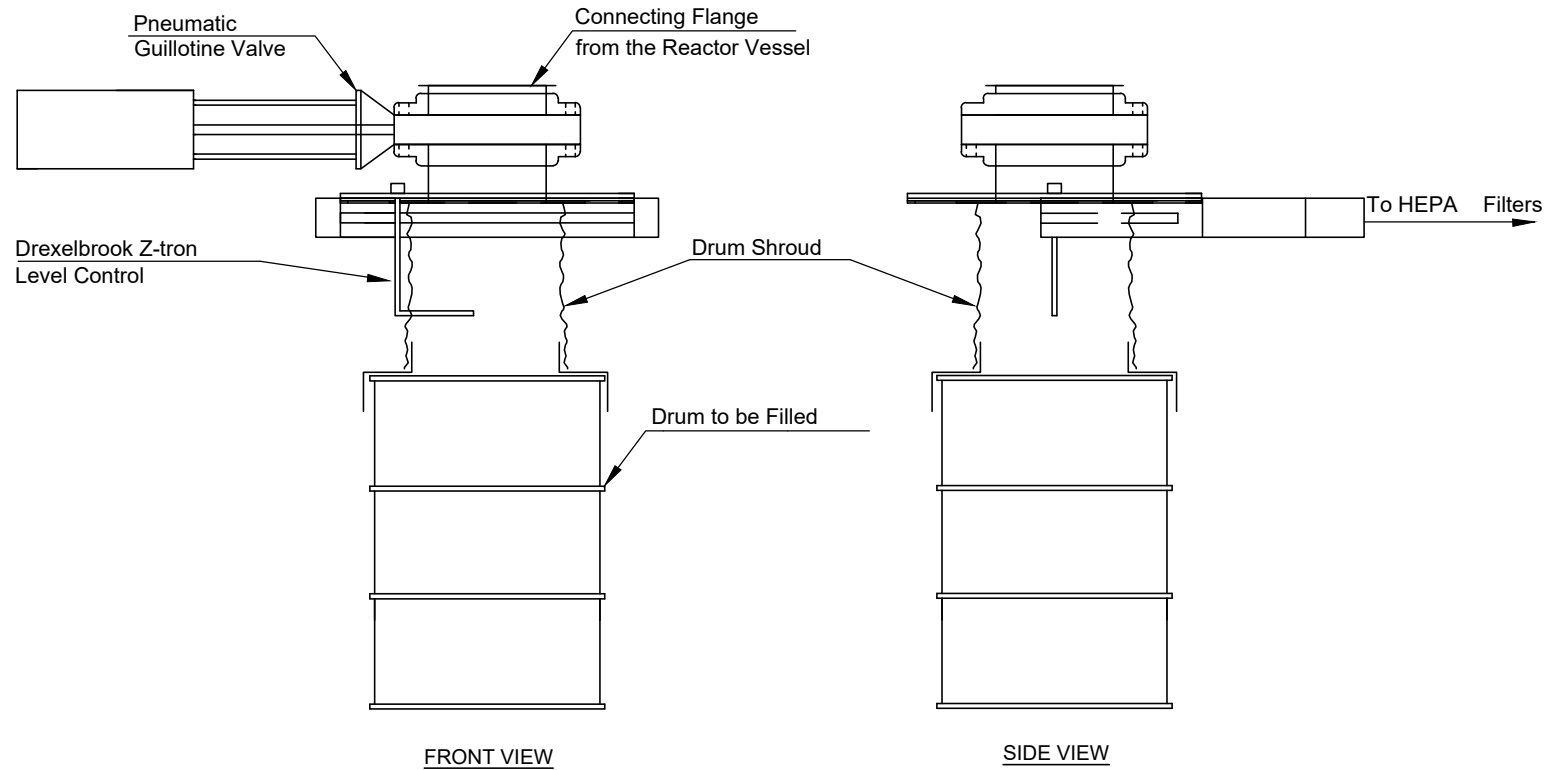


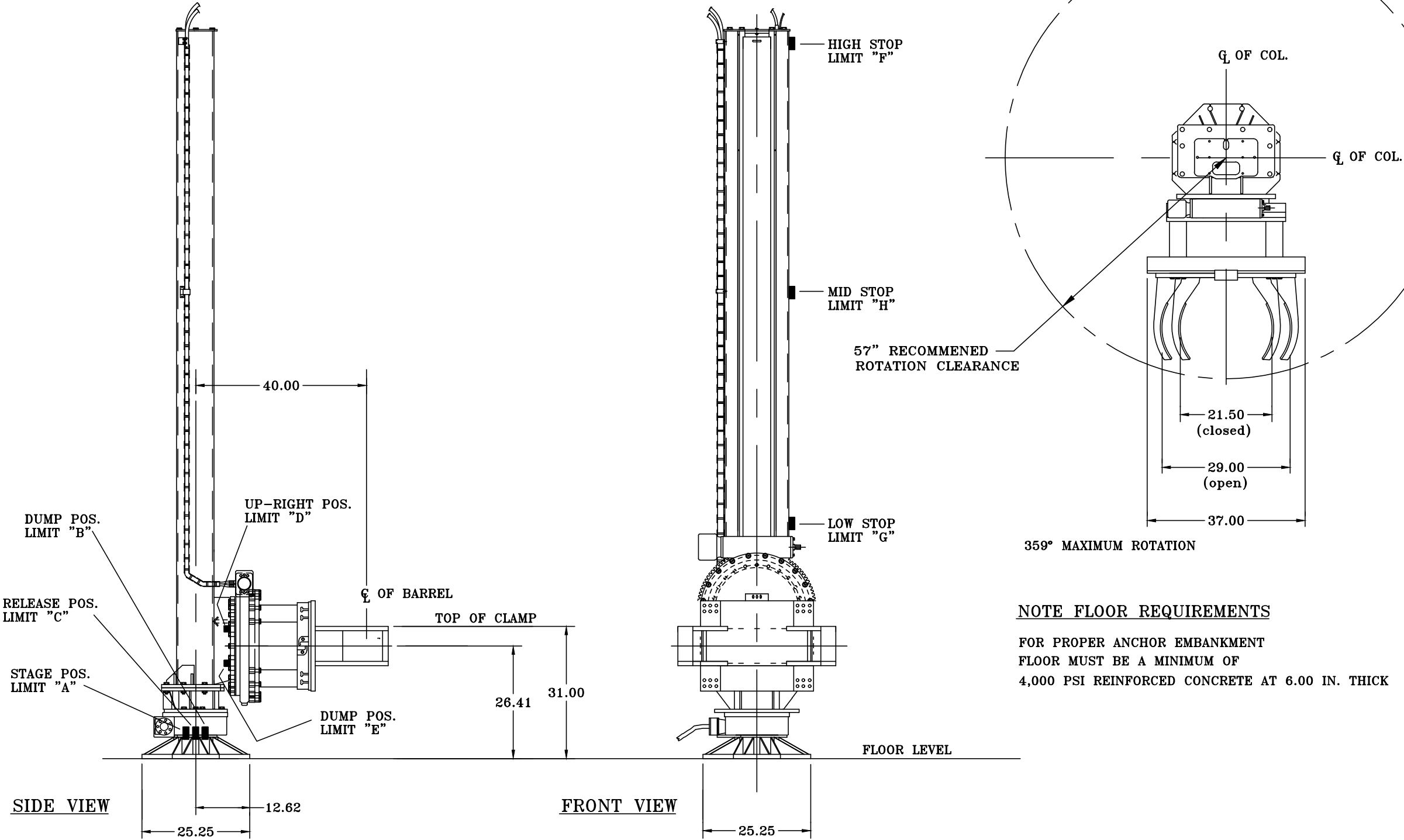
FIGURE I-27

PART I
REACTOR VESSEL UNLOADING DETAILS

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTI-REACTORVESSEL
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NOTE FLOOR REQUIREMENTS
FOR PROPER ANCHOR EMBANKMENT
FLOOR MUST BE A MINIMUM OF
4,000 PSI REINFORCED CONCRETE AT 6.00 IN. THICK



FIGURE I-28
PART I
IBC LIFT
WITH DRUM CLAMP
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Drawn By: REP | Checked By: CE | Scale: NONE | Date: 10/4/2019 | File: 61A-PR-PTI-IBC-LIFT

APPENDIX I-A
PHOTOGRAPHIC LOG

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 1. Sign at Main Entrance (09/2019)



Photo 2. Main Entrance (09/2019)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 3. East Gate (09/2019)



Photo 4. Dry Room (09/2019)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 5. Regenerative Thermal Oxidizer (RTO) (09/2019)



Photo 6. East Loading Dock (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 7. TOB Loading Dock (12/2014)



Photo 8. PSB Zone 1 Tanker Loading (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 9. PSB Southeast Corner (12/2014)



Photo 10. PSB Zone 2 Drum Storage (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 11. PSB Zone 3 Drum Storage (12/2014)



Photo 12. PSB Southwest Corner (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 13. PSB 3,000-Gallon Storage Tank (12/2014)



Photo 14. LSV Storage Area (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 15. Debris Wash Unit (12/2014)



Photo 16. LSV Processing (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 17. Exterior View of Quonset Hut (12/2014)



Photo 18. Mixed Waste Sampling Room (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 19. Quonset Hub Jib Crane (12/2014)



Photo 20. PF-I Treatment Room (12/2014)

**APPENDIX I-A. PHOTOGRAPHIC LOG, RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**



Photo 21. PF-II Thermal Desorber (12/2014)



Photo 22. TOB Drum Storage Area (12/2014)

APPENDIX I-B

PERMA-FIX® I PROCESS

APPENDIX I-B. PERMA-FIX I® PROCESS

1.1 DESCRIPTION OF PERMA-FIX I® PROCESS

The Perma-Fix I® (PF-I) process is used primarily to treat characteristic inorganic hazardous or mixed wastes to meet treatment standards for land disposal. In some instances non-hazardous liquids and sludges are likewise stabilized using the PF-I process to allow for more efficient handling and disposal. As indicated in Figure I-8, the inorganic wastes that do not contain organic hazardous constituents in excess of applicable land disposal restriction levels are target waste streams for the PF-I process.

The basis for the PF-I process is the permanent stabilization of the waste. Stabilization is a chemical process that changes the chemical composition and permanently binds the potentially hazardous and leachable components of the hazardous or mixed waste. Waste identified for the PF-I process are evaluated for specific chemical characteristics to identify the appropriate proprietary treatment “recipe” for converting the key waste constituents to a more chemically stable and insoluble form. EPA has determined that stabilization is the best-demonstrated available technology (BDAT) for the treatment of certain listed and characteristic hazardous wastes.

Examples of successfully treated wastes using the PF-I process:

- Glass and plastic beads used for paint removal
- Powdered coatings containing cadmium
- Caustic cleaners
- Spent acid sludge
- Acid sludges from lubrication oil manufacturers
- Chromium and cadmium sludge from plating tanks
- Dust contaminated with heavy metals
- Zinc phosphate sludge
- Caustic quench sludge
- Waterfall paint booth sludge
- Lead chromate sludge
- Soils contaminated with heavy metals

Once subjected to the PF-I process, the treated waste is sampled to determine whether it meets the desired treatment standards (e.g., whether the waste no longer exhibits a hazardous waste characteristic identified in 40 CFR Part 261, Subpart C and/or meets applicable land disposal restrictions listed in 40 CFR 268.48). After receiving chemical stabilization treatment, the waste is in a final form that meets the waste acceptance criteria of the authorized disposal facility.

Typically, the PF-I process is applied to wastes in drums. However, larger or smaller containers may be used, depending upon the nature of the waste to be treated. In any event, the waste is usually stabilized in the container to be used to ship the waste off site for disposal. In some instances, the addition of treatment additives will increase volume such that the stabilized waste must be transferred to an additional or larger container prior to disposal.

APPENDIX I-B. PERMA-FIX I® PROCESS

The PF-I process will generate relatively small quantities of secondary waste consisting primarily of personal protective equipment (PPE) and plastic sheeting used to collect any incidental spillage of the treated waste or waste treatment materials. Secondary waste will be appropriately characterized, treated, or disposed.

2.1 EQUIPMENT SPECIFICATION

A skid-mounted hydraulic mixer is used to mix the PF-I waste and treatment additives (Reference Figure I-7 “PF-I and PF-2 Process Flow Diagram”). The waste container (drum) serves as the mixing vessel. Only the steel shaft of the mixer enters the top of the drum undergoing treatment.

The operation consists of adding treatment additives to the container and subsequently mixing the additives into the waste. The process is conducted in an area equipped with secondary containment.

All relevant procedures to prevent hazards; inspections, testing, maintenance, and containment requirements addressed in this permit application for containers are applied to the operation of the PF-I process equipment. Appropriate records will be maintained in the Facility Operating Record.

3.1 ENVIRONMENTAL PERFORMANCE STANDARDS

3.1.1 RELEASE PREVENTION

The PF-I process area and equipment are located, designed, constructed, operated and maintained in a manner that will ensure protection of human health and the environment. The hydrogeologic, geologic, and meteorologic factors of concern for the Facility site and surrounding areas are addressed in Section A of this permit application. For purposes of ensuring protection of human health and the environment, PFF will operate the PF-I process in conformance with applicable container standards. Appropriate secondary containment is incorporated into the design and operation of the equipment. No run-on and run-off of precipitation or liquids from the PF-I process area are likely because this treatment is conducted in secondary containment in an enclosed building.

See Part II, Section B of this permit application for details regarding containment; management of ignitable, reactive, and incompatible wastes; condition and management of containers; inspections; and prevention of run on and accumulation of precipitation in the Treatment and Operations Building, Processing and Storage Building, and/or LSV Process Area where PF-I process operations will take place.

3.1.2 PREVENTION OF RELEASES TO GROUNDWATER OR SUBSURFACE ENVIRONMENT

Releases to groundwater or the subsurface environment from the PF-I process are extremely unlikely for the following reasons.

- The containers to be treated contain relatively small volumes of material and the operation is a batch process; i.e., waste will be treated in 55-gallon drums.
- The process is located within a secondary containment system designed to meet the requirements of 40 CFR 264, Subpart I. The containment system is designed to contain the volume of the largest container, or 10% of the total volume of containers permitted for the area, whichever is larger. The containment system floor is applied with a sealer/hardener material to make the concrete surface impermeable to the materials processed.

APPENDIX I-B. PERMA-FIX I® PROCESS

- The PF-I process area containment system is inspected at least once per week in accordance with the Facility inspection plan. Leaks or spills are cleaned up within 24 hours of discovery or as soon as it is practicable and safe to do so.
- The system is located within a building; i.e., the system is physically separated from the subsurface environment and groundwater.
- PFF maintains a Contingency Plan to provide a framework for PFF response to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the system.

3.1.3 PREVENTION OF RELEASES TO SURFACE WATER, WETLANDS, OR SOIL SURFACE

Releases to surface water, wetlands, or soil surface from the PF-I treatment process are extremely unlikely for the following reason.

- The containers to be treated contain relatively small volumes of material and the operation is a batch process; i.e., waste will be treated in up to 55-gallon drums.
- The process is located within a secondary containment system designed to meet the requirements of 40 CFR 264, Subpart I. The containment system is designed to contain the volume of the largest container, or 10% of the total volume of containers permitted for the area, whichever is larger. The containment system floor is applied with a sealer/hardener material to make the concrete surface impermeable to the materials processed.
- The PF-I process area containment system is inspected at least once per week in accordance with the Facility inspection plan. Leaks or spills are cleaned up within 24 hours of discovery or as soon as it is practicable and safe to do so.
- The system is located within a building; i.e., the system is physically separated from the subsurface environment and groundwater.
- PFF maintains a Contingency Plan to provide a framework for PFF response to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the system. See Appendix II-A-2 to Part II.A of this permit application.

3.1.4 PREVENTION OF RELEASES TO AIR

Releases to air from the PF-I process are extremely unlikely for the following reasons:

- The system is located within a building.
- Containers will be kept closed at all times except during treatment or removal of waste from containers.
- Organic vapors are not anticipated because the wastes to be treated are classified as inorganic wastes. (The PF-I process will be used to treat characteristic inorganic hazardous wastes having an average VOC content of less than 500 ppmw.)
- Particulate emissions generation during the addition of treatment chemicals are minimized by wetting or other means (as appropriate).

APPENDIX I-B. PERMA-FIX I® PROCESS

- Particulate emissions after treatment are minimal because of the consistency of the treated waste and solidification of the matrix.
- Any fugitive particulate emissions generated during treatment will be captured by a dust collector and HEPA filter system connected to the enclosed room in which the PF-I treatment process is conducted.
- Screening the wastes for reactive cyanide and sulfide will prevent generation of fumes from reactive wastes.

3.1.5 MONITORING AND INSPECTIONS

PFF personnel monitor the PF-I process during processing operations. The system is operated manually (or automated equipment is manually operated). The PF-I process area is visually inspected at least once per week for evidence of leaks or spills. The inspection is in accordance with the requirements of the Facility inspection plan. The secondary containment system is also inspected at least once per week for evidence of cracks or breaches in containment as specified in the Facility inspection plan.

3.1.5 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

PFF workers within the Treatment and Operations Building are the most likely human receptors for chemicals or chemical constituents released from the PF-I process. The exposure is anticipated to be minimal because personnel are provided with appropriate personal protective equipment (PPE) including, as applicable, respirators. The primary pathway for human receptors from the PF-I process is air, specifically, air emissions (particulates) generated by addition of treatment chemicals. Where appropriate, water may be added to the wastes or treatment chemicals prior to loading to minimize the generation of particulates.

Personnel operating the system (or personnel present for any other reason) are required to wear PPE selected to address the potential hazards identified for the wastes to be managed and the operating parameters of the system. The PPE selected is in accordance with OSHA standards and may include use of particulate respirators (as appropriate).

Environmental receptors such as soil, surface water, groundwater, and air are unlikely to be impacted by the PF-I process because of the containment system and location of the treatment area within a building physically separated from soils and protected from precipitation, run-on and run-off.

3.1.6 EFFECTIVENESS OF THE PF-I PROCESS

EPA has determined that stabilization, which is the basis for the PF-I process, is the best- demonstrated available technology (BDAT) for the treatment and pre-treatment of certain listed and characteristic hazardous and mixed wastes. Perma-Fix has been conducting the PF-I process for many years and has considerable experience on which to determine optimal formulations for a wide variety of wastes.

APPENDIX I-C

VENDOR SPECIFICATIONS ON SOLVENT DISTILLATION UNIT

APPENDIX I-C. SOLVENT DISTILLATION



M-110 SOLVENT RECOVERY SYSTEM

Standard Terms and Specifications

1.0 SCOPE

- 1.1 This Proposal covers standard terms and specifications for the sale of one (1) M-110 solvent recovery distillation unit and accessories ("M-110 System") by Siva, a Division of Pneumatic Products Corporation ("SIVA"), as summarized below and described herein:

- One (1) 30,000 watt, M-110 distillation unit with wetted parts of 304 stainless steel; explosion-proof light; elevated base stand; and on-board, microprocessor control system with LCD and LED operating displays and trouble-shooting indicators (480V, 3Ph, 60Hz)
- One (1) automatic level-controlled fill system

- 1.2 Siva's "Standard Terms and Conditions" included herein as "Exhibit C" shall apply to this Proposal. Siva reserves the right to change the terms and specifications of this Proposal at any time.

3.0 EQUIPMENT SPECIFICATIONS

3.1 Size and Approximate Weights of Vessels and Assemblies:

<u>VESSEL</u>	<u>SIZE</u> <u>(W x D x H)</u>	<u>APPROX. WEIGHT</u> <u>(Empty)</u>
M-110 Unit w/ Stand	56" x 70" x 121"	1700 Lbs.

APPENDIX I-C. SOLVENT DISTILLATION



3.2 M-110 Distillation Unit

One (1) 30,000 watt, 110-gallon capacity, 304 stainless steel distillation unit to include:

- One (1) stainless steel heating jacket surrounding the distillation unit to the height of the liquid at capacity, with two inches (2") of exterior insulation covered with a painted carbon steel cabinet
- Four (4) 7,500 watt electric immersion heaters (480V, 3Ph)
- One (1) internal demisting assembly
- One (1) 304 stainless steel condenser with removable 316L stainless steel core, mounted on the distillation vessel
- One (1) painted carbon steel supporting frame
- One (1) 18" front-mounted manway for access and inspection of the solvent chamber
- One (1) manually operated 2"Ø still bottoms discharge valve
- One (1) 5" sight window and one (1) 240 volt explosion proof light
- One (1) 5 psig pressure relief valve and one (1) 15 psig pressure rupture disk (ventilation piping for the pressure relief valve and rupture disk not supplied by Siva)

3.3 Internal Oil Heating Package

One (1) 30,000 watt, internal, explosion-proof thermal oil heating unit connected by fiberoptics to the M-110 on-board control system, to include:

- Four (4) 7,500 watt electric immersion heaters, with heating elements connected to two electric circuits (each @ 15 kW; 480V, 3Ph)
- One (1) carbon steel elevated oil expansion tank, with low-level sensor alarm and shutdown.

APPENDIX I-C. SOLVENT DISTILLATION



R-2A

Siva

...THE COMPLETE APPLICATIONS
SOLUTION SOURCE

R-2A/2AX/2V SERIES

Bench-top still for recycling solvents that boil up to 500°F. R-2A distills 4 gallons in 8 hours.

R-2AX includes closed-loop cooling water system. R-2V distills 5 gallons in 8 hours with vacuum assistance. All units feature fully automatic operation with disposable liners for sludge removal.

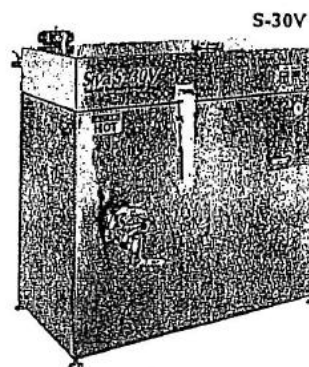
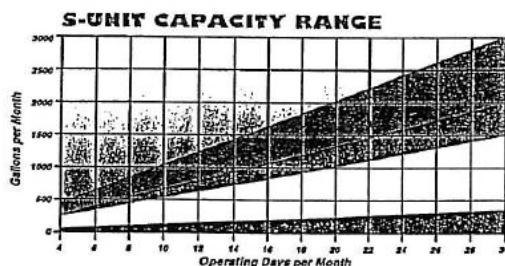


R-2V

S-SERIES



Self-contained vacuum and non-vacuum stills with all stainless steel and Teflon® parts. Single batch and continuous flow capacities from 10 to 100 gallons per day. Microprocessor controls and safety interlocks allow installation anywhere.

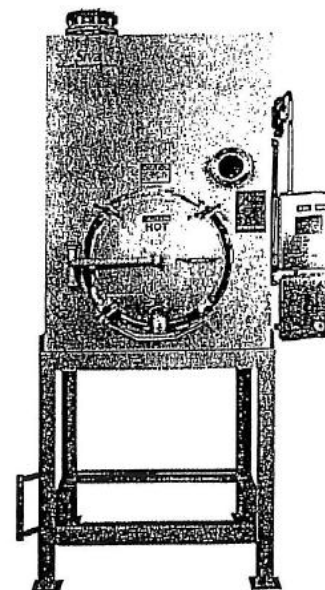
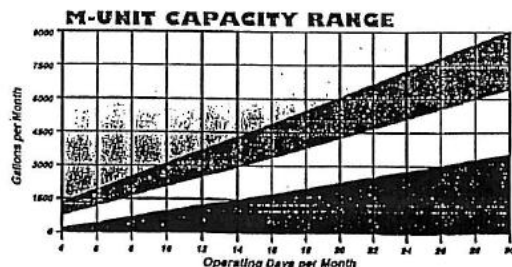
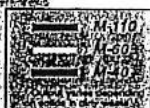


S-30V

M-SERIES



Batch or continuous flow vacuum and non-vacuum stills with throughput capacities from 40 to over 300 gallons per day. Front door drain and elevated base stand provide easy access to still chamber and allow gravity discharge of liquid still bottoms to a 55-gallon drum.



M-60

Siva

APPENDIX I-C. SOLVENT DISTILLATION

M and DAS Series Solvent Recovery Systems

Siva
A Division of Pneumatic Products Corporation

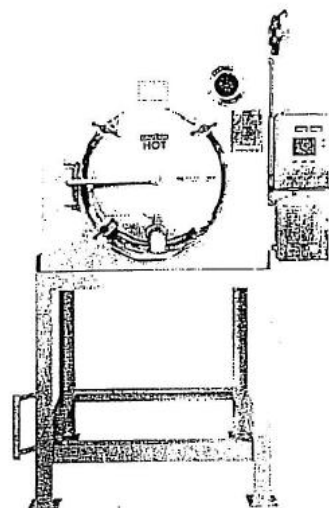
High Capacity Solvent Distillation

Description

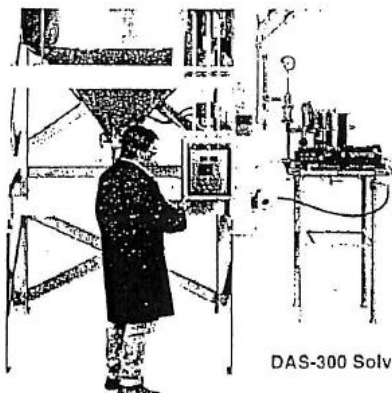
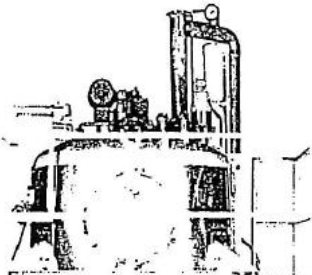
Siva M and DAS Series Solvent Recovery Systems are designed for high volume applications with throughput capacities from 40 to over 1000 gallons per day.

Electric heaters immersed in thermal oil surrounding the solvent chamber provide heat for distillation in M-Series systems. An external oil heating package or in-plant steam provides heat for distillation in DAS Series systems. Reclaimed solvent vapors are condensed in water-cooled stainless steel heat exchangers mounted on the rear of the unit. Waste contaminants remain in the solvent chamber as liquid or semi-liquid still bottoms.

All DAS systems feature an automatic internal scraper to clean the sidewalls of the solvent chamber and improve the heating efficiency of the unit. DAS systems are most effective for distillation of viscous solvents or solvents with thermosetting solids.



M-60 Solvent Recovery System



DAS-300 Solvent Recovery System

All M Series systems feature a large front-mounted door with sludge discharge valve for easy access to the solvent chamber. An elevated base stand allows still bottoms to flow by gravity to a 55-gallon drum. M systems are virtually maintenance free and are exceptionally cost effective when used for applications that leave flowable still bottoms.

All M and DAS Series systems are available with vacuum assistance to reduce the boiling point of the waste solvent. M and DAS systems with vacuum will distill and reclaim most solvents, including the new, high boiling-point, environmentally safe solvents. With vacuum assistance, actual distillation temperatures are typically below 365°F (185°C).

For most M and DAS Series applications, solvent recovery yields exceed 80% and reclaimed solvent purity exceeds 99%.

APPENDIX I-C. SOLVENT DISTILLATION

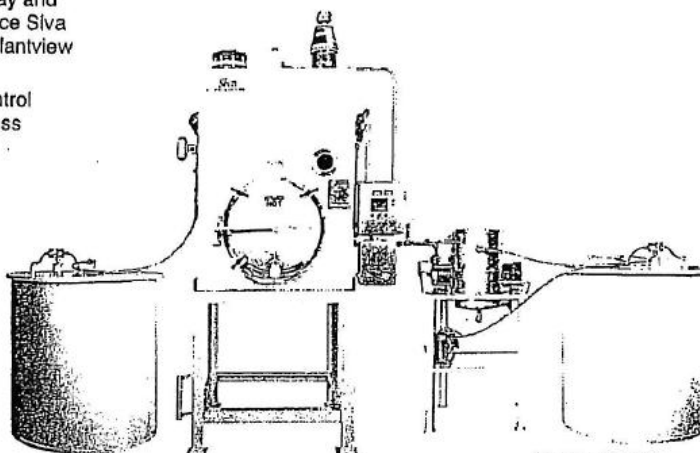
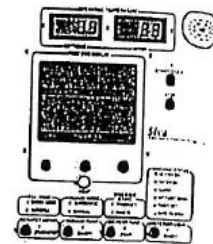
Control Systems

All Siva M and DAS systems feature an explosion-proof, intrinsically safe solid state control system mounted on the unit. The control system has user friendly, programmable temperature and operating set points and features LCD menu-driven displays of operating conditions and trouble-shooting indicators; as well as automatic start and stop functions.

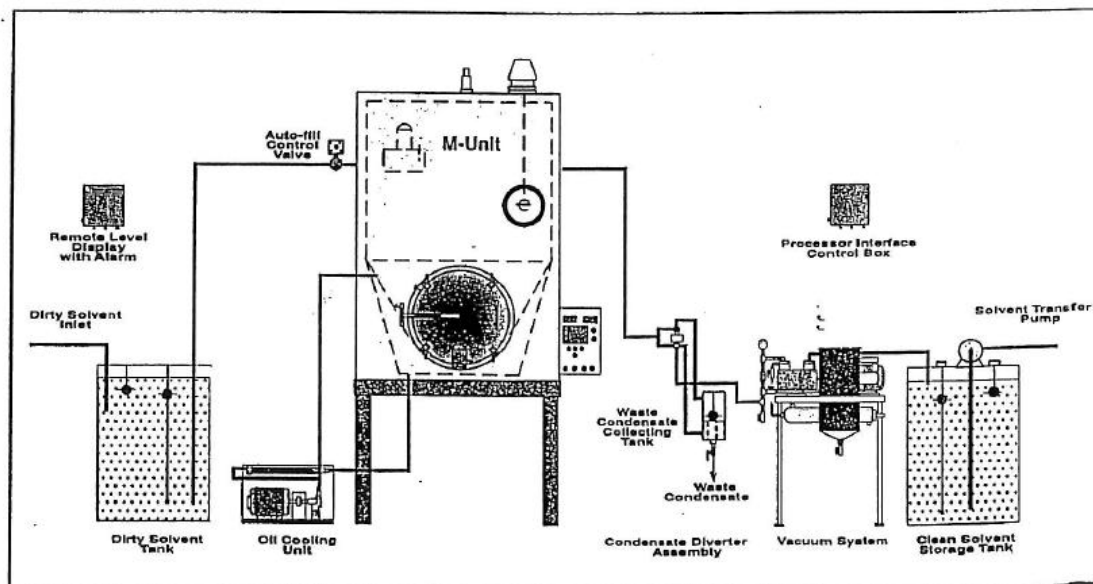
M and DAS Series systems utilize intrinsically safe low voltage electrical circuitry, fiberoptic interfacing of accessories, and explosion-proof electrical components. Remote operating, display and alarm panels and serial ports to Interface Siva control systems with customer owned plantview systems are available.

Siva systems with solvent flow and control packages are also available with process interface kits that electronically interface the solvent recovery system with down-stream solvent washers or processors. This allows the user to operate washing equipment with continuous solvent "feed-and-bleed" for true closed-loop operation.

Microprocessor Controller
M & DAS Series



M-60 w/SFCP



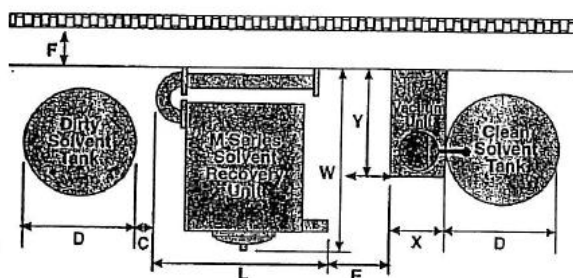
M-Unit with Optional Accessories

APPENDIX I-C. SOLVENT DISTILLATION

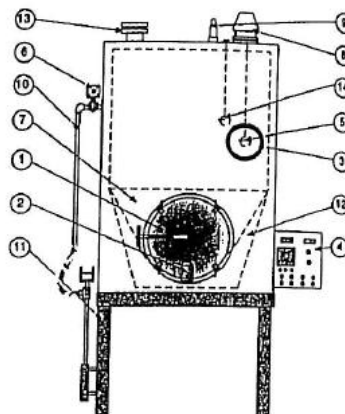
Reference Data*

Unit	Boiler Capacity, Wattage and Typical Through-put			
M-40	40 gallons (Batch or Auto-Fill)	12,000 Watts	40-120 gallons/day	
M-60	60 gallons (Batch or Auto-Fill)	18,000 Watts	60-180 gallons/day	
M-110	110 gallons (Batch or Auto-Fill)	30,000 Watts	110-330 gallons/day	
Unit	Electrical			
M-40	480 V	60 Hz	Three 3Ø	16 Amps
M-60	480 V	60 Hz	Three 3Ø	22 Amps
M-110	480 V	60 Hz	Three 3Ø	34 Amps
Vacuum Unit	480 V	60 Hz	Three 3Ø	2 Amps
Unit	Utilities			
	Cooling Water		Process Air	
	Flow	Inlet	Pressure	Pressure
M-40	2 gpm	<70°F	35-60 psi	80-100 psi
M-60	4 gpm	<70°F	35-60 psi	80-100 psi
M-110	7 gpm	<70°F	35-60 psi	80-100 psi

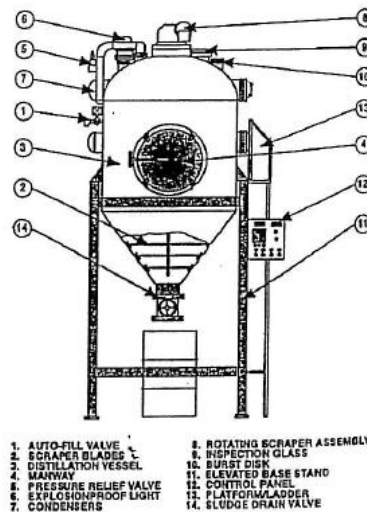
Note: Daily throughput will vary depending on the type of solvent and the amount of solids in the waste to be reclaimed. Please consult factory for throughput estimates.



	Width				Depth				Height
	L	X	D	C	W	Y	F		H
M-40 w/Stand	58"			5"	68"		24"		110"
M-60 w/Stand	58"			5"	68"		24"		110"
M-110 w/Stand	58"			5"	72"		24"		121"
Vacuum Assy.		30"				37"			48"
100 Gal.			30"						36"
150 Gal.			36"						34"
250 Gal.			48"						36"



M-110 Front View



DAS-175 Front View

* Please consult factory for DAS Series
Dimensions and Installation Data

Because of our policy of continuous improvement some information, specifications and dimensions contained herein may be revised. For confirmed accuracy, always refer to factory submittals.

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A United Dominion Company
Flair Engineered Products

APPENDIX I-D

MERCURY AMALGAMATION

APPENDIX I-D. MERCURY AMALGAMATION

1.1 PROCESS DESCRIPTION

Perma-Fix of Florida (PFF) treats elemental mercury using a process designed to meet the specifications of the technology-based treatment standard (AMLGM) for the Elemental Mercury Contaminated with Radioactive Materials treatability subcategory in 40 CFR 268.40. The process amalgamates liquid, elemental mercury contaminated with radioactive materials utilizing inorganic reagents such as copper, zinc, nickel, gold, and/or sulfur. PFF's specific treatment approach is a proprietary process that produces a non-liquid, semi-solid amalgam, thereby reducing potential emissions of elemental mercury vapors to the air.

1.1.1 SORTING

Sorting and separation is performed in a ventilated enclosure within the TOB and/or LSV processing area. PFF will receive only lab pack quantities of elemental mercury. However, experience has shown that lab packs may consist of various devices (e.g., switches and thermometers) that may require minor dismantling for mercury removal. The emptied devices will be managed as RCRA debris.

In addition, lab packs may be received occasionally in damaged condition. Damaged lab packs and their over-packed containers will be processed to segregate mercury-contaminated debris and/or packing material. The mercury-contaminated debris and/or solids will be managed as explained in the subsection titled "Secondary Wastes".

Once a drum's contents are unloaded or unpacked, elemental mercury will be consolidated into a single container. All secondary wastes shall be segregated, bulked, and containerized in accordance with applicable regulatory container management practices. Upon completion of sorting and separation, samples of material may be taken and analyzed chemically. All waste materials at this time may be removed and placed in storage awaiting final treatment and/or disposal.

1.1.2 MERCURY AMALGAMATION

Up to one-gallon quantities of elemental mercury are processed at any one time. As described above, reagents will be added as required by the treatment-specific proprietary recipe to achieve a successful amalgam. The amalgamation process is conducted in the ventilated enclosure using a mixing vessel.

1.1.3 TREATMENT EFFECTIVENESS

The mercury amalgamation process results in a non-liquid, semi-solid amalgam. RCRA LDR does not specify a numerical treatment standard to confirm amalgamation for radioactive elemental mercury, but specifies amalgamation as the specified treatment technology. The amalgamated waste will be sampled and analyzed per the TCLP method to ensure it passes the mercury toxicity level prior to disposing it in a Subpart D landfill.

1.1.4 SECONDARY WASTES

Secondary wastes generated during the mercury amalgamation process may include such items as non-RCRA empty containers, RCRA debris, and solids.

Non-RCRA waste materials will be collected, consolidated, and stored until sufficient quantities are gathered for shipment to an off-site facility

APPENDIX I-D. MERCURY AMALGAMATION

RCRA debris will be collected and stored. The debris will either be treated on site using the already permitted chemical extraction process for debris treatment (268.45) or shipped off site to an off-site hazardous waste treatment and/or disposal facility.

RCRA non-debris solids/sludge will be containerized and shipped to an off-site hazardous waste treatment or disposal facility.

Any liquids generated during the mercury amalgamation process will be managed according to the liquid's constituents of concern and in compliance with appropriate treatment standards.

1.1.5 WASTE CODE TRACKING

PFF assigns and tracks waste codes for treatment residuals in accordance with 40 CFR 261. When hazardous debris that exhibits the characteristic of ignitability, corrosivity, or reactivity is deactivated by treatment using one of the technologies identified in Table 1 of 40 CFR 268.45 (and described in the permit application), the treated debris becomes a non-hazardous waste. Residue from the deactivation of ignitable, corrosive, or reactive characteristic hazardous debris (other than cyanide-reactive wastes) that is not contaminated with a listed hazardous waste constituent retains the appropriate characteristic waste code unless it is deactivated.

Toxicity characteristic debris treatment residuals remain subject to the waste code(s) and treatment standards for the toxic constituent(s) for which the debris exhibited the toxicity characteristic. Residuals from the treatment of debris contaminated with listed waste remains subject to the treatment standards and waste codes assigned for those constituents or wastes. Hazardous debris that has been treated using one of the physical and/or chemical extraction technologies in conformance with 40 CFR 268.45 and the treated debris does not exhibit a characteristic of hazardous waste identified in 40 CFR 261, Subpart C is not a hazardous waste and will not be assigned any waste codes.

2.1 MIXER VESSEL

The mixing vessel is designed to produce 5 gallons of amalgam. The ideal waste to reagent ratio is estimated to range from 1:1 to 1:4. The optimal reagent content may vary for particular waste streams. The duration of the amalgamation process depends on the rate of addition and volume of reagent to waste mercury batch. The small batch nature of the process will minimize the total volume of waste in the system at any one time.

Any fugitive emissions will go through a dedicated air control system in addition to the air pollution control devices in place for the process area. The dedicated air control system for the mercury amalgamation process will be used (e.g., a HEPA system and an activated carbon bed impregnated with sulfur for the capture of mercury vapor).

3.1 MAINTENANCE

Facility personnel will conduct a preventative and corrective maintenance program for the mercury amalgamation process system components. The preventative maintenance program will be based on information supplied by the equipment vendors regarding the expected life of process components and by a periodic historical review of maintenance records. Corrective maintenance will be conducted on an as-needed basis. Additionally, the system will be maintained and operated in accordance with good engineering practice.

APPENDIX I-D. MERCURY AMALGAMATION

4.1 ENVIRONMENTAL PERFORMANCE STANDARDS

4.1.1 RELEASE PREVENTION

The mercury amalgamation process is located, designed, constructed, operated, maintained, and closed in a manner that will ensure protection of human health and the environment. For purposes of ensuring protection of human health and the environment, PFF has designed and will operate the mercury amalgamation equipment in conformance with applicable tank standards. Appropriate secondary containment and air emission controls are incorporated into the design and operation of the equipment. Any liquids from the mercury amalgamation area will be controlled.

4.1.2 PREVENTION OF RELEASES TO GROUNDWATER OR SUBSURFACE ENVIRONMENT

Releases to groundwater or the subsurface environment from the mercury amalgamation process are extremely unlikely for the following reasons.

- Relatively small volumes (i.e., approximately one gallon) of waste are treated in the batch process.
- The mercury amalgamation process is conducted within secondary containment systems designed to collect any liquid spills. The containment system is coated with a chemically resistant material that is compatible with the waste streams designated for processing.
- The treatment areas will be inspected each operational day. Leaks or spills from the system will be cleaned up as soon as it is practicable and safe to do so, but within 24 hours of discovery.
- The treatment areas are located within buildings physically separated from the subsurface environment, groundwater, and precipitation.
- The Facility maintains a Contingency Plan to provide a framework for facility response to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the system.

4.1.3 PREVENTION OF RELEASES TO SURFACE WATER, WETLANDS, OR SOIL SURFACE

Releases to surface water, wetlands, or soil surface are also extremely unlikely for the reasons listed above.

4.1.4 PREVENTION OF RELEASES TO AIR

Releases to air from the mercury amalgamation process are extremely unlikely for the following reasons.

- The amalgamation process system uses a dedicated air emissions control system designed to remove mercury vapors (e.g. sulfur-impregnated activated carbon).
- The treatment will be conducted within building areas equipped with additional emission control devices.
- Limiting the time the waste is exposed to the atmosphere prior to processing minimizes emissions at the loading point.
- The process results in a non-liquid, semi-solid amalgam, thereby reducing potential emissions of elemental mercury vapors to the air during unloading activities.

APPENDIX I-D. MERCURY AMALGAMATION

4.1.5 MONITORING AND INSPECTIONS

PFF personnel will monitor the mercury amalgamation process during processing operations. Loading and unloading is conducted manually (or by automated equipment that is manually controlled). The mercury amalgamation process area will be visually inspected each operating day for evidence of leaks or spills. The secondary containment system will also be inspected each operating day for evidence of cracks or breaches in containment.

4.1.6 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

PFF workers within the treatment areas are the most likely human receptors for chemicals or chemical constituents released from the mercury amalgamation process. The exposure is anticipated to be minimal because of the dedicated emission control devices provided for the area and because very low amounts of mercury (i.e., one gallon) are processed at a time. The primary pathway for human exposures from the mercury treatment process is air emissions.

Operating personnel (or personnel present in the treatment areas for any other reason) will be required to wear personal protective equipment (PPE) selected to address the potential hazards identified for the wastes to be managed, and the operating parameters of the system. The PPE selected will be in accordance with OSHA standards.

Environmental receptors such as soil, surface water, groundwater, and air are unlikely to be impacted due to the air controls specific to the mercury process, the process area air controls, the containment system, and the location of the process within a building, which prevents contact with precipitation run on and run-off and soil.

APPENDIX I-E

NON-ELEMENTARY NEUTRALIZATION

APPENDIX I-E. NON-ELEMENTARY NEUTRALIZATION

1.1 PROCESS DESCRIPTION

PFF performs non-elementary neutralization in a 300-gallon treatment tank that is also used for elementary neutralization or in smaller containers. Elementary neutralization means neutralization of wastes that are hazardous only because they exhibit the corrosive characteristic (i.e., D002), or they are listed only for corrosivity. The elementary neutralization unit is exempt from RCRA permitting per 40 CFR 270.1(c)(2)(v). The non-elementary neutralization is performed on wastes that are hazardous based on corrosivity criteria (i.e., D002) and also carry other hazardous waste code(s). The process involves a 300-gallon neutralization tank equipped with an air-powered stirring paddle, a pH meter, and a temperature monitoring device. The process involves the following:

- Acids and bases received are bulked into totes.
- A sample of the acid or base in the tote is taken to the lab for recipe development.
- Using bench scale tests, the lab will develop a neutralization recipe (i.e. how much neutralizing agent is needed for the amount of material to be neutralized).
- Treatment technicians will perform the task using the 300-gallon neutralization tank (or in smaller containers) as follows:
 - The required quantity of neutralizing agent is placed into the neutralization tank.
 - The tote containing the acid or base to be neutralized is placed adjacent to the neutralization tank. A metering pump is connected to the tote and the tank.
 - The metering pump then starts pumping the material to be neutralized from the tote into the 300-gallon tank.
 - The operation is continued until the pH of the treated waste is greater than 2.0 and less than 12.5, generating a liquid waste that is radioactive only (non-RCRA).

The non-elementary neutralization (N-EN) tank system is generally used in the Treatment and Operations Building (TOB). This system is portable and can be used in the TOB and/or LSV Process Area. There is a market for D002 corrosive wastes that also contain RCRA-regulated organics and/or metals. For example, mixed waste generators routinely create acidic wastes containing chromium. The N-EN process would be conducted exactly as described above. The only difference is that the liquid resulting from the N-EN process would still be a RCRA-regulated material. These liquid wastes will then receive further processing based on the RCRA-regulated material(s) present.

1.2 WASTE CODE TRACKING

The waste to be treated by non-elementary neutralization will have a D002 hazardous waste code and at least one other hazardous waste code. The treated liquid resulting from the process will not carry the D002 waste code, but will be a hazardous waste based on the original code other than D002.

2.1 MAINTENANCE

Facility personnel will conduct a preventative and corrective maintenance program for the non-elementary neutralization process system components. The preventative maintenance program is based on information

APPENDIX I-E. NON-ELEMENTARY NEUTRALIZATION

supplied by the equipment vendors regarding the expected life of process components and by a periodic historical review of maintenance records. Corrective maintenance will be conducted on an as-needed basis. Additionally, the system will be maintained and operated in accordance with good engineering practice.

3.1 ENVIRONMENTAL PERFORMANCE STANDARDS

3.1.1 RELEASE PREVENTION

The non-elementary neutralization process is located, designed, constructed, operated, maintained, and closed in a manner that will ensure protection of human health and the environment. For purposes of ensuring protection of human health and the environment, PFF has designed and will operate the process equipment in conformance with applicable tank standards. Appropriate secondary containment and air emission controls will be incorporated into the design and operation of the equipment. Any accidental spills are contained in the secondary containment area.

3.1.2 PREVENTION OF RELEASES TO GROUNDWATER OR SUBSURFACE ENVIRONMENT

Releases to groundwater or the subsurface environment from the non-elementary neutralization process are extremely unlikely for the following reasons.

- Relatively small volumes (i.e., less than 300 gallons) of waste are treated in the batch process.
- The process is conducted within secondary containment systems designed to collect any liquid spills. The containment system is coated with a chemically resistant material compatible with the waste streams designated for processing.
- The treatment areas will be inspected each operational day. Leaks or spills from the system will be cleaned up as soon as it is practicable and safe to do so, but within 24 hours of discovery.
- The treatment areas are located within buildings physically separated from the subsurface environment, groundwater, and precipitation.
- The Facility maintains a Contingency Plan to provide a framework for facility response to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the system.

3.1.3 PREVENTION OF RELEASES TO SURFACE WATER, WETLANDS, OR SOIL SURFACE

Releases to surface water, wetlands, or soil surface are also extremely unlikely for the reasons listed above.

3.1.4 PREVENTION OF RELEASES TO AIR

Releases to air from the non-elementary neutralization process are prevented by conducting the treatment within building areas equipped with emission control devices or sufficient ventilation.

3.1.5 MONITORING AND INSPECTIONS

PFF will monitor the non-elementary neutralization process during processing operations. Loading and unloading is conducted manually (or by automated equipment that is manually controlled). The process area will be visually

APPENDIX I-E. NON-ELEMENTARY NEUTRALIZATION

inspected each operating day for evidence of leaks or spills. The secondary containment system will also be inspected each operating day for evidence of cracks or breaches in containment.

3.1.6 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

PFF workers within the treatment areas are the most likely human receptors for chemicals or chemical constituents released from the non-elementary neutralization process. The exposure is anticipated to be minimal because emission control devices or sufficient ventilation is provided for the area and because very low amounts of waste (i.e., less than 300 gallons) are processed at a time. The primary pathway for human exposures from this treatment process is inhalation of air emissions.

Operating personnel (or personnel present in the treatment areas for any other reason) will be required to wear personal protective equipment (PPE) selected to address the potential hazards identified for the wastes to be managed, and the operating parameters of the system. The PPE selected will be in accordance with OSHA standards.

Environmental receptors such as soil, surface water, groundwater, and air are unlikely to be impacted due to the process area air controls, the containment system, and the location of the process within a building, which prevents contact with precipitation run-on and run-off and soil.

APPENDIX I-F
DEACTIVATION PROCESS

APPENDIX I-F. DEACTIVATION PROCESS

1.1 DESCRIPTION OF DEACTIVATION PROCESS

Unlike all other processes described in this application, there is no single, straightforward description for the “deactivation” that PFF will perform. The definition of D003 from 40 CFR 261.23 lists eight properties of a “reactive” waste. Each of the eight properties requires a different treatment to change the chemical structure of the waste so that it is no longer reactive. PFF will not treat explosives that are specified in 40 CFR 261.23(a)(8).

With the exception of plating sludges that might contain cyanides, it is anticipated, based on market knowledge, that the majority of reactive wastes PFF will receive would be in lab packs. The actual volume of waste would be very small. D003 wastes that will be deactivated will be mixed wastes. Typical waste volumes to be treated would be 100 to 1,000-ml bottles of liquid and 100 to 1,000-gram bottles of solids. Each container from the lab pack will be treated separately. No bulking for treatment shall be done.

A typical waste to be deactivated could be a 1,000-gram container of a reactive metal, such as aluminum powder. Aluminum powder is spontaneously combustible if allowed to become wet (i.e., a pile of aluminum powder/dust/shavings wet by rain). A treatment option for this waste could be mixing the powder with Portland cement to make a monolithic slab or changing the elemental aluminum to a non-reactive oxide by mixing it with water in quantities that would prevent spontaneous combustion.

Another example would be anhydrous calcium chloride, which generates excessive amounts of heat when wetted. Treatment for this material would be to slowly add the material to a mass of water sufficient to absorb the heat generated without dangerously raising the temperature of the water.

As can be seen from these two examples, each reactive waste will require the development of a specific treatment chemistry for the waste.

2.1 PHYSICAL CHARACTERISTICS, MATERIALS OF CONSTRUCTION, AND DIMENSIONS OF THE UNIT

The deactivation work is performed in a glove box large enough for two technicians to work in. The glove box is 76 inches wide, 28 inches deep, and 38 inches high, set on legs, placing the glove box at a working height of approximately 32 inches. The glove box has a sealed door on each end for passing materials in and out of the box.

The glove box is constructed of stainless steel and is fitted with a clear Lexan front equipped with two sets of gloves. The glove material is Hypalon but may be changed depending on its compatibility with the material to be treated.

The glove box is operated under an inert atmosphere. The exhaust from the glove box is handled differently depending on the waste to be treated. For example, if the material being deactivated releases an acid gas during treatment, the exhaust from the glove box will go through a scrubber before going to the RTO.

3.1 DECONTAMINATION PROCEDURES

When not in use, the glove box is stored in the Treatment and Storage Building. It will be cleaned inside and out to remove any chemical and/or radiological contamination before it is removed from the treatment area. The cleaning residues generated will be disposed of as radioactive waste.

APPENDIX I-F. DEACTIVATION PROCESS

There may be times when chemical-specific cleaning will be necessary. An example would be the neutralization of perchloric acids. Because perchloric acids can form explosive perchlorates, perchloric acids will not be neutralized in the 300-gallon neutralization tank. These acids will be neutralized one container (typically 2.5 liter or smaller) at a time inside the glove box in an inert atmosphere. After the neutralization is completed and the glove box is decontaminated, an indicating solution will be sprayed on the interior surfaces of the glove box. The indicating solution will turn black on contact with perchlorates. If perchlorates are indicated, the glove box will be cleaned until the presence of perchlorates is not detected.

4.1 ENVIRONMENTAL PERFORMANCE STANDARDS

4.1.1 RELEASE PREVENTION

The deactivation process area and equipment is located, designed, constructed, operated, maintained, and closed in a manner that will ensure protection of human health and the environment. The hydrogeologic, geologic, and meteorologic factors or concerns for the Facility site and surrounding areas are addressed in Section A of the permit application. For purposes of ensuring protection of human health and the environment, PFF conducts the deactivation process in conformance with applicable container standards. Appropriate secondary containment is incorporated into the design and operation of the equipment. Run-on and run-off of precipitation are controlled as the deactivation process is conducted in an enclosed building. Section B of Part II of this permit application provides details regarding containment, management of reactive wastes, condition and management of containers, inspections, and prevention of run-on and accumulation of precipitation in the Treatment and Operations Building, and/or LSV Process Area where the deactivation process is conducted.

4.1.2 PREVENTION OF RELEASES TO GROUNDWATER OR SUBSURFACE ENVIRONMENT

Releases to groundwater or the subsurface environment from the deactivation process are extremely unlikely for the same reasons described for the PF-I process in Appendix C.

4.1.3 PREVENTION OF RELEASES TO SURFACE WATER, WETLANDS, OR SOIL SURFACE

Releases to surface waters, wetlands, or soil surface from the deactivation process are extremely unlikely for the same reasons described for the PF-I process in Appendix C.

4.1.4 PREVENTION OF RELEASES TO AIR

Releases to air from the deactivation process are extremely unlikely for the following reasons.

- The deactivation process is conducted inside a glove box inside an enclosed building area, which is provided with an air pollution control system.
- Containers will be kept closed at all times, except during treatment.
- It is not anticipated that there will be any particulate emissions. However, particulate emissions, if generated, will be discharged to an enclosed treatment area provided with HEPA filter air treatment.
- Organic emissions, if any, will be vented to the RTO.

APPENDIX I-F. DEACTIVATION PROCESS

4.1.5 MONITORING AND INSPECTIONS

The deactivation process will be monitored by PFF personnel during treatment operations, which will be conducted manually.

The deactivation process area will be visually inspected each operating day for evidence of leaks or spills. The secondary containment system will also be inspected each operating day for evidence of cracks or breaches in containment, as specified in the Facility inspection plan.

4.1.6 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

The deactivation process will reduce the potential of exposure of humans/environmental receptors since the reactive characteristic of the waste is eliminated by the treatment. The primary pathway of exposure for human receptors will be inhalation during treatment. PFF workers within the Treatment and Operations Building and/or LSV Process Area are the most likely human receptors for chemicals or chemical constituents released from the deactivation process. This exposure will be minimal since appropriate deactivation chemicals will be selected for addition into the container based on a bench test performed for a particular waste stream. During the bench test, observations will be made to ensure that deactivation of reactive wastes will not result in reactions that create any condition specified in 40 CFR 264.17(b).

If necessary, personnel performing the deactivation process (or other persons in the immediate vicinity of the treatment process when being conducted) will be required to wear personal protective equipment (PPE) selected to address potential hazards. The PPE selected will be in accordance with OSHA standards.

APPENDIX I-G

LSV CERTIFICATION REPORT

APPENDIX I-G. LSV CERTIFICATION REPORT

INSPECTION AND CERTIFICATION REPORT: LIQUID SCINTILLATION VIAL PROCESSING SYSTEM PERMA-FIX OF FLORIDA, INC.

INTRODUCTION

At the request of Perma-Fix of Florida, Inc., 1940 N.W. 67th Place, Gainesville, Florida, *Lewis Engineering and Consulting, Inc. (LEC)*, Gainesville, Florida conducted an inspection of the Liquid Scintillation Vial (LSV) crushing and processing system for purposes of assessing compliance with EPA 40 CFR 264.190, Subpart J: Tank Systems, and 40 CFR 264.600, Subpart X: Miscellaneous Units. An on-site inspection and process documentation review was performed by LEC on November 13, 2009. An initial inspection and certification report for the LSV system was issued November 17, 1998 by R.O. Lewis, P.E. of LEC and A. Bodo, P.E., *Bodo & Associates*, Gainesville, Florida shortly after the system was first constructed and commissioned.

Now in it's 11th year of operation, the LSV system has undergone a major overhaul and revisions. A majority of the material conveyance systems at that time for both wet and dry material processing have been removed and that which has been retained for wet processing only has been modified. The principal component of the LSV processing system remains the Model 13CSE multi-bladed grinder, referred to as a knife hog grinder, manufactured by Reduction Technology, Leeds, Alabama. The grinder was purchased new by Perma-Fix in the first quarter, 1998. The grinder received a new cylinder in 2009 which houses the knife blade assembly. Several other external covers and jackets on the grinder were also replaced during the overhaul. All of the parts used in the overhaul were sourced from the OEM supplier and were of the same material quality and specifications as those originally purchased and assembled in 1998.

The primary LSV system modifications involved removal of a series of in-line outfeed screw conveyors. Those have been replaced by a single fully enclosed fire suppression protected conveyor belt system manufactured by the original equipment manufacturer, Reduction Technology. The conveyor belt is a type 304 stainless steel woven mesh belt that was originally developed for the heat treating industry. The design lends itself well to the LSV process application as the open mesh design of the belt allows liquids to drain through the belt to a sump effectively separating the liquids from the chopped solids that the belt transports to a collector drum. A T304 stainless steel trough beneath the belt collects the liquids which by gravity flow to

LEWIS ENGINEERING AND CONSULTING, INC.

APPENDIX I-G. LSV CERTIFICATION REPORT

INSPECTION AND CERTIFICATION REPORT:
PERMA-FIX LSV PROCESS, REDUCTION TECHNOLOGY KNIFE HOG GRINDER SYSTEM
NOVEMBER 16, 2009

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a 110 gallon T304 SS sump tank located beneath the grinder. Liquids collected in the sump tank can be pumped to a 350 gallon T304 stainless steel tank that remains from the original LSV system certified in 1998, or to portable T340SS tanks for transfer to a bulk transport tanks.

System schematics in **Figures 1, 2 and 3** illustrate the configuration of the system and identify the component parts. The photograph in **Figure 4** shows the LSV system as viewed looking north inside the LSV processing room. During operation, raw feed materials are screened to remove dirt, debris and packing materials. A large permanent magnet positioned above the in-feed conveyor removes ferrous material from the waste stream that could damage the blades of the grinder and potentially generate sparks. Potential fire hazards associated with processing flammable solvents are minimized via a fire suppression system and nitrogen purging.

CONCLUSIONS AND RECOMMENDATIONS

The 11 year old LSV system appears to have been well maintained and those components and parts of the system subject to normal wear, such as the screw-flight outfeed system, have been fully replaced with new components. The knife hog grinder has been refitted with new knives, covers and panels to restore those surfaces subject to abrasion and wear. The successful and safe performance of the grinder during the past 11 years confirms that the original design and materials of construction of the grinder has been well suited for this application.

The use of T304 stainless steel throughout the system for all wetted surfaces and including the recently modified outfeed belt conveyor provides reliable wear and corrosion resistance for all but very corrosive hazardous waste materials. The system would not be suitable for processing very acidic waste streams, less than pH 2, or high solubility chloride content waste streams that would be treated employing high temperature to evaporate solids to dryness. Neither of these two conditions represent foreseeable use of the wet grinding system. Magnetic screening of the waste stream conveyed to the grinder minimizes the potential for generating sparks at the blades, and a fire suppression and nitrogen purge system is installed to further minimize the risk of fire and explosions.

The structural assessment and certification of the concrete floor to support the LSV system equipment remains valid as presented in 1998. No additional equipment weight has been added during system modifications. Instead, there has been an overall equipment weight

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APPENDIX I-G. LSV CERTIFICATION REPORT

INSPECTION AND CERTIFICATION REPORT:
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reduction via the removal of the multiple in-series screw-flight outfeed conveyors and replacement with the smaller and lighter single belt conveyor. No other changes affecting the structural integrity of the floor and containment room for the LSV system have been made since the system was originally certified in 1998.

It is the opinion of the undersigned that the system, as installed, is well suited for its intended purpose and is in very good serviceable condition.

As required by EPA 40 CFR 270.11(d):

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 gather and evaluate 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.

Respectfully submitted,


Richard O. Lewis, P.E.
NOVEMBER 16, 2009

LEWIS ENGINEERING AND CONSULTING, INC.

APPENDIX I-G. LSV CERTIFICATION REPORT

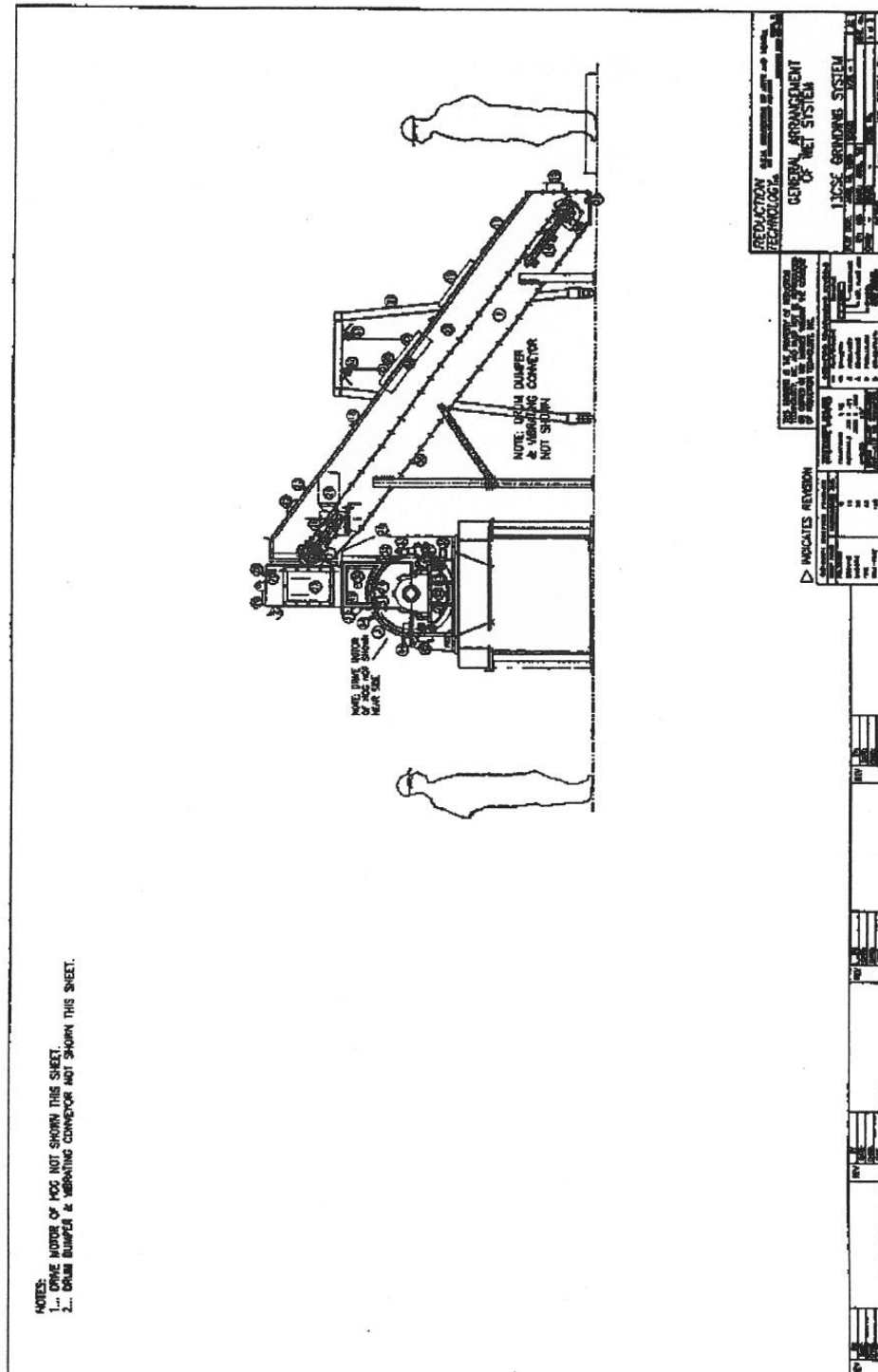


Figure 1. Elevation schematic of Reduction Technology 13 CSE wet grinding system configuration, located at Perma-Fix.

APPENDIX I-G. LSV CERTIFICATION REPORT

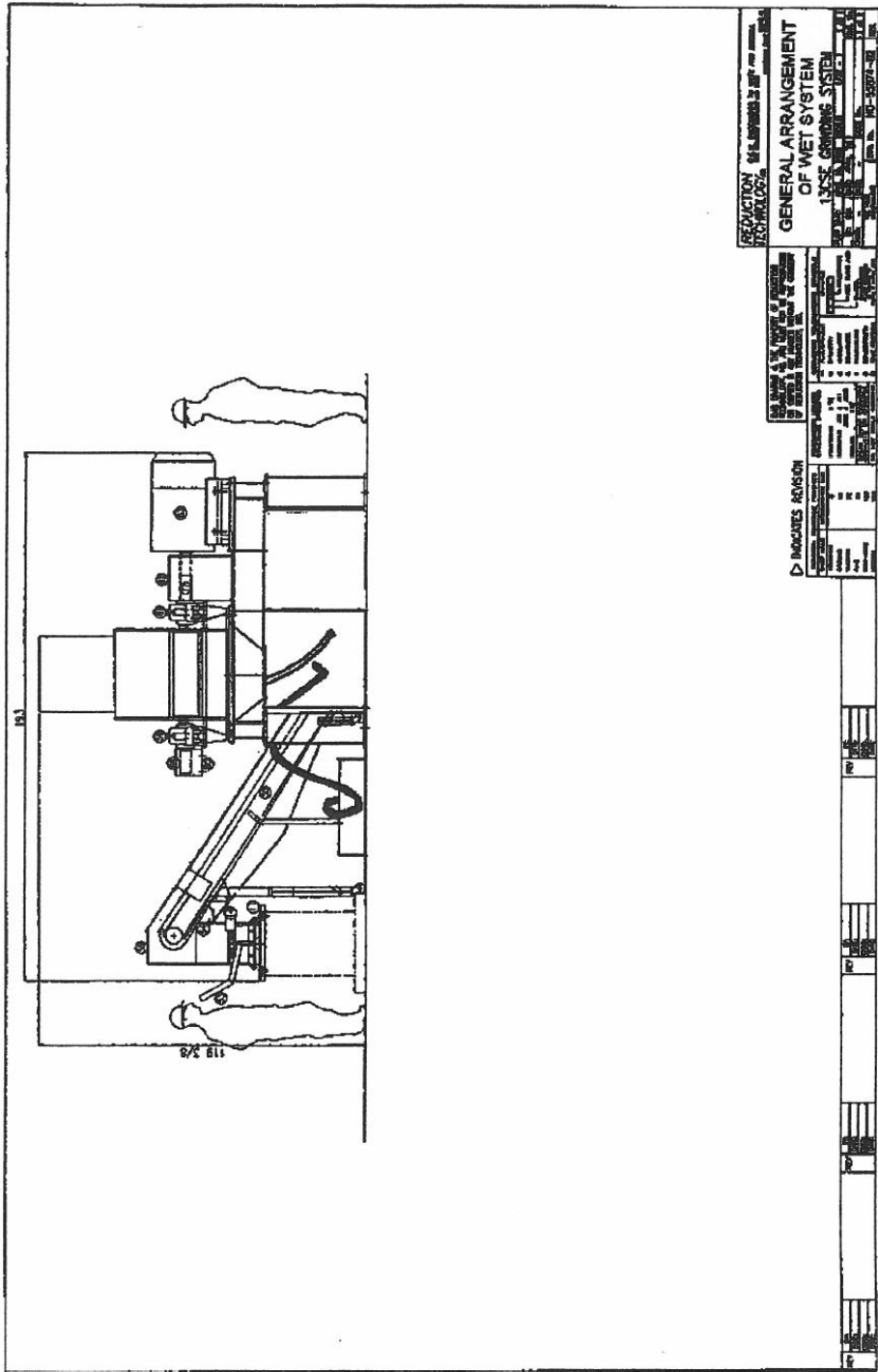


Figure 2. Elevation schematic of Reduction Technology 13 CSI wet grinding system configuration; located at Perma-Fix.

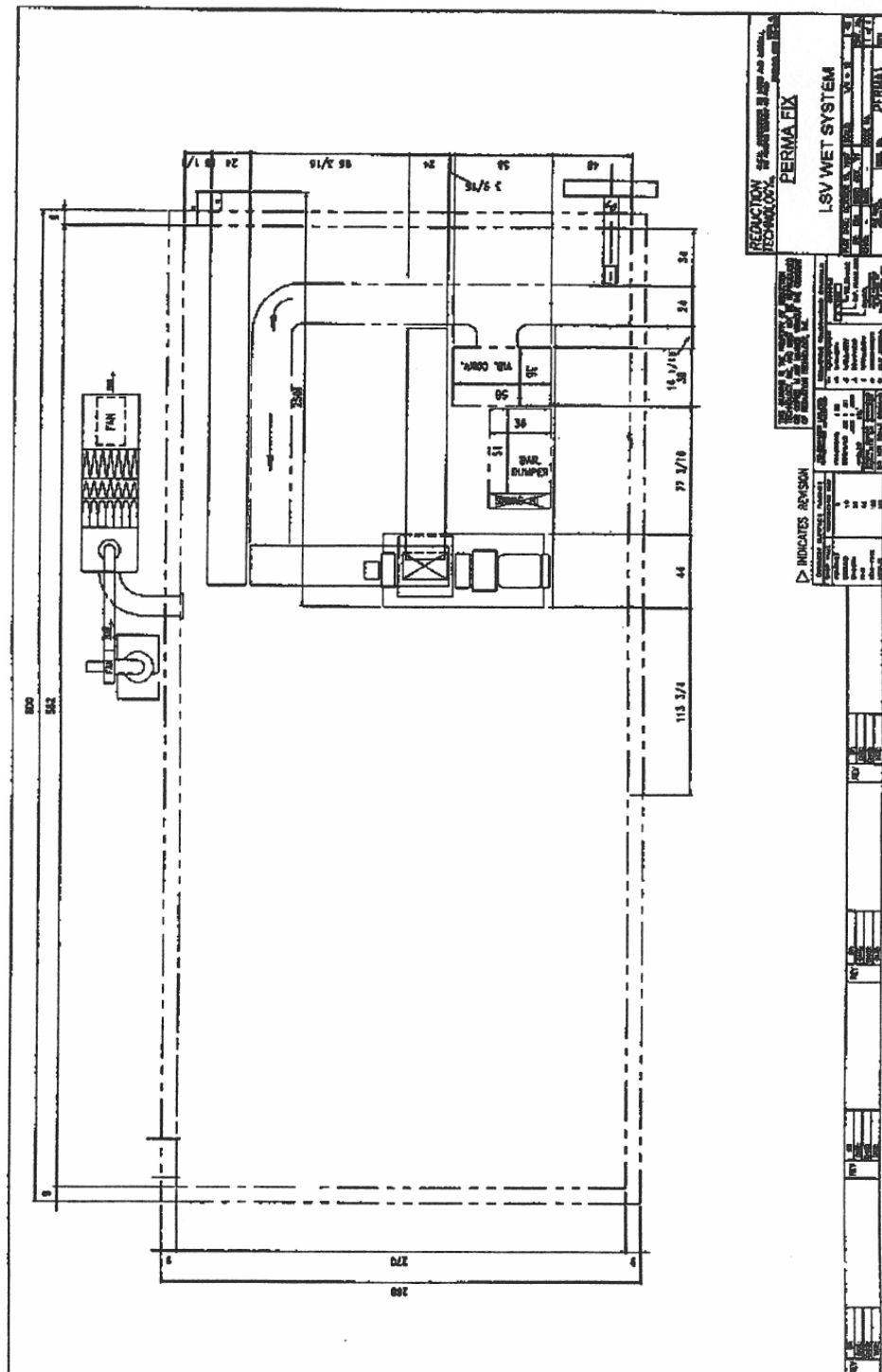


Figure 3. Plan view schematic of Reduction Technology wet grinding system; located at Perma-Fix.

APPENDIX I-G. LSV CERTIFICATION REPORT

PERMA-FIX LSV EVALUATION AND CERTIFICATION



Figure 4. Image of LSV system as viewed looking north inside the LSV room.

Lewis Engineering and Consulting, Inc.

APPENDIX I-H

DEBRIS TREATMENT PROCESS

APPENDIX I-H. DEBRIS TREATMENT

1.1 PROCESS DESCRIPTION

PFF treats debris using the "Alternative Treatment Standards for Debris" described in 40 CFR 268.45 Table 1. The alternative treatment technologies conducted at the Facility are either performed in conjunction with or exclusive of the PF-I process and PF-II process.

The debris treatment technologies conducted at the facility include physical extraction (scarification, grinding, and planing; spalling; and, high pressure steam and water sprays) and chemical extraction (water washing and spraying, liquid-phase solvent extraction).

Debris is sorted and segregated from any non-debris prior to size reduction and treatment. Sorting and segregating consist simply of picking out the debris from the original shipping container and placing it into another container. Identification of the most appropriate treatment approach (physical and/or chemical) is determined during the sorting and segregation activities. Size reduction is performed using hand-operated power tools (e.g., circular saw, reciprocating saw), when required, to necessitate compliance with the appropriate size dimensions cited in 40 CFR 268.45.

The alternative debris treatment technologies are primarily performed in the LSV processing area, but in certain cases may be performed in the TOB Area. Selection is based on waste stream quantities. The LSV processing area is equipped with a stainless steel vat measuring approximately 48.5" x 36.5" x 30.5", which is sufficient in size to accommodate all anticipated forms of debris and is used to accommodate large treatment campaigns. Figure I-17 illustrates the location of the vat inside the LSV processing area.

The vat is equipped with a gantry crane and pneumatic lift and dump station, including an in-line pneumatic press. One of the two submersion methods are employed to treat hazardous debris: 1) perforated stainless steel baskets (approximately 25-gallon capacity with removable lids) are raised and lowered into and out of the vat using the gantry crane; or 2) debris is directly loaded into the vat and held submerged using a steel grid and later shoveled into the perforated baskets. In either case, and following the required treatment residence time, the perforated baskets are raised and positioned onto a platform (containing rollers with a sloped catch-basin, draining back into the vat) that is equipped with a press. The wetted debris is allowed to drain and is pressed forcing the removal of any additional absorbed liquids. Once pressed, the basket is rolled into the dumping position where a pneumatic lift dumps the treated debris into a pre-positioned receiving container. The vat is equipped with an emissions control hood, which is vented directly to the facility air pollution control system.

Debris treatment activities conducted in the TOB are performed using the pneumatic drum tumbler. Small quantities of debris are treated in the drum tumbler rather than the LSV vat to minimize secondary waste residues. Debris is added to a tumbling vessel (55- or 85-gallon stainless steel drum) along with a select chemical solvent. The tumbling vessel is allowed to agitate on the drum tumbler for the required period of time. The original bung-top lid is replaced with a perforated lid, and the residual liquids are allowed to drain into a pre-positioned stainless steel catch basin.

The debris treatment activities conducted in the TOB are in a closed container provided with a pressure-relief device attached to the bung-top lid to minimize potential emissions. Fugitive emissions from both process areas (i.e., LSV vat and drum tumbler) are directed through the Facility's air control system.

APPENDIX I-H. DEBRIS TREATMENT

1.2 CHEMICAL SELECTION

PFF is aware that acids, solvents, and chemical reagents may react with some debris and contaminants to form hazardous compounds. Therefore, prior to debris treatment, applicable safety precautions specified in Material Safety Data Sheets and discussed in industrial hygiene publications will be reviewed. Past experience has shown that high-flash mineral spirits or a 1:1 (by volume) mixture of Lift- It® and water are appropriate solvents for most of the debris contaminants. Lift- It® is a mixture of dipropylene glycol methyl ether, dipropylene glycol n-butyl ether, and sodium hydroxide. It is anticipated that Lift-It® or a similar product will be the most commonly used extraction solvent for the liquid-phase solvent extraction procedure. Additional extraction solvents may include ethanol and industrial soaps.

PFF will conduct additional bench testing, as needed on new waste streams, to identify the most appropriate solvent for use. Regulations require that target constituents contaminating debris must be at least 5% soluble in the treatment solvent. Bench testing for solubility will consist of adding 10 parts by weight of solvent to one part by weight of a commercial grade product of the contaminant to be removed from the debris. If no meniscus forms in the mixture, the hazardous constituent is presumed to be at least 5% soluble.

1.3 SECONDARY WASTES

Secondary wastes generated in the vat are removed by pumping or, in the case of solids, by using hand tools (e.g. shovels, hoes). Solid treatment residuals generated from the extraction processes are containerized and, prior to being manifested to an off-site hazardous waste disposal facility, may be treated using the PF-I or PF-II process, in accordance with the waste-specific treatment standards of 40 CFR 268 Subpart D. Treatment residual candidates for the PF-I or PF-II processes are solids (e.g., soil) containing organic and inorganic hazardous waste constituents in excess of applicable land disposal restriction standards. The treated debris is managed and disposed of off- site in accordance with the conditioned exclusion provided by 40 CFR 268.45(c). Generated liquids will be blended with other mixed waste fuels and shipped off site or will be directly (i.e., without blending) shipped off site to a permitted facility.

1.4 WASTE CODE TRACKING

PFF assigns and tracks waste codes for treatment residuals and treated debris in accordance with 40 CFR 268.45 and 40 CFR 261.3(f)(1). When hazardous debris that exhibits the characteristic of ignitability, corrosivity, or reactivity is deactivated by treatment using one of the technologies identified in Table 1 of 40 CFR 268.45 (and described in the permit application), the treated debris is not a hazardous waste. Residue from the deactivation of ignitable, corrosive, or reactive characteristic hazardous debris (other than cyanide-reactive wastes) that is not contaminated with a listed waste hazardous constituent retains the appropriate characteristic waste code unless it is deactivated. Toxicity characteristic debris treatment residuals remain subject to the waste code(s) and treatment standards for the toxic constituent(s) for which the debris exhibited the toxicity characteristic. Residuals from the treatment of debris contaminated with listed waste remains subject to the treatment standards and waste codes assigned for those constituents or wastes. Hazardous debris that has been treated using one of the physical and/or chemical extraction technologies in conformance with 40 CFR 268.45 and does not exhibit a characteristic of hazardous waste identified under subpart C, Part 261 of 40 CFR after treatment is not a hazardous waste and will not be assigned any waste codes.

APPENDIX I-H. DEBRIS TREATMENT

If the water washing and spraying technology is ever implemented for waste codes F020, F021, F022, F023, F026, or F027, an application for "Equivalent Technology" approval as specified in 40 CFR 268.42(b) will be filed prior to the commencement of treatment.

1.5 DEBRIS STORAGE

Debris is received and stored prior to and after treatment based on its hazardous characteristics and/or assigned waste code(s). See Table I-2, Summary of Treatment Methods and Storage Locations.

2.1 ENVIRONMENTAL PERFORMANCE STANDARDS

2.1.1 RELEASE PREVENTION

The debris treatment processes are located, designed, constructed, operated, maintained, and closed in a manner that will ensure protection of human health and the environment. For purposes of ensuring protection of human health and the environment, PFF has designed and operates the debris treatment equipment in conformance with applicable container standards. Appropriate secondary containment and air emission controls are incorporated into the design and operation of the equipment, and run on and run off of precipitation or liquids from the debris treatment area are controlled. See Part II, Section B of this permit application for details regarding containment; management of ignitable, reactive, and incompatible wastes; condition and management of containers; inspections; and prevention of run on and accumulation of precipitation in the Treatment and Operations Building and LSV area where the debris treatment operations take place.

2.1.2 PREVENTION OF RELEASES TO GROUNDWATER OR SUBSURFACE ENVIRONMENT

Releases to groundwater or the subsurface environment from the debris treatment processes are extremely unlikely for the following reasons.

- Relatively small volumes of waste are incorporated into the debris.
- Debris is treated within secondary containment systems designed to collect liquids generated during processing. The containment system is coated with a chemically resistant material that is compatible with the waste streams designated for processing.
- The treatment areas are inspected each treatment day in accordance with the facility inspection plan. Leaks or spills from the system are cleaned up within 24 hours of discovery or as soon as it is practicable and safe to do so.
- The areas are located within buildings physically separated by a concrete base from the subsurface environment and groundwater.
- The Facility maintains a Contingency Plan to provide a framework for facility response to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the system.

2.1.3 PREVENTION OF RELEASES TO SURFACE WATER, WETLANDS, OR SOIL SURFACE

Releases to surface water, wetlands, or soil surface are extremely unlikely for the following reasons.

APPENDIX I-H. DEBRIS TREATMENT

- Relatively small volumes of waste are incorporated into the debris.
- Debris is treated within secondary containment systems designed to collect liquids generated during processing. The containment system is coated with a chemically resistant material that is compatible with the waste streams designated for processing.
- The treatment areas are inspected each treatment day in accordance with the facility inspection plan. Leaks or spills from the system are cleaned up within 24 hours of discovery or as soon as it is practicable and safe to do so.
- The areas are located within buildings physically separated by a concrete base from the subsurface environment and groundwater.
- The Facility maintains a Contingency Plan to provide a framework for facility response to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the system.

2.1.4 PREVENTION OF RELEASES TO AIR

Releases to air from the debris treatment are extremely unlikely for the following reasons.

- The system is located within building areas equipped with emissions control devices. The emissions control system is designed to handle at least the volume of organic emissions anticipated from the process.
- Limiting the time the debris is exposed to the atmosphere prior to processing minimizes emissions at the loading point.
- Emissions during unloading are minimal because the potential contaminants are significantly removed during processing.

2.1.5 MONITORING AND INSPECTIONS

PFF personnel monitor the debris treatment process during processing operations. Loading and unloading are conducted manually (or by automated equipment that is manually operated).

The debris treatment areas are visually inspected each operating day for evidence of leaks or spills; the inspection is in accordance with the requirements of the facility inspection plan. The secondary containment systems are also inspected each operating day for evidence of cracks or breaches in containment as specified in the facility inspection plan.

2.1.6 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

PFF workers within the treatment areas are the most likely human receptors for chemicals or chemical constituents released from the debris treatment process. The exposure is anticipated to be minimal because of the emission control devices provided for the areas. The primary pathway for human receptors from debris treatment processes is air, specifically, air emissions (volatiles or particulates) generated during treatment processes. Where appropriate, water may be applied during processing to minimize the generation of particulates.

APPENDIX I-H. DEBRIS TREATMENT

Operating personnel (or personnel present in the treatment areas for any other reason) are required to wear personal protective equipment (PPE) selected to address the potential hazards identified for the wastes to be managed and the operating parameters of the system. The PPE selected will be in accordance with OSHA standards and may include use of particulate/radioactive/organic respirators (as appropriate).

Environmental receptors such as soil, surface water, groundwater, and air are unlikely to be impacted by the debris treatment processes because of the air controls provided for the treatment areas, containment systems, and location within buildings that are physically separated from soils and protected from precipitation, as well as storm water run on and run off.

PART II



PART II
REVISED RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA 32653
DRAFT FOR REVIEW

March 4, 2022

Project #: 61A-004-001

SUBMITTED BY: Trihydro Corporation

3740 St. Johns Bluff, Suite 14, Jacksonville, Florida 32224

ENGINEERING SOLUTIONS. ADVANCING BUSINESS.

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II. PART II

This application has been organized based on the structure found in Florida Department of Environmental Protection (DEP) Hazardous Waste Permit Application (DEP Form 62-730.900(2)(a)). The Part II section includes the specific facility information required as part of the permit application, including Section A General Information, Section B Containers, Section C Tanks, Section I Miscellaneous Units, and Section T Certification.

A GENERAL

A.1 GENERAL INFORMATION

Topographic Contour and Other Required Figures

A topographic contour figure showing a distance of 1,000 feet around the hazardous waste management area at a scale of 1 inch to 200 feet is presented in Figure II-A-1. Site access control including the location of fences and gates is presented in Figure II-A-2. Figure II-A-3 shows the location of site buildings and other structures and loading/unloading areas. City of Gainesville sanitary sewer and water supply schematics are presented in Figure II-A-4. Surface water flow direction is presented in Figures II-A-5. Figure II-A-6 shows the location of hazardous waste units. The site drainage pattern is presented on Figure II-A-7.

Wind Rose

The Iowa State University Iowa Environmental Mesonet (IEM) provides recent climate and wind data for the Gainesville, Florida area. The IEM meteorological data was filtered to provide surface wind data for the five-year period from October 1, 2014 to October 1, 2019 at the Gainesville Regional Airport. The Gainesville Regional Airport site is approximately 5.5 miles southeast of the Perma-Fix of Florida, Inc. facility (PFF). A five-year wind rose for the 2014 to 2019 meteorological data set is presented in Figure II-A-8. The wind direction during the 2014 to 2019 time period was variable. The predominant wind direction is from the east with approximately 30.5 percent of the time winds being from the northeast, east-northeast, east, east-southeast, and southeast directions. Approximately 20 percent of the time the winds were from the west, west-southwest, and southwest.

Traffic Patterns

Traffic pattern, traffic control, and access patterns are identified in Figure II-A-9. The average truck traffic of incoming and outgoing waste is anticipated to be no more than 5 trailers or tanker trucks per day. The road system and parking area have adequate load-bearing capacity to withstand the projected loads. The access route to the plant is from US441 to SR121 to NW 67th Place and then to PFF. US441 and SR121 roadways are capable of truck traffic

carrying in excess of 80,000 pounds. There are no weight restrictions on these roadways. The internal roadway (NW 67 Place) and PFF parking lot are asphalt paved and can withstand truck traffic without difficulty.

A.2 FINANCIAL RESPONSIBILITY

A copy of the financial mechanism used to establish financial assurance for closure of the facility and a copy of the facility liability coverage are attached (see Appendix II-A-1).

A.3 FLOOD MAP

The operational area for the PFF site is located outside of the 100-year flood plain. As shown on Figure I-2 in Part I of this application, portions of the northern and eastern edges of the property have been redrawn to be within the 100-year flood plain. However, permitted activities are not conducted in these areas of the site.

A.4 FACILITY SECURITY

Description of Security

PFF is surrounded by a high-quality chain-linked fence topped with three strands of barbed wire with an overall height of at least six feet. The fence is in good condition and is periodically inspected. Entry into the facility is controlled by gate access. The entrance gates are closed and locked at all times, and only authorized personnel are allowed into the facility.

All facility visitors must enter through the main reception area located in the office building. See Figure II-A-3.

Warning Signs: Entrances to PFF loading, unloading, processing, and storage areas are posted with appropriate signs signifying “Danger - Unauthorized Personnel Keep Out” and “No Smoking”. These signs are visible and legible from a distance of at least 25 feet.

Contingency Plan

A copy of the PFF Contingency Plan is included as Appendix II-A-2.

Description of Procedures, Structures, or Equipment to Prevent Hazards, etc.

In the event of a power failure, all transfer pumps and treatment operations will stop. Automatic check valves prevent reversal of flow of waste in the LSV transfer lines. Operations in the container and tank storage areas and in the treatment areas are rendered safe during a power failure. Nevertheless, potential hazards will be assessed by the PFF Emergency Coordinator and PFF personnel during power outages and once again upon restoration of power.



Emergency exit signs and lighting are provided at critical locations throughout the facility and are powered by battery backup power units. A portable gas- powered electric generator is available for use, if necessary.

Containers of hazardous waste are unloaded from transport trucks into the staging and storage areas located in each of the three buildings where hazardous waste is managed. Special equipment such as non-sparking tools will be used in the flammable hazardous waste management areas. Forklift operators are instructed in proper and safe operation of the forklift and in incident response procedures. See the Contingency Plan and Personnel Training Plan included as Appendix II-A-2 and Appendix II-A-3, respectively, for training and incident response details.

All persons entering hazardous waste management areas are required to wear protective clothing, which is appropriate for the activities to be conducted in those areas. Personal protective equipment (PPE) is selected and used according to the standards and guidelines promulgated by the Occupational Safety and Health Administration (OSHA) and the American Conference of Governmental Industrial Hygienists (ACGIH). The Contingency Plan contains a list of PPE available at PFF. Training in the use of PPE is covered by the Personnel Training Plan.

PFF has been designed to prevent runoff from waste management areas onto other areas of the facility or to the environment (e.g., ground water). Waste management areas are enclosed and/or have sufficient containment to prevent runoff of contaminated water. Rainwater is directed to the on-site retention pond or to a drainage ditch north of the facility. The 3,000- gallon mixed waste storage tank is located inside the Processing and Storage Building in a containment area that is capable of containing 150% of the entire contents of the tank. Curbs and/or storm drains prevent surface drainage from passing through the waste management areas. Adequate containment is also provided for all process areas.

Avoiding the discharge of hazardous materials onto unprotected ground will prevent groundwater contamination. No drains are located within the waste management areas, and no unauthorized materials are released to the sanitary sewer or to surface water runoff. PFF accounts for all hazardous wastes delivered to and removed from the facility through a material accounting system. This includes a generator-specific numbering system to identify, at all times, the current status of each container of material received on-site. PFF tracks each container of material from time of receipt through final disposition. Intermediate and on-site generated waste packages are assigned a dedicated number for tracking purposes. Hazardous waste is stored and managed at the facility in areas equipped with secondary containment to prevent releases to the surrounding environment. In the unlikely event of a spill on unprotected ground from a transportation incident, the procedures outlined in the Contingency Plan would provide for immediate control and removal of hazardous waste spills.

All hazardous wastes received by PFF are assumed to be ignitable or reactive in some fashion and are managed accordingly until determined otherwise by facility personnel through sample analysis or profile review. Appropriate precautions are taken to eliminate sources of ignition including open flames; smoking, cutting, and welding hot surfaces; frictional heat; and spark from in and around the container storage, tank storage, and processing areas. PFF is fenced for security, and smoking is not allowed within the facility.

The hazardous waste storage and treatment areas are operated in accordance with applicable National Fire Protection Association (NFPA) standards. Other precautions against ignition include the following:

- All electrical systems and motors will be properly grounded and adequately rated for their intended use.
- Storage and treatment areas will be adequately ventilated.
- Special tools with low spark risk will be used for maintenance or repair work.

In the LSV processing and storage areas, additional safety features include:

- Electrical grounding for all key equipment including sampling tanks, bulk storage tank, and ancillary equipment.
- Automatic fire suppression for the LSV process line.
- Overflow interlocks and alarms for the sampling tanks and bulk storage tank.
- Circuit overload and lockout mechanisms.
- Ventilation systems for the process and work areas that maintain negative pressure in these areas and filter the exhaust for particulate matter and organic vapors.
- Automatic LSV process line shutdown button.
- Four-hour fire wall between LSV building and the office area.

In the TOB processing and storage areas, additional safety features include:

- Electrical grounding for all key equipment including the reaction vessel, condenser, and ancillary equipment.
- Automatic fire suppression for the PF-II process line.
- Mechanical drum dumper for loading the PF-II reactor vessel trays.
- Overflow interlocks and alarms for the process units.
- Mechanical drum lifter and pneumatic guillotine valve for emptying the reactor vessel into drums.

- Circuit overload and lockout mechanisms.
- Ventilation systems for the process and work areas that maintain negative pressure in these areas and filter the exhaust for particulate matter. Organic vapors which are treated by the regenerative thermal oxidizer (RTO).
- Equipment pressure relief valves and conservation vents to prevent over pressurization.
- Automatic PF-II process line shutdown button.

Undesirable, uncontrolled, and dangerous reactions between incompatible wastes will be prevented by the early identification of potentially incompatible waste streams. Waste characterization and screening procedures are described in detail in the Waste Analysis Plan (WAP) included as Appendix II-A-4. In addition, compatibility testing will be conducted on materials that are part of lab packs or that will be bulked with other waste streams. Compatibility testing procedures are also addressed in the WAP. These procedures include the mixing of samples of potentially incompatible wastes. The mixture(s) will be observed for temperature rise, evolution of gases, and/or polymerization. Leaking or damaged containers of hazardous waste will be isolated from other containers until the contents have been placed in new containers or such drum is overpacked.

Preparedness and Prevention Procedures Design and Operation of Facility

The PFF treatment, storage, and processing areas, and associated process equipment, are designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned release of hazardous waste constituents to the air, soil, surface water, or groundwater that could threaten human health or the environment. To facilitate effective responses to potential emergency situations, the following equipment and procedures are used by PFF.

All hazardous waste to be treated with the PF-II process will be assumed to be ignitable until proven otherwise. This waste will be separated and protected from sources of ignition or reaction such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electric, or mechanical), spontaneous ignition, and radiant heat. PFF is fenced for security, and smoking is not allowed anywhere inside the facility. Containers holding ignitable and reactive wastes are stored at least 50 feet from the facility property line.

Potentially incompatible wastes or incompatible wastes and materials will not be placed in the same container, tank, or treatment equipment unless the wastes/materials are first tested in order to determine the necessary precautions to prevent reactions that:

1. Generate extreme heat or pressure, fire or explosions, or violent reactions.
2. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment.
3. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion.
4. Damage the structural integrity of the container, tank, or treatment equipment or the facility.
5. May otherwise threaten human health or the environment.

Incompatible wastes will be stored in separate containers in separate secondary containment areas. Separation will be maintained by the use of berms, dikes, or by placing containers of incompatible waste in separate buildings. Incompatible wastes will not be placed in the same container, tank, or the same bermed storage section.

Required Equipment

A computer system is used for management of important operations data. To minimize the potential for loss of information during power outages or computer system failure, key waste management information is also maintained in hard copy form. The following emergency or incident response equipment is maintained by PFF:

- Internal telephone communication system capable of notifying all employees in the event of an emergency.
- External communications equipment to summon outside assistance, if necessary.
- Emergency equipment:
 - Strategically located fire extinguishers
 - Automatic fire sprinkler system with Aqueous Fire Fighting Foam in the waste processing and storage areas
 - Spill cleanup (e.g., absorbent materials, booms, shovels, etc.)
 - Decontamination supplies
- Water for fire control at an adequate volume and pressure to supply water hose streams, foam-producing equipment, or water spray systems. The water source for supplying water hose streams is the City of Gainesville.

Emergency equipment is listed in Table II-1.

Access to Communication System

Access to the communication system is readily available from several locations in and around the facility waste management areas. Additionally, a paging system allows for broadcasting of announcements at the facility. Activities

are not conducted in treatment or process areas unless at least two employees are present. Operating personnel will carry two-way portable radios or will have ready access to the plant telephone or both. The plant telephone system is connected to outside telephone systems and can be used to notify local authorities in the event of an emergency. The local fire department is less than one mile from PFF and is adequately equipped to respond in the event of a fire.

Testing and Maintenance of Equipment

An outside contractor inspects and tests PFF's fire suppression equipment and alarm system semi-annually. In addition, all emergency response equipment and supplies are tested and maintained by facility personnel to assure proper operation in time of emergency. Table II-1 lists the emergency equipment available at the facility.

Required Aisle Space

Adequate aisle space will be maintained in all areas of the facility to provide unobstructed movement of personnel, material handling machinery, fire suppression equipment, and spill control equipment. Pallets of hazardous waste containers or drums in storage areas that may be stacked up two high will be banded and situated so that at least two sides of each pallet are visible and accessible at all times, except for the chemotherapy and pharmaceutical waste containers. Pallets or drums are added and removed from the ends of rows by lift trucks.

Arrangements with Local Authorities

Arrangements have been made to familiarize local authorities, such as police, fire, and emergency response departments with the:

- Layout of PFF.
- Properties and associated hazards of the wastes managed on site.
- Places where facility personnel would normally be working.
- Entrances to and roads inside the facility.
- Possible evacuation routes.

This includes the opportunity for facility inspections/visits by the local authorities. Arrangements with state and local emergency response authorities for assisting PFF (in the event that outside emergency response becomes necessary) are listed in Section 12 of the Contingency Plan (Appendix II-A-2).

Copies of the current Contingency Plan are provided to the local police and fire departments, the nearest major hospital, and the local emergency response team (i.e., the fire department). Copies of each Contingency Plan update will be provided to each of the listed agencies.

Personnel Training

The training programs used to prepare persons to operate or maintain the facility in a safe manner are addressed in the Personnel Training Plan included as Appendix II-A-3 to this permit application.

A.5 CHEMICAL AND PHYSICAL ANALYSIS OF WASTE

The hazardous and mixed waste that is stored and treated by PFF is generated by off-site and on-site sources. Off-site sources of hazardous waste may include, but are not limited to, RCRA treatment, storage, or disposal (TSD) facilities; remediation sites; research institutions; government agencies; paint and coatings manufacturers and users; solvent users; and other industries that generate hazardous wastes. The facility also receives wastes from a variety of conditionally exempt and small quantity generators. In addition, waste collected during various county household hazardous waste collection campaigns is managed at the facility. Hazardous waste generated by on-site sources consists primarily of treatment residues, spent PPE, laboratory wastes, including samples of hazardous waste taken for testing and analysis, and, to a lesser extent, occasional small spill clean-up residues and soils.

The diverse nature of waste sources results in hazardous and mixed wastes of variable chemical composition being stored and treated by PFF. A list of wastes and waste constituents that may be accepted by PFF is included as Table II-2. These materials are listed by the EPA waste numbers found in 40 CFR Part 261, Subparts C and D.

The physical composition of the hazardous waste managed at the facility is either liquid (pumpable) or solid (non-pumpable). The physical composition of hazardous waste generated off-site generally determines its mode of transportation to the facility. Typically, the hazardous waste that is treated and stored at the facility can be characterized as follows:

- Organic liquids, including suspended solids, which are received from off-site in drums and other containers meeting Department of Transportation (DOT) specifications.
- Sludges and solids, possibly containing free liquids, which are received from off-site by truck in drums and other containers meeting the requirements of the DOT.
- A variety of debris contaminated with hazardous constituents received in containers.

- Miscellaneous liquid and solid hazardous waste generated by PFF as a result of waste treatment and miscellaneous management activities, such as clean-up materials, PPE, and decontamination rinsate.
- Lab packs received from off-site.

Liquid wastes generated on-site include cleaning solvents and residues. Solid wastes generated on-site include filter cleaning residues and used PPE.

All hazardous waste shipments determined to be unacceptable will be rejected. Rejected shipments will be returned to the generator or shipped to an alternate authorized TSD facility. Acceptance parameters are addressed in the Waste Analysis Plan.

A.6 WASTE ANALYSIS PLAN

The Waste Analysis Plan (WAP) has been developed as a stand-alone document and is included as Appendix II-A-4. The WAP establishes hazardous waste acceptance procedures, sampling methods, frequency of analyses, analytical techniques, and related quality control/quality assurance procedures that will be followed by PFF to ensure that sufficient information is available for proper storage and treatment of hazardous waste. The chemical and physical analytical parameters that define acceptable hazardous waste, along with the rationale for their selection, are presented in the WAP.

Also addressed in the WAP are the precautions used to prevent undesirable chemical reactions resulting from mixing of incompatible hazardous waste or from the inadvertent receipt of hazardous waste exhibiting undesirable chemical reactions.

Undesirable chemical reactions are listed in 40 CFR 264.17(b) as reactions that:

1. Generate extreme heat or pressure, fire or explosions, or violent reactions,
2. Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health and the environment,
3. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions,
4. Damage the structural integrity of the facility, and
5. May otherwise threaten human health and the environment.

A.7 MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING

Required Notice

When entering into any agreement to receive any waste from a generator, PFF will inform the generator in writing of PFF's permit status and the ability to accept the waste the generator will be shipping.

Prior to transferring ownership or operation of PFF, PFF will provide appropriate notification in writing to the proper authorities in accordance with 40 CFR 270.40.

Use of Manifest System

PFF requires generators to provide a completed manifest for each shipment of hazardous waste. PFF will comply with the manifest use requirements of 40 CFR 264.71 and 264.72. In addition to the manifest number, PFF will assign a dedicated internal tracking number to each container and/or shipment received by PFF for ease of identification.

When hazardous waste accompanied by a manifest is received, PFF will:

1. Sign and date each copy of the manifest to certify that the hazardous waste covered by the manifest was received.
2. Note any significant discrepancies in the manifest (as defined in 40 CFR 264.72(a)) on each copy of the manifest.
3. Immediately give the transporter at least one copy of the signed manifest.
4. Within 30 days after the delivery, send a copy of the manifest to the generator.
5. Retain at the facility a copy of each manifest for at least three years from the date of delivery.

Manifest Discrepancies

Upon discovering a significant discrepancy (as defined in 40 CFR 264.72(a)), PFF will attempt to reconcile the discrepancy with the waste generator or transporter (e.g., through telephone conversations). If the discrepancy is not resolved within 15 days after receiving the waste, PFF will immediately submit to the Florida Department of Environmental Protection (DEP) a letter describing the discrepancy and attempts to reconcile it, and a copy of the manifest at issue.

Unmanifested Waste Report

If PFF accepts for treatment, storage, or disposal any hazardous waste from an off-site source without an accompanying manifest, as described in 40 CFR 263.20(e)(2), and if the waste is not excluded from the manifest requirement by 40 CFR 261.5, then PFF will prepare and submit a single copy of a report to the DEP within fifteen days after receiving the waste.



Such report will be submitted on EPA form 8700-13B (or by other means as required by DEP), be designated “Unmanifested Waste Report” and include the following information:

1. The EPA identification number, name, and address of PFF.
2. The date PFF received the waste.
3. The EPA identification number, name, and address of the generator and the transporter, if available.
4. A description and the quantity of each unmanifested hazardous waste PFF received.
5. The method of treatment, storage, or disposal for each hazardous waste.
6. The certification signed by the owner or operator of PFF or his authorized representative.
7. A brief explanation of why the waste was unmanifested, if known.

Electronic Manifests

PFF may choose to use electronic manifests in lieu of paper manifests by complying with 40 CFR 264.71(f), (g), (h), (i), (j), and (k); and 40 CFR 262.24.

Operating Record/Biennial Report

Copies of the manifests and operating records will be maintained on-site for at least one year. After that, all records may be transferred to an off-site records storage facility where they will remain for at least three years unless otherwise specified below. The Biennial Report of hazardous waste received and processed by PFF will address the quantities of materials shipped to PFF. Copies of the Biennial Report will be submitted to the DEP by March 1 of each even numbered year.

1. The biennial report will be submitted on EPA form 8700-13B [or by other means as required by DEP (e.g., electronic format)]. The report will cover facility activities during the previous calendar year and will include all information required by DEP/USEPA.

The following reports will be maintained by PFF:

- A description and the quantity of each hazardous waste received, and the method(s) and date(s) of its treatment and/or storage at the facility, as required. This record will be maintained until closure of PFF.
- The location of each hazardous waste within the facility and the quantity at each location. This information will include cross-reference to specific manifest document numbers if the waste was accompanied by a manifest. This record will be maintained until closure of PFF.

- Records and results of waste analysis performed.
- Summary reports and details of all incidents that require implementation of the Contingency Plan.
- Records and results of inspections.
- All closure cost estimates in accordance with 40 CFR 264, Subpart G. This record will be maintained until closure of PFF.

PFF will also maintain the following records at the facility or the off-site storage location for a period of at least three years:

- Waste minimization certification.
- Reports of releases, fire, and explosions.
- Closure Plan and Closure Cost Estimate.
- Notices to the off-site generators in accordance with 40 CFR 264.12(b).
- Land disposal restriction notices received from off-site generators.

All operating records maintained on site pursuant to this permit application will be available to state and federal environmental regulatory personnel for inspection.

A.8 FEDERAL ENVIRONMENTAL LEGISLATION

PFF is not subject to the Coastal Zone Management Act, Fish and Wildlife Coordination Act, the National Historic Preservation Act, and Wild and Scenic River Act. PFF is located within an Industrial Park in urban setting and to the best of our knowledge there are no endangered species or archaeological or historical sites within the property. Supporting documentation from the Florida Department of State, Division of Historical Resources, and the Florida Game and Fresh Water Fish Commission is included as Appendix II-A-5.

B. CONTAINERS

PFF is currently permitted to store up to 72,105 gallons of containerized hazardous waste in the Processing and Storage Building; up to 35,200 gallons of container storage in the Treatment and Operations Building (see Figures I-6-A and I-6-B in Part I of this application); and up to 54,350 gallons of hazardous waste in the LSV Processing and Waste Storage Warehouse in containers. In addition, permitted container treatment activities include stabilization/solidification (i.e., PF-I process); and treatment in containers, which includes deactivation of reactive



wastes (e.g., D003), mercury amalgamation, non-elementary neutralization, and treatment of debris using drum rotator(s).

B.1 DESCRIPTION OF CONTAINMENT SYSTEM

The secondary containment system for the Processing and Storage Building consists of curbed and sloped concrete slabs and sumps, which are designed to drain liquids resulting from leaks or spills to sumps for removal. The containment system for the Processing and Storage Building consists of the following:

- An approximately 4-foot 10-inch wide and at least 4-inch high #4 rebar reinforced concrete sloped berm (“rollovers”) extending about 6 feet at forklift entry points to container storage areas.
- A 6-inch wide #4 rebar reinforced concrete curb with a minimum height of 2.5 inches around storage building perimeters.
- Continuous Neoprene® water stops within the concrete curbs and berms.
- Minimum of 20 mils of epoxy sealer at all joints and gaps.
- Polysulfide joint sealant in all floor joints.
- Sealant (e.g., Ashford Formula, which is a water-based inorganic silicate material for sealing and hardening of concrete floors), applied to the floor of the storage area to render the floor sufficiently impervious, in accordance with 40 CFR 264.175(b)(1).

The secondary containment system for the Treatment and Operations Building consists of curbed concrete slabs. The containment system for the Treatment and Operations Building consists of the following:

- 6-inch thick and approximately 5.75-inch high #4 rebar reinforced concrete curb near the building wall.
- 6-inch thick and 5.5-inch high #4 rebar reinforced concrete berm around each segregated container storage area.
- Approximately 7-foot wide and 4-inch high #4 rebar reinforced rollover berms for forklift entry/exit points for the container storage areas.
- Minimum of 20 mils of epoxy adhesive sealer at the concrete joints.
- Sealant (e.g., Ashford Formula, which is a water-based inorganic silicate material for sealing and hardening of the concrete floor), applied to the floor of the container storage area to render the floor sufficiently impervious, in accordance with 40 CFR 264.175(b)(1).

The container storage area within the LSV Processing and Waste Storage Warehouse is provided with a 5.5-inch thick and 5.5-inch high concrete curbing. The minimum height of the rollover berms for this storage area is 2.75 inches. A sealer and hardener have been applied to the storage area floor.

The floor slab making up the container storage areas in the Treatment and Operations Building, the Processing and Storage Building, and the LSV Processing and Waste Storage Warehouse consists of a concrete base that is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed. In addition, the surface of the concrete base has been applied with a sealant (e.g., Ashford Formula) to ensure the impervious nature of the containment base. The product data for the Ashford Formula is included as Appendix II-B-1. In the future, a sealant other than Ashford Formula may be used to render the floor sufficiently impervious, in accordance with 40 CFR 264.175(b)(1).

The capacities of the containment systems in the Processing and Storage Building, the Treatment and Operations Building, and the LSV Processing and Storage Warehouse are sufficient to contain more than 10% of the volume of the maximum number of containers in each building. Containment calculations are included as Table II-3. Details of the secondary containment system for the Processing and Storage Building, Treatment and Operations Building, and the LSV Processing and Waste Storage Warehouse are shown on Figure I-12, Figures I-6-A and I-6-B, and Figure I-15, respectively, in Part I of this application.

Engineering reviews have been conducted on the floor slabs in the container storage areas of each container storage building at the Facility. Copies of the engineering reports for the floors are included as Appendix II-B-2. The October 13, 1997 Floor Slab Inspection letter addresses the concrete pad in the former Nelson Building; referred to in this permit application as the Treatment and Operations Building. The 1989 work sheet addresses the integrity of the concrete pad in the former Quadrex container and tank storage building; referred to in this permit application as the Processing and Storage Building. The concrete slab in the LSV Processing and Storage Warehouse is similar in nature as the other two buildings.

To prevent run-on and accumulation of precipitation, the container storage areas in each building are roofed and sufficiently sided to prevent run-on of stormwater. In addition, the perimeters of the concrete floor slabs are curbed in each building. Finally, site grading directs surface water away from the buildings.

The sloped floors in the Processing and Storage Building will direct any liquid to the sumps. The container storage areas will be inspected at least once a week for accumulation of liquids, and any accumulation will be removed from the container storage area and/or sumps in as timely a manner as possible but no later than within 24 hours of detection

by PFF personnel. Material removed from the container storage area and/or sump will be characterized and managed in accordance with applicable regulations. In addition, all containers stored in the Processing and Storage Building are kept off the floor on pallets or, in the case of totes, on built-in legs that prevent tote contact with any standing liquids.

The concrete slab in the Treatment and Operations Building and in the LSV Processing and Storage Warehouse is on a near level gradient. These container storage areas will be inspected at least once a week for accumulation of liquids, which will be remediated in as timely a manner as possible but no later than within 24 hours of detection. Depending on the amount involved, absorbents, submersible pumps, or a vacuum truck will be used to remove any liquids. All containers stored in the Treatment and Operations Building and in the LSV Processing and Storage Warehouse will also be kept off the floor on pallets or, in the case of totes, on built-in legs that prevent tote contact with standing liquids. All material removed from secondary containment areas will be characterized in accordance with 40 CFR 262.11 and stored, treated, or disposed of accordingly.

Ignitable, Reactive, and Incompatible Wastes

No container of ignitable or reactive waste will be stored within 15 meters (50 feet) of the Facility property line or a public right-of-way as shown on Figure I-1 in Part I of this permit application. Hazardous waste will not be placed in an unwashed container that previously held an incompatible waste or material. A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers or open tanks will be separated from the other materials or protected from them by means of a dike, berm, wall, or other device.

In order to ensure compatibility of waste streams intended for co-mingling, PFF will implement the following management procedures prior to mixing potentially incompatible wastes.

- Prior to receipt at the Facility, all hazardous wastes must be profiled and preapproved. See the Facility Waste Analysis Plan (WAP) (Appendix II-A-4 of this permit application) for details on the approval and profile process.
- Containers of incompatible waste identified by the waste profile and/or WAP will be segregated from each other.
- Potentially incompatible wastes will be mixed together in small quantities and observed for undesirable reactions prior to being stored, treated, or otherwise managed together at the Facility. See the WAP for compatibility testing details. Incompatible wastes, or incompatible wastes and materials, will not be placed in the same container (or an unwashed container), unless the requirements of 40 CFR 264.17(b) are complied with.
- Lab Pack packing lists will be reviewed to identify potentially incompatible wastes.
- During Lab Pack decommissioning (transfer of waste from small containers to bulk containers), potentially incompatible wastes will not be bulked together unless compatibility testing indicates that the wastes may be

combined i.e., the requirements of 40 CFR 264.17 (b) are complied with. Incoming Lab Pack wastes determined to be incompatible will be segregated from each other and shipped off site for disposal in separate containers unless treated or deactivated and made compatible. See Figures I-6-A and I-6-B in Part I of this permit application for an illustration of segregated storage bays.

Condition and Management of Containers

Upon receipt of a shipment of containers, PFF personnel will review the manifest and other documents accompanying the shipment for completeness and accuracy and to identify the shipment and verify its compliance with 40 CFR 264.71 and 40 CFR 264.72. After verification, the containers will be inspected for defects and/or unacceptable conditions, as required in 40 CFR 264.171. If a container is found to be leaking, or is of questionable integrity, the container will be overpacked or its contents transferred into another container in good condition. If, following analysis in accordance with the WAP, the contents of a container are found to be unacceptable, the containerized waste will be rejected and returned to the generator, or sent to an alternate TSD, per the generator's instructions.

A representative sample of the incoming waste will be collected and analyzed in accordance with the Waste Receipt Analysis section of the WAP to determine consistency with the waste profile. Containers of waste will remain in the receiving area portions of the storage areas until accepted for storage in accordance with the WAP. Upon acceptance, containers will be moved to one of the container storage areas in the Processing and Storage Building, Treatment and Operations Building, or LSV Processing and Storage Warehouse. Unacceptable or rejected containers will be stored in one of the container storage areas until transportation to the generator or an alternate TSD can be arranged.

- All containers will be managed as if they contain free liquids until determined by Facility personnel to contain solids through inspection and/or sampling. Containers of hazardous waste will be kept closed except during sampling or when hazardous waste is added or removed. All 55-gallon containers will be palletized upon arrival, and all palletized containers will be banded when double- stacked, except for the chemotherapy drugs and other pharmaceuticals stored in the cage area in Zone 2 of the Processing and Storage Building where pallets of chemotherapy drugs and pharmaceutical waste can be stacked three pallets high.
- Adequate aisle space will be maintained in all areas of the Facility to provide unobstructed movement of personnel, material handling machinery, fire suppression equipment and spill control equipment. Pallets of hazardous waste containers or drums in storage areas that may be stacked up two high (except for chemotherapy drugs and pharmaceutical waste) will be banded and situated so that at least two sides of each pallet are visible and accessible at all times. Pallets or drums are added and removed from the ends of rows by lift trucks.

All containers received from off-site must meet US Department of Transportation (DOT) requirements for the material being shipped in the container. Containers that do not meet DOT requirements will be overpacked into suitable containers for storage and/or shipment off site.

Examples of containers typically received at the Facility will include:

- 55-gallon steel drums (on standard pallets)¹
- 55- and 30-gallon poly drums (on standard pallets)¹
- 30-gallon steel and poly drums (on standard pallets)²
- 5-gallon steel and poly drums (on standard pallets)
- DOT overpacked drums containing glass vials, plastic vials, ½- to 1-gallon glass or plastic containers, and up to 30-gallon plastic carboy containers (on standard pallets)
- DOT specification roll-off containers
- DOT specification fiberboard containers (on standard pallets)
- DOT specification tote tanks (up to 550-gallon capacity)³
- DOT specification tanker/trailers (not stored in container storage areas)
- Other DOT-approved (performance-oriented) containers (on standard pallets)

B-25 and B-12 Containers: these are 96 and 48 cubic feet Strong Type A containers used by the Nuclear Waste industry, typical dimensions are 6'W x 4'H x 4'D for the B-25 and 6'W x 2'H x 4'D for the B-12.

Figures I-6-A and I-6-B, I-12, and I-15 in Part I of this permit application illustrate typical container storage configurations in the container storage areas. These configurations are for illustration purposes only. PFF will only receive containers made of or lined with materials that will not react with and are otherwise compatible with the hazardous waste to be stored.

¹ Typical dimensions: 55-gal drum – 36" x 22" dia; 30-gal drum – 27" x 18" dia; 5-gal container – 14" x 10" dia.

² Typical dimensions: 55-gal drum – 36" x 22" dia; 30-gal drum – 27" x 18" dia; 5-gal container – 14" x 10" dia.

³ Totes are on legs, which keep them off the ground and away from accumulated liquid in containment areas. The dimensions for 450-gallon totes are 4 feet by 4.5 feet (base) by 5 feet, 4 inches (height). 450-gallon totes have 5.5- inch legs. 550-gallon totes have a base that is 3.5 feet by 4 feet and are 6 feet, 3 inches tall. 550-gallon totes sit on 6.5-inch legs.

Inspections

PFF personnel will inspect areas where containers are stored or treated at least once per week. The inspections will cover proper placement of containers for ready access, container conditions, labeling, and inventory control. A detailed inspection log is maintained to ensure compliance with applicable Florida container and tank inspection requirements. An example of inspection log for container storage areas is included as Table II-4. Inspection logs will be maintained in the Facility operating record for a period of at least three years.

Closure Plan and Closure Cost Estimate

A copy of the Facility Closure Plan and closure cost estimate is included in Section II.K of Part II of this application.

C TANK SYSTEMS

C.1 TANK SYSTEM INTEGRITY

The integrity of the existing tank has been certified by Lewis Engineering and Consulting, Inc. (Appendix II-C-1). The certification by Richard Lewis, a professional engineer, found the tank to be structurally sound. The certification process included a review of Facility records for the tank system, a visual inspection of the tank, and an ultrasonic thickness survey of the tank walls. The visual inspection found no leaks or exterior corrosion of the tank. The ultrasonic survey found that the head and shell thickness was nominally 0.25 inch.

Figures II-C-1 and II-C-2 provide design details of the tank.

The storage tank is located within the walls of the secondary containment system. Foundation support for the full storage tank is provided by the concrete floor of the containment structure and underlying soil. Foundation calculations for the storage tank are provided in Appendix II-C-2. Based on this review, the tank foundation is designed to maintain the load of a full tank in a satisfactory manner. The tank is supported by three carbon steel support frames. The foundation appears to be adequate to resist anticipated frost heave.

Ancillary equipment is provided with secondary containment. The piping from the LSV Processing area is contained in a sealed concrete pipe valley. The pipe valley is overlaid with a steel grid making the piping available for inspection by Facility personnel at all times.

C.2 TANK SYSTEM AND ANCILLARY EQUIPMENT DESCRIPTION

The facility storage includes an aboveground 3,000-gallon tank to accumulate and store mixed liquid wastes solely that are ultimately transported off-site for energy recovery. The tank was constructed in 1999. The tank is installed



horizontally on steel supports in a concrete block secondary containment structure inside the Processing and Storage Building. (See Figure I-12 in Part I of this application for the tank location.) The tank is connected to the liquid scintillation vial (LSV) processing system located in the LSV Processing and Waste Storage Warehouse. The connection is through piping running from the LSV processing area to the tank. See Figures I-13 and I-14 in Part I of this application for process flow diagrams. See Figure II-C-3 for the LVS piping diagram.

The feed system associated with the 3,000-gallon bulk storage tank consists of the following equipment:

- Type 5, air driven, dual diaphragm pump.
- Pump suction line with ball valve.
- Pump discharge line with ball valve.
- Main fluid discharge control ball valve.
- Discharge hose connection.
- Main pump cutoff ball valve.
- Piping from the pump to the bulk tank.

The materials stored in the 3,000-gallon tank consist of the scintillation fluids, and solvent-based liquid carriers used for scintillation fluids, rinse solvents and other mixed organics (e.g., ethanol) used to clean the vial glass. Major compounds that may individually constitute up to 25% of the supplemental fuel include ethanol, toluene, and xylenes. Toluene and xylenes are contained in scintillation fluids, and ethanol is the primary solvent of choice, although conditions may occur requiring the use of other rinse solutions (isopropyl alcohol, detergents, etc.). Figures I-15, I-16, I-17, and I-18 in Part I of this permit application show the location of the LSV processing area and associated equipment.

C.3 DESCRIPTION OF SAFETY SYSTEMS AND CONTROLS

40 CFR 264.31 requires facilities to be designed, constructed, maintained, and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents. The following addresses the equipment and procedures employed by PFF to facilitate compliance with 40 CFR 264.31.

All flanges and openings on the tank have been sealed to minimize the emission of volatile organic chemicals (VOCs). This sealing is accomplished by using rubber seals on doors/latches wherever there are openings (i.e., hinged hatch and manway shown in Figure II-C-1). In addition, even though the mixed waste storage tank is exempt from 40 CFR 264

Subpart CC VOC emission control requirements while storing mixed waste per 40 CFR 264.1080(b)(6), the tank is designed and will be operated in a manner consistent with Subpart CC Level 1 emission controls. Specifically, the following controls will be maintained:

- Fixed Roof.
- Vent pipe with a spring-loaded pressure relief valve.

The tank is equipped with mechanical pressure and temperature gauges, as well as a fill gauge. Overfill protection is provided by an intrinsically safe high-level alarm. The alarm emits an audible signal and shuts off power to the tank feed pump when the tank level reaches 80% of its capacity.

In addition, the tank is grounded to prevent risks associated with potential electrical surges and is located within containment in the Processing and Storage Building to prevent releases to the soil or surface water. Exposure to the sun and extreme temperatures is not an issue because the tank is under a roof, which protects it from direct sunlight.

C.4 DIAGRAM OF PIPING, INSTRUMENTATION, AND PROCESS FLOW

A process flow diagram is presented in Figure I-13 in Part I of this application. The piping diagram is provided as Figure II-C-3.

C.5 CORROSION PROTECTION

The tank system and its appurtenances are not directly exposed to the weather. Since the tank and associated fixtures are made of stainless steel, they are not painted. Exposed piping is galvanized and not painted. The P.E. certification report (Appendix II-C-1) indicates that there has been no deterioration of the tank.

Surface protection for the secondary containment has been provided. This protection consists of application of a sealant (e.g., Ashford Formula) to the containment floors. This application seals cracks and voids in the structure surfaces and hardens the concrete surface to provide good resistance to splashes and spillage that may occur in the containment area.

C.6 NEW TANK SYSTEMS

There are no new tank systems on site. Section C.6 does not apply to this permit application.

C.7 SECONDARY CONTAINMENT SYSTEM ASSESSMENT

The following paragraphs give a detailed comparison between current containment system features and applicable requirements. For brevity, “secondary containment” as used here means features that meet the requirements of 40 CFR 264.193.

A. Materials compatibility (40 CFR 264.193(c)(1))

The primary waste material collected and stored in the tank system consists of toluene, xylenes, ethanol, or other selected rinse solvents/solutions. The primary hazardous characteristic of the waste is ignitability. These wastes are considered compatible with the system materials of construction (primarily concrete, stainless and galvanized steel, and the concrete sealer/hardener).

B. Strength and Foundation (40 CFR 264.193(c)(2))

The most critical strength requirement for the floor slab of the tank containment structure is its service as foundation support for the tank when full. Pressures on the soils below the floor slab are well below acceptable levels (see Appendix II-C-2). Satisfactory service with practically no cracking of the slab or the containment walls is further evidence of the adequacy of the system. As previously stated, the foundation support is adequate to prevent failure due to settlement, compression, uplift, or pressure gradients. The carrying capacity of the floor under the tank supports is enhanced by increased concrete thickness and steel reinforcing.

C. Leak Detection (40 CFR 264.193(c)(3))

All components of this system are accessible for visual inspection. Leak detection is provided by a documented daily visual inspection of the tank system on each day it contains hazardous waste.

The Inspection Log for the tank is included as Table II-5. Overfill protection is provided by a high-level alarm that emits an audible alarm and shuts off the feed pump when the tank level reaches 80% capacity (i.e., 4 feet). Normal operating practice will be to keep the tank level below 4.0 feet.

D. Liquid Removal (40 CFR 264.193(c)(4))

Liquid removal from the secondary containment is accomplished by a vacuum pump that removes liquid from a blind sump within the containment to the tank or other container. The containment floor is sloped to the blind sump.

E. External Liner System (40 CFR 264.193(d) and (e)(1))

As documented in Appendix II-C-3, the secondary containment for the tank system has a design capacity (4,870 gallons) sufficient to hold more than 100 percent of the tank’s capacity (3,000 gallons). Inspection of the facility in January 1988 demonstrated that the secondary containment floor slab and walls were free of cracks and gaps (see Appendix II-C-3). The impermeable sealant/hardener described in Appendix II-C-4

had been applied to the floor. The containment completely surrounds the tank and is capable of preventing both lateral and vertical migration of the waste.

C.8 VARIANCES

There are no variances for this site. Section C.8 does not apply to this permit application.

C.9 SPILLS AND OVERFLOW PROTECTION

The tank feed lines are utilized only in a batch mode and are not prone to fluid loss. Detailed inventory logs are maintained for each process batch, with any potential losses occurring in the transfer of fluids being readily identified. The overflow protective device is interlocked to the fluid feed system to prevent overfilling. The tank has a high-level alarm that shuts off the feed pump when the tank reaches 80% capacity. The feed system will not function, and an alarm will sound. The high-level alarm is inspected each day the tank contains hazardous waste to ensure its operability.

The bulk tank is compatible with flammable liquids and is permanently grounded via a dedicated grounding system.

C.10 IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES IN TANKS

The 3,000-gallon storage tank is a dedicated tank and will only receive mixed liquid wastes. PFF operating procedures, including waste profile review prior to acceptance and evaluation upon arrival at PFF, are designed to prevent the addition of incompatible wastes that could cause failure of the tank system.

Specifically, PFF will not place incompatible wastes, or incompatible wastes and materials, in the same tank per the requirements of 40 CFR 264.17(b). Wastes designated as D002 will not be managed in the tank system. Stored waste is protected from any material or condition that may cause the waste to react or ignite. The tank content is tested prior to each shipment for disposal as described in the Waste Analysis Plan (Section 6.0). The fluids are pumped into and out of the tank through a manifold system.

The tank location meets the requirement of 40 CFR 264.198(b) regarding maintenance of protective distance from the public way or adjoining property line that can be built upon.

C.11 INSPECTION REQUIREMENTS

The bulk tank, its associated equipment, and containment are inspected each day the tank contains hazardous waste in accordance with applicable requirements of 40 CFR 264.195. Detailed inspection logs are maintained in the Facility Operating Record for at least three years from the date of inspection. An example inspection log for a tank is included in Table II-5.

C.12 RESPONSE TO LEAKS OR SPILLS

Should there be a leak or spill from the storage tank and/or its secondary containment or if the tank system is unfit for use, the following will be performed:

PFF will immediately stop flow to the tank or to the secondary containment and inspect the system to determine the cause of release.

If the release was from a tank system, hazardous waste will be removed from the tank as much as possible to prevent further release within 24 hours of release detection. If can be demonstrated that this time frame is not feasible, then waste removal from the tank will be conducted at the earliest practicable time. Inspections and repair to the tank system will be performed after removal of waste.

Accumulated liquids will be removed from the secondary containment as soon as it is practicable and safe to do so; but no later than 24 hours after detection.

Upon detection of a release, a visual inspection of the release will be immediately conducted to prevent further migration of the leak, or spill to soils or surface water. If visual inspection reveals contamination of soil or surface water, the contaminated media will be removed and properly disposed of. Proper disposal will require waste characterization of the contaminated soil or surface water.

PFF will prevent further migration of the leak or spill.

In accordance with 40 CFR 264.196(d), any release of hazardous waste into the environment, except as provided in paragraph (d)(2), will be reported to the hazardous waste section of the DEP's N.E. District Office within 24 hours of its detection. A report of a release in excess of the reportable quantity (RQ) as specified in 40 CFR Part 302 will satisfy this requirement. In addition, reporting is not required if the leak or spill is confined in the tank secondary containment system, as explained on page 25455 of the Federal Register dated July 14, 1986. Any leak or spill of hazardous

waste of less than one (1) pound that is immediately contained and cleaned up will be exempt from the reporting requirement.

A written report in accordance with the requirements of 40 CFR 264.196(d)(3) will be sent to the DEP within 30 days of detection of a reportable release.

PFF will perform the repairs, or provide secondary containment, as required, prior to returning the tank system to service.

If repairs are extensive, PFF will obtain a certification from a qualified professional engineer registered in the state of Florida, prior to returning the tank system to service. A copy of such certification will be kept in the facility operating record until the closure of the facility, in accordance with 40 CFR 264.196(f).

The PFF Spill Prevention, Control, and Countermeasure Plan (SPCC) has been included as Appendix II-C-5.

C.13 TANK SYSTEMS THAT DO NOT MEET REQUIREMENTS

The PFF tank systems meet requirements of 40 CFR 264.193.

C.14 CLOSURE PLAN

A copy of the Facility Closure Plan is included in Section K of this permit application.

C.15 CLOSURE COST ESTIMATE

A copy of the Facility Closure Cost Estimate is included in Section K of this permit application.

I MISCELLANEOUS UNITS

I.1 DESCRIPTION OF MISCELLANEOUS UNITS

This section describes the Perma-Fix II® process that may be identified as a miscellaneous unit regulated under 40 CFR 264 Subpart X. The unit will be used to physically and/or chemically treat hazardous wastes and/or non-RCRA radioactive wastes. This section of the permit application is intended to address the regulations for miscellaneous units applicable to this process.



PFF conducts thermal desorption and/or chemical oxidation/reduction in a treatment unit. The operation is a proprietary process known as Perma-Fix II® (PF-II). A detailed description of the proposed batch unit and its operation follows. The batch thermal desorber is planned to be replaced with an externally heated batch retort including new condensers and vacuum pumps, which is described in Appendix II-I-1. The new replacement PF-II unit is anticipated to have a similar 3,000 lbs./day waste processing rate. In addition, the supporting PF-II ancillary equipment, including the associated air pollution control systems, are planned for upgrade or replacement.

Process Description

The PF-II process typically consists of three primary steps used to treat organic contaminated soils, sludge, or other process waste (e.g., waste media not classified as debris or <60 mm particle size). Wastes selected for PF-II treatment require compliance with the treatment standards identified in 40 CFR Parts 268.40, 268.48, or 268.49 prior to land disposal. Dependent upon generator waste profile information and/or PFF process control analyses, PF-II treated waste may require PF-I treatment (metals stabilization) to ensure total compliance with the identified regulations.

PF-II treatment candidates are identified using the information provided by generators on waste (material) profile forms and accompanying support documentation such as land disposal restriction (LDR) notification forms. Example material profile and LDR forms are included as Appendix II-I-2 and I-3. Upon arrival at the facility, wastes are evaluated for proper management (storage and/or treatment) per the Waste Management Decision Trees of Figures I-8, I-9, I-19, and I-20 in Part I of this application.

See Figures I-6-A and I-6-B in Part I of this application for the general layout of the Treatment and Operations Building and the location of the PF-II process equipment and container storage areas. See Figure II-I-1-B for the proposed PF-II process layout. See Appendix II-I-1 of this permit application section for a detailed description.

The PF-II process is conducted inside the Treatment and Operations Building (TOB). Emissions from treatment activities inside the TOB are controlled using a negative pressure ventilated system consisting of a dust collector, four HEPA filters (each rated at 1,000 cfm), and a regenerative thermal oxidizer (RTO). These units are collectively referred to as the “air emissions control system”.

Feed Stock Preparation

Containers of hazardous waste requiring PF-II treatment are delivered to the TOB by powered lift trucks or drum dollies.

PF-II candidate waste streams are visually and physically screened for nonconforming items (e.g., items identified as debris according to 40 CFR 268.45). Non-debris solids (PF-II waste) are consolidated separately for the PF-II treatment. All drum unloading activities take place at ambient temperature while the TOB is under negative pressure.

Waste Treatment

Preconditioning

The first treatment step of the PF-II process usually involves pre-conditioning of the waste. Select solvents (as determined through preliminary data review or bench testing) are added to the waste and mixed to remove soluble organics that typically prohibit successful thermal operations. Some waste streams that have a high solubility potential (i.e., paint-related materials), are drastically reduced in volume during the pre-conditioning stage. This reduction is beneficial since it minimizes the solids destined for land disposal. Wastes that do not require pre-conditioning (e.g., lightly contaminated soils) are sent directly to thermal desorption.

The pre-conditioning activities are conducted using the pneumatic drum tumbler. The pneumatic drum tumbler is an end-over-end rotation device that can accommodate 55- or 85-gallon container(s). Approximately one-third of the tumbling vessel is filled with PF- II waste. An equivalent volume of a select solvent is added to the vessel. The tumbling vessel is closed appropriately using a bung-top lid. A pressure relief device is placed in the bunghole. The waste and solvent are tumbled for a predetermined amount of time (to achieve sufficient solvent extraction). The vessel's bung top lid is removed and replaced with a perforated lid. The vessel is drained of its liquid-phase contents into a catch-pan.

The process is repeated with a follow-up pre-conditioning step using a solvent with an opposing chemical polarity. Typically, the solvents of choice are hexane followed by water. In certain cases, other more effective solvents are selected through bench testing.

Thermal Desorption

Figures I-11-A and I-11-B in Part I of this application provides a process schematic for the thermal desorption step of the PF-II process. Wastes selected for thermal desorption are transferred from their holding container (normally a 55-gallon drum) into 5-gallon buckets using a shovel. The buckets of PF-II waste solids are loaded into trays for the proposed unit, which are then loaded into the retort. If appropriate, water may be added to the reactor vessel and

thoroughly mixed with the waste to form a homogeneous mixture or slurry¹. The slurry is mixed and externally heated in the retort reactor vessel. Non-contact steam circulated through a temperature control jacket is used to heat the reactor vessel and its contents². During this phase of the process, the liquid portions of the waste evaporate, and water and organic constituents pass through the heat exchanger (condenser) where part of the vaporized waste is condensed (liquid phase) and part remains in the vapor phase.

The vapor phase and condensate (liquid phase) are discharged into accumulator tanks. From there, the small volume of non-condensable vapors that pass through the vacuum pumps downstream of the condenser go to the RTO to destroy residual organics. Nitrogen may be used to blanket the waste inside the process.

The process of heating the waste and removing the water and/or organic constituents from the vaporized waste continues until the free water and organic constituents have been stripped from the waste and collected in the accumulation tanks. The absorber tank vents to the air emission control system. This system operates under a vacuum and an inert atmosphere (e.g., nitrogen blanket) to prevent explosions and fires.

Once the thermal desorption step is complete, the condensate and liquid treatment residuals are collected from the accumulator tanks; containerized; characterized; and sent off site to a permitted waste management facility. The treated waste solids are containerized. Prior to container closure, a sample of the treated solid residuals is obtained and analyzed for compliance with the land disposal treatment standard. The containerized waste solids are placed in storage pending the results of the analytical tests.

If the PFF process control analyses determine the waste has not been successfully treated, the waste residuals may undergo additional cycles of pre-conditioning and thermal treatment or undergo chemical oxidation/reduction.

If successful treatment of the organic constituents is determined by the PFF laboratory screening analysis, the residual waste may require treatment for inorganic contaminants using the PF-I process. The waste solids remain in storage until the PF-I treatment is conducted. Once all applicable land disposal treatment standards are met, treated wastes are stored until a sufficient number of containers are obtained to support a shipment for disposal to a permitted waste management facility. Treated wastes will not be stored for more than a year.

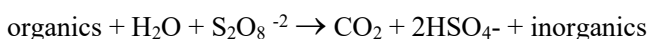
¹ Alternatively, some waste may already be in slurry form when introduced into the reactor vessel and will not require the addition of water. In addition, certain wastes may require the addition of surfactants or organic solvents (e.g., hexane) to the waste slurry to mobilize contaminants and facilitate the treatment process. This step is conducted, when needed, during the pre-conditioning stage of the PF-II process.

² Alternatively, hot water or cold water can be circulated through the system to control the temperature in the reactor vessel.

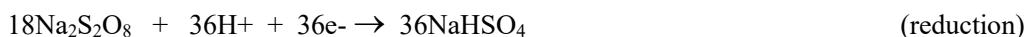
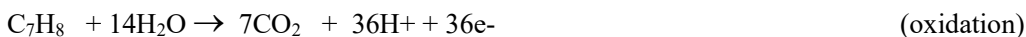
Chemical Oxidation

If chemical oxidation treatment is required, the type and amount of oxidizer to be used is selected by bench tests carried out on that particular waste stream. The possible oxidizers are: peroxydisulfate salts (solid or in solution), persulfuric acid, and/or hydrogen peroxide. Water is added to the reactor vessel if deemed necessary to dissolve the oxidizer. Mixing is resumed, and the temperature of the vessel is raised enough to allow the oxidation reaction to begin (approximately 75 to 85°C). Any vapors created during this step are condensed in the condenser, and the condensate is discharged into the accumulator tanks.

An example oxidation chemical reaction is as follows:



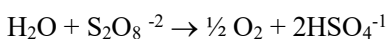
Example using sodium peroxydisulfate and toluene as the organic contaminant:



Example using hydrogen peroxide:



Water is also capable of reducing the oxidizer:



Oxygen is produced during the oxidation step. Through bench tests, it has been determined that the amount of volatile and semi-volatile organic compounds left in the stream after the thermal desorption step is very low; consequently, the amounts of off-gasses produced from the oxidation of chlorinated organic compounds, namely hydrochloric acid and chlorine gas, are also very low.

The time required to complete the oxidation process depends on temperature, the waste stream composition, and the amount of water added. Before the reaction is assumed to be complete, a sample of the aqueous phase is titrated to determine the concentration of unreacted oxidizer. When the oxidizer has been depleted, the oxidation step is considered complete.

Upon completion of the oxidation step, the reactor vessel is allowed to cool, and, if necessary, either calcium hydroxide or sodium hydroxide is added to adjust the pH of the mixture to within a range that minimizes corrosion of the PF-II process equipment. The reactor vessel may be heated to the boiling point of water to dry the slurry as appropriate for further treatment and/or disposal. The water condensed from the drying of the oxidized stream is discharged into the accumulator tanks. Condensed/separated organic liquids recovered from the vaporized organic constituents are collected in the accumulator tanks and pumped into drums when the treatment run is complete. An inert atmosphere (e.g., nitrogen blanket) is provided at all times during treatment operations to prevent explosions and fires.

The non-volatile residual solids remaining in the reactor vessel are discharged into 55- gallon drums through a pneumatic guillotine valve located beneath the reactor vessel. Prior to container closure, a sample of the treated residual solids is obtained and analyzed for compliance with the appropriate treatment standard. The containerized residual solids are placed in proper storage awaiting analytical determination.

If the PFF process control analyses determine the residual solids have not been successfully treated for organics, the residual solids will undergo additional cycles of pre- conditioning and thermal treatment or undergo the chemical oxidation step again.

If analysis indicates successful treatment of the organic constituents, the residual solids may require treatment for inorganic contaminants using the PF-I process. The residual solids remain in storage until the PF-I treatment is conducted. Once all applicable treatment standards are met, the residual solids are stored until a sufficient number of containers are obtained to support a shipment for disposal to a permitted waste management facility. The residual solids storage period will not exceed one year.

Process Residuals Management

The various steps in the PF-II process may generate several types of waste. These wastes will be characterized in accordance with the requirements of 40 CFR 262. Waste characterization may include the application of knowledge of the PF-II process and/or analytical testing pursuant to the Facility's Waste Analysis Plan. Generally, PFF will "carry through" all listed waste codes to each of the residual wastes generated by the PF- II process. In other words, PF-II residual wastes will be generated and manifested with the same listed waste codes assigned to the waste prior to its

treatment. Appropriate characteristic waste codes will be retained or assigned to the residual wastes at the waste stream's final point of generation (prior to its being shipped off site). The anticipated disposition of residual wastes is discussed in further detail below.

- Wastes treated to meet the land disposal restrictions for hazardous waste constituents by thermal desorption, chemical oxidation, and/or stabilization/solidification, will be shipped to a permitted waste facility for disposal.
- The condensed volatiles separated by the thermal desorption process will be shipped to a permitted waste facility for energy recovery.
- The segregated debris is containerized in 55-gallon drums and placed in storage in the container storage area located in the TOB awaiting debris treatment and/or final packaging and shipment to a permitted waste management facility.
- RCRA empty containers originating from the PF-II activities are compacted, consolidated and managed as non-RCRA radioactive waste. The non-RCRA radioactive waste is stored until sufficient quantities are collected, at which point the waste is sent to a permitted waste management facility for final disposal.

Decontamination Procedures

Decontamination of PF-II process equipment will be conducted whenever it would be inappropriate for treated wastes to come in contact with residuals from wastes previously treated in the equipment (e.g., when potentially incompatible wastes are involved or high radio-isotopic activity levels require decontamination to minimize cross-contamination).

When necessary, PF-II process equipment will be decontaminated as follows:

The tray surfaces, the interior of the reactor vessel, and the contact surfaces of the unloading valve will be scraped, wiped, and rinsed. The recovered solids collected in the reactor vessel will be scraped, swept, and/or wiped out through the unloading valve at the bottom of the reactor.

When necessary, the PF-II process organic constituent recovery system (i.e., condenser, accumulator, and associated piping) will be decontaminated as follows:

The accumulator tanks will be emptied. Next, approximately 55 gallons of water will be heated and evaporated in the reactor vessel, flushing all the condensing surfaces in the organic constituent recovery system. If further decontamination is necessary, the accumulator tanks will be rinsed with water until no phasing or discoloration is detected in any of the units.



Physical Characteristics, Materials of Construction, and Dimensions of the Unit

A list and description of equipment currently contained in the design of the PF-II process system is included as Appendix II-I-2.

The PF-II process equipment is designed, located, constructed, operated, maintained, monitored, inspected, and closed in accordance with the applicable requirements of 40 CFR 264. A copy of the inspection schedule for the PF-II processing area and equipment is included as Table II-6 of this section. All relevant procedures to prevent hazards, inspections, testing, and maintenance and closure procedures and containment requirements addressed in this permit application for tanks and containers are applied to the construction and operation of the PF-II process equipment as well. Records of inspections, etc. will be maintained in the Facility Operating Record. The PF-II process equipment and location has been addressed in the Facility Closure Plan included in this permit application.

Reactor Vessel

The proposed reactor vessel is designed to process 15 cubic feet (cft) of slurry or solids. The ideal waste to water ratio is estimated to range from 1:1 to 1:2. However, the optimal water content may vary for particular waste streams. The duration of the desorption process depends on the organic contaminant loading of the particular wastes as well as the processing temperatures. The organic contaminant levels are predetermined through onsite testing activities prior to processing. Preconditioning and or oxidization methodologies to reduce contaminate levels may also be used prior to desorption to minimize process duration. An inert atmosphere (e.g., nitrogen blanket) is provided at all times during treatment operations to prevent explosions and fires.

The electric heating jacket unit has a design pressure of +/-29" Hg and a design temperature of 1200°F. The jacket is constructed of stainless steel (SS), which is compatible with steam or hot water. The pressure relief valves are tested on an annual basis, with documentation in the Facility Operating Record.

Condenser

The shell and tubes of the condenser have a design pressure of 14.7 psi. The shell (non- waste contact) side of the condenser is constructed of carbon steel, which is compatible with the cooling water to be circulated through the

condenser. The tube (waste contact) side of the condenser is constructed of SS, which is compatible with the waste to be processed.

The centrifugal pump with a maximum head pressure of approximately 30 psi is used to circulate water through the shell of the condenser. The pressure generated by the circulation pump is well below the design pressure of 14.7 psi for the shell of the condenser.

Accumulator

The accumulator tanks have a design pressure of 15 psi. The tanks are constructed of SS, which is compatible with the material being contained in the accumulator. The accumulator operates at about 70°F. The top accumulator tank can hold 18 gallons while the bottom tank can hold 125 gallons.

Absorber

In the proposed process, with refrigerated condensers, the absorber tank is eliminated.

I.2 ENVIRONMENTAL PERFORMANCE STANDARDS

Release Prevention

The hydrogeologic, geologic, and meteorological factors of concern for the PFF Facility site and surrounding areas are addressed in Section A of this permit application. For purposes of ensuring protection of human health and the environment, PFF will operate the PF-II process equipment in conformance with applicable container and tank standards. Appropriate secondary containment and air emission controls are incorporated into the design and operation of the equipment. See Part II, Section B of this permit application for details regarding containment; management of ignitable, reactive, and incompatible wastes; condition and management of containers; inspections; and prevention of run on and accumulation of precipitation in the Treatment and Operations Building where the PF-II process operations take place.

Prevention of Releases to Groundwater or Subsurface Environment

Releases to groundwater or the subsurface environment from the PF-II treatment process are extremely unlikely for the following reasons:

- The process will manage relatively small volumes of material; i.e., each treatment batch is approximately 15 cft of waste.
- The unit is located within a secondary containment system designed to meet the requirements of 40 CFR 264, Subparts I and J. The containment system is designed to contain the entire volume of the waste being treated plus



the volume of containers staged for processing. A sealant (e.g., Ashford Formula, which is a concrete sealer and hardener) has been applied to the containment system floor and walls. Containment calculations are included as Table II-7. In the future, sealants other than Ashford Formula may be used to provide a sufficiently impervious floor, in accordance with 40 CFR 264.175(b)(1).

- The PF-II process area will be inspected each operating day. Leaks or spills from the system will be cleaned up immediately upon detection or as soon as it is practicable and safe to do so.
- The system is located within the TOB; i.e., the system is physically separated from the subsurface environment and groundwater.
- PFF maintains a Contingency Plan to provide a framework for PFF responses to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the PF-II process.

Prevention of Releases to Surface Water, Wetlands, or Soil Surface

Releases to surface water, wetlands, or soil surface from the PF-II process are also extremely unlikely for the reasons listed above.

Prevention of Releases to Air

Releases to air from the PF-II process are extremely unlikely for the following reasons:

- The system is located within an enclosure inside the TOB. The enclosure is equipped with an emissions control system. The emissions control system is designed to handle the volume of organic emissions anticipated from the process. See air emissions control system description below.
- Organic vapors released from the waste streams in the reactor vessel during processing will be routed to a condenser. Liquids from the condenser will be transferred to the separator, while uncondensed vapors are routed through the HEPA filter and RTO.
- Emissions at the reactor vessel loading point are minimized by limiting the time the containers are open prior to processing.
- Emissions during unloading of the reactor vessel are minimal because the potential air contaminants will be significantly removed or destroyed during processing.

Air Emissions Control System

PFF has installed and operates an organic emissions control system consisting of a regenerative (heat recovering) thermal oxidizer designed to control the emission of volatile organic compounds (VOCs) from the LSV processing area and the PF-II treatment operations enclosure in the TOB. The oxidizer will use a higher temperature to destroy VOCs. The following provides an overview of the current system. Figures I-21 through I-23 in Part I of this application are system layout, P&ID, and general arrangement drawings detailing this system.

Process VOCs are delivered to the air emission control system fan. This fan provides the motive force for the system. From the fan, the airstream moves to a switching valve for distribution into one of two heat recovery chambers filled with ceramic media to provide heat transfer. Recovery of up to 95% of thermal energy is accomplished using ceramic media. The airstream travels upward through the ceramic media and is preheated by the heat previously absorbed (retained in the ceramic media) to a temperature of approximately 1,300°F prior to entry into the combustion chamber. In the combustion chamber, the temperature is raised to approximately 1,500°F by a burner, and the VOCs in the airstream are destroyed.

After destruction in the combustion chamber, the cleaned hot gases (airstream) pass downward through the second heat recovery chamber, where heat is absorbed by the ceramic media. The cooled airstream then discharges from the heat recovery chamber through a valve and is ducted to the exhaust stack.

The VOC destruction efficiency specified in the system design is 95% minimum. The system is based on the following design criteria:

<u>Process</u>	<u>LSV Processing</u>	<u>PF-II Treatment Area</u>	<u>Combined</u>
Airflow	4,000 CFM	8,000 CFM	12,000 CFM
Temperature	70°F	70°F	70°F
VOC Concentration	571 ppm	500 ppm (est.)	500 ppm (estimated) ¹

¹ It should be noted that the assumptions used for the design criteria (i.e., air flow and VOC concentration) are purposely conservative to ensure the effectiveness of the thermal oxidizer.

The regenerative thermal oxidizer was designed, installed, and is operated in accordance with the applicable requirements of 40 CFR 264 Subpart AA (Air Emission Standards for Process Vents). See also Part II Section R of this permit application.



Monitoring and Inspections

The PF-II process will be monitored by PFF personnel during process operations. The PF-II process area and equipment will be visually inspected each operating day for evidence of leaks or spills. The inspection will be in accordance with the requirements of the PFF inspection plan. The secondary containment system will also be inspected each operating day for evidence of cracks or breaches in containment as specified in the PFF inspection plan.

I.3 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

PFF workers within the PF-II treatment enclosure are the most likely human receptors of exposure to chemicals or chemical constituents released from the PF-II process. The exposure is anticipated to be minimal because of the negative pressure maintained in the process area and the air emission control system provided for the PF-II process area. The primary pathway for human exposure from the PF-II process is air emissions (volatiles or particulates) generated during the loading and unloading of the preconditioning and reactor vessels.

Personnel operating the system (or personnel present in the PF-II treatment enclosure for any other reason) are required to wear personal protective equipment (PPE) selected to address the potential hazards identified for the wastes to be managed and the operating parameters of the system. The PPE selected will be in accordance with OSHA standards.

Environmental receptors outside of the PF-II treatment enclosure, such as soil, surface water, groundwater, and air, are unlikely to be impacted by the PF-II system due to the air pollution control system, the containment system, and the location of process equipment within a building that physically separates the process area from groundwater, the subsurface environment, and precipitation.

I.4 EFFECTIVENESS OF PERMA-FIX II PROCESS

Experience has shown that >95% of target organic constituents concentrations are removed during the pre-conditioning phase of the PF-II process. Wastes introduced into the reactor following preconditioning have minimal volatile organic emissions. The wastes are primarily wetted sludge. As stated, the organic constituents are removed through solvent extraction during preconditioning. Analytical screening has shown LDR universal treatment standard levels are frequently achieved by pre-conditioning prior to thermal desorption.

The manufacturer's specifications for the reactor vessel and condenser indicate a 67% recovery efficiency for freon. Bench scale testing has indicated worst-case heat exchanger (condenser) efficiencies for typical organic constituents of 69% to 90%. The operation of the accumulator tanks (liquid-liquid extraction) substantially improves the organic

constituent removal/recovery efficiency. Current test results indicate that the thermal desorption and liquid-liquid extraction process will remove more than 90% of the organics contained in the pretreated wastes. This efficiency level has been achieved with low volatility organics such as PCBs as well. It is anticipated that subsequent chemical oxidation, when selected, will effectively destroy the remaining residual organic constituents. VOC emissions from the process will be vented to and/or captured and destroyed by the air emissions control system. The thermal oxidizer will reduce VOCs a minimum of 95%.

The effectiveness of the PF-II process is dependent on the complexity of individual waste streams and individual hazardous waste organic constituents. Waste streams are subjected to the PF-II process until a sample of the treated waste indicates that it meets applicable land disposal restriction treatment levels. Experience has shown that preconditioning of the waste streams followed by thermal desorption has been highly successful and repeat processing cycles are rare. In fact, chemical oxidation is almost never required following the two initial treatment steps.

The treatment steps of the PF-II process (i.e., thermal desorption, condensation, organic separation and absorption, and chemical oxidation) are established technologies comprising the technology-based treatment standards of 40 CFR 268.42, Table 1 based on the following technology codes: chemical or electrolytic oxidation (CHOXD), deactivation (DEACT), liquid-liquid extraction (LLEXT), and recovery of organics (RORGs).

I.5 APPLICABLE TANK STANDARDS

The PF-II process contains several components that have been certified in accordance with certain tank standards, as specified in 40 CFR 264.192. This certification is included as Appendix II-I-5 to this permit application section. Management practices for ignitable, reactive, and incompatible wastes at the facility have been designed to minimize the potential for fires, explosions, gaseous emission, leaching, or other discharge of hazardous waste or hazardous waste constituents that could result from the mixing of incompatible wastes or materials if tank systems ruptured or failed. PFF will not place incompatible wastes or incompatible wastes and materials in the same tank or tank-like system per the requirements of 40 CFR 264.17(b). In addition, hazardous waste will not be placed in a tank or tank-like system that previously held an incompatible waste or material and has not been decontaminated per the requirements of 40 CFR 264.17(b).

Where ignitable or reactive waste will be stored or treated in a tank or tank-like system, the permittee will comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in the NFPA code.¹

In addition, ignitable or reactive waste will not be placed in tank or tank-like systems, unless the waste is treated, rendered, or mixed before or immediately after placement in the tank system so that:

- The resulting waste, mixture, or dissolved material no longer meets the definition of ignitable or reactive waste under 40 CFR 261.21 or 261.23 and the requirements of 40 CFR 264.17(b) are complied with; or
- The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or
- The tank system is used solely for emergencies

New Tank Standards – Tank Assessment

An as-built written certification by an independent, qualified, registered professional engineer for the PF-II process components for handling hazardous waste was submitted to the DEP in October 2000. Please see Appendix II-I-5 for tank certification documentation.

External Corrosion Protection

The PF-II process equipment is located indoors; hence, it is protected from the weather.

Tank Installation and Testing

Prior to placement of a tank or tank-like system in hazardous waste service, an independent, qualified installation inspector or an independent, qualified registered professional engineer inspected the tank system for the following items:

- Weld breaks.
- Punctures.
- Scrapes of protective coatings.
- Cracks.

¹ National Fire Protection Association (NFPA), "Flammable and Combustible Liquids Code," Tables 2-1 through 2-6, 1990. NFPA Tables 2-1 through 2-6, 1977 or 1981, are incorporated by reference into 40 CFR 260.11.

- Corrosion.
- Other structural damage or inadequate construction/installation.

This inspection report will be included as Appendix II-I-5 once installation is complete.

Dimensions and Capacity

Details regarding dimensions and capacity of the PF-II process unit and components are included in the engineering certification provided as Appendix II-I-5 of this permit application section.

Descriptions of Feed Systems, Safety Cut-offs, Bypass Systems, and Pressure Controls

The PF-II process includes enclosed vessels equipped with loading and unloading ports and vents. The reactor vessel is loaded at the top, and contents are piped through downstream equipment via hard piping. The unloading of treatment residuals from the reactor vessel is accomplished from the bottom of the unit. As appropriate, manways are used for inspection and cleaning operations.

Piping between components is regulated by valves (or equivalent devices). Typically, the rigid lines are attached to the tanks by flange couplings. The pressure control system for components consists of thief hatches with a combination of normal venting and a vacuum breaker. A nitrogen purge system is used to minimize the potential for fires or explosions. Additional details of feed systems, safety cutoff, bypass systems, and pressure controls for tank systems are provided in Appendix II-I-1.

Piping, Instrumentation, and Process Flow

The normal process flow for the batch treatment is summarized in the process description provided above. See Figures II-I-2-A and II-I-2-B for the PF-II process flow diagram. See also Figure I-7-A and I-7-B in Part I of this permit application.

High/Low Pressure Piping

The PF-II process incorporates the use of flexible hoses as well as semi-rigid or rigid piping. Hazardous waste transfer on-site will be classified as low-pressure transfer.

Ancillary Equipment

Ancillary equipment consists of piping between the PF-II system components as well as loading and unloading equipment and other container management equipment used in association with the process. Additional details

regarding ancillary equipment are provided in Appendix II-I-4 in Part II and Figures I-7-A and I-7-B in Part I of this permit application.

Containment of Releases

The PF-II process line is located within secondary containment in accordance with the applicable requirements of 40 CFR 264.192. PFF operating procedures include inspections designed to identify spilled liquids in a timely manner. Detailed inspection logs are maintained in the Facility Operating Record for a period of at least three years. After discovery, spilled liquids will be removed from the collection area in as timely a manner as is necessary to prevent overflow of the collection system. Spilled liquids will be identified by visual observation, review of Facility records, and, if necessary, by chemical analysis. If required, analyses will be conducted in accordance with the Facility Waste Analysis Plan.

I.6 CLOSURE PLAN

A copy of the Facility Closure Plan is included in Section K of this permit application.

K CLOSURE

K.1 INTRODUCTION

This section contains a discussion of the steps that shall be taken should PFF decide to partially or completely close hazardous waste operations at the Facility during the intended operating life. Procedures to be used for an unplanned partial closure are, as applicable, similar to the procedures outlined for final closure.

The Closure Plan has been prepared to meet the requirements of Subpart G of 40 CFR 264 and included as Appendix II-K-1. This written plan for closure of hazardous waste management units will be amended, and written notification of or request for a permit modification to authorize the change in the approved Closure Plan will be submitted to the DEP, whenever:

- Changes in operating plans or Facility design affect the Closure Plan.
- In conducting partial or final closure activities, unexpected events require a modification of the approved Closure Plan.

Any modifications to this Closure Plan after the Part B permit are renewed for PFF will be made in accordance with the requirements of 40 CFR 270.42 and Rule 62-730.290, F.A.C. Copies of the approved Closure Plan for the Facility will

be maintained at the Facility office until the DEP has notified PFF of satisfactory closure after reviewing the closure certification.

PFF will submit the notification or request for a permit modification including a copy of the amended Closure Plan, for approval by DEP, at least sixty (60) days prior to any proposed change in Facility design or operation, or no later than sixty (60) days after an unexpected event has occurred which has affected the Closure Plan. If an unexpected event occurs during the partial or final closure period, PFF will notify DEP as soon as possible and will submit a request for a permit modification no later than thirty (30) days after the unexpected event; or will not submit a permit modification request (if agreed to by DEP), and changes to the approved Closure Plan will be documented in the Closure Report. PFF will attempt to meet or discuss with DEP prior to submitting a permit modification regarding any rule changes that could affect the closure plan.

A closure schedule is provided in Table II-9. PFF will close hazardous waste tank and container management units in accordance with this Closure Plan unless an alternate partial or final Closure Plan has been approved by DEP. In accordance with 40 CFR 264.112(e), this Closure Plan shall not preclude PFF from removing hazardous wastes and decontaminating or dismantling equipment in accordance with the approved partial or final Closure Plan at any time before or after notification of partial or final closure.

At the time of closure, all regulated hazardous waste management units and ancillary equipment will be decontaminated and left in place or dismantled and disposed of properly. Within 180 days of receipt of the final waste shipment, the complete waste inventory will be taken for off-site treatment, storage, or disposal, as appropriate. Closure of the permitted units will be completed within 180 days of initiation of closure. In accordance with the requirements of 40 CFR 264.115, PFF will submit to DEP, by registered mail, a certification that the hazardous waste facility has been closed in accordance with specifications in the approved Closure Plan. The certification, to be submitted within 60 days of the completion of final closure, will be signed by PFF and by a qualified professional engineer registered in the state of Florida.

PFF will close the facility in a manner that minimizes the need for further maintenance; controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, surface waters, or atmosphere; and complies with the closure requirements of 40 CFR 264, Subpart G.

A description of the closure procedures to be used to close the existing hazardous waste container storage areas and tank is located in Section K.7. Closure procedures for the proposed units (i.e., Continuous PF-II process) are also

presented in Section K.7. Closure of the hazardous waste container storage areas and tank and the proposed Continuous PF-II process will be conducted such that no post-closure care shall be necessary.

In the event that the clean closure criteria presented in Section K6 cannot be achieved, a closure/post-closure plan will be submitted to the DEP. The Closure Cost Estimate presented in Appendix II-K-2 conservatively assumes that hazardous waste inventory will be treated or disposed of off-site; closure activities will be carried out by third party personnel; and decontaminated equipment will remain on-site. This scenario assumes a “worst case” closure situation.

There is no on-site disposal activity of hazardous waste at the Facility; therefore, there is no disposal capacity to be exhausted. It is anticipated that the Facility will remain in operation at least until the year 2050.

K.2 FACILITY DESCRIPTION

The Facility is located in Gainesville, Florida. The street and the mailing address for the operation is:

Perma-Fix of Florida, Inc.
1940 N.W. 67th Place
Gainesville, FL 32653

A copy of the Closure Plan or the most recent plan revision is maintained at the Facility. It is intended that all closure work will be completed and final with processing and/or removal of all hazardous waste, followed by cleaning and decontamination of the Facility and equipment used in hazardous waste receipt, storage, processing, transfer, and handling; and disposing of wastes generated during closure activities.

K.2.1 IDENTIFICATION OF RCRA PERMITTED UNITS

Closure procedures will be performed on the following units which are/will be utilized for the storage and treatment of hazardous waste during operation of the RCRA facility:

- Processing and Storage Building
- Container Storage Area
- 3,000-Gallon Storage Tank

LSV Building

110-Gallon LSV Fluids Tank Underneath the Outfeed Belt

275-Gallon Test Tank

521-Gallon Portable Debris Vat (Dip Tank) Shredder

Container Storage Area

Treatment and Operations Building

60 cft Reactor Vessel

18-Gallon Top Accumulator Tank

125-Gallon Bottom Accumulator Tank

83-gallon Chiller Tank

Container Storage Area

300-Gallon Non-Elementary Neutralization Tank

Maximum 55-Gallon Capacity Deactivation Unit

Maximum 170-Gallon Capacity Dual Drum Rotator

Maximum 15-Gallon Mercury Amalgamation Unit

The last four units listed above for the TOB are portable and can be used in the PSB and LSV buildings.

The locations of the existing and proposed units are shown in Figures II-K-1, II-K-2, and II-K-3 (see also Figure I-1 in Part I of this application). The proposed units are the new thermal desorber and pug mills.

Ancillary equipment scheduled for closure will consist of the following:

- Pumps
- Piping
- Hoses
- Connectors
- Valves
- Flanges
- Aftercooler

Other equipment scheduled for closure will consist of the following:

- Grinders
- Strainers
- Forklifts
- Conveyors
- Screens
- Sorting Table

K.2.2 OPERATING RECORDS

The operating records associated with the Closure Plan include:

- Closure Plan (A copy of the Closure Plan and current amendments is maintained in the Facility Operating Record.).
- Closure Cost Estimate (The Closure Cost Estimate and all amendments or annual adjustments for inflation will be maintained in the Facility Operating Record).
- Financial Assurance document(s) to cover the closure cost estimate.

K.3 MAXIMUM CLOSURE INVENTORY

The required estimate for maximum waste inventory at the time of closure is based on the condition that Facility tanks and container storage areas are full of material. The maximum capacity of the existing Facility is 166,574 gallons of hazardous waste. The tabulated compilation of this maximum inventory is tabulated in Table II-8.

K.4 CLOSURE TIME SCHEDULES

An outline of the Closure Time Schedule is included in Table II-9. As indicated in Table II-9, some of the closure activities will be occurring simultaneously.

If it is expected that closure activities will take longer than 180 days to complete, PFF will apply for an extension to the closure period from the DEP. This request will be made at least 30 days prior to expiration of the allowable 180-day period.

K.5 AMENDMENTS TO CLOSURE PLAN

PFF can foresee possible future needs for modifications to this Closure Plan. These could be associated with changes in Facility design or in operating plans. Specific requirements for amending the Closure Plan, if applicable, are contained in 40 CFR 264.112(c)(2) and (3) and will be met. Written requests for approval of Closure Plan amendments, if required, will be in accordance with 40 CFR 264.112(c). If an unexpected event affects the Closure Plan, a written request for a modification to the Plan will be submitted within 60 days of the event.

K.6 CLOSURE PERFORMANCE STANDARDS

Closure procedures will be performed on the RCRA units, identified in Section K.2.1, which are utilized for the processing and/or storage of hazardous waste during operation of the Facility.

The RCRA units will be closed in a manner that will eliminate the need for further post-closure maintenance or remediation and will be protective of human health and the environment. The potential for release of hazardous waste or hazardous waste constituents to groundwater, surface water, soil, or to the atmosphere after final closure of the Facility will be eliminated as a result of successful implementation of this Closure Plan.

During closure, all wastes that exist on-site will be shipped off-site for proper treatment and/or disposal. The contaminated equipment will either be decontaminated as appropriate to provide for future reuse, recycled as scrap, or disposed of off-site. The decontamination residues generated will be disposed of off-site for proper treatment and/or disposal.

If, due to naturally occurring or pre-hazardous waste operating conditions, the following clean closure standards cannot be applied, an alternate (hybrid) closure standard may be established for individual units. PFF will submit to the DEP copies of analytical results obtained during closure activities and proceed with additional investigations around suspect sample locations, if deemed necessary. Any additional subsurface investigations will define the extent and magnitude, as is practical, for that unit.

Additional investigation procedures will be similar to those specified in Appendix II-K-1 and will continue until the extent of potential contamination is assessed. Once the additional investigation activities are completed, the resulting data will be evaluated to determine if a risk assessment will be performed or if corrective action activities will be implemented. Closure verification data, analytical results, and certification reports will be submitted to the DEP.

Prior to conducting additional investigation activities or performing a risk assessment, PFF will submit a written work plan to DEP, and a permit modification request will be made if advised by DEP.

All final rinse water samples will exhibit constituent concentrations that meet Florida's groundwater standards and minimum criteria listed in Chapter 62-777, Florida Administrator Code (F.A.C.). For the parameters that are not listed in these Chapters, final rinse water samples shall exhibit constituent concentrations that are protective of human health and the environment.

Adequate protection of human health and the environment may be demonstrated either by using Florida's risk assessment methodology found in Rule 62-780.650, F.A.C., or alternatively PFF may use Florida's groundwater and/or soil cleanup Target Levels listed in Chapter 62-777, F.A.C.

K.6.1 TANK CLOSURE STANDARDS

In order to verify that the tanks have been properly decontaminated, the tanks shall be considered clean closed when sampling verifies that each final rinsate sample exhibits constituent concentrations below those levels listed in "Table I: Groundwater and Surface Water Cleanup Target Levels for Chapter 62-777, F.A.C." (See Table I-10 for a summary of closure performance standards for tanks). DEP guidance or rules pertaining to acceptable rinsate levels available at the time of closure may be used in lieu of Table I-10.

Final rinsate samples will be collected and analyzed for constituents identified in 40 CFR 261 Appendix VIII that have been stored at the facility as well as any degradation and reaction products. To achieve the clean closure standard, each tank and associated ancillary equipment will be initially emptied of all hazardous wastes (i.e., liquids and solids). Subsequently, each tank and associated equipment will be cleaned and rinsed adequately to achieve the clean closure standard. Rinsate generated during tank and equipment cleaning will be managed as a hazardous waste, with the exception of final rinsate that meet the clean closure performance standard.

Following final tank and equipment rinsing, the following options, dependent upon rinsate analysis, may be exercised.

1. If the final rinsate meets the clean closure standard, no end use restrictions shall be placed on decontaminated tanks or process equipment, and closure of each tank unit will be deemed final.
2. Tanks or process equipment that cannot meet the clean closure standard will be recycled as scrap metal.

The secondary containment structures associated with tanks will also undergo decontamination activities and will be decontaminated to the standards identified in Section K.6.2. Detailed closure procedures for tanks are further discussed in Section K.7.1.1.

K.6.2 SECONDARY CONTAINMENT CLOSURE STANDARDS

In order to verify that secondary containment areas have been properly decontaminated, the units shall be considered clean-closed when sampling verifies that either 1) the final rinse water demonstrates compliance with either Table I Groundwater and Surface Water Cleanup Target Levels for Chapter 62-777, F.A.C., or the Risk Assessment Methodology provided in Chapter 62-780, F.A.C., or 2) concrete samples demonstrate clean closure upon meeting the Table II Soil Cleanup Target Levels for Chapter 62-777, F.A.C. See Table I-10 for a summary of closure performance standards for secondary containment areas.

Final rinsate samples or concrete samples will be collected and analyzed for hazardous constituents identified in 40 CFR 261, Appendix VIII that have been previously stored at the facility. To achieve the clean closure standard, the secondary containment areas will be decontaminated by scrubbing down all surfaces, and subsequently pressure washing and rinsing the surfaces.

Rinsate generated during decontamination activities will be managed as a hazardous waste, with the exception of the final rinsate that meet the clean closure standard.

Following final rinsing, the following options, dependent upon rinsate analysis and/or concrete analysis, may be exercised.

1. If the final rinsate or concrete samples meet the clean closure criteria, no end use restrictions shall be placed on the decontaminated units, and closure of the unit will be deemed final.
2. Concrete that cannot meet the clean closure criteria will be removed and disposed of. If the concrete is not contaminated by a known listed waste and if it passes TCLP, concrete will be managed as a non-hazardous waste.

Detailed closure procedures for secondary containment areas are further discussed in Section K.7.1.2.

K.6.3 ANCILLARY EQUIPMENT AND MISCELLANEOUS RCRA UNITS CLOSURE STANDARDS

In order to verify that ancillary equipment and miscellaneous RCRA units have been properly decontaminated, the equipment shall be considered clean closed when field sampling verifies that the final rinsate sample exhibits constituent concentrations below the Table I Groundwater and Surface Water Cleanup Target Levels for Chapter 62-777, F.A.C., or the Risk Assessment Methodology provided in Chapter 62-780, F.A.C. See Table I-10 for a summary of closure performance standards for ancillary equipment.

Final rinsate samples will be collected and analyzed for constituents identified in 40 CFR 261, Appendix VIII that have been previously stored at the facility. To achieve the clean closure standard, the ancillary equipment and miscellaneous RCRA units will be initially emptied of all hazardous wastes (i.e., liquids and solids). Subsequently, the equipment will be cleaned and rinsed adequately to achieve the clean closure standard. Rinsate generated during equipment cleaning will be managed as a hazardous waste, with the exception of final rinsate that meet the clean closure standard. Following final equipment rinsing, the following options, dependent upon rinsate analysis, may be exercised.

1. If the final rinsate meets the clean closure standard, no end use restrictions shall be placed on decontaminated equipment, and closure of the ancillary equipment or miscellaneous RCRA unit will be deemed final.
2. Equipment (composed of steel) that cannot meet the clean closure standard will be recycled as scrap metal. Non-ferrous equipment will be recycled to the extent feasible as non-hazardous waste; otherwise, it will be disposed of as hazardous waste.

Detailed closure procedures for ancillary equipment and miscellaneous RCRA units are further discussed in Section K.7.1.3.

K.6.4 SUBSURFACE INVESTIGATION CLOSURE STANDARDS

Subsurface investigations will be conducted at the secondary containment areas where hazardous wastes were previously stored. In order to verify that the soil underlying these areas has not been impacted with hazardous waste or hazardous waste constituents, the soil underlying these units shall be considered clean closed when representative soil samples exhibit constituent concentrations below the Table II Soil Cleanup Target Levels for Chapter 62-777, F.A.C., naturally occurring background concentrations, or the Risk Assessment Methodology provided in Chapter 62-780, F.A.C. See Table 10 for a summary of closure performance standards for subsurface investigations. To meet the clean closure criteria, any contaminant remaining in the soil below Table II Soil Cleanup Target Levels must not leach contaminants into groundwater above Groundwater Cleanup Target Levels (GCTLs), if GCTLs for such contaminant is listed in Table I of Chapter 62-777, F.A.C.

Soil samples will be collected and analyzed for constituents identified in 40 CFR 261, Appendix VIII that have been previously stored at the facility. To verify clean closure of the secondary containment areas, a subsurface investigation will be conducted at these areas as presented in Appendix II-K-1. Following receipt of analytical results, the following options may be exercised.

1. If the soil results meet the clean closure standard, no end use restrictions shall be placed on the units.
2. If soil results exceed the clean closure standard, additional subsurface investigations will be performed to define the extent and magnitude of constituent contamination, or the Facility may utilize the Risk Assessment Methodology provided in Chapter 62-780, F.A.C.
3. Upon defining the extent and magnitude of constituent contamination, a risk assessment will be performed, or corrective action activities will be conducted. Detailed subsurface investigation activities are discussed in detail in Appendix II-K-1.

K.7 CLOSURE PROCEDURES

The following subsections outline the procedures for partial and final closure of the units at the Facility. During partial and final closure of the units, a decontamination area/station will be set up for the cleaning of equipment used during closure (tools, machines, material handling equipment, etc.). Shower facilities, cleaning equipment, and decon supplies will be available to workers performing closure activities. All potentially contaminated rinse water, debris, and personal protective equipment (PPE) will be containerized in a tank(s) or deposited in containers for subsequent characterization and management at an off-site treatment, storage, or disposal facility (TSDF). A separate Closure Sampling and Analysis Plan is presented in Appendix II-K-1.

K.7.1 PARTIAL CLOSURE ACTIVITIES

Required partial closure notices will be submitted as specified in 40 CFR 264.112(d) to the following:

Waste and Air Resources Management Administrator
Florida Department of Environmental Protection
7825 Baymeadows Way, Suite B200
Jacksonville, FL 32256-7577

K.7.1.1 TANK CLOSURE

Standard tank cleaning activities associated with tank closure shall consist of the following procedures.



- Drain all liquid materials from the tank through the lowest fitting on the tank. Transfer the liquid contents to a different container for transportation off-site.
- Test for explosive vapors and oxygen content using standard instrument procedures before entering in a tank.
- Remove any solids that may have settled out of the liquid at the bottom of the tank. This may include the use of self-priming, high-clearance centrifugal pump(s) or rental vacuum pump unit(s). Some more compacted solids may have to be removed manually within the tank and transferred to externally located roll-off bins for temporary on-site storage and final disposal at an off-site TSDF. Removal procedures will follow standard confined space entry procedures.
- Use a high-pressure wash with detergent for cleaning the interior of each tank and associated fittings and piping. After use, transfer the potentially contaminated rinse water to a transport container for transport off-site.
- Open the tank access ports. Allow the tank to dry out.
- Inspect the tank interior for visual cleanliness. Repeat the above steps, if necessary.
- Analyze the final rinse water, using methods outlined in Appendix II-K-1, to check for the presence of constituents identified in Section K.6.1. The tank will be certified as clean-closed (decontaminated) when analytical results on the final rinse water indicate that levels of constituents are below the closure criteria identified in Table II-10.

The tank cleaning procedures listed above will also be followed during final closure to decontaminate the associated tank appurtenances (piping, fittings, nozzles, valves, pumps etc.). A partial closure of these items may occur during the normal operations of the Facility and may include washing in parts washers and/or power washing and other methods to remove visible signs of contamination prior to reuse or scrapping for metal recovery.

Following cleaning/decontamination activities, one of the options identified in Section K.6.1 will be initiated.

K.7.1.2 CONTAINER STORAGE FACILITIES AND SECONDARY CONTAINMENT AREA CLOSURE

Standard cleaning activities associated with container storage facilities and secondary containment areas closure shall consist of the following procedures.

- Process all existing wastes stored in containers or ship the containers to an off-site RCRA permitted TSDF.
- Dispose of all empty containers through an authorized drum recycler/disposal facility.

- Examine the containment structures for evidence of cracks, stains, spills, or residuals, as well as review past operating records for information on past spills or leaks. These activities will form the basis for selection of sampling locations.
- Decontaminate the units by scrubbing down all surfaces and subsequently pressure washing the surfaces with detergent solution followed by a clean water rinse.
- Collect a final rinse water sample and analyze the sample, using methods outlined in Appendix K-1, to check for the presence of constituents identified in Section K.6.1. The structures will be deemed clean-closed when analytical results on the final rinse water indicate that levels of constituents are below the closure criteria identified in Table II-10, or PFF may elect to forgo collecting a rinse water sample and collect a concrete sample.

The concrete sample will be collected and analyzed utilizing the methods outlined in Appendix II-K-1, to check for the presence of constituents identified in Section K.6.1. The structures will be deemed clean-closed when analytical results of the concrete indicate that levels of constituents are below the closure criteria identified in Table II-10.

Following cleaning/decontamination activities, one of the options identified in Section K.6.2 will be initiated.

K.7.1.3 ANCILLARY EQUIPMENT AND MISCELLANEOUS UNIT CLOSURES

Routine operational replacement of ancillary equipment, such as filter canisters and baskets, shredders, grinders, pumps, valves, piping, hoses and fittings, etc., may require removal and partial closure during the life of the Facility. This section addresses the "partial closure" of these items during the normal routine operations of the Facility, prior to reuse, recycle for scrap metal recovery, or disposal as non-hazardous waste. Additionally, this section addresses the closure of the miscellaneous RCRA unit (i.e., Perma-Fix II® process).

Ancillary Equipment

Standard cleaning activities associated with ancillary equipment replacement include the following procedures.

- Isolate and remove all liquid holdup from the equipment through the fitting(s) situated at the lowest level to ensure proper drainage. A vacuum pump may be used, if necessary. Transfer the liquid contents to a tank/container that is in hazardous waste service for further processing and/or proper disposal.
- Remove any solids/slurry that may have settled out at the bottom sections, using a vacuum pump, if necessary. Transfer the solids/slurry contents to a tank/container that is in hazardous waste service for further processing and/or proper disposal.



- Cleaning of the parts and/or equipment using parts washers; recirculation of virgin, waste, or recycled solvents such as alcohols, ketones, aliphatic hydrocarbons, etc.; and/or high-pressure wash with detergent solution and other methods to remove visible signs of contamination.
- Inspect the equipment for visual cleanliness. Repeat the above steps, if necessary. Visual cleanliness will be the adequate closure criteria for ancillary equipment, prior to disposal as scrap metal.
- If rinse water is used, analyze the rinse water, using methods outlined in Appendix II-K-1, to check for presence of constituents identified in Section K.6.1. The equipment will be deemed clean-closed when analytical results of the final rinse water indicate that levels of constituents are below the closure criteria identified in Table II-10.
- Equipment that meets the clean closure criteria will be removed from service. Equipment that does not meet the criteria will have the cleaning steps repeated until it meets the requirements or will be disposed at an off-site facility as hazardous waste, or it will be disposed of as scrap metal.

Cleaning solutions, rinse waters, and other liquids resulting from cleaning activities will be collected and sent off site for proper treatment or disposal. Following cleaning and decontamination, the parts and/or equipment will be available for reuse, recycle for scrap metal recovery, or disposal as non-hazardous waste.

Miscellaneous Unit Closure

- Drain all liquid materials from each piece of equipment listed in Appendix II-I-1 that is associated with the Perma-Fix II® process (i.e., miscellaneous unit). Drain liquids from the lowest fitting on the equipment or tank.
- Transfer the liquid contents to a different container (if required) for transport off-site.
- Remove any hazardous waste solids or liquids that may remain in the unit. This may include the use of self-priming, high-clearance centrifugal pump(s) or rental vacuum pump unit(s). Compacted sludge solids may have to be removed manually from each piece of the unit and transported to externally located roll-off bins for temporary on-site storage and final disposal at an off-site TSDF. Removal procedures will follow standard confined space entry procedures and will be conducted by qualified individuals.
- Pressure wash with appropriate detergent for cleaning and decontaminating the interior of each piece of equipment and all associated valves, fittings, piping, and pumps.
- Transfer the potentially contaminated rinse/wash water to a transport container for transport off-site.
- Open all access ports, drains, valves, etc. Allow the equipment's interior and exterior to dry out.
- Test for explosive vapors and oxygen content using standard instrument and industrial hygiene/safety procedures.

- Inspect the interior of each tank, reservoir, or piece of ancillary equipment.
- Gather a composite final rinse water sample from the miscellaneous unit.
- Analyze the final rinse water, using methods outlined in Appendix II-K-1, to check for the presence of constituents identified in Section K.6.1. The miscellaneous unit will be deemed clean-closed (i.e., decontaminated) when analytical results of the final rinse water indicate that levels of hazardous constituents are below the closure performance standard specified in Table II-10.
- Equipment that meets the clean closure criteria will be removed from service. Equipment that does not meet the criteria will have the cleaning steps repeated until it meets the requirements or will be disposed at an off-site facility as hazardous waste, or it will be disposed of as scrap metal.

Cleaning solutions, rinse waters, and other liquids resulting from cleaning activities will be collected and sent off-site for proper treatment or disposal. Following cleaning and decontamination, the parts and/or equipment will be available for reuse, recycle for scrap metal recovery, or disposal as non-hazardous waste.

K.7.1.4 SUBSURFACE INVESTIGATION ACTIVITIES

As a means of demonstrating that hazardous constituents have not impacted soils underlying and surrounding the container storage facilities, a subsurface investigation will be conducted at these units. Detailed subsurface investigation activities are provided in Appendix II-K-1. Planned boring locations are presented in Figures II-K-1 through II-K-3.

K.7.2 FINAL CLOSURE ACTIVITIES

It is anticipated that the Facility will remain open and in operation until at least the year 2050. Final closure activities will follow the procedures presented in this section.

Final closure activities will basically follow the same procedures described in Section K.7. However, prior to final closure of the Facility, the DEP will be notified of the intent to close the Facility. After receiving approval from the Agency to implement the Closure Plan, final closure will start, and waste will no longer be accepted at the Facility. A qualified professional engineer will provide general oversight over the Closure Activities.

No environmental impact on surrounding land surfaces and soil areas is expected, because of the widespread use of concrete for secondary containment, use of welded flanged steel piping, frequent inspection of operations, and prompt corrective action, if necessary, after inspections.

The miscellaneous residues from facility decontamination work, including debris, absorbents, supplies, and used personal protective clothing will be collected and accumulated on-site in containers. Containers will be sent off-site for treatment or disposal, as appropriate, to permitted hazardous waste facilities.

PFF will submit a certification of final closure per the requirements of 40 CFR 264.115. All supporting documentation for the certification will be made available to the Director of DEP upon request, until PFF is released from financial assurance requirements. Supporting documents to be maintained will minimally consist of the following:

- (a) A copy of the certification of closure prepared by the qualified professional engineer registered in the state of Florida;
- (b) Results of all sampling and analyses;
- (c) Activities conducted by the professional engineer or his/her designee(s) during site visits and inspections;
- (d) Field reports documenting each site visit;
- (e) List of Facility records that were reviewed in preparing the certification report; and,
- (f) Photographic documentation.

K.8 CLOSURE COST ESTIMATE

The Closure Cost Estimate has been prepared utilizing CostPro[®] software (Version 6.0) and is unchanged from the 2015 permit renewal application. It should be noted that non-default values were used in the Closure Cost Estimate in certain instances to estimate labor and disposal costs as well as to estimate the time it will take to conduct certain closure activities. A note to that effect is included in the appropriate CostPro[®] worksheet.

The Closure Cost Estimate shall be reviewed whenever a change in the closure plan increases or decreases the cost of closure. Copies of the original Closure Cost Estimate, or a revised cost estimate (if applicable), and the latest annual inflation adjusted estimate required by 40 CFR 264.142(b) shall be kept at the Facility during its operating life. The cost of closure for the Facility is detailed in Appendix II-K-2. It does not include the closure cost for proposed units (i.e., vibrating screen, crusher, shredder, pug mills) associated with the continuous PF-II process. Since a continuous PF-II process is not being installed and this is considered an “in-kind” replacement an updated closure cost was not prepared.

K.9 POST-CLOSURE PLAN

A Post Closure Plan is not required at this time since there is no hazardous waste disposal unit at the facility. However, if “clean closure” in accordance with 40 CFR 264.197(b) cannot be achieved for closure of the tank, then PFF will submit a closure/post-closure plan in accordance with the requirements for landfills (40 CFR 264.310).

P INFORMATION REGARDING POTENTIAL RELEASES FROM SWMUS

Part II.P Information Regarding Potential Releases from SWMUS (DEP Form 62-730.900(2)(c)) can be found in the attached Appendix II-P. Although unassociated with a SWMU, one release was reported by the facility recently to the DEP in January 2017. A fire was reported within a roll-off dumpster, which led to soil sampling and the removal of approximately 42 cubic yards of soil with polyaromatic hydrocarbons in September 2019. Confirmation soil sample concentrations were below Residential Direct Exposure and Groundwater Leachability Soil Cleanup Target Levels. Further details are available in the *Source Removal Report and No Further Action Request* dated November 5, 2019 (Trihydro 2019).

Q. RCRA FACILITY ASSESSMENT

RCRA Facility Assessment conducted by EPA’s contractor, A. T. Kearney, is attached as Appendix II-Q.

A Release Assessment Report for Area of Concern A (Paint Spray Booth) and Area of Concern C (Soil Mound Area) prepared by Environmental Science Associates, Inc. and dated June 2001 was submitted to DEP. This Report had concluded that no further action was warranted for Areas of Concern A and C, based on the results of the laboratory analysis of the soil samples. This investigation was required by the HSWA corrective action section of the hazardous waste permit that was in effect then.

The current hazardous waste permit issued on May 27, 2015 requires no further action for any potential SWMUs at the facility. No releases from any additional SWMUs have been identified after the issuance of this permit.

The current operational facility property was acquired by PFF from Quadrex Corporation on June 17, 1994. The Quadrex Annex Area was never owned by PFF; the Quadrex Annex Area is indicated on the SWMU map (Figure II-Q-1). Hence, SWMUs #30, 31, and 32 shown on the attached map are not SWMUs associated with PFF.

R PROCESS VENTS

These standards apply to process vents associated with distillation, fractionation, thin- film evaporation, solvent extraction, and air or steam stripping operations that manage hazardous waste with organic content of at least 10 ppm by weight.

PFF currently operates affected process vents in association with the Liquid Scintillation Vial (LSV) waste treatment unit, the Perma-Fix II® (PF-II) process that meets the definitions of “distillation” and “steam stripping operations” as defined in Subpart AA, and chemical extraction operations for debris treatment as described in Part I of this permit application. Hence, Subpart AA will apply to operation of each of these three units when hazardous waste of at least 10 ppm organic content by weight is processed.

In addition, PFF plans to operate a solvent distillation process at the Facility. Although this process will be exempt from permitting requirements, it will be subject to Subpart AA requirements because the unit will be located at a TSDF otherwise subject to permitting requirements of Part 270. The unit will be located in an area equipped with a vapor recovery system in accordance with the requirements of 40 CFR 264.1033.

Under the provisions of 40 CFR 264.1032(a), total facility organic emissions from affected process vents must be either reduced with a control device by 95 weight percent or limited to 3 pounds/hour and 3.1 tons/year.

PFF has installed a closed-vent system and air pollution control device on the PF-II unit to control volatile organic compounds (VOCs). The PF-II process is designed to vent minimal concentrations of VOCs that are not collected in the condenser and absorber units to a regenerative thermal oxidizer (RTO). The RTO is described in detail in Part II.I of this permit application. The PF-II process equipment is located within the Facility’s Treatment and Operations Building. See Part I, Figure I-6-A and I-6-B.

The LSV unit is connected to a closed-vent system meeting the definition of 40 CFR 264.1031. Chemical extraction operations for debris treatment are conducted in a vat near the LSV processing area. Each of the three process areas regulated under 40 CFR 264, Subpart AA are vented through the RTO. The RTO is designed and operated to capture and control VOC air emissions. The minimum VOC control efficiency of the RTO is 95%.

Compliance Documentation for Process Vent Air Emission Standards

PFF has implemented volumetric flow monitoring for the LSV process area (including debris treatment) and the PF-II process as required by 40 CFR 264.1033(f)(1). Flow monitors are located upstream of the RTO gas inlet. Process vent volumetric air flow is recorded at least once per operating hour. In addition, a temperature-monitoring device equipped with a continuous recorder is installed as specified by 40 CFR 264.1033(f)(2)(i). To demonstrate compliance with the 95% efficiency requirements of 40 CFR-264.1033(c), PFF relies on the manufacturer’s guarantee of a minimum of 95% destruction efficiency.

S REQUIREMENTS FOR EQUIPMENT

Pursuant to the requirements of 40 CFR 264.1050, the air emissions standards for equipment leaks apply to the equipment at the Facility that contain or come in direct contact with hazardous waste with organic chemical concentrations of 10% by weight or higher.

PFF manages hazardous waste with organic chemicals that range in concentration from 0 to 100% by weight. Therefore, all of the equipment (as defined in 40 CFR 264.1031) at the Facility that contains or is in direct contact with hazardous waste is potentially subject to the leak detection and monitoring standards.

The equipment in the following areas of the Facility is potentially subject to 40 CFR 264, Subpart BB:

- LSV area
- 3,000-gallon Tank
- Debris treatment area
- Hazardous waste transfer area
- Mixed waste tanker loading area
- Mixed waste transfer to larger containers area
- PF-II treatment area

Except for the LSV area equipment, the hazardous waste transfer equipment, and the mixed waste transfer to larger containers equipment, all equipment contacting hazardous waste with organic chemical concentration of 10% by weight or higher is exempt from the Subpart BB requirements. These exemptions are described below.

40 CFR 264.1050(f) states, “Equipment that contains or contacts hazardous waste with an organic concentration of at least 10% by weight for less than 300 hours per calendar year is excluded from the requirements of Sections 264.1052 through 264.1060, if it is identified, as required by Section 264.1064(g)(6).” This exemption applies to the equipment associated with the 3,000-gallon storage tank, debris treatment area, and mixed waste tanker loading. A log identifying either by list or location (area or group) of this exempted equipment will be kept in the Facility Operating Record as required by 40 CFR 264.1064 (g)(6).

40 CFR 264.1050(e) states, “Equipment that is in vacuum service is excluded from the requirements of 264.1052 to 264.1060 if it is identified as required by 264.1064(g)(5).” This exemption applies to equipment used by the PF-II

treatment. A log containing a list of identification numbers for equipment in vacuum service will be kept in the Facility Operating Record as required by 40 CFR 264.1064(g)(5).

Per the requirements of 40 CFR §264.1050, PFF has identified and marked each piece of existing equipment to which the equipment leak standards apply. PFF has developed process and instrumentation diagrams (P&IDs) to identify the location of each piece of equipment subject to 40 CFR 264, Subpart BB requirements and the associated hazardous waste management units. The diagrams have been provided as Figures II-S-1 through II-S-4. Exempt equipment for the 3,000-gallon tank, debris treatment, mixed waste tanker loading area, and PF-II treatment area is shown by Figures II-S-5 through II-S-9. A comprehensive list of the equipment subject to the standards of 40 CFR 264 Subpart BB has been included in Table II-11 for the hazardous waste transfer area equipment, Table II-12-1 and II-12-2 for the LSV area equipment, and Table II-13 for mixed waste transfer to larger containers area equipment.

The Facility storage tank is exempt from Subpart CC tank requirements because the 3,000-gallon tank is used to receive mixed waste. The PF-II process components, although considered tank- like for permitting, are also exempt from Subpart CC requirements because they are designated solely for the management of mixed wastes. Because Subpart CC container requirements do not apply to containers or tanks holding mixed waste, the LSV processing equipment will not be subject to Subpart CC since only mixed wastes are processed in the equipment. For containers up to 110 gallons holding hazardous wastes with a volatile organic content of less than 500 ppm and that are not radioactive, PFF will meet the Level 1 control requirement regulations specified in 40 CFR 264.1086 (c). For any container greater than 110 gallons (e.g., totes) holding hazardous waste that is not radioactive, PFF will meet the Level 2 control requirements specified at 40 CFR 264.1086(d). PFF receives hazardous waste and places treatment residuals which are hazardous waste in containers that meet U.S. Department of Transportation (DOT) regulations on packaging hazardous materials for transportation as specified in 40 CFR 264.1086(c). It should be noted that the PF-I stabilization and fixation process will be used to treat characteristic mixed wastes having an average VOC concentration of less than 500 ppmw. Therefore, Subpart CC does not apply to the PF-I process. Debris treatment operations conducted in the LSV Processing Area involving the use of the debris treatment vat (Dip Tank) will meet the Level 3 Subpart CC emission control requirements specified in 40 CFR 264.1086(e). The air pollution control system (regenerative thermal oxidizer) that will be used to meet the Level 3 controls is described in Part II.I of the permit application.

Pumps in Light Liquid Service

All of the pumps subject to Subpart BB standards are designated for light liquid service at this time. As provided in 40 CFR 264.1052(e), all the pumps in the hazardous waste transfer area, the LSV area, and the mixed waste transfer to larger containers area are designated “no detectable emissions” (i.e., instrument reading of less than 500 ppm above

background) and will be monitored annually using Method 21 specified in 40 CFR Part 60. These pumps do not have an externally actuated shaft penetrating the pump housing.

Compressors

The Facility does not have any compressors that are in direct contact with hazardous waste; therefore, 40 CFR 264.1053 is not applicable.

Pressure Relief Devices in Gas/Vapor Service

The PF-II the piping system includes pressure relief devices. However, since the pressure relief devices are part of a closed vent system (see previous regenerative thermal oxidizer discussion) capable of capturing and transporting leakage from devices, the requirements of 40 CFR 264.1054 do not apply.

Sampling Connection Systems

The Facility does not have any sampling connecting systems or in-situ sampling systems. The samples for analysis are collected through open-ended valves or lines. Hence, the requirements of 40 CFR 264.1055 are not applicable.

Open-ended Valves or Lines

The open-ended valves and lines that are subject to the requirements of 40 CFR 264.1056 are identified in the equipment list for the hazardous waste transfer area, LSV area, and the mixed waste transfer to larger containers area as shown in Table II-11, Table II-12.1, Table II-12.2, and Table II-13, respectively. These pieces of equipment are either equipped with caps, blind flanges, plugs, or second valves that seal the open end at all times except during operations requiring hazardous waste flow through the open-ended valve or line. Each open-ended valve or line equipped with a second valve is operated so that the valve on the hazard waste side is closed before the second valve is closed.

Valves in Gas/Vapor Service or in Light Liquid Service

All existing valves that come into direct contact with hazardous waste liquid are designated for light liquid service at this time and are identified in the equipment list. All valves in light liquid service and in gas/vapor service will meet the standards specified by 40 CFR 264.1057.

As provided in 40 CFR 264.1057(f), all valves in the hazardous waste transfer area, the LSV area, and the mixed waste transfer to larger containers area are designated for no detectable emissions (i.e., instrument reading of less than 500 ppm above background) and will be monitored annually using Method 21 specified in 40 CFR Part 60. These valves do not have an external actuating mechanism in contact with the hazardous waste.

Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and other Connectors

At the present time, all pumps and valves in contact with hazardous waste liquid are designated for light liquid service. There are no pressure relief devices in liquid service at the facility. Flanges and other connectors subject to the requirements of 40 CFR 264.1058 are identified in the equipment list and will be monitored within 5 days if evidence of a potential leak is found by a visual, audible, or olfactory method during the daily inspection of piping.

If a leak is detected using Method 21 specified in 40 CFR Part 60 (i.e., an instrument reading of 10,000 ppm or greater above the background), the flange or connector will be repaired as soon as practicable, but no later than 15 calendar days after detection. The first attempt at repair will be made within 5 days of detection. Repair of a leaking flange/other connector may extend beyond 15 days if at least one of the conditions specified in the subsection titled "Delay of Repair" is met.

Recordkeeping Requirements

Pursuant to the requirements of 40 CFR 264.1064, PFF has identified each affected piece of equipment by number and location as shown in Tables II-11, II-12, and II-13.

The following information will be maintained at the Facility to demonstrate compliance with the requirements of 40 CFR 264 Subpart BB:

1. Type of equipment - valve, pump, flange, etc.
2. Service - designated as light liquid at this time, based on knowledge of the hazardous waste received and managed at the Facility for all equipment contacting liquids.
3. Percent-by-weight of total organics is not necessary for the affected equipment because PFF has determined applicability and consequently designed the compliance program based on the fact that PFF manages hazardous waste up to 100% organics by weight.
4. Method of compliance with the standard.
5. Leak monitoring results and any repairs conducted at the Facility.
6. Notification record(s) to the Florida DEP if a detected leak is not repaired within the designated time period.
7. Records associated with the Test Methods and Procedures outlined in 40 CFR 264.1063. These records typically include VOC Analyzer Calibration, Response Time, and Calibration Precision Logs (typical forms included in Appendix II-S-1). A copy of Reference Method 21 (40 CFR Part 60) has been included in Appendix II-S-2.

Copies of sample inspection forms and the VOC analyzer logs are included in Tables II-14-1 and II-14-2, respectively.

PFF may choose the exemption provided in 40 CFR 264.1050(f) for the affected equipment identified in Tables II-11, II-12, and II-13 if this equipment contains or contacts hazardous waste for less than 300 hours per calendar year and keep a record of hours of operation.

Delay of Repair

All detected leaks will be repaired as soon as practicable, but not later than 15 days after detection unless the following conditions arise.

- The repair is not technically feasible without shutdown of a hazardous waste management unit. In such a case, the leak repair will be completed before the end of the next shutdown of the hazardous waste management unit.
- The leaking equipment is isolated and does not continue to contain or contact hazardous waste with an organic concentration of at least 10% by weight.
- The emissions resulting from immediate repair of a leaking valve would be greater than the emissions likely to result from delay of repair.
- The repair of a leaking pump requires the use of a dual mechanical seal system, which includes a barrier fluid system. In such a case, the repair will be completed as soon as practical, but no later than six months after leak detection.

Reporting Requirements

For each semi-annual reporting period designated by the Florida DEP Director, a report will be submitted including the information required by 40 CFR 264.1065(a) if the following condition occurs during that reporting period.

- Leak repair is not performed within 15 calendar days of leak detection and/or the first attempt at repair is not performed within 5 calendar days of the leak detection for valves in gas/vapor service or in light liquid service.

This report will include:

- EPA identification number, name, and address of the facility;
- Dates of hazardous waste management unit shutdowns that occurred during the reporting period; and,
- Equipment identification number of each pump or valve for which leak repair was not performed within 15 calendar days after leak detection or the first attempt at repair was not performed within 5 calendar days.



T CERTIFICATION

DEP Form 62-730.900(2)(d) Certification has been included as Appendix II-T.

PART II

TABLES

TABLE II-1. EMERGENCY EQUIPMENT LIST
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Item	Description/Capability	Location(s)
Telephone	Telephone communications for emergency notification	Waste Areas, Laboratory, and Other General Locations
Fire Extinguishers	Dry chemical, CO2, extinguish fires	Throughout Facility, Admin & Processing
Fire Hydrant	Fire hydrant – combat fire	Southwest Corner of Process and Storage Building
Absorbent Material	Vermiculite and absorbent material in spill kits – absorbs liquid spills	Waste Treatment Areas, Container Storage and Tank Storage Areas
Respirators	Full-face chemical cartridge, Self-Contained Breathing Apparatus (SCBA)	Waste Treatment Areas, Laboratory, Main Building Storage Areas
Eye Wash	Permanent installation and portable eye wash bottles/stations – flush eyes	Waste Treatment Areas, Laboratory
First Aid Kits	Band-Aids, bandages – provide minor first aid	Laboratories and Container Storage Areas
Fork Lift(s)	Multiple units: 5-, 6-, 15-thousand-pound capacity – assist in moving materials	Designated Equipment Parking Area Adjacent to PSB
Bobcat	Small, bucketed, material-handling machine	Outside Maintenance – West Side
Automatic Fire Suppression	Fire sprinkler system, AFFF system (in LSV PSB, TOB); wet sprinkler system through remainder of building areas	Entire Facility
Protective Apron & Gloves	Cloth, Tyvek, rubber, or nitrile – body protection	Waste Management Areas & Maintenance Area
Safety Glasses	Personal protective equipment – issued to employees	All Operational Areas
Emergency Exit Lighting & Signs	Emergency egress equipment	Throughout Administrative Offices, Lab, Waste Management Areas
Portable Radios and/or Cellular Phones	Communication devices	Emergency Coordinators, Process Technicians
Spill Kit(s)	Clean up minor spills	Each Waste Management Area
Emergency Generator	Gas-powered generator – to provide electricity during emergency	Maintenance Area
Shovels, Brooms	To transfer spilled material manually into containers	Kept with Spill Kits, extras kept in Maintenance Area
Empty Containers	To collect spilled material or PPE used during cleanup	On east side of LSV storage Warehouse
Portable Pumps	To transfer spilled liquids into containers or tanker trucks	Maintenance Area
Absorbent Booms	To prevent spills from entering surface waters or to absorb spilled material from the surface water	Mezzanine Above LSV Entry/Exit Area
Field Monitoring Equipment (e.g., dosimeters, PID)	To assess an emergency and screen releases	Dosimeters in Radiation Lab; PID in office of the EHS Manager

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Waste Code	Description
D001	Ignitable Waste
D002	Corrosive Waste
D003	Reactive Waste (not DOT Class I (explosive) hazardous materials)
D004	Arsenic
D005	Barium
D006	Cadmium
D007	Chromium
D008	Lead
D009	Mercury
D010	Selenium
D011	Silver
D012	Endrin
D013	Lindane
D014	Methoxychlor
D015	Toxaphene
D016	2,4-D
D017	2,4,5-TP (Silvex)
D018	Benzene
D019	Carbon Tetrachloride
D020	Chlordane
D021	Chlorobenzene
D022	Chloroform
D023	o-Cresol
D024	m-Cresol
D025	p-Cresol
D026	Cresol
D027	1,4-Dichlorobenzene
D028	1,2-Dichloroethane
D029	1,1-Dichloroethylene
D030	2,4-Dinitrotoluene
D031	Heptachlor (and its epoxide)
D032	Hexachlorobenzene
D033	Hexachlorobutadiene
D034	Hexachloroethane
D035	Methyl ethyl ketone
D036	Nitrobenzene
D037	Pentachlorophenol
D038	Pyridine
D039	Tetrachloroethylene
D040	Trichloroethylene
D041	2,4,5-Trichlorophenol
D042	2,4,6-Trichlorophenol
D043	Vinyl chloride

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Waste Code	Description
F-Codes	
F1	The following 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.
F2	The following spent halogenated solvents: tetrachloroethylene, methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, ortho-dichlorobenzene, trichlorofluoromethane, 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 listed in F001, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F3	The following 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, only the above spent non-halogenated solvents; and all spent solvent mixtures/blends containing, before use, one or more of the above non-halogenated solvents, and a total of ten percent or more (by volume) of one or more of those solvents listed in F001, F002, F004, and F005; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F4	The following spent non-halogenated solvents: cresols and cresylic acid, and nitrobenzene; 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.
F5	The following 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, or F004; and still bottoms from the recovery of these spent solvents and spent solvent mixtures.
F6	Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating of carbon steel; (5) cleaning/stripping associated with tin, zinc, and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum
F7	Spent cyanide plating bath solutions from electroplating operations
F8	Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process
F9	Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process
F10	Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process
F11	Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations
F12	Quenching waste water treatment sludges from metal heat treating operations where cyanides are used in the process

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Waste Code	Description
F19	Wastewater treatment sludges from the chemical conversion coating of aluminum except from zirconium phosphating in aluminum can washing when such phosphating is an exclusive conversion coating process. Wastewater treatment sludges from the manufacturing of motor vehicles using a zinc phosphating process will not be subject to this listing at the point of generation if the wastes are not placed outside on the land prior to shipment to a landfill for disposal and are either: disposed in a Subtitle D municipal or industrial landfill unit that is equipped with a single clay liner and is permitted, licensed or otherwise authorized by the state; or disposed in a landfill unit subject to, or otherwise meeting, the landfill requirements in §258.40, §264.301 or §265.301. For the purposes of this listing, motor vehicle manufacturing is defined in paragraph (b)(4)(i) of this section and (b)(4)(ii) of this section describes the recordkeeping requirements for motor vehicle manufacturing facilities.
F20	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- or tetrachlorophenol, or of intermediates used to produce their pesticide derivatives. (This listing does not include wastes from the production of Hexachlorophene from highly purified 2,4,5-trichlorophenol.)
F21	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of pentachlorophenol, or of intermediates used to produce its derivatives
F22	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzenes under alkaline conditions
F23	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the production or manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tri- and tetrachlorophenols. (This listing does not include wastes from equipment used only for the production or use of Hexachlorophene from highly purified 2,4,5-trichlorophenol.)
F26	Wastes (except wastewater and spent carbon from hydrogen chloride purification) from the production of materials on equipment previously used for the manufacturing use (as a reactant, chemical intermediate, or component in a formulating process) of tetra-, penta-, or hexachlorobenzene under alkaline conditions
F27	Discarded unused formulations containing tri-, tetra-, or pentachlorophenol or discarded unused formulations containing compounds derived from these chlorophenols. (This listing does not include formulations containing Hexachlorophene synthesized from prepurified 2,4,5-trichlorophenol as the sole component.)
F28	Residues resulting from the incineration or thermal treatment of soil contaminated with EPA Hazardous Waste Nos. F020, F021, F022, F023, F026, and F027
F32	Wastewaters (except those that have not come into contact with process contaminants), process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that currently use or have previously used chlorophenolic formulations (except potentially cross-contaminated wastes that have had the F032 waste code deleted in accordance with §261.35 of this chapter or potentially cross-contaminated wastes that are otherwise currently regulated as hazardous wastes (i.e., F034 or F035), and where the generator does not resume or initiate use of chlorophenolic formulations). This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
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Waste Code	Description
F34	Wastewaters (except those that have not come into contact with process contaminants), process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use creosote formulations. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol.
F35	Wastewaters (except those that have not come into contact with process contaminants), process residuals, preservative drippage, and spent formulations from wood preserving processes generated at plants that use inorganic preservatives containing arsenic or chromium. This listing does not include K001 bottom sediment sludge from the treatment of wastewater from wood preserving processes that use creosote and/or pentachlorophenol.
F37	Petroleum refinery primary oil/water/solids separation sludge-Any sludge generated from the gravitational separation of oil/water/solids during the storage or treatment of process wastewaters and oil cooling wastewaters from petroleum refineries. Such sludges include, but are not limited to, those generated in oil/water/solids separators; tanks and impoundments; ditches and other conveyances; sumps; and stormwater units receiving dry weather flow. Sludge generated in stormwater units that do not receive dry weather flow, sludges generated from non-contact once-through cooling waters segregated for treatment from other process or oily cooling waters, sludges generated in aggressive biological treatment units as defined in §261.31(b)(2) (including sludges generated in one or more additional units after wastewaters have been treated in aggressive biological treatment units) and K051 wastes are not included in this listing. This listing does include residuals generated from processing or recycling oil-bearing hazardous secondary materials excluded under §261.4(a)(12)(i), if those residuals are to be disposed of.
F38	Petroleum refinery secondary (emulsified) oil/water/solids separation sludge-Any sludge and/or float generated from the physical and/or chemical separation of oil/water/solids in process wastewaters and oily cooling wastewaters from petroleum refineries. Such wastes include, but are not limited to, all sludges and floats generated in: induced air flotation (IAF) units, tanks and impoundments, and all sludges generated in DAF units. Sludges generated in stormwater units that do not receive dry weather flow, sludges generated from non-contact once-through cooling waters segregated for treatment from other process or oily cooling waters, sludges and floats generated in aggressive biological treatment units as defined in §261.31(b)(2) (including sludges and floats generated in one or more additional units after wastewaters have been treated in aggressive biological treatment units) and F037, K048, and K051 wastes are not included in this listing.
F39	Leachate (liquids that have percolated through land disposed wastes) resulting from the disposal of more than one restricted waste classified as hazardous under Subpart D of this part. (Leachate resulting from the disposal of one or more of the following EPA Hazardous Wastes and no other Hazardous Wastes retains its EPA Hazardous Waste Number(s): F020, F021, F022, F026, F027, and/or F028.)

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
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Waste Code	Description
K-Codes	
K001	Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol
K048	Dissolved air flotation (DAF) float from the petroleum refining industry
K049	Slop oil emulsion solids from the petroleum refining industry
K050	Heat exchanger bundle cleaning sludge from the petroleum refining industry
K051	API separator sludge from the petroleum refining industry
K052	Tank bottoms (leaded) from the petroleum refining industry
K061	Emission control dust/sludge from the primary production of steel in electric furnaces
K062	Spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC Codes 331 and 332)
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
K156	Organic waste (including heavy ends, still bottoms, light ends, spent solvents, filtrates, and decantates) from the production of carbamates and carbamoyl oximes. (This listing does not apply to wastes generated from the manufacture of 3-iodo-2-propynyl n-butylcarbamate.)
K157	Wastewaters (including scrubber waters, condenser waters, washwaters, and separation waters) from the production of carbamates and carbamoyl oximes. (This listing does not apply to wastes generated from the manufacture of 3-iodo-2-propynyl n-butylcarbamate.)
K158	Bag house dusts and filter/separation solids from the production of carbamates and carbamoyl oximes. (This listing does not apply to wastes generated from the manufacture of 3-iodo-2-propynyl n-butylcarbamate.)
K159	Organics from the treatment of thiocarbamate wastes
K161	Purification solids (including filtration, evaporation, and centrifugation solids), bag house dust and floor sweepings from the production of dithiocarbamate acids and their salts. (This listing does not include K125 or K126.)
K169	Crude oil storage tank sediment from petroleum refining operations
K170	Clarified slurry oil tank sediment and/or in-line filter/separation solids from petroleum refining operations
K171	Spent Hydrotreating catalyst from petroleum refining operations, including guard beds used to desulfurize feeds to other catalytic reactors (this listing does not include inert support media)
K172	Spent Hydrorefining catalyst from petroleum refining operations, including guard beds used to desulfurize feeds to other catalytic reactors (this listing does not include inert support media)

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
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Waste Code	Description
P-Codes	
P001	Warfarin & salts; 2H-1-Benzopyran-2-on, 4-hydroxy-3-(3-oxo-1-phenylbutyl), when present at concentrations >0.3%
P002	Acetamide, N-(aminothioxomethyl)-; 1-Acetyl-2-thiourea
P003	Acrolein; 2-Propenal
P004	Aldrin; 1,4,5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexa-chloro-1,4,4a,5,8,8a-hexahydro-
P005	Allyl alcohol; 2-Propen-1-ol
P006	Aluminum phosphide (R, T)
P007	5-(Aminomethyl)-3-isoxazolol; 3(2H)-Isoazolone, 5-(aminomethyl)-
P008	4-Aminopyridine; 4-Pyridinamine
P009	Ammonium picrate; Phenol, 2,4,6-trinitro-, ammonium salt
P010	Arsenic acid H ₃ AsO ₄
P011	Arsenic oxide As ₂ O ₅ ; Arsenic pentoxide
P012	Arsenic trioxide
P013	Barium cyanide
P014	Benzenethiol; Thiophenol
P015	Beryllium powder
P016	Dichloromethyl ether; Methane, oxybis[chloro-
P017	Bromoacetone; 2-Propanone, 1-bromo-
P018	Brucine; Strychnidine-10-one, 2,3-dimethoxy-; Strychnine & salts
P020	Dinoseb; Phenol, 2-(1-methylpropyl)-4,6-dinitro-
P021	Calcium cyanide Ca(CN) ₂
P022	Carbon disulfide
P023	Acetaldehyde, chloro-; Chloroacetaldehyde
P024	Benzenamine, 4-chloro-; p-Chloroaniline
P026	1-(O-chlorophenyl)thiourea; Thiourea, (2-chlorophenyl)-
P027	3-Chloropropionitrile; Propanenitrile, 3-chloro-
P028	Benzene, (chloromethyl)-; Benzyl chloride
P029	Copper cyanide
P030	Cyanides (soluble cyanide salts), not otherwise specified
P031	Cyanogen; Ethanedinitrile
P033	Cyanogen chloide (CN)Cl
P034	2-Cyclohexyl-4,6-dinitrophenol; Phenol, 2-cyclohexyl-4,6-dinitro-
P036	Arsonous dichloride, phenyl-; Dichlorophenylarsine
P037	Dieldrin; 2,7:3,6-Dimethanonaphth[2,3-b]oxirine
P038	Arsine, diethyl-; Diethylarsine
P039	Disulfoton; Phosphorodithioic acid, o,o-diethyl s-[2-(ethylthio)ethyl] ester
P040	O,O-Diethyl O-pyrazinyl phosphorothioate; Phosphorothioic acid, O,O-diethyl O-pyrazinyl ester
P041	Diethyl-p-nitrophenyl phosphate; Phosphoric acid, diethyl 4-nitrophenyl ester
P042	1,2-Benzenediol, 4-[1-hydroxy-2-(methylamino)ethyl]-, epinephrine
P043	Diisopropylfluorophosphate; Phosphorofluoridic acid, bis(1-methylethyl) ester
P044	Dimethoate; Phosphorodithioic acid, O,O-dimethyl S-[2-(methylamino)-2-oxoethyl] ester
P045	2-Butanone, 3,3-dimethyl-1-(methylthio)-, O-[methylamino]carbonyl] oxime; Thiofanox
P046	Benzeneethanamine, a,a-dimethyl-; a,a-Dimethylphenethylamine

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
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Waste Code	Description
P047	4,6-Dinitro-o-cresol & salts; Phenol, 2-methyl-4,6-dinitro- & salts
P048	2,4-Dinitrophenol; Phenol, 2,4-dinitro-
P049	Dithiobiuret; Thionidodicarbonic diamide [(CH ₂ N)C(S)] ₂ NH
P050	Endosulfan; 6,9-Methano-2,4,3-benzodioxathiepin, 6,7,8,9,10,10-hexachloro-1,5,5a,6,9,9a-hexahydro-, 3-oxide; Endosulfan sulfate
P051	2,7:3,6-Dimethanonaphth [2,3-b]oxirene, 3,4,5,6,9,9-hexachloro-1a,2,2a,3,6,6a,7,7a-octahydro-; Endrin & metabolites; Endrin aldehyde
P054	Aziridine; Ethyleneimine
P056	Fluoride, Fluorine
P057	Acetamide, 2-fluoro-; Fluoroacetamide
P058	Acetic acid, fluoro-, sodium salt; Fluoroacetic acid, sodium salt
P059	Heptachlor; 4,7-Methano-1H-indene, 1,4,5,6,7,8,8-heptachloro-, 3a,4,7,7a-tetrahydro-; Heptachlor epoxide
P060	1,4,5,8-Dimethanonaphthalene, 1,2,3,4,10,10-hexa-chloro-1,4,4a,5,8,8a-hexahydro-; Isodrin
P062	Hexaethyl tetraphosphate; Tetraphosphoric acid, hexaethyl ester
P063	Hydrocyanic acid; Hydrogen cyanide
P064	Methane, isocyanato-; Methyl isocyanate
P065	Fulminic acid, mercury (2+) salt; Mercury fulminate
P066	Ethanimidothioic acid, N-[(methylamino)carbonyl]oxy-, methyl ester; Methomyl
P067	Aziridine, 2-methyl-; 1,2-Propylenimine
P068	Hydrazine, methyl-; Methyl hydrazine
P069	2-Methylactonitrile; Propanenitrile, 2-hydroxy-2-methyl-
P070	Aldicarb; Propanal, 2-methyl-2-(methylthio)-, O-[(methylamino)carbonyl]oxime
P071	Methyl parathion; Phosphorothioic acid, O,O,-dimethyl O-(4-nitrophenyl) ester
P072	a-Naphthylthiourea; Thiourea, 1-naphthalenyl-
P073	Nickel carbonyl Ni(CO) ₄
P074	Nickel cyanide Ni(CN) ₂
P075	Nicotine & salts; Pyridine, 3-(1-methyl-2-pyrrolidinyl)-, (S)-, & salts
P077	Benzenamine, 4-nitro-; P-Nitroaniline
P078	Nitrogen dioxide
P081	Nitroglycerine; 1,2,3-Propanetriol, trinitrate
P082	Methanamine, n-methyl-n-nitroso-; n-Nitrosodimethylamine
P084	n-Nitrosomethylvinylamine; Vinylamine, n-methyl-n-nitroso-
P085	Diphosphoramidate, octamethyl-; Octamethylpyrophosphoramidate
P087	Osmium tetroxide; Osmium oxide OsO ₄ , (T-4)-
P088	Endothall; 7-Oxabicyclo[2.2.1]heptane-2,3-dicarboxylic acid
P089	Parathion; Phosphorothioic acid, O,O-diethyl O-(4-nitrophenyl) ester
P092	Mercury, (acetato-O)phenyl-; Phenylmercury acetate
P093	Phenylthiourea; Thiourea, phenyl-
P094	Phorate; Phosphorodithioic acid, O,O-diethyl S-[(ethylthio)methyl] ester
P095	Carbonic dichloride; Phosgene
P096	Hydrogen phosphide; Phosphine
P097	Famphur; Phosphorothioic acid, O-[4-[(dimethylamino)sulfonyl]phenyl] O,O-dimethyl ester
P098	Potassium cyanide K(CN)

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
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Waste Code	Description
P099	Argentate(1-), bis(cyano-C)-, potassium; Potassium silver cyanide
P101	Ethyl cyanide; Propanenitrile
P102	Propargyl alcohol; 2-Propyn-1-ol
P103	Selenourea
P104	Silver cyanide
P105	Sodium azide
P106	Sodium cyanide
P108	Strychnidin-10-one, & salts; Strychnine, & salts
P109	Tetraethyldithiopyrophosphate; Thiodiphosphoric acid, tetraethyl ester
P110	Lead; Plumbane, tetraethyl-; Tetraethyl lead
P111	Diphosphoric acid, tetraethyl ester; Tetraethyl pyrophosphate
P112	Methane, tetranitro-; Tetranitromethane
P113	Thallic oxide; Thallium oxide Tl ₂ O ₃
P114	Selenious acid, dithallium (1+) salt; Thallium selenite
P115	Sulfuric acid, dithallium (1+) salt; Thallium sulfate
P116	Hydrazinecarbothioamide; Thiosemicarbazide
P118	Methanethiol, trichloro-; Trichloromethanethiol
P119	Ammonium vanadate; Vanadic acid, ammonium salt
P120	Vanadium pentoxide
P121	Zinc cyanide
P122	Zinc phosphide Zn ₃ P ₂ , when present at conc. >10%
P123	Toxaphene
P127	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-, methylcarbamate
P128	Phenol, 4-(dimethylamino)-3,5-dimethyl-, methylcarbamate (ester)
P185	1,3-Dithiolane-2-carboxaldehyde, 2,4-dimethyl-, O-[(methylamino) carbonyl] oxime
P188	Physostigminesalicylate
P189	Carbamic acid, [(dibutylamino) thio] methyl-, 2,3-dihydro-2,2-dimethyl-7-benzofuranyl ester
P190	Carbamic acid, methyl-, 3-methylphenyl ester
P191	Carbamic acid, dimethyl-, 1- [(dimethylamino) carbonyl]-5-methyl-1H-pyrazol-3-yl ester
P192	Carbamic acid, dimethyl-, 3-methyl-1-(1-methylethyl)-1H-pyrazol-5-yl ester
P194	Ethanimidothioc acid, 2-(dimethylamino)-N-[[[(methylamino)carbonyl]oxy]-2-oxo-, methyl ester
P196	Manganese, bis(dimethylcarbamodithioato-S,S')-
P197	Methanimidamide, N,N-dimethyl-N'-[2-methyl-4-[[[(methylamino) carbonyl]oxy]phenyl]-
P198	Methanimidamide, N,N-dimethyl-N'-[3-[[[(methylamino) carbonyl]oxy]phenyl]-, monohydrochloride
P199	Phenol, (3,5-dimethyl-4-(methylthio)-, methyl carbamate
P201	Phenol, 3-methyl-5-(1-methylethyl)-, methyl carbamate
P202	Phenol, 3-(methylethyl)-, methyl carbamate
P203	Propanal, 2-methyl-2-(methylsulfonyl)-, O-[(methylamino) carbonyl] oxime
P204	Pyrrolo[2,3-b]indol-5-01, 1,2,3,3a,8,8a-hexahydro-1,3a,8-trimethyl-, methylcarbamate (ester), (3aS-cis)-
P205	Zinc, bis(dimethylcarbamodithioato-S,S')-, (T-4)-

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Waste Code	Description
U-Codes	
U001	Acetaldehyde; Ethanal
U002	Acetone; 2-Propanone
U003	Acetonitrile
U004	Acetophenone; Ethanone, 1-phenyl-
U005	Acetamide, n-9h-fluoren-2-yl-; 2-Acetylaminofluorene
U006	Acetyl chloride
U007	Acrylamide; 2-Propenamide
U008	Acrylic acid; 2-Propenoic acid
U009	Acrylonitrile; 2-propenenitrile
U010	Azirino[2',3':3,4]pyrrolo[1,2-a]indole-4,7-dione, 6-amino-8-[[[(aminocarboynl)oxy]methyl]-1,1a,2,8,8a,8b-hexahydro-8a-methoxy-5-methyl-; Mitomycin C
U011	Amitrole; 1H-1,2,4-Triazol-3-amine
U012	Aniline; Benzenamine
U014	Auramine; Benzenamine, 4,4'-carbonimidoylbis[N,N-dimethyl-
U015	Azaserine; L-Serine, diazoacetate (ester)
U016	Benz(c)acridine
U017	Benzal chloride; Benzene, (dichloromethyl)-
U018	Benz(a)anthracene
U019	Benzene
U020	Benzenesulfonic acid chloride; Benzenesulfonyl chloride
U021	Benzidine; [1,1'-Biphenyl]-4,4'-diamine
U022	Benzo(a)pyrene
U023	Benzene, (trichloromethyl)-; Benzotrichloride
U024	Dichloromethoxy ethane; Ethane, 1,1'-[methylenebis(oxy)]bis[2-chloro-
U025	Dichloroethyl ether; Ethane, 1,1'-oxybis[2-chloro-
U026	Chlornaphazin; Naphthalenamine, N,N'-bis(2-chloroethyl)-
U027	bis(2-Chloroisopropyl) ether; Dichloroisopropyl ether; Propane, 2,2'-oxybis[2-chloro-
U028	1,2-Benzenedicarboxylic acid, bis(2-Ethylhexyl) ester; Diethylhexyl phthalate
U029	Methane, bromo-; Methyl bromide
U030	Benzene, 1-bromo-4-phenoxy-; 4-Bromophenyl phenyl ether
U031	1-Butanol; n-Butyl alcohol
U032	Calcium chromate; Chromic acid H ₂ CrO ₄ , calcium salt
U033	Carbon oxyfluoride; Carbonic difluoride
U034	Acetaldehyde, trichloro-; Chloral
U035	Benzenebutanoic acid, 4-[bis(2-chloroethyl_ amino)-; Chlorambucil
U036	Chlordane, alpha & gamma isomers; 4,7-Methano-1H-indene, 1,2,4,5,6,7,8,8-octachloro-2,3,3a,4,7,7a-hexahydro-
U037	Benzene, chloro-; Chlorobenzene
U038	Benzeneacetic acid, 4-chloro-a-(4-chlorophenyl)-alpha-hydroxy-, ethyl ester; Chlorobenzilate
U039	p-Chloro-m-cresol; Phenol, 4-chloro-3-methyl-
U041	Epichlorohydrin; Oxirane, (chloromethyl)-
U042	2-Chloroethyl vinyl ether; Ethene, (2-chloroethoxy)-
U043	Ethene, chloro-; Vinyl chloride
U044	Chloroform; Methane, trichloro-

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Waste Code	Description
U045	Methane, chloro-; Methyl chloride
U046	Chloromethyl methyl ether; Methane, chloromethoxy-
U047	b-Chloronaphthalene; Naphthalene, 2-chloro-
U048	o-Chlorophenol; Phenol, 2-chloro-
U049	Benzenamine, 4-chloro-2-methyl-, hydrochloride; 4-Chloro-o-toluidine, hydrochloride
U050	Chrysene
U051	Creosote; Lead; Naphthalene; Pentachlorophenol; Phenanthrene; Pyrene; Toluene; m-Xylene; p-Xylene; p-Xylene
U052	Cresol (Cresylic acid); Phenol, methyl-
U053	2-Butenal; Crotonaldehyde
U055	Cumene; Benzene, (1-methylethyl)-
U056	Benzene, hexahydro-; Cyclohexane
U057	Cyclohexanone
U058	Cyclophosphamide; 2H-1,3,2-Oxazaphosphorin-2-amine, N,N-bis(2-chloroethyl)tetrahydro-, 2-oxide
U059	Daunomycin; 5,12-Naphthacenedione, 8-acetyl-10-[3-amino-2,3,6-trideoxy)-alpha-L-lyxo-hexopyranosyl]oxy]-7,8,9,10-tetrahydro-6,8,11-trihydroxy-1-methoxy-, (8S-cis)-
U060	O,P'-DDD; Benzene, 1,1'-(2,2-dichloroethylidene)bis[4-chloro-
U061	O,P'-DDD; P,P'-DDD; O,P'-DDE; P,P'-DDD; O,P'-DDT; Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-chloro-; P,P'-DDT; DDT
U062	Carbamothioic acid, bis (1-methylethyl)-, S-(2,3-dichloro-2-propenyl) ester; Diallate
U063	Dibenz(a,h)anthracene
U064	Benzo(rst)pentaphene; Dibenzo(a,i)pyrene
U066	1,2- Dibromo-3-chloropropane; Propane, 1,2-dibromo-3-chloro-
U067	Ethane, 1,2-dibromo; Ethylene dibromide
U068	Methane, dibromo-; Methylene bromide
U069	1,2- Benzenedicarboxylic acid, dibutyl ester; Dibutyl phthalate
U070	o-Dichlorobenzene; Benzene, 1,2-dichloro-
U071	m-Dichlorobenzene; Benzene, 1,3-dichloro-
U072	Benzene, 1,4-dichloro-; p-Dichlorobenzene
U073	[1,1'- Biphenyl]-4,4'-diamine, 3,3'-dichloro-; 3,3'-Dichlorobenzidine
U074	2-Butene, 1,4-dichloro-; 1,4- Dichloro-2-butene
U075	Dichlorodifluoromethane; Methane, dichlorodifluoro-
U076	Ethane, 1,1-dichloro-; Ethylidene dichloride
U077	Ethane, 1,2-dichloro-; Ethylene dichloride
U078	1,1- Dichloroethylene; Ethene, 1,1-dichloro
U079	1,2- Dichloroethylene; Ethene, 1,2-dichloro
U080	Methylene chloride; Methane, dichloro-
U081	2,4- Dichlorophenol; Phenol, 2,4-dichloro-
U082	2,6- Dichlorophenol; Phenol, 2,6-dichloro-
U083	Propane, 1,2-dichloro-; Propylene dichloride
U084	1,3-Dichloropropene; 1-Propene, 1,3-dichloro-; 1,3-Dichloropropene (cis); 1,3-Dichloropropene (trans)
U085	2,2'-Bioxirane; 1,2:3,4-Diepoxybutane
U086	N,N'-Diethylhydrazine; Hydrazine, 1,2-diethyl-
U087	O,O-Diethyl s-methyl dithiophosphate; Phosphorodithioic acid, O,O-diethyl s-methyl ester

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Waste Code	Description
U088	1,2-Benzenedicarboxylic acid, diethyl ester; Diethyl phthalate
U089	Diethylstilbesterol; Phenol, 4,4'-(1,2-diethyl-1,2-ethenediyl)bis-
U090	Benzodioxole, 5-propyl-1,3-; Dihydrosafrole
U091	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dimethoxy-; 3,3'-Dimethoxybenzidine
U092	Dimethylamine; Methanamine, n-methyl-
U093	Benzenamine, N,N-dimethyl-4-(phenylazo)-; p-Dimethylaminoazobenzene
U094	Benz(a)anthracene, 7,12-dimethyl-; 7,12-Dimethylbenz[a]anthracene
U095	[1,1'-Biphenyl]-4,4'-diamine, 3,3'-dimethyl-; 3,3'-Dimethylbenzidine
U096	a,a-Dimethylbenzylhydroperoxide; Hydroperoxide, 1-methyl-1-phenylethyl-
U097	Carbamic chloride, dimethyl-; Dimethylcarbamoyl chloride
U098	1,1-Dimethylhydrazine; Hydrazine, 1,1-dimethyl-
U099	1,2-Dimethylhydrazine; Hydrazine, 1,2-dimethyl-
U101	2,4-Dimethylphenol; Phenol, 2,4-dimethyl-
U102	1,2-Benzenedicarboxylic acid, dimethyl ester; Dimethyl phthalate
U103	Dimethyl sulfate; Sulfuric acid, dimethyl ester
U105	Benzene, 1-methyl-2,4-dinitro-; 2,4-Dinitrotoluene
U106	Benzene, 2-methyl-1,3-dinitro-; 2,6-Dinitrotoluene
U107	Di-n-octyl phthalate;
U108	1,4-Dioxane; 1,4-Diethyleneoxide
U109	1,2-Diphenyl hydrazine; Hydrazine, 1,2-diphenyl-
U110	Dipropylamine; 1-Propanamine, N-propyl-
U111	1-Propanamine, n-nitroso-n-propyl-; Di-n-propylnitrosamine
U112	Ethyl acetate; Acetic acid, ethyl ester
U113	Ethyl acrylate; 2-Propenoic acid, ethyl ester
U114	Carbamodithioic acid, 1,2-ethanediybis-, salts & esters; Ethylenebisdithiocarbamic acid; Ethylenebisdithiocarbamic acid, salts & esters
U115	Ethylene oxide; Oxirane
U116	Ethylenethiourea; 2-Imidazolidinethione
U117	Ethyl ether; Ethane, 1,1'-oxybis
U118	Ethyl methacrylate; 2-Propenoic acid, 2-methyl-, ethyl ester
U119	Ethyl methanesulfonate; Methanesulfonic acid, ethyl ester
U120	Fluoranthene
U121	Methane, trichlorofluoro-; Trichloromonofluoromethane
U122	Formaldehyde
U123	Formic acid
U124	Furan; Furfuran
U125	2-Furancarboxaldehyde; Furfural
U126	Glycidylaldehyde; Oxiranecarboxyaldehyde
U127	Benzene, hexachloro-; Hexachlorobenzene
U128	1,3-Butadiene, 1,1,2,3,4,4-hexachloro-; Hexachlorobutadiene
U129	a-BHC; b-BHC; d-BHC; g-BHC; Cyclohexane, 1,2,3,4,5,6-hexachloro-; Lindane
U130	1,3-Cyclopentadiene, 1,2,3,4,5,5-hexachloro-; Hexachlorocyclopentadiene
U131	Ethane, hexachloro-; Hexachloroethane
U132	Hexachlorophene; Phenol, 2,2'-methylenebis[3,4,6-trichloro-
U133	Hydrazine

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Waste Code	Description
U134	Fluoride (as hydrogen fluoride); Hydrofluoric acid; Hydrogen fluoride
U135	Hydrogen sulfide
U136	Arsenic acid, dimethyl-; Cacodylic acid
U137	Indeno(1,2,3-cd)pyrene
U138	Methane, iodo-; Methyl iodide
U140	Isobutyl alcohol; 1-Propanol, 2-methyl-
U141	Benzodioxole, 5-(1-propenyl)-1,3-; Isosafrole
U142	Kepone; 1,3,4-Metheno-2H-cyclobuta[cd]pentalen-2-one, 1,1a,3,3a,4,5,5a,5b,6-decachlorooctahydro-
U143	2-Butenoic acid, 2-methyl, 7-[[2,3-dihydroxy-2-(1-methoxyethyl)-3-methyl-1-oxobutoxy]methyl]2,3,5,7a-tetrahydro-1H-pyrrolizin-1-yl ester, [1S-[1alpha(Z),7(2S*,3R*),7aalpha]]-; Lasiocarpine
U144	Acetic acid, lead(2+) salt; Lead acetate
U145	Lead phosphate; Phosphoric acid, lead (2+) salt (2:3)
U146	Lead subacetate; Lead, bis(acetato-o)tetrahydroxytri-
U147	2,5-Furandione; Maleic anhydride
U148	Maleic hydrazide; 3,6-Pyridazinedione, 1,2-dihydro-
U149	Malononitrile; Propanedinitrile
U150	Melphalan; L-Phenylalanine, 4-[bis(2-chloroethyl)amino]-
U151	Mercury
U152	Methacrylonitrile; 2-Propenenitrile, 2-methyl-
U153	Methanethiol; Thiomethanol
U154	Methanol; Methyl alcohol
U155	1,2-Ethanediamine, N,N-dimethyl-n'-2-pyridinyl-n'-(2-thienylmethyl)-; Methapyrilene
U156	Carbonochloridic acid, methyl ester; Methyl chlorocarbonate
U157	Benz(j)aceanthrylene, 1,2-dihydro-3-methyl-; 3-Methylcholanthrene
U158	Benzenamine, 4,4'-methylenebis[2-chloro-; 4,4'-Methylenebis(2-chloroaniline)
U159	Methyl ethyl ketone (MEK); 2-Butanone
U160	2-Butanone, peroxide; Methyl ethyl ketone peroxide
U161	Methyl isobutyl ketone; 4-Methyl-2-pentanone; Pentanol, 4-methyl-
U162	Methyl methacrylate; 2-Propenoic acid, 2-methyl-, methyl ester
U163	Guanidine, n-methyl-n'-nitro-n-nitroso-; MNNG
U164	Methylthiouracil; 4(1H)-Pyrimidinone, 2,3-dihydro-6-methyl-2-thioxo-
U165	Naphthalene
U166	1,4-Naphthalenedione; 1,4-Naphthoquinone
U167	1-Naphthalenamine; a-Naphthylamine
U168	2-Naphthalenamine; b-Naphthylamine
U169	Nitrobenzene; Benzene, nitro-
U170	p-Nitrophenol; Phenol, 4-nitro-
U171	2-Nitropropane; Propane, 2-nitro-
U172	1-Butanamine, n-butyl-n-nitroso-; N-Nitrosodi-n-butylamine
U173	Ethanol, 2,2'-(nitrosoimino)bis-; N-Nitrosodiethanolamine
U174	Ethanamine, n-ethyl-n-nitroso-; N-Nitrosodiethylamine
U176	N-Nitroso-n-ethylurea; Urea, n-ethyl-n-nitroso-
U177	N-Nitroso-n-methylurea; Urea, n-methyl-n-nitroso-

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Waste Code	Description
U178	Carbamic acid, methylnitroso-, ethyl ester; N-Nitroso-n-methylurethane
U179	N-Nitrosopiperidine; Piperidine, 1-nitroso-
U180	N-Nitrosopyrrolidine; Pyrrolidine, 1-nitroso-
U181	Benzenamine, 2-methyl-5-nitro-; 5-Nitro-o-toluidine
U182	Paraldehyde; 1,3,5-Trioxane, 2,4,6-trimethyl-
U183	Benzene, pentachloro-; Pentachlorobenzene
U184	Ethane, pentachloro-; Pentachloroethane
U185	Benzene, pentachloronitro-; Pentachloronitrobenzene (PCNB)
U186	1-Methylbutadiene; 1,3-Pentadiene
U187	Acetamide, n-(4-ethoxyphenyl)-; Phenacetin
U188	Phenol
U189	Phosphorus sulfide; Sulfur phosphide
U190	1,3-Isobenzofurandione; Phthalic anhydride
U191	2-Picoline; Pyridine, 2-methyl-
U192	Benzamide, 3,5-dichloro-n-(1,1-dimethyl-2-propynyl)-; Pronamide
U193	1,2-Oxathiolane, 2,2-dioxide; 1,3-Propane sultone
U194	1-Propanamine; N-Propylamine
U196	Pyridine
U197	P-Benzoquinone; 2,5-Cyclohexadiene-1,4-dione
U200	Reserpine; Yohimban-16-carboxylic acid, 11,17-dimethoxy-18-[(3,4,5-trimethoxybenzoyl)oxy]-, methyl ester, (3beta, 16beta, 17alpha, 18beta,20alpha)-
U201	1,3-Benzenediol; Resorcinol
U202	1,2-Benzisothiazol-3(2h)-one, 1,1 dioxide, & salts; Saccharin, & salts
U203	Benzodioxole, 5-(2-propenyl)-1,3-; Safrole
U204	Selenious acid; Selenium dioxide
U205	Selenium sulfide SeS2
U206	Glucopyranose, 2-deoxy-2-(3-methyl-3-nitrosoureido)-, D-; D-Glucose, 2-deoxy-2-2-[[[(methylnitrosoamino)-carbonyl]amino]-]; Streptozotocin
U207	Benzene, 1,2,4,5-tetrachloro-; 1,2,4,5-Tetrachlorobenzene
U208	1,1,1,2-Tetrachloroethane; Ethane, 1,1,1,2-tetrachloro-
U209	1,1,2,2-Tetrachloroethane; Ethane, 1,1,2,2-tetrachloro-
U210	Tetrachloroethylene; Ethene, tetrachloro-
U211	Carbon tetrachloride; Methane, tetrachloro-
U213	Tetrahydrofuran; Furan, tetrahydro-
U214	Acetic acid, thallium(1+) salt; Thallium acetate
U215	Carbonic acid, dithallium (1+) salt; Thallium carbonate
U216	Thallium chloride
U217	Nitric acid, thallium (1+) salt; Thallium nitrate
U218	Ethanethioamide; Thioacetamide
U219	Thiourea
U220	Benzene, methyl-
U221	Benzenediamine, ar-methyl-; Toluenediamine
U222	Benzenamine, 2-methyl-, hydrochloride; O-Toluidine hydrochloride
U223	Benzene, 1,3-diisocyanatomethyl-; Toluene diisocyanate
U225	Bromoform; Methane, tribromo-

**TABLE II-2. ACCEPTABLE HAZARDOUS WASTE AND WASTE CONSTITUENTS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Waste Code	Description
U226	Ethane, 1,1,1-trichloro-; Methyl chloroform
U227	Ethane, 1,1,2-trichloro-; 1,1,2-Trichloroethane
U228	Trichloroethylene; Ethene, trichloro-
U234	Benzene, 1,3,5-trinitro-; 1,3,5-Trinitrobenzene
U235	1-Propanol, 2,3-dibromo-, phosphate (3:1); Tris(2,3-dibromopropyl) phosphate
U236	2,7-Naphthalenedisulfonic acid, 3,3'-[(3,3'-dimethyl[1,1'-biphenyl]-4,4'-diyl)bis(azo)bis[5-amino-4-hydroxy]-, tetrasodium salt; Trypan blue
U237	2,4-(1H,3H)-Pyrimidinedione, 5-[bis(2-chloroethyl)amino]-; Uracil mustard
U238	Carbamic acid, ethyl ester; Ethyl carbamate (urethane)
U239	Xylene; Benzene, dimethyl-
U240	Acetic acid, (2,4-dichlorophenoxy)-, salts & esters; 2,4-D, salts, esters
U243	Hexachloropropene; 1-Propene, 1,1,2,3,3,3-hexachloro-
U244	Thioperoxydicarbonic diamide, tetramethyl-; Thiram
U246	Cyanogen bromide (CN)Br
U247	Benzene, 1,1'-(2,2,2-trichloroethylidene)bis[4-methoxy-; Methoxychlor
U248	2H-1-Benzopyran-2-one, 4-hydroxy-3-(3-oxo-1-phenyl-butyl)-; Warfarin, & salts when present at conc. of <= 0.3%
U249	Zinc phosphide Zn3P2, when present at conc. <= 10%
U271	Carbamic acid, [1- [(butylamino) carbonyl]- 1H-benzimidazol-2-yl] -, methyl ester
U278	1,3-Benzodioxol-4-ol, 2,2-dimethyl-, methyl carbamate
U279	1-Naphthalenol, methylcarbamate
U280	Carbamic acid, (3-chlorophenyl)-, 4-chloro-2-butynyl ester
U328	Benzenamine, 2-methyl-; o-Toluidine
U353	Benzenamine, 4-methyl-; p-Toluidine
U359	Ethylene glycol monoethyl ether; Ethanol, 2-ethoxy-
U364	1,3-Benzodioxol-4-ol, 2,2-dimethyl-
U367	7-Benzofuranol, 2,3-dihydro-2,2-dimethyl-
U372	Carbamic acid, 1H-benzimidazol-2-yl, methyl ester
U373	Carbamic acid, phenyl-, 1-methylethyl ester
U387	Carbamothioic acid, dipropyl-, s-(phenylmethyl) ester
U389	Carbamothioic acid, bis(1-methylethyl)-, s-(2,3,3-trichloro-2-propenyl) ester
U394	Ethanimidothioic acid, 2-(dimethylamino) -n-hydroxy-2-oxo-, methyl ester
U395	Diethylene glycol, dicarbamate; Ethanol, 2,2'-oxybis-, dicarbamate
U404	Ethanamine, N,N-diethyl-
U409	Carbamic acid, [1,2-phenylenebis (iminocarbonothioyl)] bis-, dimethyl ester
U410	Ethanimidothioic acid, N,N'-[thiobis [(methylimino) carbonyloxy]] bis-, di-methyl ester
U411	Phenol, 2-(1-methylethoxy)-, methylcarbamate

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Treatment and Operations Building
Container Storage Area

Containment Calculations

Given:

Base Area (a)	2,331 ft ² (42'x55.5')
Curb Height (h) (rollovers)	4 in = 4 in / 12 in = 0.33 ft
Pallet Displacement (pd)	(12.48 gal) (80 pallets) = 998.4 gal
100% volume of largest container (LC)	= 718 gal (i.e., B-25 container)
100% volume of total containers (TC)	= 35,200 gal (640, 55-gallon drums)
10% volume of total container = (10%) (TC)	= 3,520
25 year/24 hour storm water volume	= 0 gal (building is totally enclosed)

Containment Capacity Available (CCA):

$$CCA = (h \times a \times 7.48 \text{ gal/ft}^3) - pd$$

$$CCA = (0.33 \text{ ft} \times 2,331 \text{ ft}^2 \times 7.48 \text{ gal/ft}^3) - 998.4$$

$$CCA = 4,755 \text{ gal}$$

Conclusion

The net available containment volume (4,755 gal) exceeds the volume of the largest container (718 gal) and is in excess of 10% of the maximum volume (3,520 gal) of containerized waste that will be stored in the Treatment and Operations Building container storage area.

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Processing and Storage Building
Container Storage Area

Containment Calculations

Containment Calculations Adjustment for Pallet Displacement

Given:

Zone 1 Containment Capacity	3,241 gal (see attached calculations)
Zone 2 Containment Capacity	5,283 gal (see attached calculations)
Zone 3 Containment Capacity	7,449 gal (see attached calculations)
Pallet Displacement (pd) Total	(12.48 gal) (164 pallets) = 2,046.72 gal
Zone 1 pd	(12.48 gal) (24 pallets) = 299.52 gal
Zone 2 pd	(12.48 gal) (46 pallets) = 574.08 gal
Zone 3 pd	(12.48 gal) (94 pallets) = 1,173.12 gal
100% volume of largest container (LC):	
Zone 1 LC	= 718 gal
Zone 2 LC	= 718 gal
Zone 3 LC	= 718 gal
100% volume of total containers (TC)	= 71,830 gal
Zone 1 TC	= 9,130 gal drum equivalents
Zone 2 TC	= 21,340 gal drum equivalents
Zone 3 TC	= 41,360 gal drum equivalents
550 gal totes and B-25 displacement	= not significant (totes are on legs 5.5 in off the ground, containment curb is 5.75 in)
Other equipment displacement	= not significant (no equipment of significance is kept in containment areas)
25 year/24 hour storm water volume	= 0 gal (building has metal roof with eaves sufficient to prevent rain from blowing in)

Containment Capacity Available (CCA):

Zone 1 CCA

CCA = 3,241 gal – 299.52 gal

CCA = 2,941.48 gal

Zone 1 Conclusion

The net available containment volume (2,941 gal) exceeds the volume of the largest container (718 gal) and is in excess of 10% of the maximum volume (913 gal) of containerized waste that will be stored in Zone 1.

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Processing and Storage Building
Container Storage Area

Containment Calculations

Zone 2 CCA

CCA = 5,283 gal – 574.08 gal
CCA = 4,708.92 gal

Zone 2 Conclusion

The net available containment volume (4,709 gal) exceeds the volume of the largest container (718 gal) and is in excess of 10% of the maximum volume (2,134 gal) of containerized waste that will be stored in Zone 2.

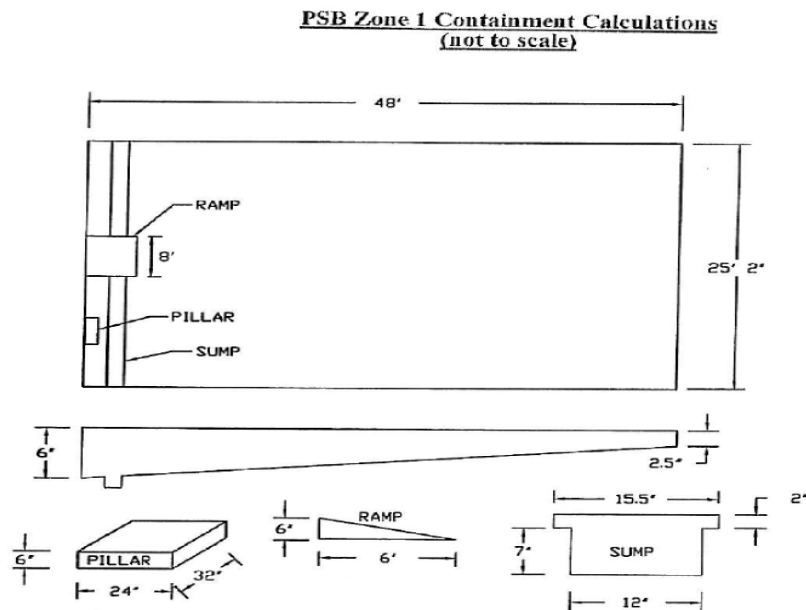
Zone 3 CCA

CCA = 7,449 gal – 1,173.12 gal
CCA = 6,275.88 gal

Zone 3 Conclusion

The net available containment volume (6,276 gal) exceeds the volume of the largest container (718 gal) and is in excess of 10% of the maximum volume (4,136 gal) of containerized waste that will be stored in Zone 3.

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA



Zone 1 Volume = Floor volume + Sump volume – Ramp volume – Pillar volume

Floor Volume = $\frac{1}{6}$ height (upper base area + lower base area + (4 x area of midsection))
= $\frac{1}{6}$ (48') ((2.5" x 25'2") + (6" x 25'2") + 4(4.25" x 25'2"))
= $\frac{1}{6}$ (576") (755" + 1,812" + 5,134")
= 739,296 cubic inches

Sump Volume = Length (Upper area + Lower area)
= 25'2" ((15.5" x 2") + (12" x 7"))
= 302" (31" + 84")
= 34,730 cubic inches

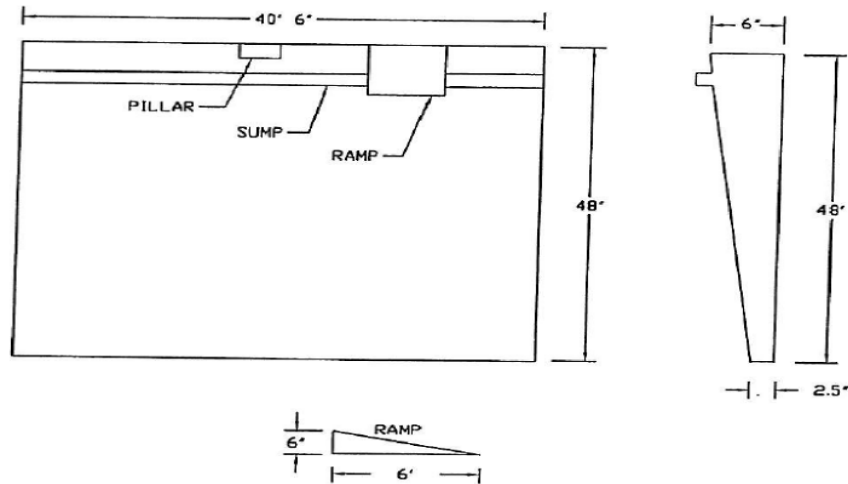
Ramp Volume = $\frac{1}{2}$ (Base x Height x Width)
= $\frac{1}{2}$ (6" x 72" x 96")
= 20,736 cubic inches

Pillar Volume = Base x Height x Width
= 24" x 6" x 32"
= 4,608 cubic inches

Zone 1 Volume = 739,296 + 34,730 – 20,736 – 4,608
= 748,682 cubic inches ÷ 231 cubic inches per gallon
= 3,241 gallons

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

PSB Zone 2 Containment Calculations
(not to scale)



Zone 2 Volume = Floor volume + Sump volume – Ramp volume – Pillar volume

Floor Volume = $\frac{1}{6}$ height (upper base area + lower base area + (4 x area of midsection))
 $= \frac{1}{6} (48') ((2.5' \times 40'6") + (6' \times 40'6") + 4(4.25' \times 40'6"))$
 $= \frac{1}{6} (576") (1,215" + 2,916" + 8,262")$
 $= 1,189,728$ cubic inches

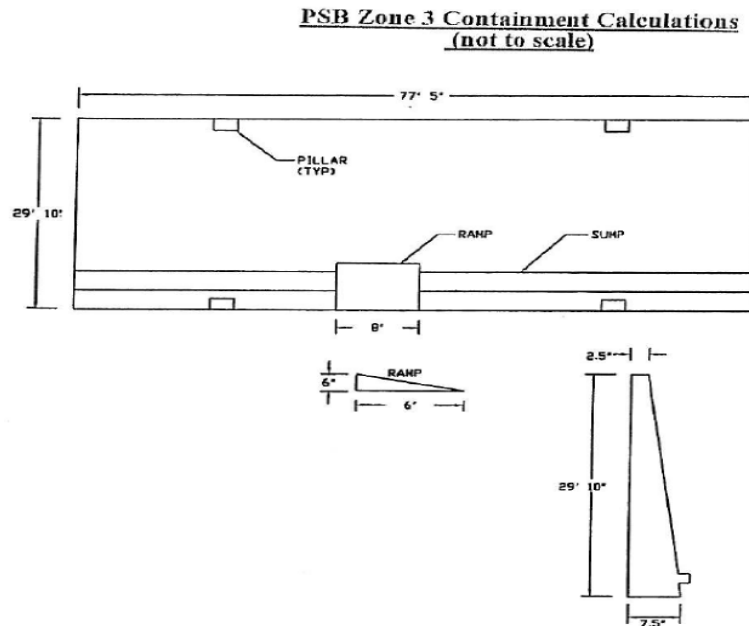
Sump Volume = Length (Upper area + Lower area)
 $= 40'6" ((15.5" \times 2") + (12" \times 7"))$
 $= 486" (31" + 84")$
 $= 55,890$ cubic inches

Ramp Volume = $\frac{1}{2}$ (Base x Height x Width)
 $= \frac{1}{2} (6" \times 72" \times 96")$
 $= 20,736$ cubic inches

Pillar Volume = Base x Height x Width
 $= 24" \times 6" \times 32"$
 $= 4,608$ cubic inches

Zone 2 Volume = $1,189,728 + 55,890 - 20,736 - 4,608$
 $= 1,220,274$ cubic inches \div 231 cubic inches per gallon
 $= 5,283$ gallons

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA



Zone 3 Volume = Floor volume + Sump volume – Ramp volume – 4 Pillar volumes

Floor Volume = $\frac{1}{6}$ height (upper base area + lower base area + (4 x area of midsection))
= $\frac{1}{6}$ (29'10") ((2.5" x 77'5") + (7.5" x 77'5") + 4(5" x 77'5"))
= $\frac{1}{6}$ (358") (2,322.5" + 6,967.5" + 18,580")
= 1,662,910 cubic inches

Sump Volume = Length (Upper area + Lower area)
= 77'5" ((15.5" x 2") + (12" x 7"))
= 929" (31" + 84")
= 106,835 cubic inches

Ramp Volume = $\frac{1}{2}$ (Base x Height x Width)
= $\frac{1}{2}$ (7.5" x 72" x 96")
= 25,920 cubic inches

Pillar Volume = Base x Height x Width
= 24" x 7.5" x 32" x 4
= 23,040 cubic inches

Zone 1 Volume = 1,662,910 + 106,835 – 25,920 – 23,040
= 1,720,785 cubic inches ÷ 231 cubic inches per gallon
= 7,449 gallons

TABLE II-3. SECONDARY CONTAINMENT CALCULATIONS - CONTAINER STORAGE AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

LSV Processing and Storage Warehouse

Containment Calculations

$$\begin{aligned}\text{Base Area} &= 41.167' \times 83.33' + 51' \times 30' - 27' \times 20' \text{ (see attached drawing)} \\ &= 3,430 + 1,530 - 540 \\ &= 4,420 \text{ ft}^2\end{aligned}$$

Curb Height = 2.75" (rollover berm height is 2.75", which is lower than the curb height)

Pallet Displacement (pd) = (12.48 gal) (111 pallets) = 1,385.28 gallons

100% volume of largest container = 718 gallons

100% volume of total containers = 54,340 gallons (988, 55-gal drums)

10% volume of total containers = 5,434 gallons

25 year/24 hour storm water volume = 0 gallons (enclosed building)

$$\begin{aligned}\text{Containment Capacity Available:} \\ &= 2.75/12 \times 4,420 \times 7.48 \text{ gal/ft}^3 - 1,385.3 \\ &= 7,577.3 - 1,385.3 = 6,192 \text{ gallons}\end{aligned}$$

Conclusion:

The net available containment volume (6,192 gallons) exceeds the volume of the largest container (718 gallons) and is in excess of 10% of the maximum volume (i.e., 5,434 gallons) of containerized waste to be stored in the container storage area at the LSV Processing and Storage Warehouse.

TABLE II-4. INSPECTION LOG - CONTAINER STORAGE AREAS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Inspection Details	M		T		W		Th		F	
Date										
Time										
Inspector										
Hazardous Waste Container Storage Areas										
Storage areas are clean	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Container exteriors are clean	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Drums are stacked no more than 2 high	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Top level drums are banded	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Aisle spacing is adequate	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Storage areas are free from leaks or spills	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Containers are free from damage	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Signs and labels are facing outward	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Sumps are free of accumulated material	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Incompatible materials are separated	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Discrepancies										
All items are in compliance/no discrepancies	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Discrepancies not listed above										
Discrepancy Location (PSB, LSV, TOB, Other)										

Instructions for inspection:

Log date, time and inspector name. Examine all Hazardous Waste Container Storage Areas (PSB Zones 1-3, TOB Zones 4-12, LSV) for area cleanliness, container cleanliness, appropriate stacking (2 drums high, second level palletized and banded, up to 3 containers high in chemotherapy cage), and evidence of damage to containers. Ensure aisle spacing is adequate for inspection and emergency response. Look for evidence of leaks and spills, and make sure that all labels are facing outward and visible. Ensure that all Hazardous Waste, DOT and Perma-Fix labels are present and legible. Inspect sumps in PSB to ensure that no liquid is accumulated. Answer all inspection questions, indicating yes or no to each statement. an answer of "No" indicates a discrepancy and requires additional steps below.

Instructions for discrepancies:

Note the location of each discrepancy, including location (PSB, LSV, TOB, Dock, Other) and the zone number if applicable. Note any container numbers related to the discrepancy, and the nature of the discrepancy. Email these details to the RSO on a daily basis. Emails are then attached to the weekly work order as documentation of inspection results.

**TABLE II-5. INSPECTION LOG - BULK TANK
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Inspection Details	M		T		W		Th		F	
Date										
Time										
Inspector										
Hazardous Waste Bulk Tank										
Tank Containment areas are clean	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Tank is free from leaks	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Tank is free from corrosion	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Containment is free from precipitation	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Containment is free from any accumulation	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Plumbing in good condition	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Concrete bunker in good condition	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Transfer pump and overflow devices functional	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Overflow alarm is functional	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Discrepancies										
All items are in compliance/no discrepancies	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
Discrepancies not listed above										

Instructions for inspection:	
<p>Log date, time and inspector name. Examine the Hazardous Waste Bulk Tank for area cleanliness, tank cleanliness and integrity, including evidence of damage. Look for evidence of leaks, spills, and accumulated precipitation. Inspect plumbing, concrete, transfer pump and overflow devices. Answer all inspection questions, indicating yes or no to each statement. An answer of "No" indicates a discrepancy and requires additional steps below.</p>	

Instructions for discrepancies:	
<p>Note the location of each discrepancy. Email these details to the RSO on a daily basis. Emails are then attached to the weekly work order as documentation of inspection results.</p>	

**TABLE II-6. INSPECTION SCHEDULE
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Equipment used in the Perma-Fix® II process will be visually inspected at least once each operating day for cracks, leaks, corrosion, bulging, erosion, or other deterioration.

SPECIFIC ITEM	TYPES OF PROBLEMS EXPECTED	FREQUENCY OF INSPECTIONS
Secondary containment	Spills, cracks, deterioration, uneven settlement	Each operational day
Piping system (includes valves, pipes, flanges, fittings, hoses)	Corrosion, bulging, cracks, deterioration, discoloration, leaks	Each operational day
Condenser	Leaks, cracks, deterioration, discoloration	Each operational day
Accumulator tank (tank shell, top, bottom, manhole)	Corrosion, bulging, cracks, deterioration, discoloration, leaks	Each operational day**
Reactor vessel (Heating/cooling jacket, discharge valve, cleanout doors, locks, and hinges)	Discoloration, cracks, leaks, deterioration of locks and hinges, corrosion	Each operational day**
Accumulator tank (internal inspection)	Pitting, seam integrity, holes, depressions, thickness, cracking	Yearly*
Reactor vessel (internal inspection)	Pitting, seam integrity, holes, depressions, thickness, cracking	Yearly*

*If the Perma-Fix II processing was not conducted for a year, facility may not conduct the yearly inspection. This inspection, however, will be conducted prior to reusing the equipment.

**An internal inspection will be conducted annually by an independent engineer.

**TABLE II-7. PERMA-FIX ® II PROCESSING AREA SECONDARY CONTAINMENT CALCULATIONS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

List of equipment situated inside secondary containment, with a minimum height of 4":

<u>Unit</u>	<u>Volume, gal.</u>
Reactor Vessel	317
Absorber tank	35
Condenser	16
Accumulator tank	110
Jib Crane	----
Drum Tumbler	160 (maximum)
Skid mixer	----
Gravity rollers	----
Up to 20 drums of waste	1,100
Liquid Collection Tote	550
<u>Total</u>	2,288

The volume these units displace is considered negligible, since only legs and support rails are in contact with the floor, except for the 20 drums of waste.

List of equipment situated inside secondary containment not elevated from the floor:

Up to twenty 55-gallon drums staged for processing displacing a total of approximately 120 gallons.

Approximate dimensions of Quonset Hut:

$$34.5' \times 34.25' = 1,181.625 \text{ ft}^2$$

Spill volume contained by 4" berm:

$$1181.625 \text{ ft}^2 \times 4/12 \text{ ft} = 393.9 \text{ ft}^3$$

$$393.9 \text{ ft}^3 \times 7.48 \text{ gal/ft}^3 = 2,946 \text{ gal}$$

Actual spill volume contained by 4" berm:

$$2,946 \text{ gal} - 120 \text{ gal (volume displaced by 20 drums)} = 2,826 \text{ gal}$$

Percent of total unit volume contained by the secondary containment:

$$2,826 / 2,288 = 1.235 \text{ (or 123\%)}$$

**TABLE II-8. MAXIMUM INVENTORY
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

DESCRIPTION	CAPACITY (Gal)
EXISTING UNITS	
Container Storage Area (Processing and Storage Building) 1311 equivalent 55 gallon drums	72,105
Storage Tank (Processing and Storage Building)	3,000
Storage Tanks (LSV Processing Area)	385
Container Storage Area (Treatment and Operations Building) 640 equivalent 55 gallon drums	35,200
Reactor Vessel (Treatment and Operations Building)	317
Treatment Tank (Condenser)	16
Treatment Tank (Accumulator Tank, Treatment and Operations Building)	120
Treatment Tank (Absorber Tank, Treatment and Operations Building)	30
Debris Treatment Vat (Dip Tank)	521
Container Storage Area (LSV Processing and Waste Storage Warehouse)	54,340
Portable Non-elementary Neutralization Tank	300
Portable Deactivation Unit	55
Portable Dual Drum Rotator	170
Portable Mercury Amalgamation Unit	15
TOTAL	166,574

**TABLE II-9. CLOSURE SCHEDULE
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Closure Activity	Days Elapsed
Notification in writing to FDEP of intent to begin closure activities.	-45
Receipt of known final volume of hazardous waste into container or tank management unit or receipt of FDEP approval of Closure Plan, whichever is later ¹ .	0
Begin treatment and/or removal of all hazardous wastes from container or tank unit(s) ² .	30
Complete treatment and/or removal of all hazardous wastes from container or tank unit(s).	90
Complete removal and decontamination of ancillary equipment, miscellaneous units, tanks, and empty containers that have contacted hazardous waste.	120
Complete decontamination of secondary containment structures.	135
Conduct soil sampling activities.	165
Complete final closure activities.	180
Submit certification to FDEP (signed by PFF and a qualified professional engineer) that the hazardous waste management units have been closed in accordance with the specifications of the approved Closure Plan.	240

¹ *If an unexpected event during closure of a hazardous waste management unit requires modification of the approved Closure Plan, PFF will request a permit modification within 30 days of the unexpected event.*

² *In event that there is a reasonable possibility that the hazardous waste management unit will receive additional hazardous wastes, PFF will initiate closure activities no later than one year after the date on which the unit received the most recent volume of hazardous waste as specified under 40 CFR 264.112(d)(2).*

**TABLE II-10. CLOSURE PERFORMANCE STANDARDS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

UNIT	CLOSURE PERFORMANCE STANDARDS	
	Media Sampled	Closure Standard
Tanks	Rinsewater	Table I Groundwater and Surface Water Cleanup Target Levels for Chapter 62-777, F.A.C., or the risk Assessment Methodology provided in Chapter 62-780, F.A.C.
Container Storage Area's Secondary Containment	Rinsewater	Table I Groundwater and Surface Water Cleanup Target Levels for Chapter 62-777, F.A.C., or the risk Assessment Methodology provided in Chapter 62-780, F.A.C.
	Concrete	Table II Soil Cleanup Target Levels for Chapter 62-777, F.A.C., or the Risk Assessment Methodology provided in Chapter 62-780, F.A.C.
Subsurface Investigations	Soil	Table II Soil Cleanup Target Levels for Chapter 62-777, F.A.C., naturally-occurring background concentrations, or the Risk Assessment Methodology provided in Chapter 62780, F.A.C.
Ancillary Equipment & Miscellaneous RCRA Units	Rinsewater	Table I Groundwater and Surface Water Cleanup Target Levels for Chapter 62-777, F.A.C., or the Risk Assessment Methodology provided in Chapter 62-780, F.A.C.

**TABLE II-11 EQUIPMENT LIST - PF-II VACUUM EQUIPMENT
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

PART NO.	Equipment Description	Exemption from Subpart Requirements	Applicable Regulation
15A06TM/XX5XZ5	Vacuum Pump	1	40 CFR 264.1050(e)
247254	Drive Assembly w/Aluminum Guard	1	40 CFR 264.1050(e)
M-133022	Bare Assembly C.S.	1	40 CFR 264.1050(e)
223000	Vacuum Guage SS	1	40 CFR 264.1050(e)
T-133022-1	Air/Water Separator SS	1	40 CFR 264.1050(e)
41604,843-12	Level Guage and Valves SS XP	1	40 CFR 264.1050(e)
1/2" GLOBE VLV	Balancing Globe Valve 316SS	1	40 CFR 264.1050(e)
1 1/2 " 9NB3600TT	Vacuum Inlet Isolation Valve 316SS	1	40 CFR 264.1050(e)
5002-316-1 1/2	Inlet Check Valve 316SS Teflon Seals	1	40 CFR 264.1050(e)
3/4" 9NB3600TT	Recirculating Liquid Iso/Reg Valve 316SS	1	40 CFR 264.1050(e)
581SS-3/4 SS	Recirculating Liquid Y-Strainer SS	1	40 CFR 264.1050(e)
223001	Compound Gauge SS	1	40 CFR 264.1050(e)
1 1/2" 9NB3600TT	Drain Valve SS	1	40 CFR 264.1050(e)
518SS-1/2	Y-Strainer SS	1	40 CFR 264.1050(e)
T-133022-2	Accumulator Tank SS	1	40 CFR 264.1050(e)
03048-1-375-4	Heat Exchanger SS Tubes	1	40 CFR 264.1050(e)
223002	Temperature Gauge SS	1	40 CFR 264.1050(e)
249000	Formed Base	1	40 CFR 264.1050(e)
B-83066	Temperature Gauge SS 3" Dial, 0-250, 6" Stem	1	40 CFR 264.1050(e)
1" 9NB3600TT	Ball Valve SS	1	40 CFR 264.1050(e)
1/2" AK200UOM	Check Valve, Swing SS	1	40 CFR 264.1050(e)
3/4" AK200UJM	Recirulating Liquid Control Valve	1	40 CFR 264.1050(e)
MTS	Level Gauge	1	40 CFR 264.1050(e)

**TABLE II-12. EQUIPMENT LIST - HAZARDOUS WASTE TRANSFER AREA (PSB)
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Equipment ID# (Tag Number)	Equipment Type/Location	Exemption from Subpart Requirements	Applicable Regulation
BV-1	Valve, Ball, 2" @ KN-1 and CA-1 on Pump Suction, wand end. Open ended valve.	2	40 CFR 264.1057
BV-2	Valve, Ball, 2" @ KN-2 and CA-2 on Pump Suction, pump end. Open ended valve.	2	40 CFR 264.1057
BV-3	Valve, Ball, 2" @ suction side of Pump PU-5. Open ended valve.	2	40 CFR 264.1057
BV-4	Valve, Ball, 2" @ discharge side of pump PU-5. Open ended valve.	2	40 CFR 264.1057
BV-5	Valve, Ball, 2" @ CA-6 on 2" Sch 40 pipe on bulk tank wall. (Drop pipe). Open ended valve.	2	40 CFR 264.1057
BV-6	Valve, Ball, 2" @ CA-10 on 2" Sch 40 pipe at discharge end (to tanker). Open ended valve.	2	40 CFR 264.1057
BV-7	Valve, Ball, 2" @ CA-9 on 2" Chemhose, from 2" tanker discharge end of pipe. Open ended valve.	2	40 CFR 264.1057
BV-8	Valve, Ball, 2" @ CA-8 on tanker end of discharge hose. Open ended valve.	2	40 CFR 264.1057
BV-9	Valve, Ball, 2" @ Discharge side of pump PU-4. Open ended valve.	2	40 CFR 264.1057
BV-10	Valve, Ball, 2" @ Suction side of pump PU-4. Open ended valve.	2	40 CFR 264.1057
CA-1	Camlock, Male, 2" @ BV-1 on wand end of suction hose.	n/a	40 CFR 264.1058
CA-2	Camlock, Male, 2" @ BV-2 on pump end of suction hose.	n/a	40 CFR 264.1058
CA-3	Camlock, Female, 2" @ CP-1 and CA-2 on suction of pump PU-5	n/a	40 CFR 264.1058
CA-4	Camlock, Male, 2" @ CP-2 on discharge side of pump PU-5	n/a	40 CFR 264.1058
CA-5	Camlock, Female, 2" @ KN-3 on jumper hose connecting to ovhd.	n/a	40 CFR 264.1058
CA-6	Camlock, Female, 2" @ BV-5 on 2" Sch 40 pipe on bulk tank wall. (Drop pipe)	n/a	40 CFR 264.1058
CA-7	Camlock, Male, 2" @ KN-4 on 2" Chemhose jumper to overhead.	n/a	40 CFR 264.1058
CA-8	Camlock, Male, 2" @ BV-8 Tanker end of discharge hose.	n/a	40 CFR 264.1058
CA-9	Camlock, Female, 2" @ BV-7 on pipe end (Overhead) of tanker fill hose.	n/a	40 CFR 264.1058
CA-10	Camlock, Male, 2" @ BV-6 on discharge (tanker) end of overhead pipe.	n/a	40 CFR 264.1058
CA-11	Camlock, Female, 2" @ EL-6 on suction wand	n/a	40 CFR 264.1058
CA-12	Camlock, Male, 2" on Discharge side of pump PU-4	n/a	40 CFR 264.1058
CA-13	Camlock, Female, 2" on Suction side of pump PU-4	n/a	40 CFR 264.1058

**TABLE II-12. EQUIPMENT LIST - HAZARDOUS WASTE TRANSFER AREA (PSB)
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Equipment ID# (Tag Number)	Equipment Type/Location	Exemption from Subpart Requirements	Applicable Regulation
CP-1	Coupling, 2" @ BV-3 on suction side of pump PU-5	n/a	40 CFR 264.1058
CP-2	Coupling, 2" @ BV-4 on discharge side of pump PU-5	n/a	40 CFR 264.1058
CP-3	Coupling, 2" @ BV-9 on discharge of pump PU-4	n/a	40 CFR 264.1058
CP-4	Coupling, 2" @ BV-10 on suction side of pump PU-4	n/a	40 CFR 264.1058
CV-1	Check Valve, 1/4" Backflow preventer on PU-5 Discharge (Blowback lines)	2	40 CFR 264.1057
CV-2	Check Valve, 1/4" Backflow preventer on PU-5 Suction (Blowback Lines)	2	40 CFR 264.1057
CV-3	Check Valve, 1/4" Backflow preventer on PU-4 Discharge (Blowback lines)	2	40 CFR 264.1057
CV-4	Check Valve, 1/4" Backflow preventer on PU-4 Suction (Blowback Lines)	2	40 CFR 264.1057
EL-1	Elbow, 45 deg., Galv., 2" @ BV-5 @ jumper hose connection to drop pipe on wall.	n/a	40 CFR 264.1058
EL-2	Elbow, 45 deg., Galv., 2" @ KN-6 on pulse dampener hose to overhead.	n/a	40 CFR 264.1058
EL-3	Elbow, 45 deg., Galv., 2" @ KN-6 on pulse dampener hose to overhead.	n/a	40 CFR 264.1058
EL-4	Elbow, 90 deg., Galv., 2" @ pump end of overhead pipe	n/a	40 CFR 264.1058
EL-5	Elbow, 90 deg., Galv., 2" @ tanker end of overhead pipe after U-2	n/a	40 CFR 264.1058
EL-6	Elbow, 90 deg., Galv., 2" on drum suction wand.	n/a	40 CFR 264.1058
KN-1	Nipple, King, 2" @ BV-1 on wand end of suction hose.	n/a	40 CFR 264.1058
KN-2	Nipple, King, 2" @ BV-1 on wand end of suction hose.	n/a	40 CFR 264.1058
KN-3	Nipple, King, 2" @ CA-5 on pump end of jumper hose connecting to ovhd.	n/a	40 CFR 264.1058
KN-4	Nipple, King, 2" @ CA-7 on overhead end of jumper hose, connected to CA-6	n/a	40 CFR 264.1058
KN-5	Nipple, King, 2" @ 45 deg Elbow EL-2 @ dampener hose connecting to overhead.	n/a	40 CFR 264.1058
KN-6	Nipple, King, 2" @ 45 deg Elbow EL-3 @ dampener hose connecting to overhead.	n/a	40 CFR 264.1058
KN-7	Nipple, King, 2" @ BV-7 on pipe end of tanker fill hose.	n/a	40 CFR 264.1058
KN-8	Nipple, King, 2" @ BV-8 on tanker end of tanker fill hose.	n/a	40 CFR 264.1058
PU-4	Pump, Sandpiper, 2", SB-2 series diaphragm pump	1	40 CFR 264.1052

**TABLE II-12. EQUIPMENT LIST - HAZARDOUS WASTE TRANSFER AREA (PSB)
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Equipment ID# (Tag Number)	Equipment Type/Location	Exemption from Subpart Requirements	Applicable Regulation
PU-5	Pump, Sandpiper, 2", SB-2 series diaphragm pump	1	40 CFR 264.1052
U-1	Union, 2" Galv. On 2" galv. Overhead pipe @ EL-4 end of pipe. (Pump End)	n/a	40 CFR 264.1058
U-2	Union, 2" Galv. On 2" galv. Overhead pipe @ EL-5 end of pipe. (Tanker end)	n/a	40 CFR 264.1058

LEGEND:

CA – CAMLOCK BV – VALVES CP- Coupling FA – FLANGE CP - COUPLING
KN- KING NIPPLE EL - ELBOW M - MOTOR CV- CHECK VALVE U - UNION
VP - VACUUM PUMP T - TEE TK - TANK X - CROSS
PSB - Processing and Storage Building

Exemptions:

PUMPS (1): 40 CFR 264.1052(e) Pumps without externally actuated shafts, which penetrate the pump housing (e.g. sandpiper pumps), will be monitored. If the results of the monitoring indicate no detectable emissions (instrument reading of < 500 ppm), the pump is exempt from monthly monitoring and weekly inspection and is subject to annual monitoring. The exempted pump identification numbers will be kept in a list as required by 40CFR264.1064(g)(2).

VALVES (2): 40 CFR 264.1050(f) Equipment that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for less than 300 hours per calendar year is excluded from the requirements of section 264.1052 through 264.1060 of this subpart if it is identified, as required in section 264.1064(g)(6) of this subpart.

All repairs must be performed within 15 days of discovery.

**TABLE II-13. EQUIPMENT LIST - MIXED WASTE TRANSFER TO LARGER CONTAINERS AREA
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Tag No.	Equipment Type/Location	Exemption from Subpart Requirements	Applicable Regulation
BV-1	Valve, Ball, 1-1/2" on Pump Discharge. Open ended valve.	2	40 CFR 264.1057
BV-2	Valve, Ball, 1-1/2" on Pump Suction. Open ended valve.	2	40 CFR 264.1057
BV-3	Valve, Ball, 1-1/2" @ CA-3 and KN-1 on Pump Discharge. Open ended valve.	2	40 CFR 264.1057
BV-4	Valve, Ball, 1-1/2" on Pump Discharge Hose @ CA-2 and KN-4. Open ended valve.	2	40 CFR 264.1057
BV-5	Valve, Ball, 1-1/2" on Pump Suction Hose @ CA-5 and KN-3. Open ended valve.	2	40 CFR 264.1057
BV-6	Valve, Ball, 1-1/2" on Pump Suction Hose @ KN-4 and CA-6. Open ended valve.	2	40 CFR 264.1057
CA-1	CAMLOCK, Male, 1-1/2" @ BV-1 on Pump Discharge	n/a	40 CFR 264.1058
CA-2	CAMLOCK, Female, 1-1/2" @ BV-5 and KN-3 on Pump Suction	n/a	40 CFR 264.1058
CA-3	CAMLOCK, Male, 1-1/2" @ BV-3 on Pump Discharge Hose	n/a	40 CFR 264.1058
CA-4	CAMLOCK, Male, 1-1/2" @ KN-2 and BV-4 on Tank End of Discharge Hose	n/a	40 CFR 264.1058
CA-5	CAMLOCK, Male, 1-1/2" @ BV-5 and KN-3 on Pump End of Suction Hose	n/a	40 CFR 264.1058
CA-6	CAMLOCK, Female, 1-1/2" @ BV-6, on hose @ Wand End of Suction Hose	n/a	40 CFR 264.1058
CA-7	CAMLOCK, Male, 1-1/2" on Wand	n/a	40 CFR 264.1058
KN-1	Nipple, King, 1-1/2" @ BV-3, Pump Discharge Hose	n/a	40 CFR 264.1058
KN-2	Nipple, King, 1-1/2" @ CA-4 and BV-4 on Tank End of Pump Discharge Hose	n/a	40 CFR 264.1058
KN-3	Nipple, King, 1-1/2" @ BV-5 on Pump end of Pump Suction Hose	n/a	40 CFR 264.1058
KN-4	Nipple, King, 1-1/2" @ BV-6, Pump Suction, Wand End of Hose	n/a	40 CFR 264.1058
PU-3	Pump, Sandpiper, 1-1/2", Diaphragm Type	1	40 CFR 264.1052

LEGEND:

CA – Camlock BV - Valves CP- Coupling FA – Flange
KN- King Nipple EL – Elbow M - Motor CV- Check Valve
U – Union VP - Vacuum Pump T – Tee TK - Tank X - Cross

Exemptions:

Pumps (1): 40 CFR 264.1052(e) Pumps without externally actuated shafts, which penetrate the pump housing (e.g. sandpiper pumps), will be monitored. If the results of the monitoring indicate no detectable emissions (instrument reading of < 500 ppm), the pump is exempt from monthly monitoring and weekly inspection and is subject to annual monitoring. The exempted pump identification numbers will be kept in a list as required by 40CFR264.1064(g)(2). Pumps with externally actuated shafts will be monitored monthly and visually inspected weekly. Examples of this pump are the Gorman-Rupp pumps in LSV. An instrument reading of >10,000 ppm indicates a leak which requires repair.

VALVES (2): 40 CFR 264.1050(f) Equipment that contains or contacts hazardous waste with an organic concentration of at least 10 percent by weight for less than 300 hours per calendar year is excluded from the requirements of section 264.1052 through 264.1060 of this subpart if it is identified, as required in section 264.1064(g)(6) of this subpart.

ALL repairs must be performed within 15 days of discovery.

PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

FOR POLLUTION CONTROL DUCTWORK AND FLANGES¹

[illegible]

¹ The entire length of the VOC emission control system ductwork must be inspected from the catwalk.

² DRI = Direct Reading Instrument (e.g., organic VOC analyzer or photoionization detector)

**TABLE II-14-1. SAMPLE INSPECTION FORMS
RCRA PERMIT RENEWAL APPLICATION
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

SUBPART BB EQUIPMENT REPAIR LOG

Equipment ID	Date Leak is Detected	Expected Date of Repair	Actual Repair Date	Repair Successful? (i.e., VOC monitoring shows < 10,000 ppm)	Method of Repair	Reason for Delay

PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

FOR SUBPART BB EQUIPMENT

[illegible]

attempt to repair within 5 days. If leak is detected, complete the Repair Log.

Date:

PART II

FIGURES

\\TRIHYRO.COM\CLIENTS\OTOR\PERMAFIX\FEL\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-TOPOCONT

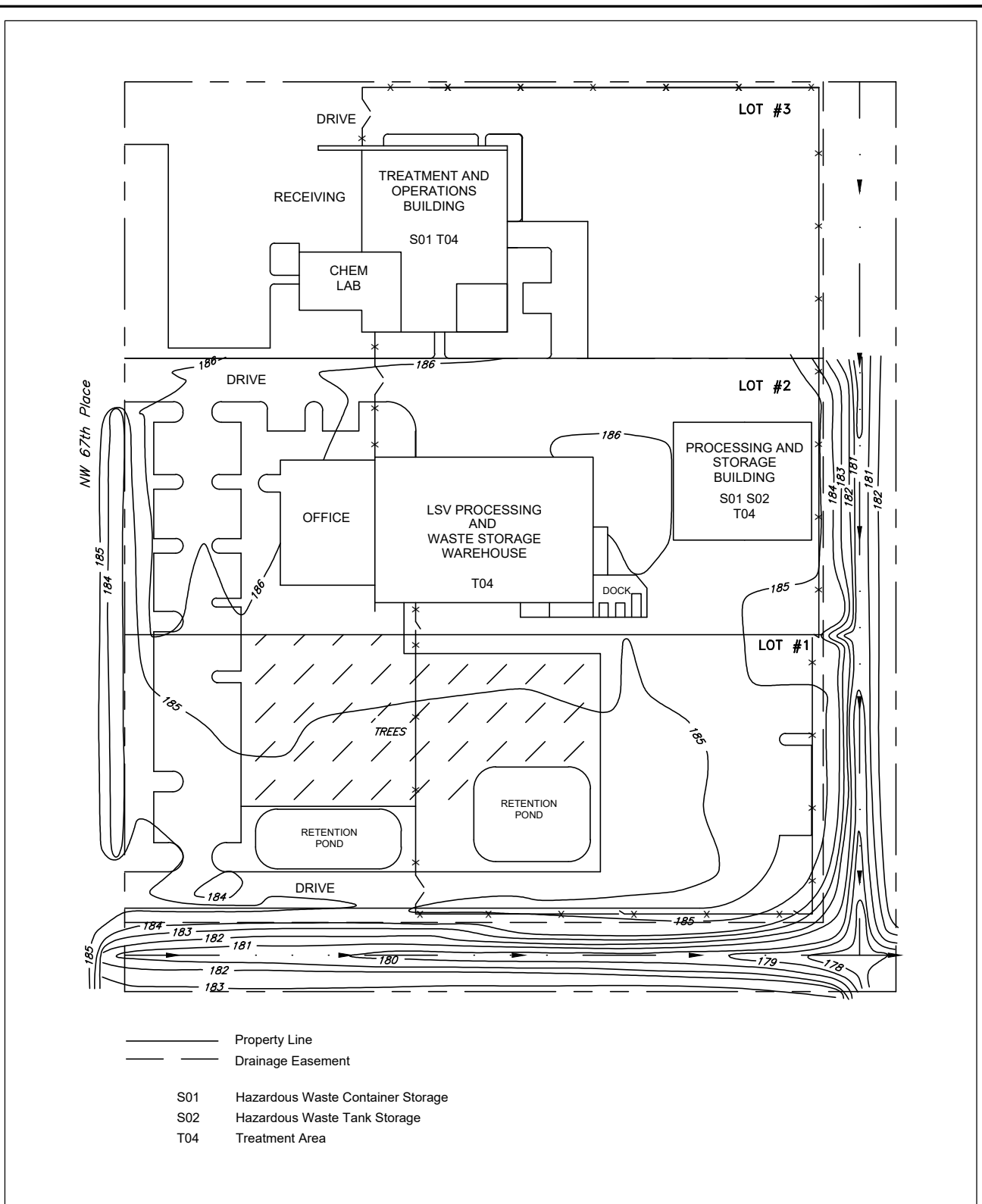


FIGURE II-A-1

**PART II
TOPOGRAPHIC CONTOURS**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP

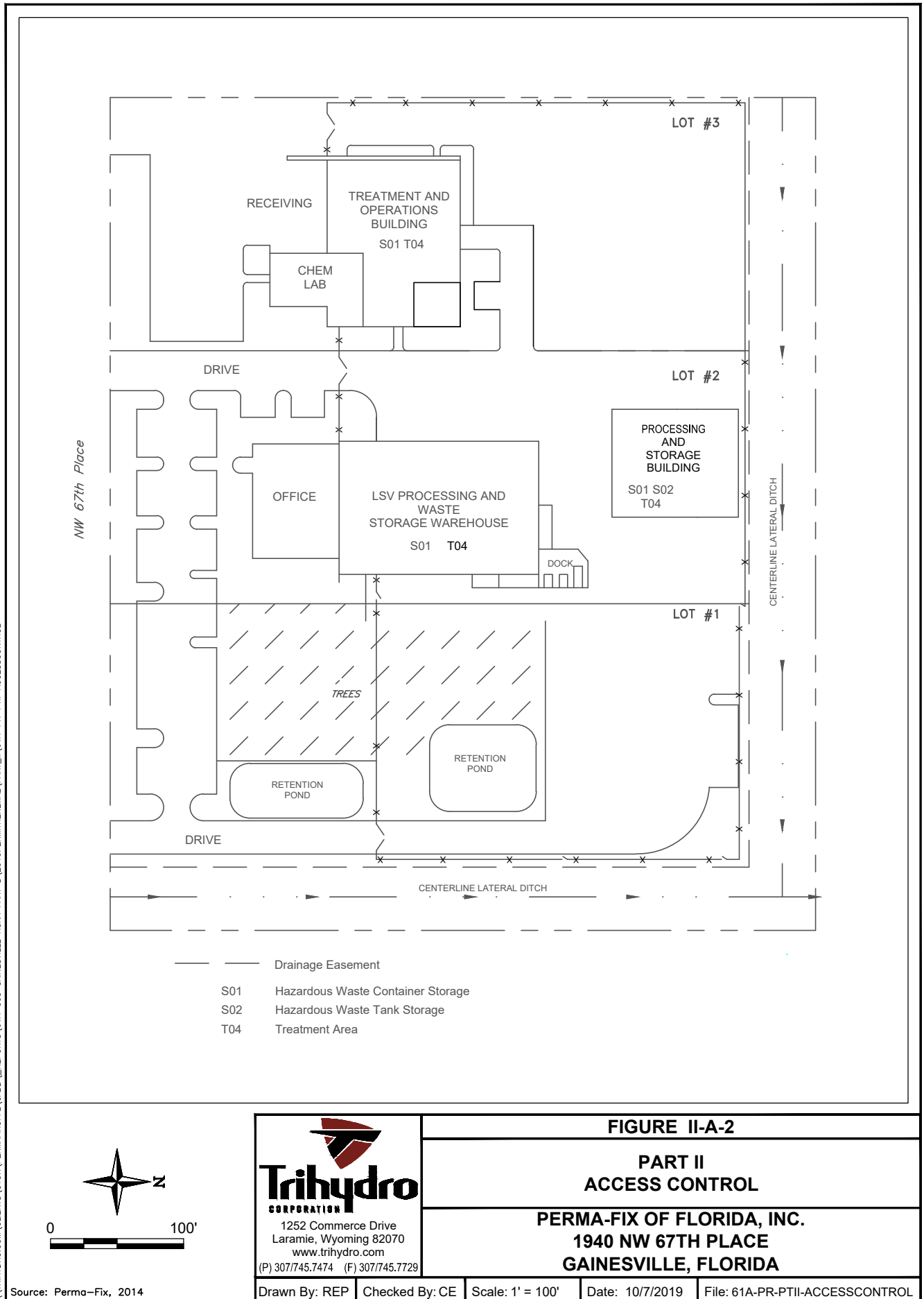
Checked By: CE

Scale: 1" = 100'

Date: 10/4/2019

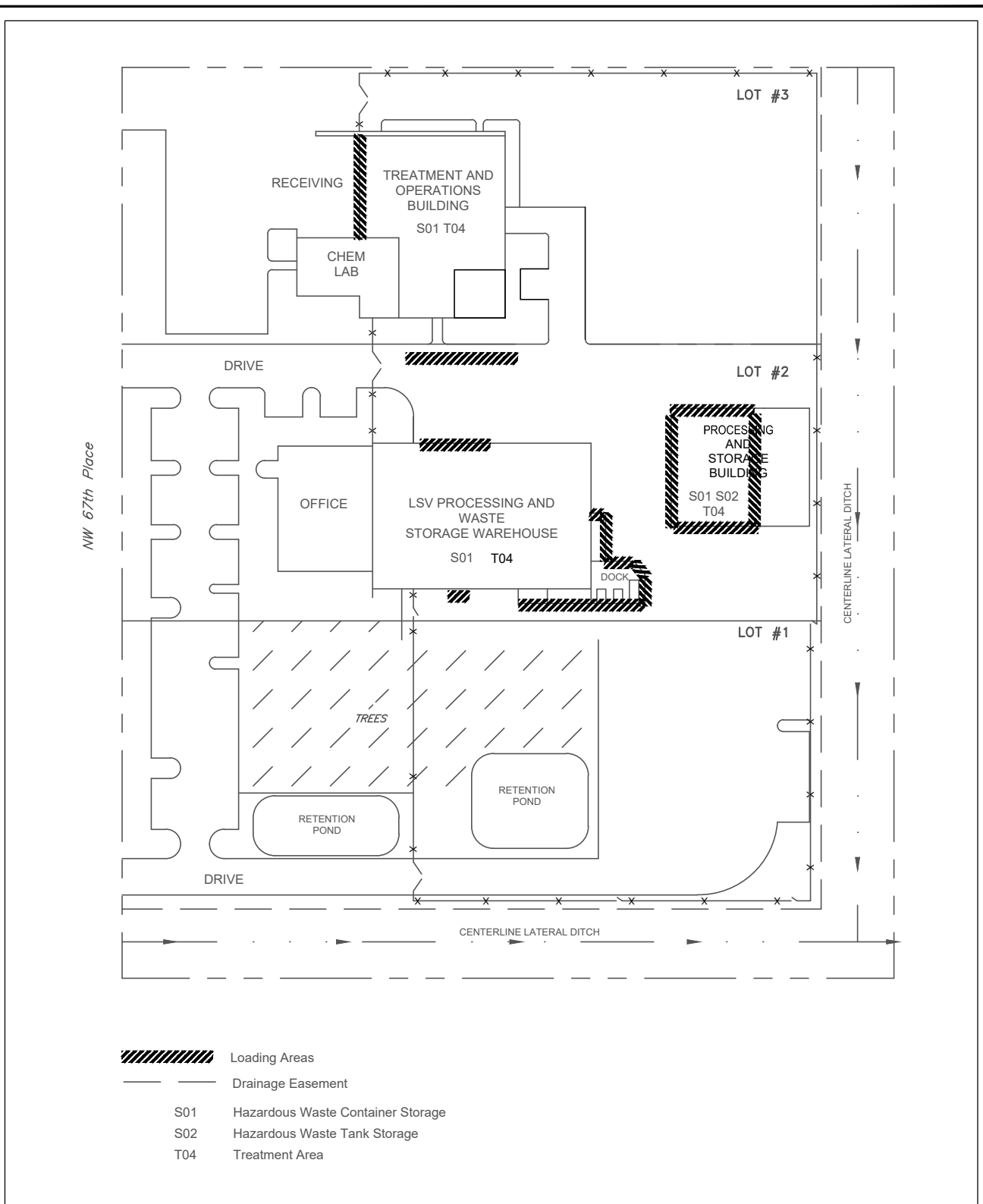
File: 61A-PR-PTII-TOPOCONT

\\TRIHYDRO.COM\CLIENTS\OTOR\PERMAFIX\FEL\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-ACCESSCONTROL



Source: Perma-Fix, 2014

M:\OTOR\PERMAFIX\FEEL\CAUD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART_61A-PR-PTII-BUILDSTRUCT



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FIGURE II-A-3

**PART II
BUILDING AND OTHER STRUCTURES**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PTII-BUILDSTRUCT
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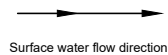
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Source: Perma-Fix, 2014

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FIGURE II-A-4			
PART II			
SANITARY SEWER AND WATER SYSTEMS			
PERMA-FIX OF FLORIDA, INC.			
1940 NW 67TH PLACE			
GAINESVILLE, FLORIDA			
Drawn By: REP	Checked By: CE	Scale: NONE	Date: 11/8/2019
File: 61A-PR-PTII-SANSEWERWTRSYS			



PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

M:\OTOR\PERMAFIX\FEEL\CAUD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-HAZDWASTEUNITS

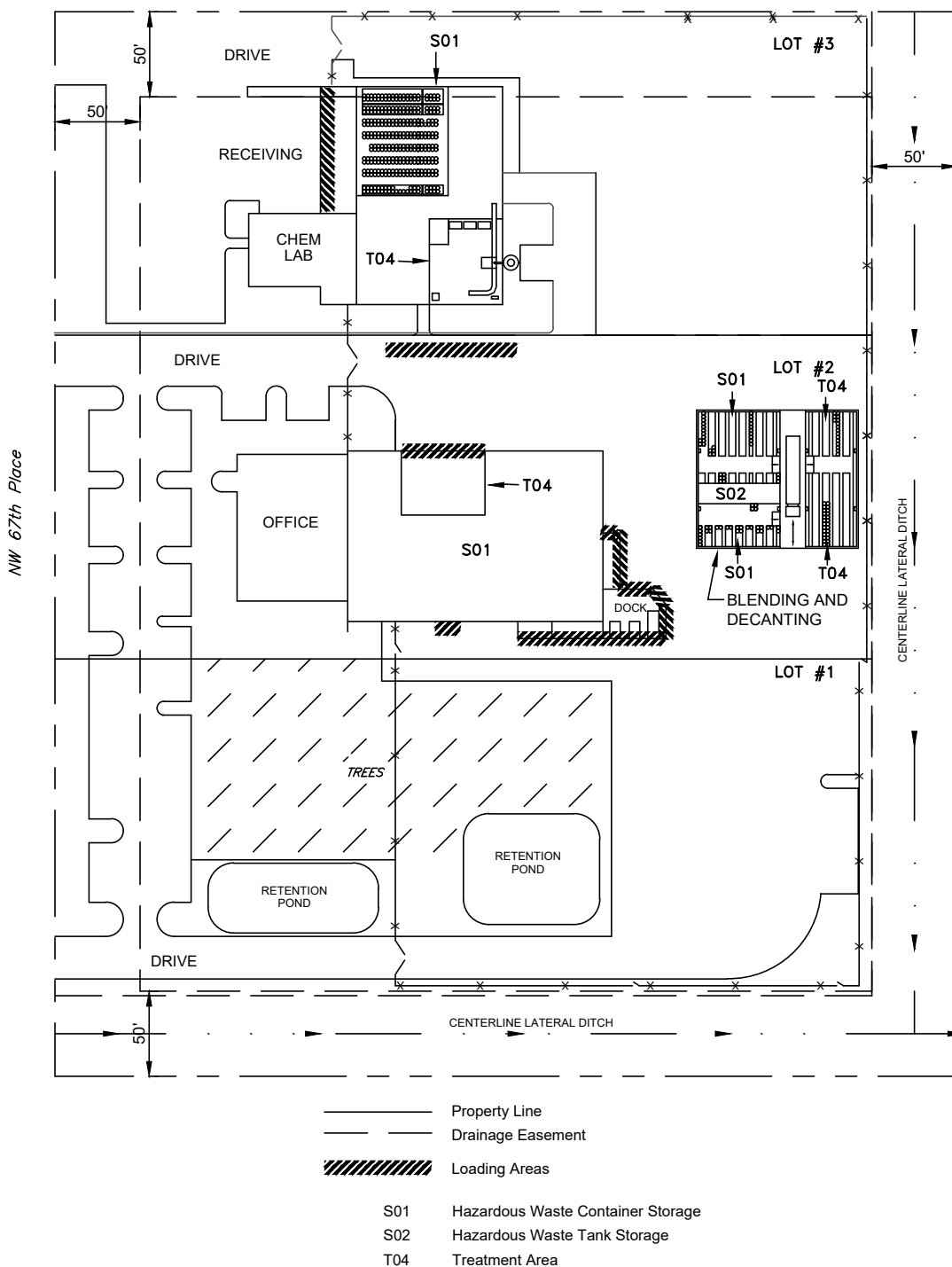


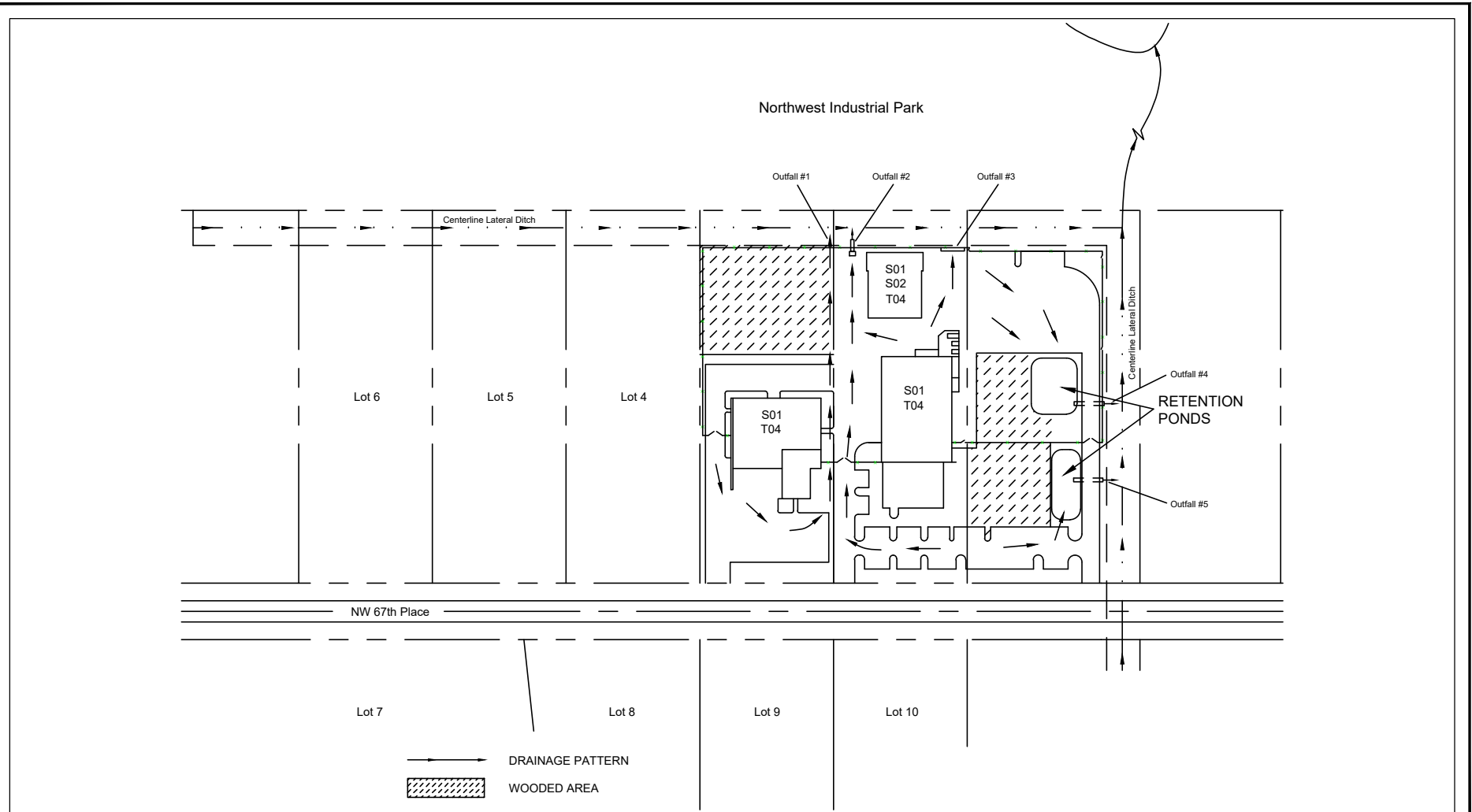
FIGURE II-A-6

**PART II
HAZARDOUS WASTE UNITS
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PTII-HAZDWASTEUNITS
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M:\OTDR\PERMAFIX\FLL\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART_II\61A-PR-PTII-SURFWTRSITEDRAIN



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FIGURE II-A-7

**PART II
SURFACE WATER AND SITE DRAINAGE PATTERN**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PTII-SURFWTRSITEDRAIN
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[GNV] GAINESVILLE RGNL
Windrose Plot [All Year]
Period of Record: 01 Oct 2014 - 01 Oct 2019

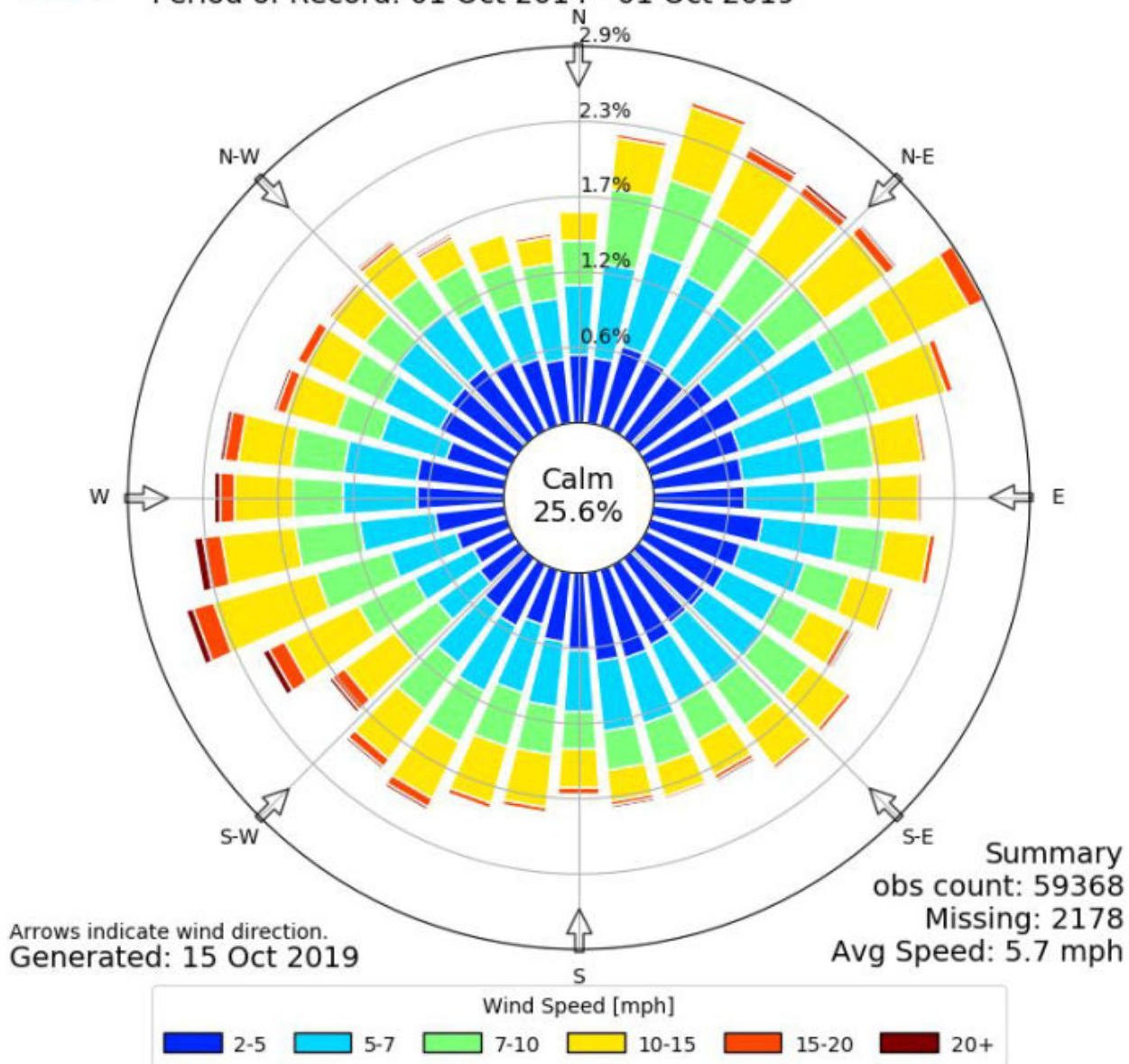


FIGURE II-A-8

PART II
FIVE-YEAR WIND ROSE

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Drawn By: DH

Checked By: CE

Scale: 1 " = 0 '

Date: 11/9/19

File: WindRose_FigII-A-8.mxd

M:\OTORPERMAFIX\FELG\GIS\MAPPING\GAINESVILLE_SSA\GAINESVILLE_RCRA_PARTII\WINDROSE_FIGII-A-8.MXD

\\TRIHYRO.COM\CLIENTS\OTOR\PERMAFIXOFFL\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-TRAFFICINFO

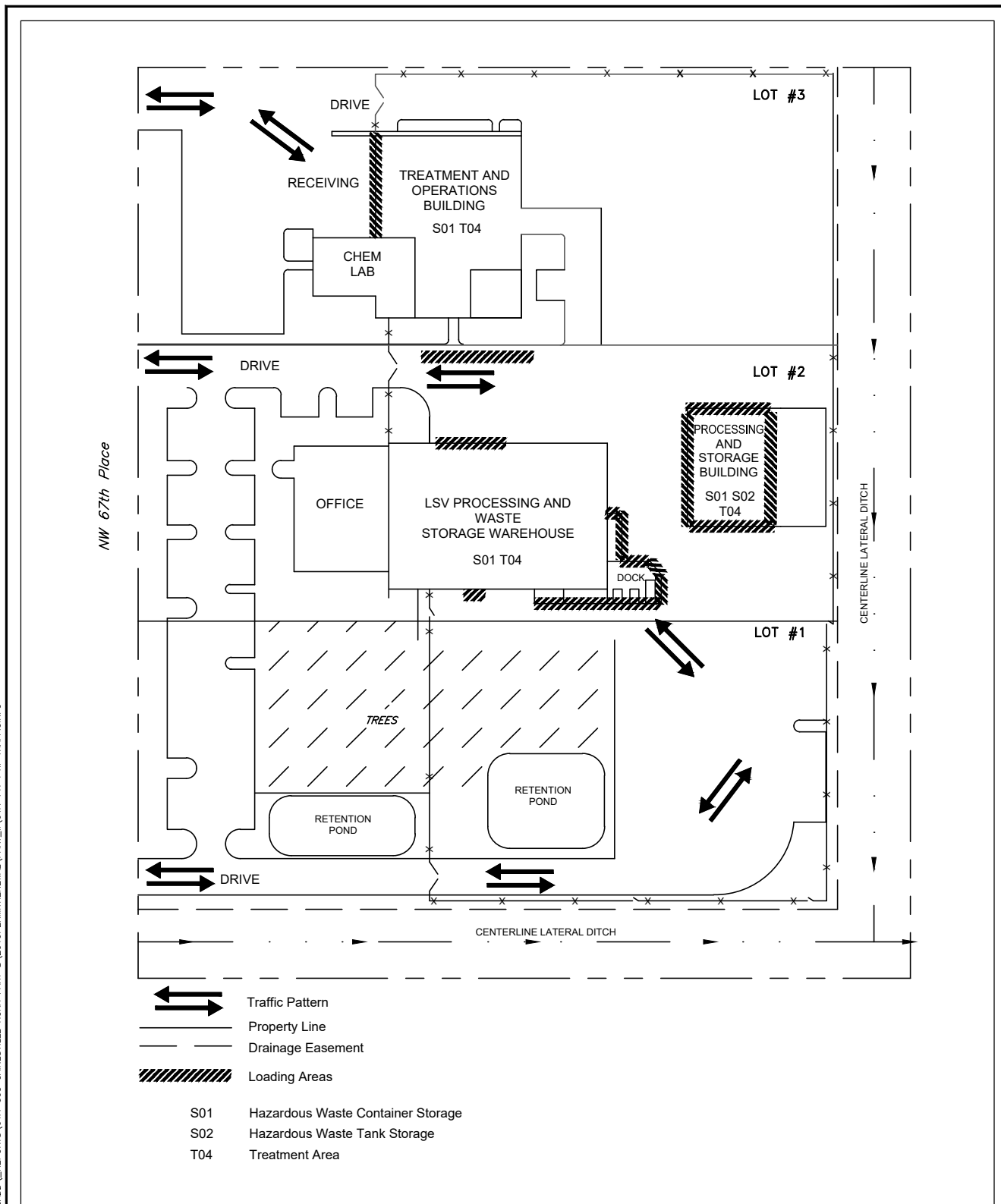


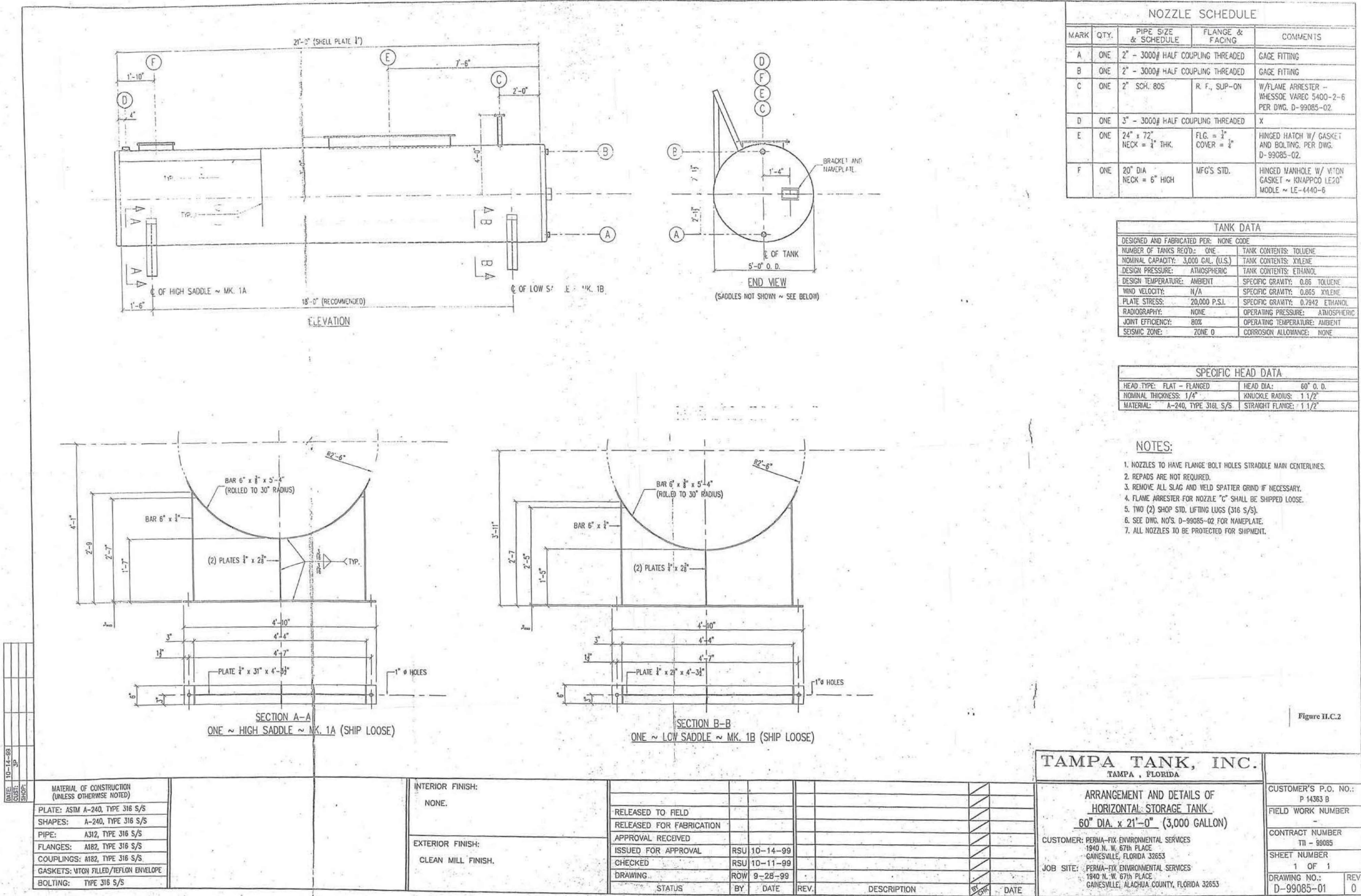
FIGURE II-A-9

**PART II
TRAFFIC INFORMATION**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: 1" = 100'	Date: 10/4/2019	File: 61A-PR-PTII-TRAFFICINFO
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M:\OTOR\PERMAFIXOFF\CAD\REPORTS\61A-003 GAINESVILLE RORA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-HORZSTRNK-DETAILS

Source: Perma-Fix, 2014

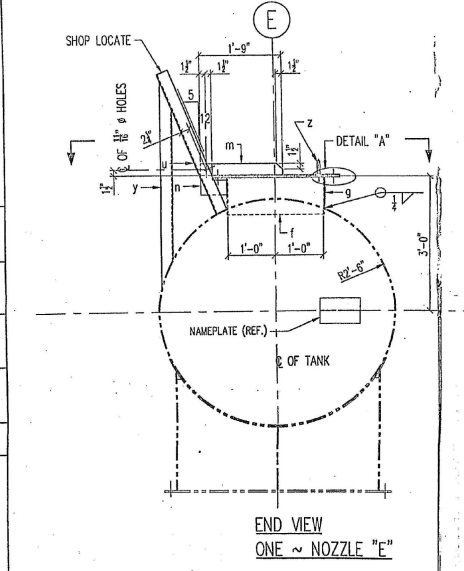
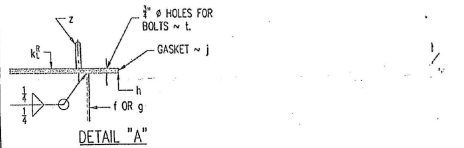
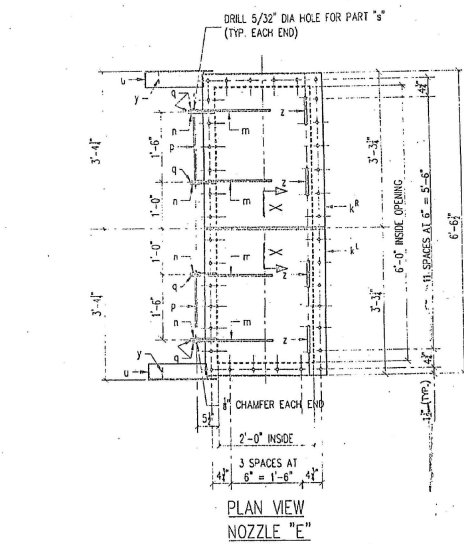


FIGURE II-C-1
PART II
ARRANGEMENT AND DETAILS OF
HORIZONTAL STORAGE TANK
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

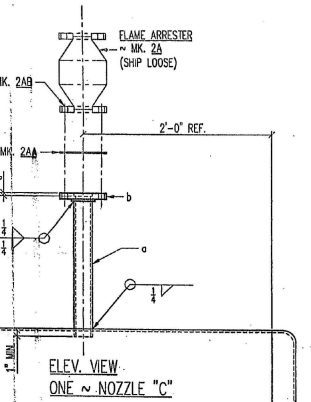
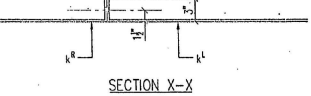
M:\OTOR\PERMAFIXOFF\CAD\REPORTS\61A-003 GAINESVILLE RORA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-TANKNOZZLES

DATE: 10-14-99
CUST: 3P
SHEET: 3P

FILE: 61A-PR-PTII-TANKNOZZLES.dwg
TWO: 14-14-02-38 1099 REV



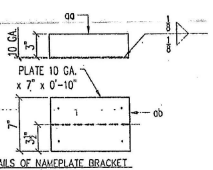
NAMEPLATE NOTES:
1. LETTERING TO BE AT LEAST 5/32" HIGH
2. NAMEPLATE TO BE POP-RIVETED TO BRACKET WITH (4) 1/8" DIA. POP-RIVETS ~ oc.



NAMEPLATE

PURCHASER: PERMA-FIX ENVIRONMENTAL SERVICES
PURCHASE ORDER NO.: P 14363 B
MFG'S. SERIAL NO.: 99085 YEAR COMPLETED: 1999
PURCHASER'S TANK NO.:
PRODUCT STORED: TOLUENE, XYLENE, ETHANOL
DESIGN TEMP.: AMBIENT
NOMINAL DIA.: 5'-0" SPECIFIC GRAVITY: 0.865
NOMINAL LENGTH: 21'-6" (±) DESIGN PRESSURE: ATM
NOMINAL CAPACITY: 3,000 GAL CORROSION ALLOW.: NONE
FABRICATED BY: TAMPA TANK, INC.

DETAILS OF NAMEPLATE



BILL OF MATERIAL				
QTY	PART	QTY	DESCRIPTION	MATERIAL
-	-	-	2" NOZZLE ASSEMBLY (AT NOZZLE "C")	-
a	1	1	PIPE 2" SCH. 80S x 1'-7 1/2"	A312, TYPE 316 S/S
b	1	1	FLANGE 2" - 150# R. F., SUP-ON	A382, TYPE 316 S/S
ONE	2AA	-	GASKET 1/2" THK. x 6" O. D. x 2 1/2" I. D. W/ (4) 1/2" HOLES	VITON FILLED/
-	-	-	ON 4 1/2" DIA. BOLT CIRCLE	TEFLON ENVELOPE
ONE	2A	-	2" FLAME ARRESTER 150# R. F. FLANGE - WHESSE VAREC	316 S/S
-	-	-	S400-2-B SERIES WITH 316 S/S HOUSING, CORE, AND	-
-	-	-	ELEMENT (SHIP LOOSE)	-
4	2AB	-	BOLT 1/2" x 2 1/2" HEX. HEAD W/ (1) HEX. NUT EACH	316 S/S
-	-	-	24" x 72" HATCH ASSEMBLY (AT NOZZLE "E")	-
f	2	2	NECK - PLATE 1/2" x 11 1/2" x 24"	A-240, TYPE 316 S/S
g	2	2	NECK - PLATE 1/2" x 11 1/2" x 72"	A-240, TYPE 316 S/S
h	1	1	FLANGE - PLATE 1/2" x 30 1/2" x 78 1/2" (SHOP LAYOUT)	A-240, TYPE 316 S/S
j	1	1	GASKET 1/2" THK. x 30 1/2" x 78 1/2" (LAYOUT TO MATCH DRILL	VITON FILLED/
-	-	-	WITH PART "h")	TEFLON ENVELOPE
k	1/1	1/1	COVER PLATE - PLATE 1/2" x 30 1/2" x (30" + 2 1/2") (SHOP TO	A-240, TYPE 316 S/S
-	-	-	MATCH DRILL WITH PART "h")	-
m	4	4	HINGE - BAR 3" x 1/2" x 1'-9"	A-240, TYPE 316 S/S
n	4	4	HINGE - PLATE 1/2" x 6 1/2" x 0'-8 1/2"	A-240, TYPE 316 S/S
p	2	2	HINGE PIN - BAR 1/2" x 1'-9"	316 S/S
q	8	8	1/2" FENDER WASHER	316 S/S
s	4	4	COTTER PIN - 1/8" x 2" LONG	316 S/S
t	40	40	BOLT 1/2" x 1 1/2" HEX. HEAD W/ (1) HEX. NUT EACH	316 S/S
z	4	4	WINDLES - BAR 1/2" x (3" + 6" + 3")	316 S/S
-	-	-	COVER STOP (AT NOZZLE "E")	-
u	2	2	ANGLE 3 x 3 x 1/2 x 3'-2 1/2"	316 S/S
y	2	2	ANGLE 3 x 3 x 1/2 x 4'-4 1/2" (SHOP LAYOUT)	316 S/S
-	-	ONE	NAMEPLATE SUPPORT ASSEMBLY	-
oa	1	1	PLATE 10GA. x 3' x 0'-10"	316 S/S
ob	1	1	PLATE 10GA. x 7' x 0'-10"	316 S/S
oc	4	4	1/8" DIA. POP-RIVETS	316 S/S
-	-	ONE	NAMEPLATE	-
-	-	1	BLANK PLATE SIZE = 22GA. x 5' x 0'-8 1/2"	316 S/S

Figure II-C.3

INTERIOR FINISH:	NONE.
EXTERIOR FINISH:	CLEAN MILL FINISH.

RELEASED TO FIELD	
RELEASED FOR FABRICATION	
APPROVAL RECEIVED	
ISSUED FOR APPROVAL	RSU 10-14-99
CHECKED	RSU 10-12-99
DRAWING	ROW 9-29-99
STATUS	BY DATE REV. DESCRIPTION

TAMPA TANK, INC.
TAMPA, FLORIDA

DETAILS OF NOZZLES "C" AND "E" AND NAMEPLATE FOR HORIZONTAL STORAGE TANK 60" DIA. x 21'-0" (3,000 GALLON)

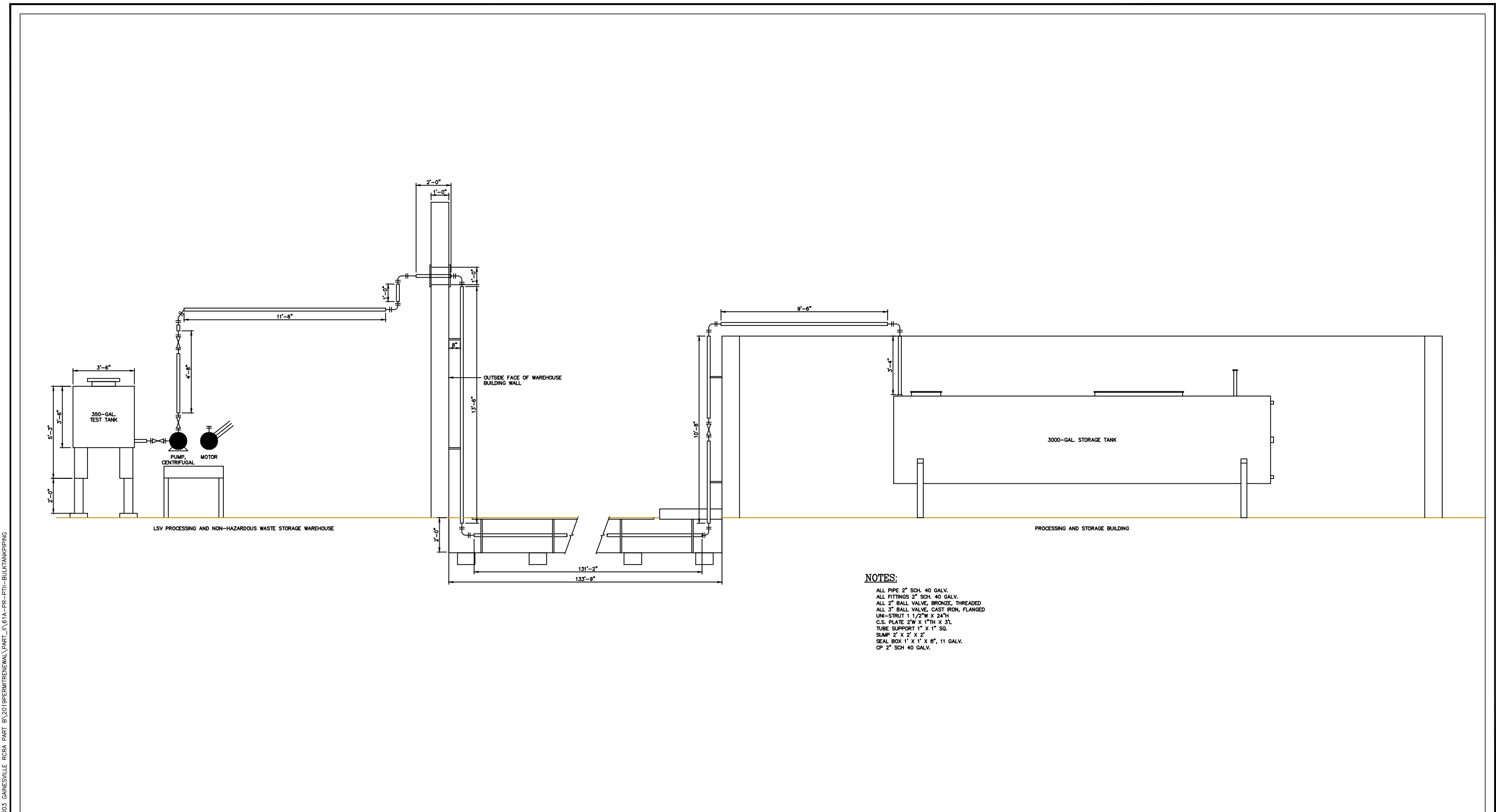
CUSTOMER: PERMA-FIX ENVIRONMENTAL SERVICES
1940 N. W. 67TH PLACE
GAINESVILLE, FLORIDA 32653

JOB SITE: PERMA-FIX ENVIRONMENTAL SERVICES
1940 N. W. 67TH PLACE
GAINESVILLE, ALACHUA COUNTY, FLORIDA 32653

CUSTOMER'S P.O. NO.: P 14363 B
FIELD WORK NUMBER -
CONTRACT NUMBER TM - 99085
SHEET NUMBER 1 OF 1
DRAWING NO.: D-99085-02
REV. 0




FIGURE II-C-2
PART II
TANK NOZZLES "C", "E", AND NAMEPLATE FOR HORIZONTAL STORAGE TANK
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA



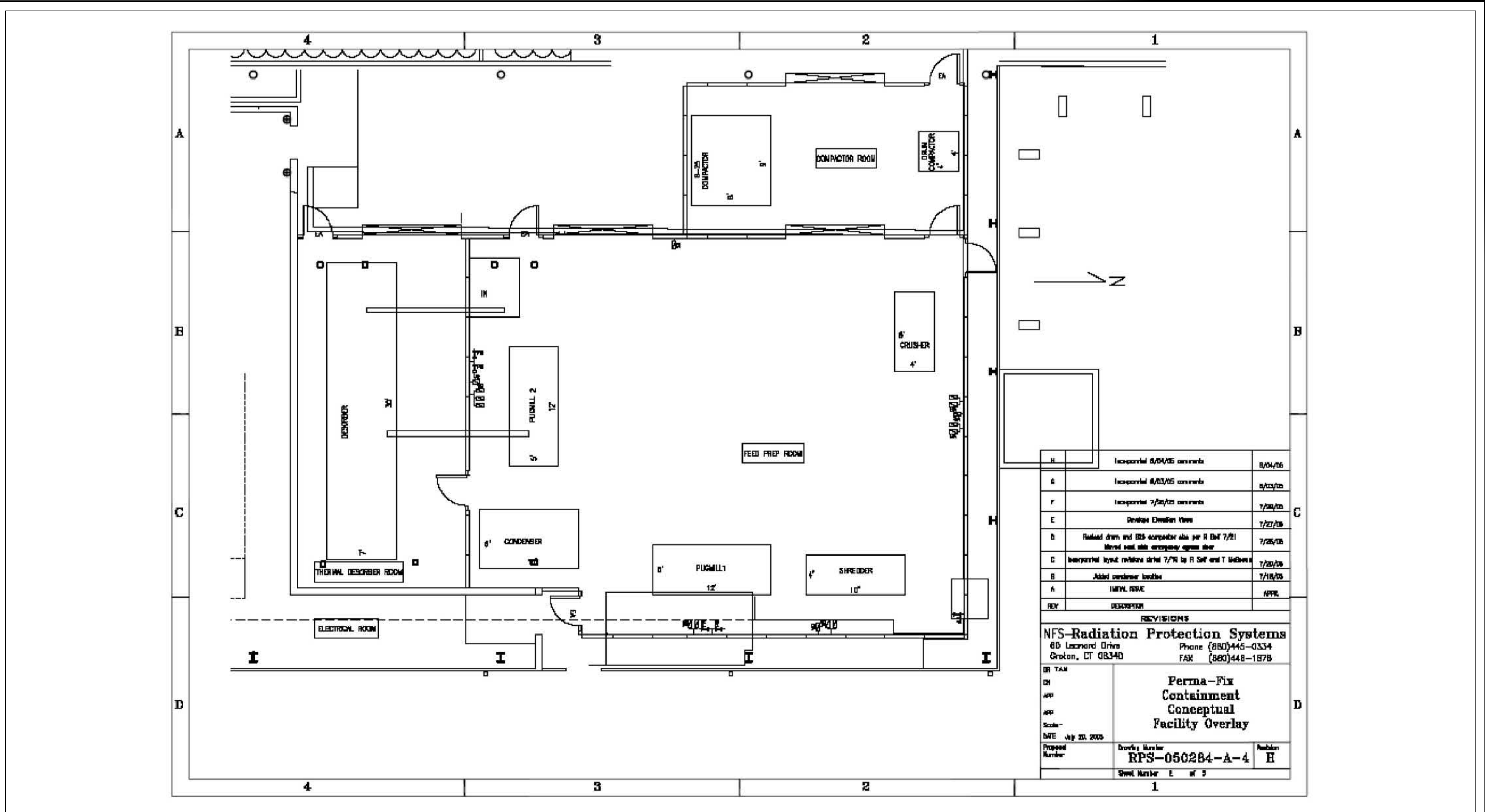
NOTES:
ALL PIPE 2" SCH. 40 GALV.
ALL FITTINGS 2" SCH. 40 GALV.
ALL 2" BALL VALVE, BRONZE, THREADED
ALL 3" BALL VALVE, CAST IRON, FLANGED
UNI-STRUT 1 1/2"W X 24"H
C.S. PLATE 2"W X 1"TH X 3'L
TUBE SUPPORT 1" X 1" SQ.
SUMP 2' X 2' X 2'
SEAL BOX 1' X 1' X 8", 11 GALV.
CP 2" SCH 40 GALV.

M:\OTOR\PERMAFIXOFFL\CADD\REPORTS\61A-003 GAINESVILLE RORA PART B\2019PERMITRENEWAL\PART_II\61A-PR-PTII-BULKTANKPIPING

Source: Perma-Fix, 2014


 1252 Commerce Drive Laramie, Wyoming 82070 www.trihydro.com (P) 307/745.7474 (F) 307/745.7729	FIGURE II-C-3			
	PART II BULK TANK PIPING DIAGRAM			
	PERMA-FIX OF FLORIDA, INC. 1940 NW 67TH PLACE GAINESVILLE, FLORIDA			
Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTII-BULKTANKPIPING

M:\OTOR\PERMAFIXOFF\CAD\REPORTS\61A-003 GAINESVILLE RORA PART B\2019PERMITRENEWAL\2021\FIGURES-A\61A-PR-PTII-PROP-PFII-LAYOUT-A



H	Incorporated 8/04/05 comments	8/04/05
G	Incorporated 8/03/05 comments	8/03/05
F	Incorporated 7/26/05 comments	7/26/05
E	Develop Elevation Views	7/27/05
D	Revised drum and BSB-compressor also per R Encl 7/21 Moved east side emergency egress door	7/25/05
C	Incorporated layout revisions dated 7/19 by R Self and T McGraw	7/20/05
B	Added condenser location	7/19/05
A	INITIAL ISSUE	APRIL
REV	DESCRIPTION	

REVISIONS		
NFS-Radiation Protection Systems		
610 Leonard Drive Phone (880)445-0334		
Groton, CT 06340 FAX (880)448-1878		
DR TAN	Perma-Fix Containment Conceptual Facility Overlay	
DN		
APP		
APP		
Scale-		
DATE July 20, 2005		
Project Number	Drawing Number RPS-050284-A-4	Revision E
	Sheet Number E of 3	



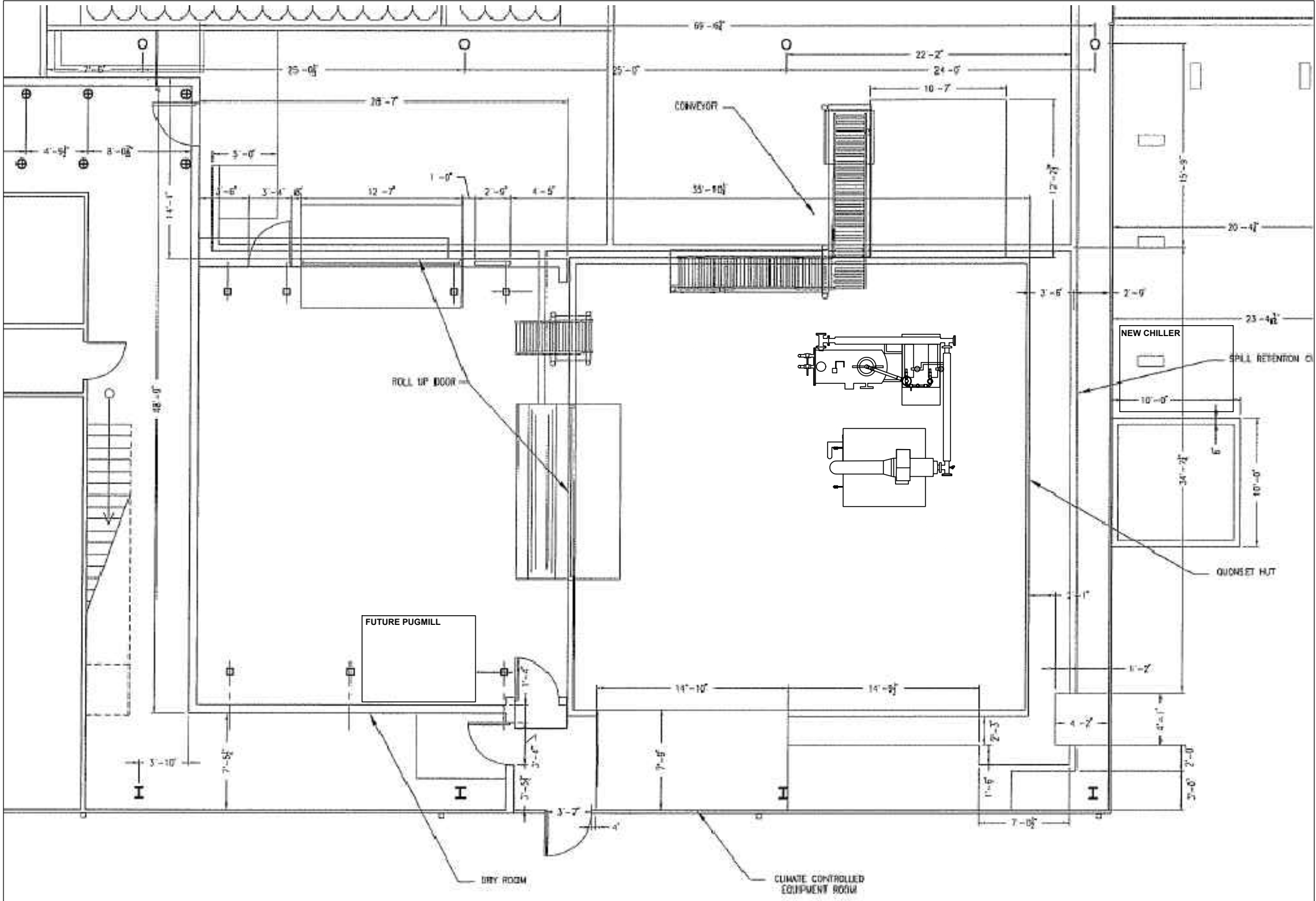
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www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

PREVIOUS FIGURE II-I-1-A

PART II
PROPOSED PF-II LAYOUT

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Drawn By: REP Checked By: CE Scale: NONE Date: 10/4/2019 File: 61A-PR-PTII-PROP-PFII-LAYOUT-A



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FIGURE II-I-1-B

PART II
PROPOSED PF-II LAYOUT

PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTII-PROP-PFII-LAYOUT-B
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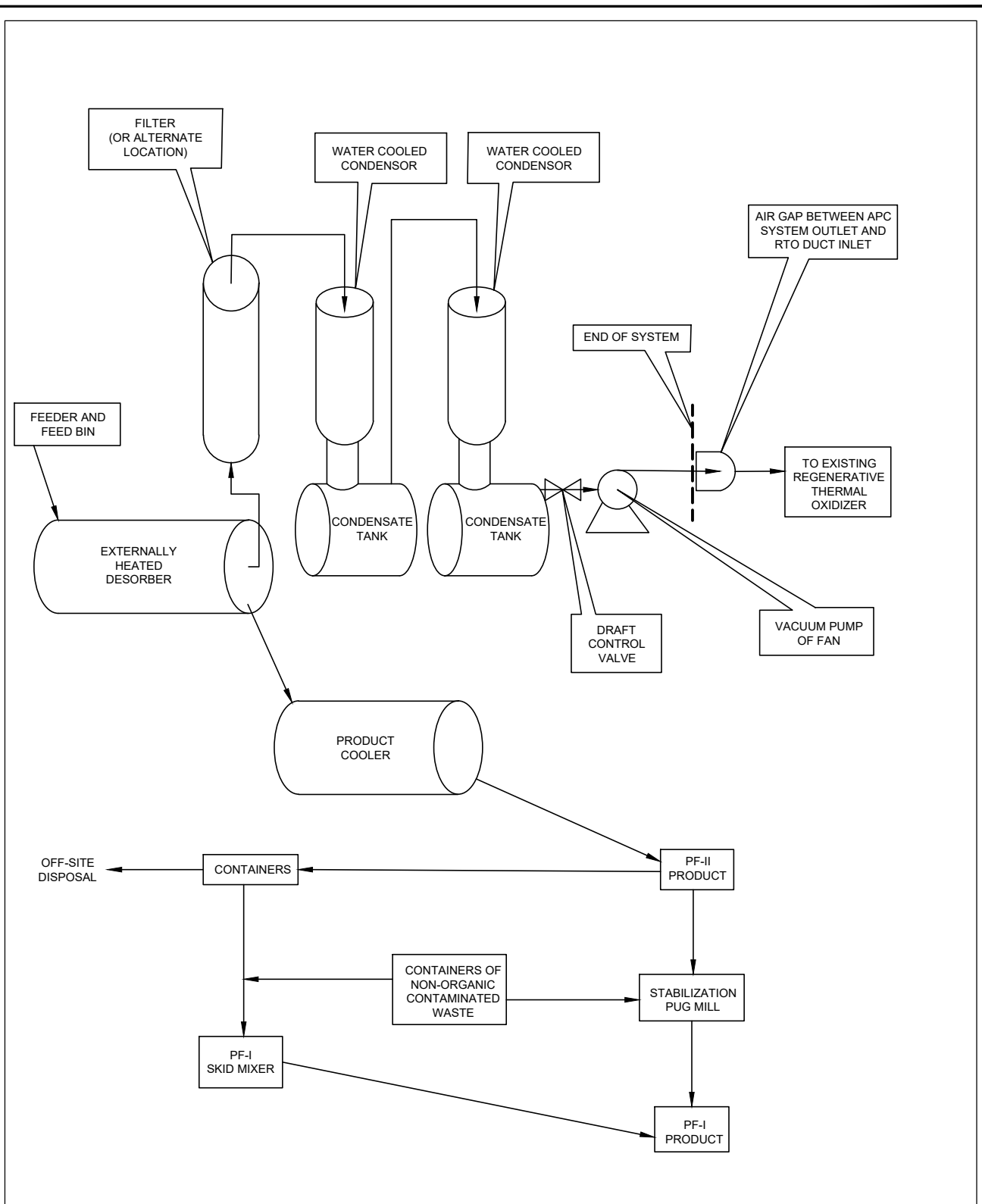


FIGURE II-I-2-A
PART II CURRENT
PROCESS FLOW DIAGRAM
PF-I AND PF-II PROCESSES
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/4/2019	File: 61A-PR-PTII-PFD-PFI-PFII-A
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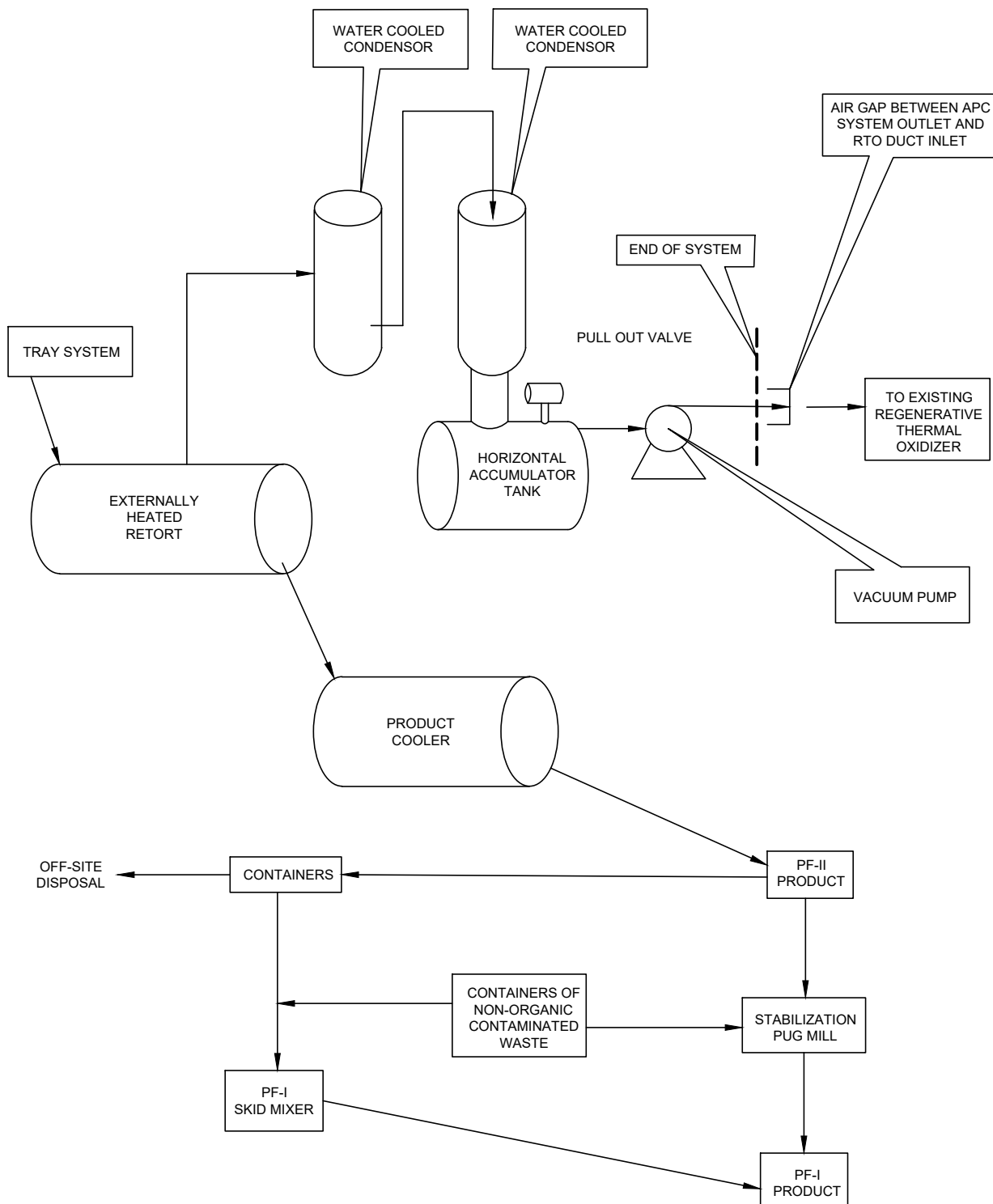
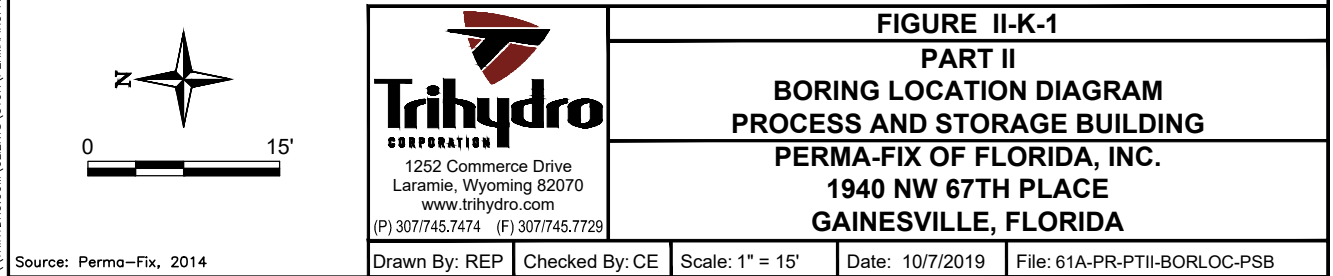
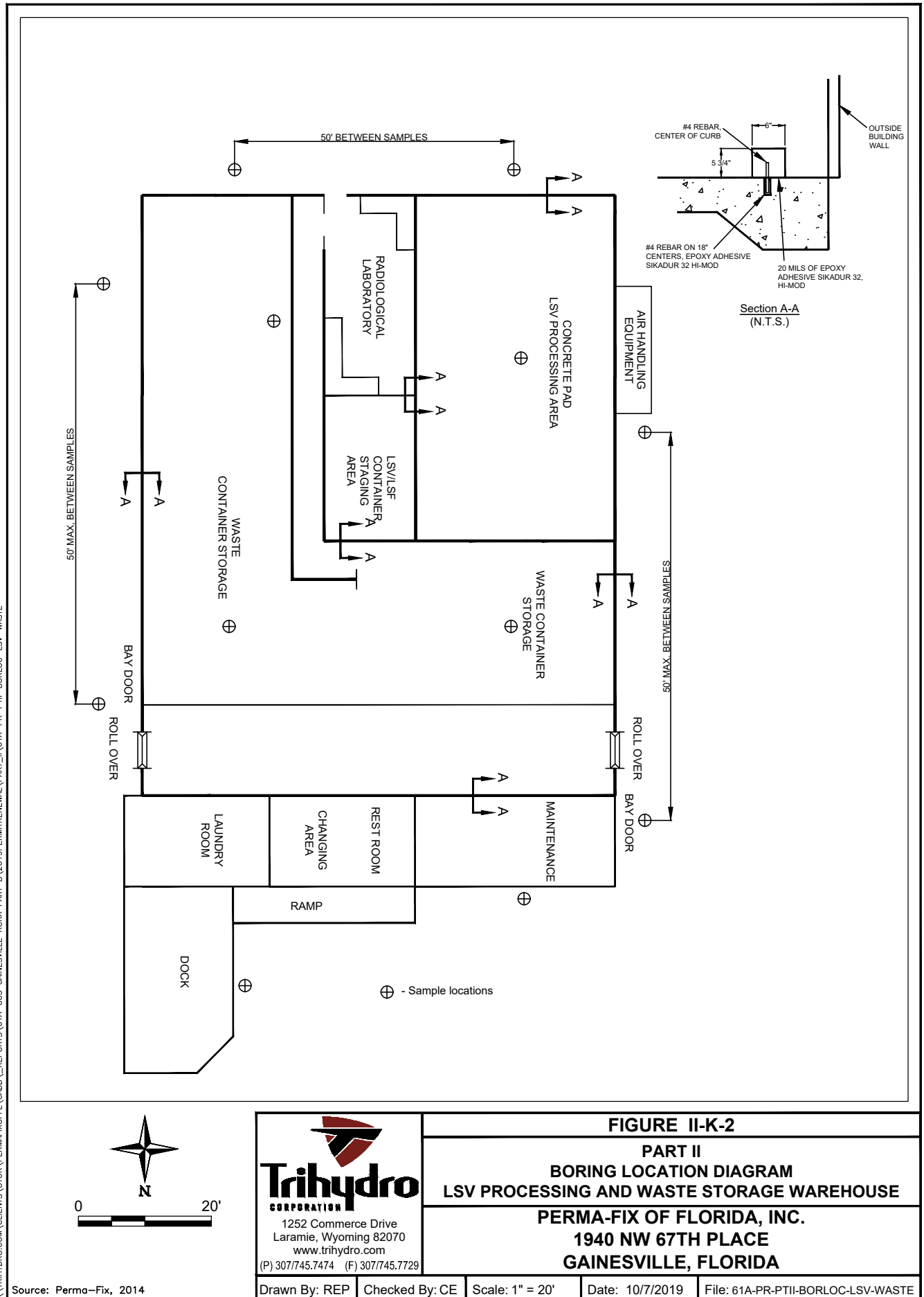


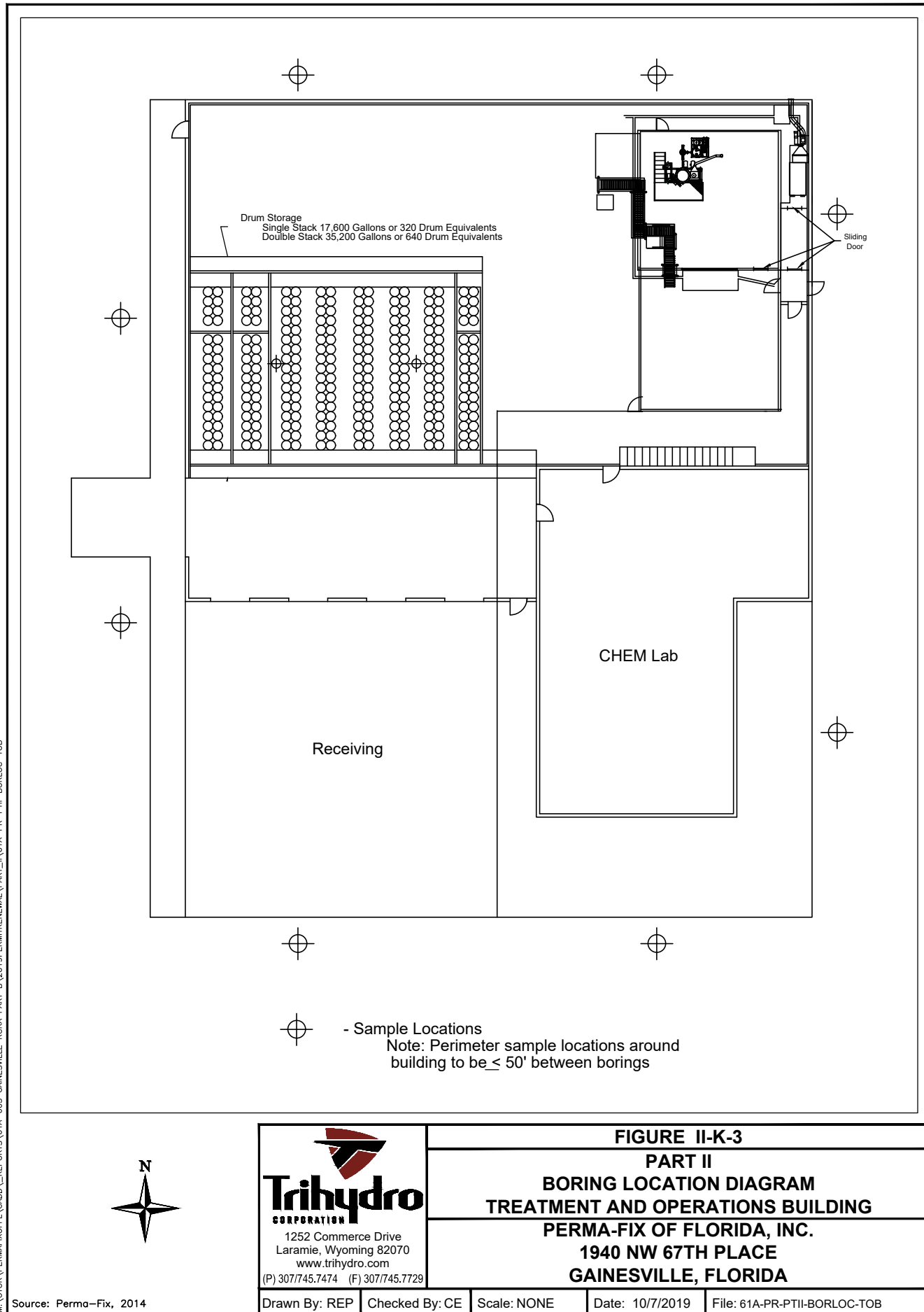
FIGURE II-I-2-B
PART II PROPOSED
PROCESS FLOW DIAGRAM
PF-I AND PF-II PROCESSES
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

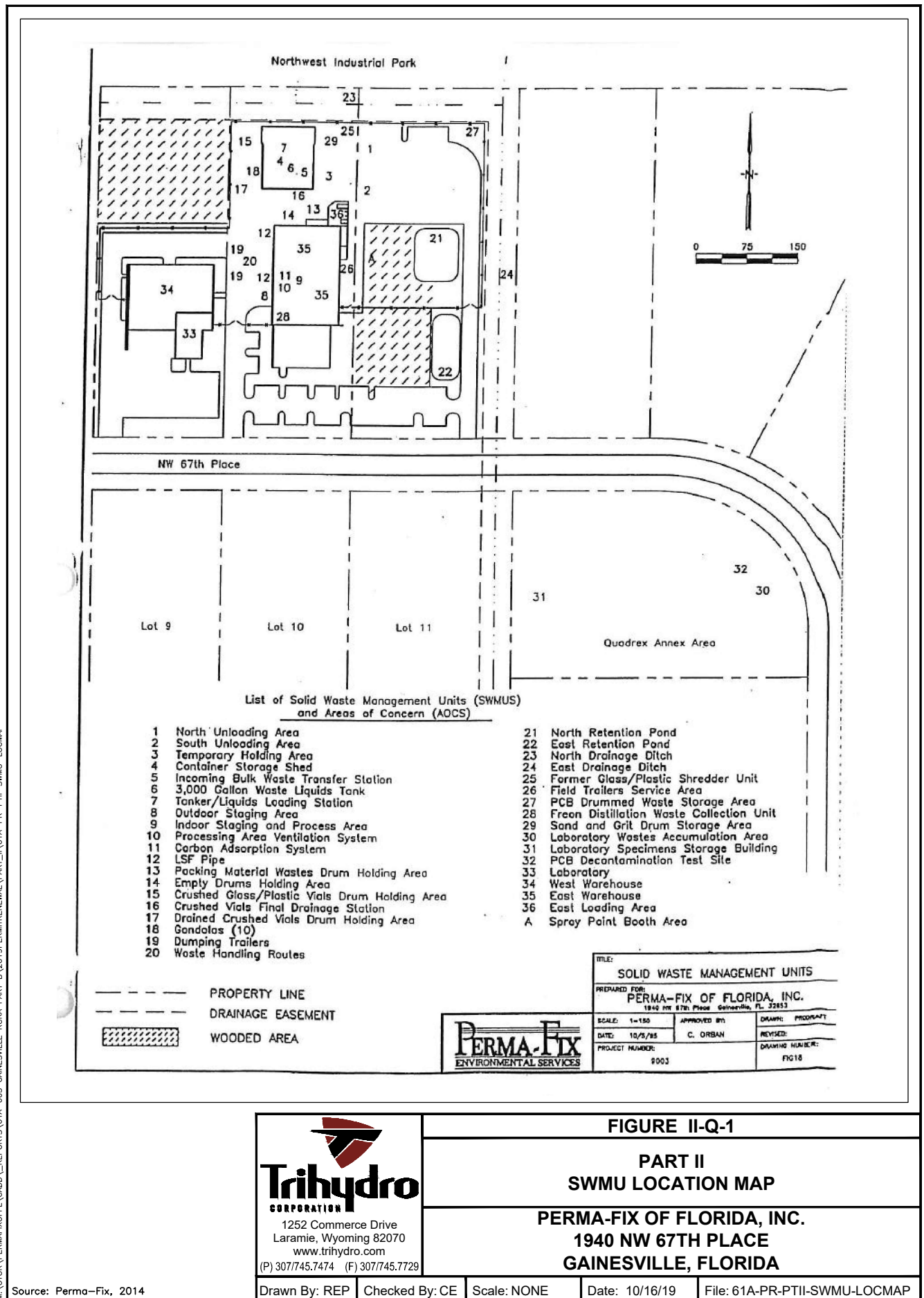
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M:\OTOR\PERMAFIX\OFF\CAAD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART_II\61A-PR-PTII-SWMU-LOCMAP

Source: Perma-Fix, 2014

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FIGURE II-Q-1

**PART II
SWMU LOCATION MAP**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Drawn By: REP Checked By: CE Scale: NONE Date: 10/16/19 File: 61A-PR-PTII-SWMU-LOCMAP

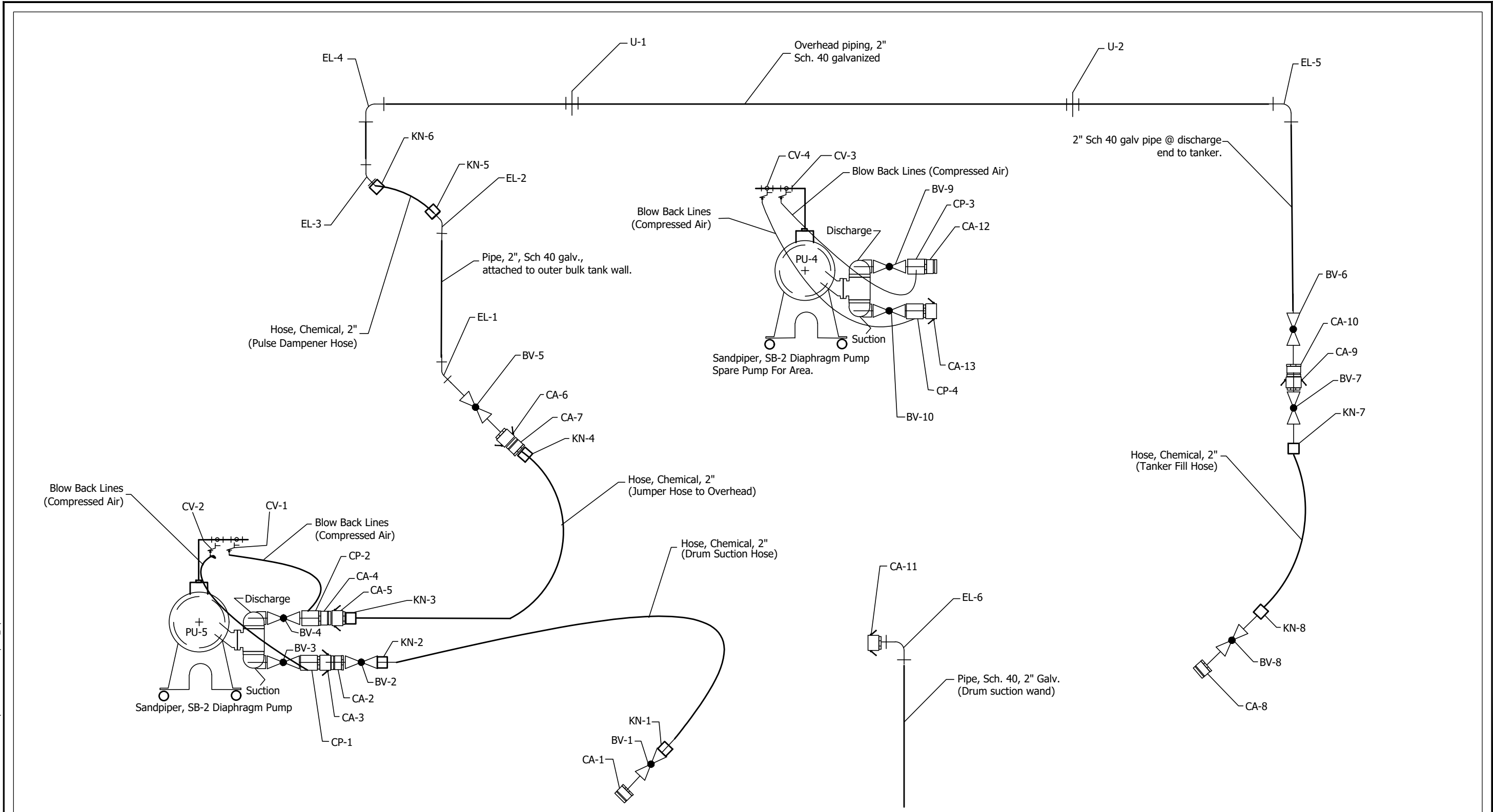


FIGURE II-S-1
PART II
HAZARDOUS WASTE TRANSFER AREA -
PROCESS AND STORAGE BUILDING
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

M:\OTORY\PERMAFIX\F\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART_II\61A-PR-PTII-MIXWSTTRNSFRAREA

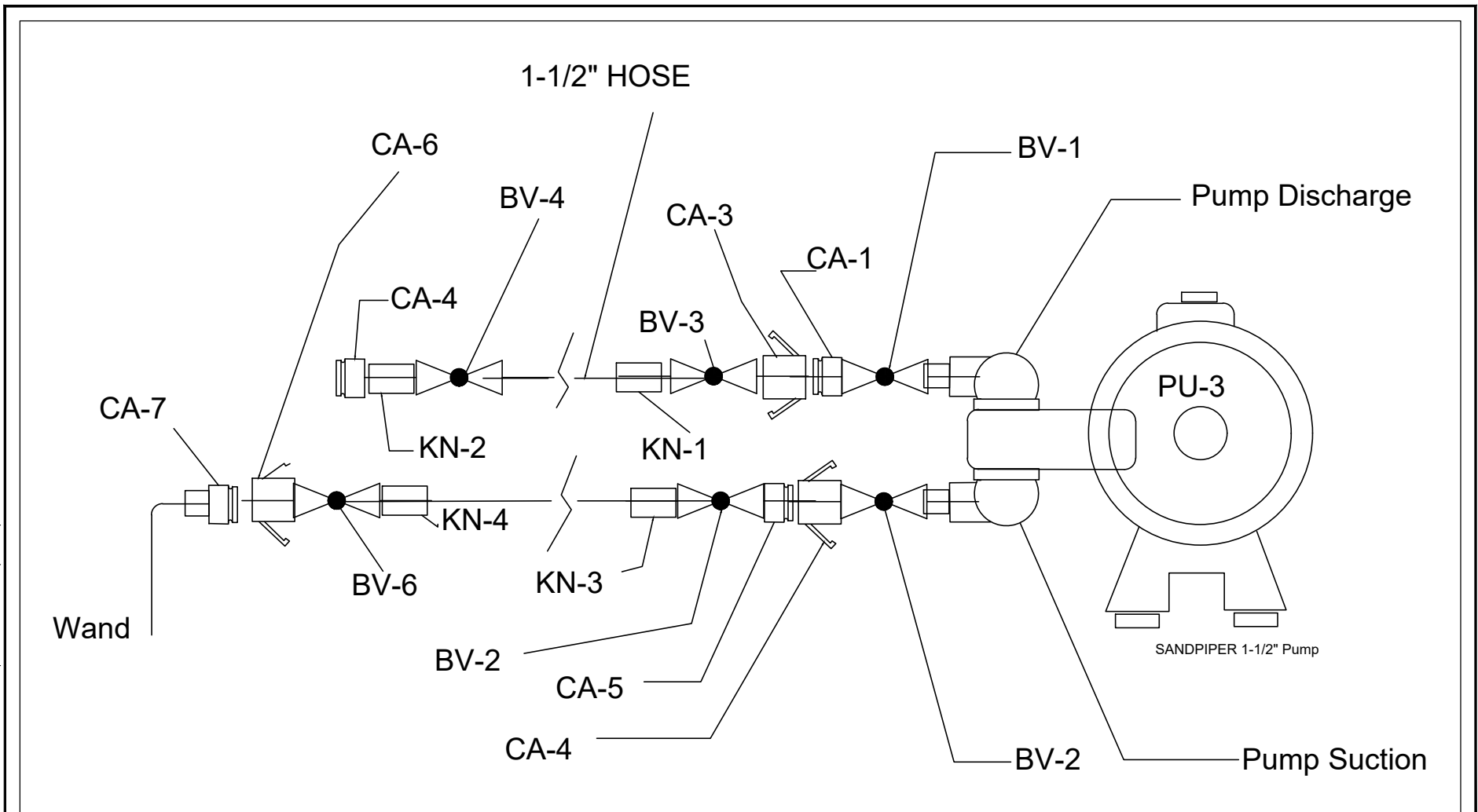
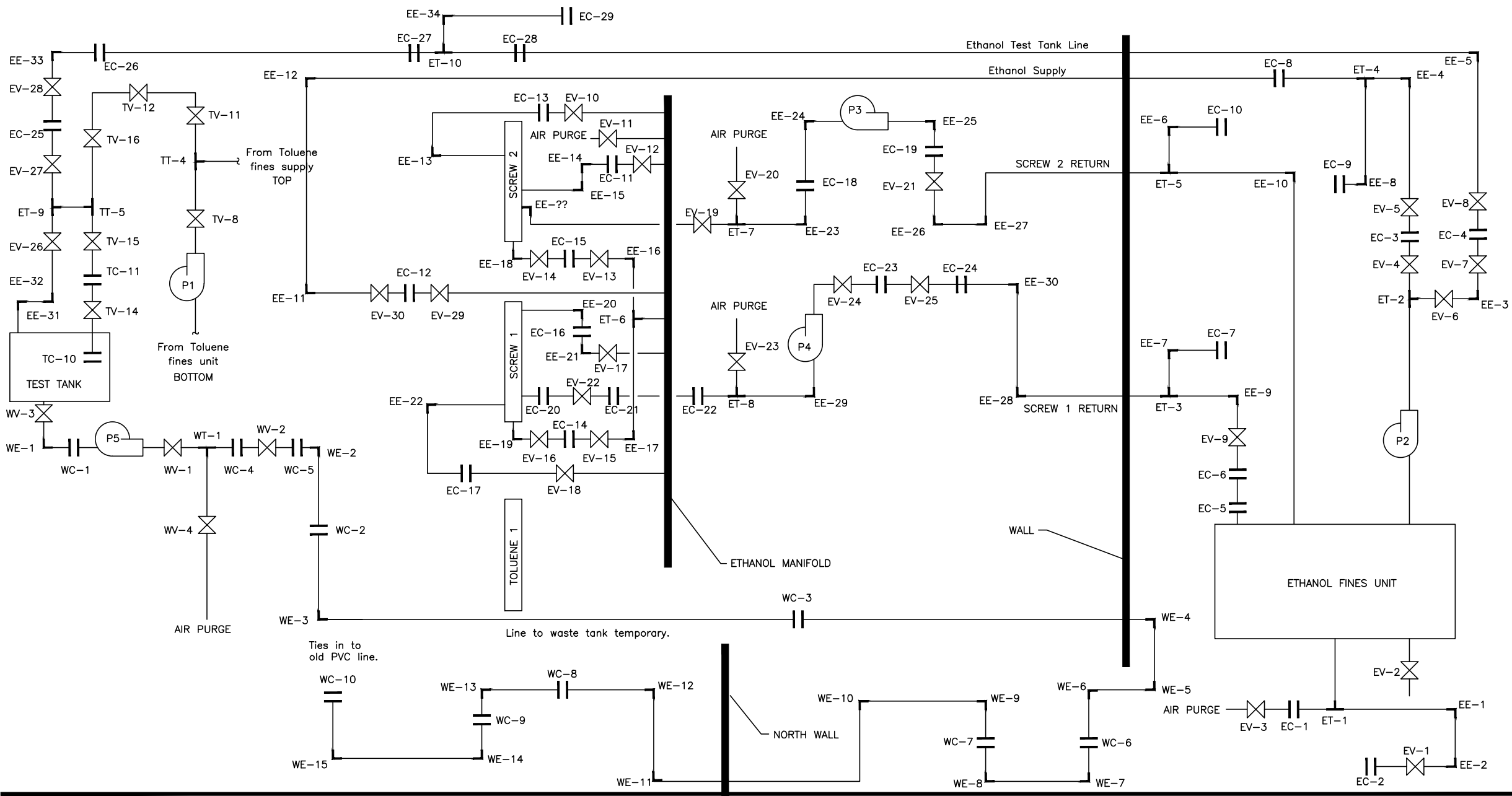


FIGURE II-S-2
PART II
MIXED WASTE TRANSFER
TO LARGER CONTAINER AREA
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PTII-MIXWSTTRNSFRAREA
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ETHANOL LEGEND

- EV-1 ETHANOL VALVE
- P1 PUMP
- EE-1 ETHANOL ELBOW
- EC-1 ETHANOL CONNECTOR
- ET-1 ETHANOL TEE

TOLUENE LEGEND

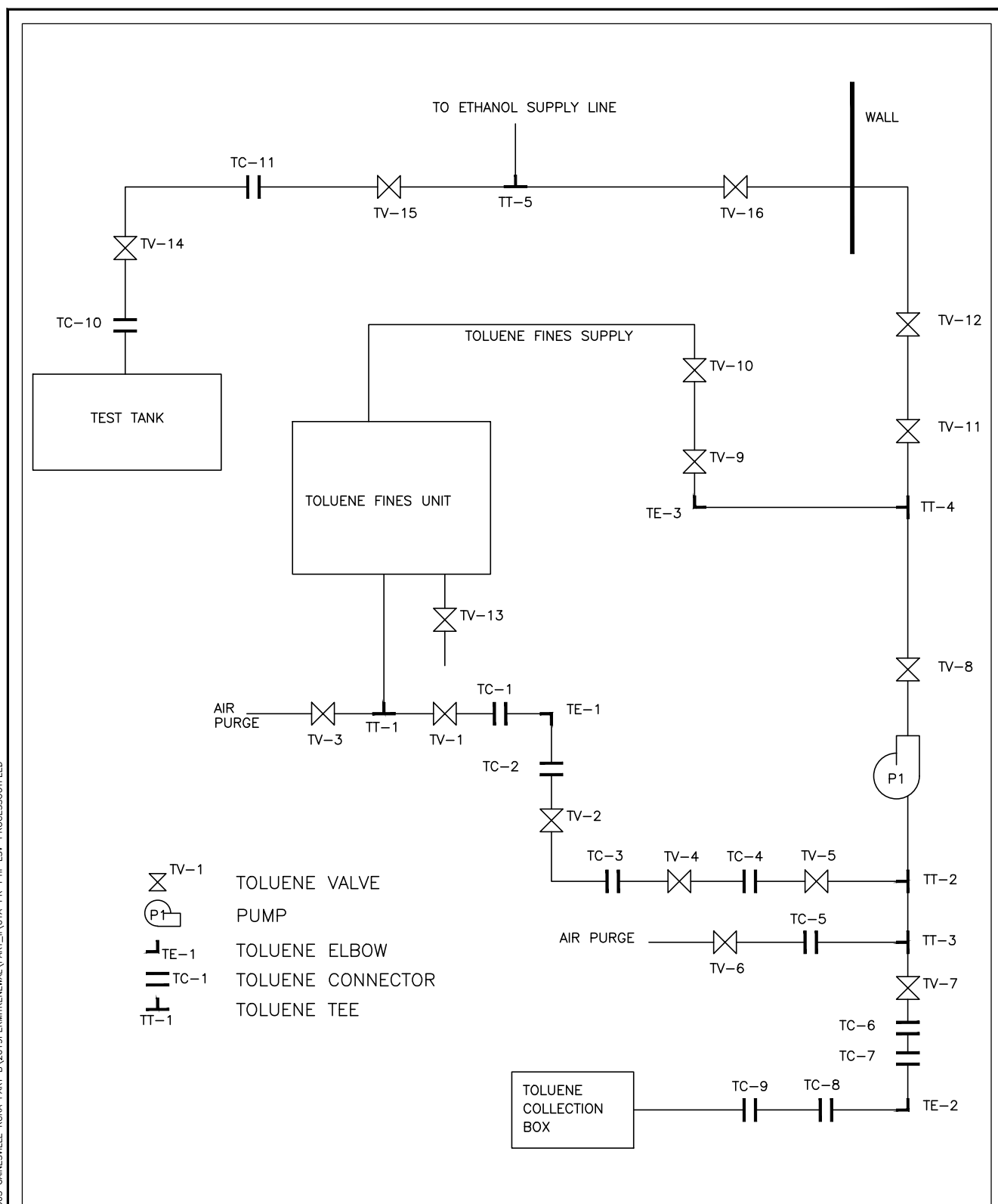
- TV-1 TOLUENE VALVE
- P1 PUMP
- TE-1 TOLUENE ELBOW
- TC-1 TOLUENE CONNECTOR
- TT-1 TOLUENE TEE

WASTE LEGEND

- WV-1 WASTE VALVE
- P1 PUMP
- WE-1 WASTE ELBOW
- WC-1 WASTE CONNECTOR
- WT-1 WASTE TEE



FIGURE II-S-3
PART II
LSV PROCESSING AREA -
WASTE AND ETHANOL SYSTEMS
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA



M:\OTDR\PERMAFIX\FEED\CADD\REPORTS\61A-003 GAINESVILLE RCRA PART B\2019PERMITRENEWAL\PART II\61A-PR-PTII-LSV-PROCESSOUTFEED

Source: Perma-Fix, 2014



FIGURE II-S-4

PART II
LSV PROCESS OUTFEED
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PTII-LSV-PROCESSOUTFEED
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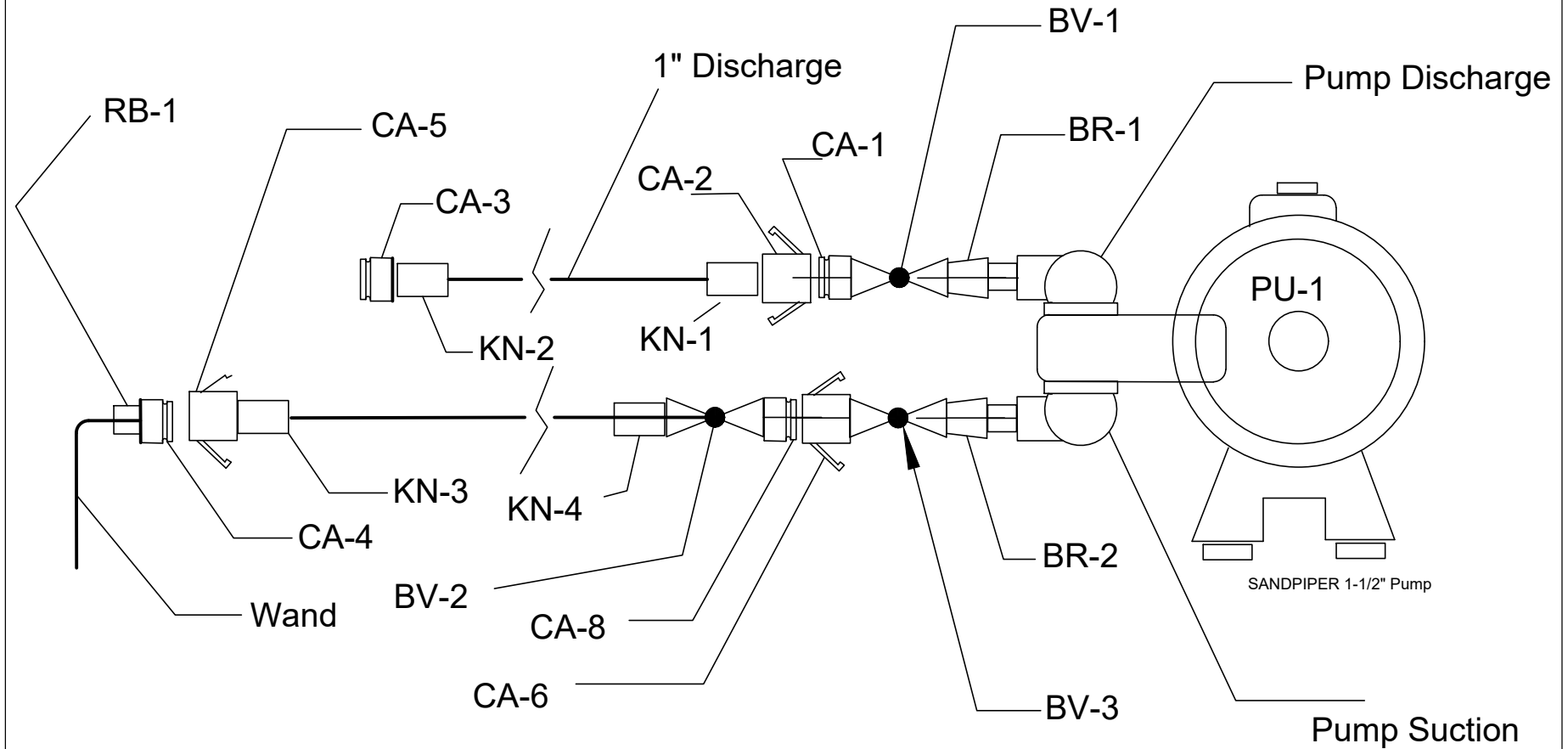


FIGURE II-S-5

**PART II
DEBRIS TREATMENT AREA - LSV**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 11/11/2019	File: 61A-PR-II-DEBRISTRTMTAREA-LSV
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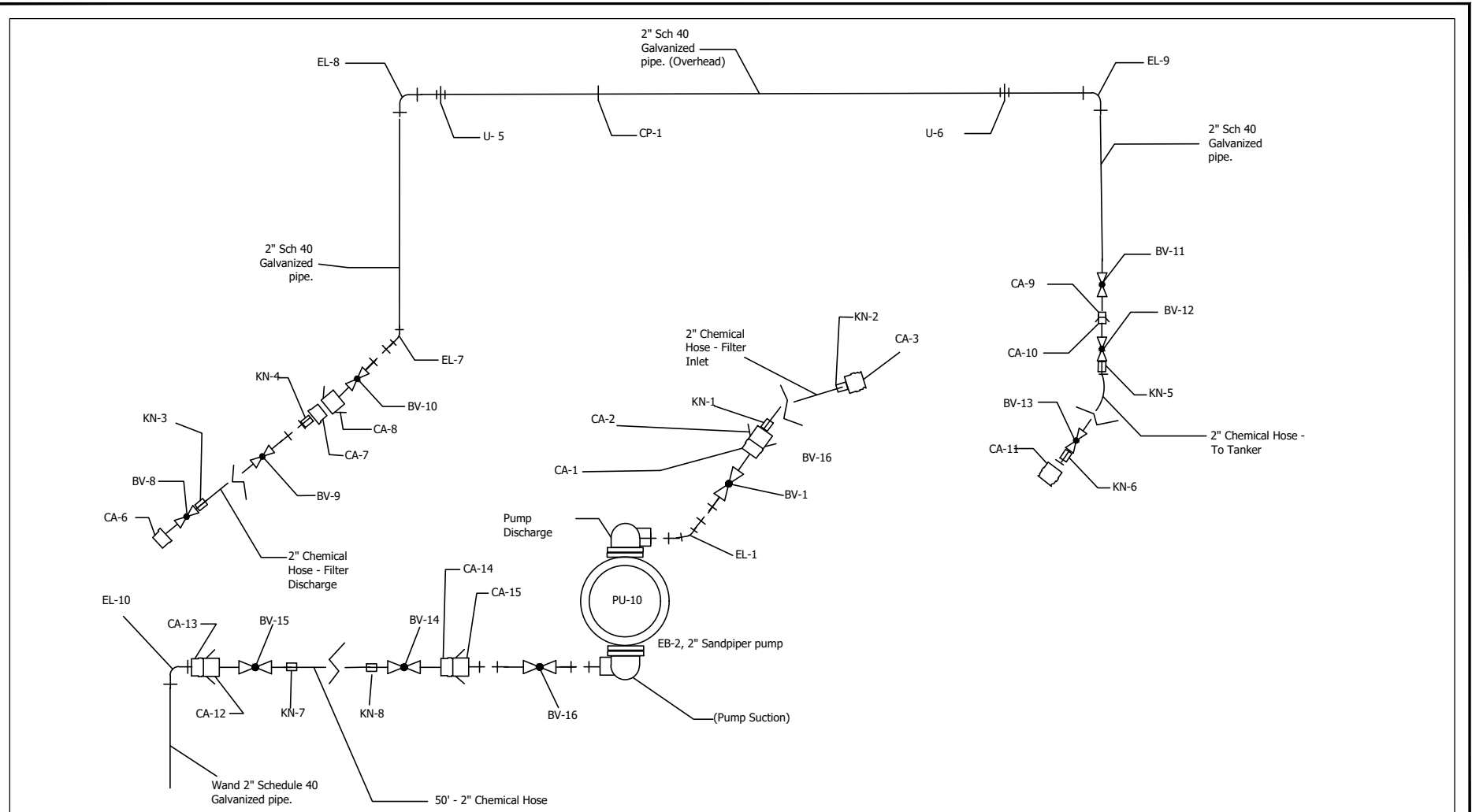


FIGURE II-S-6

PART II

**MIXED WASTE TANKER LOADING AREA -
TREATMENT AND OPERATIONS BUILDING**

PERMA-FIX OF FLORIDA, INC.

**1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-II-MIXWSTTKRAREA-TOB
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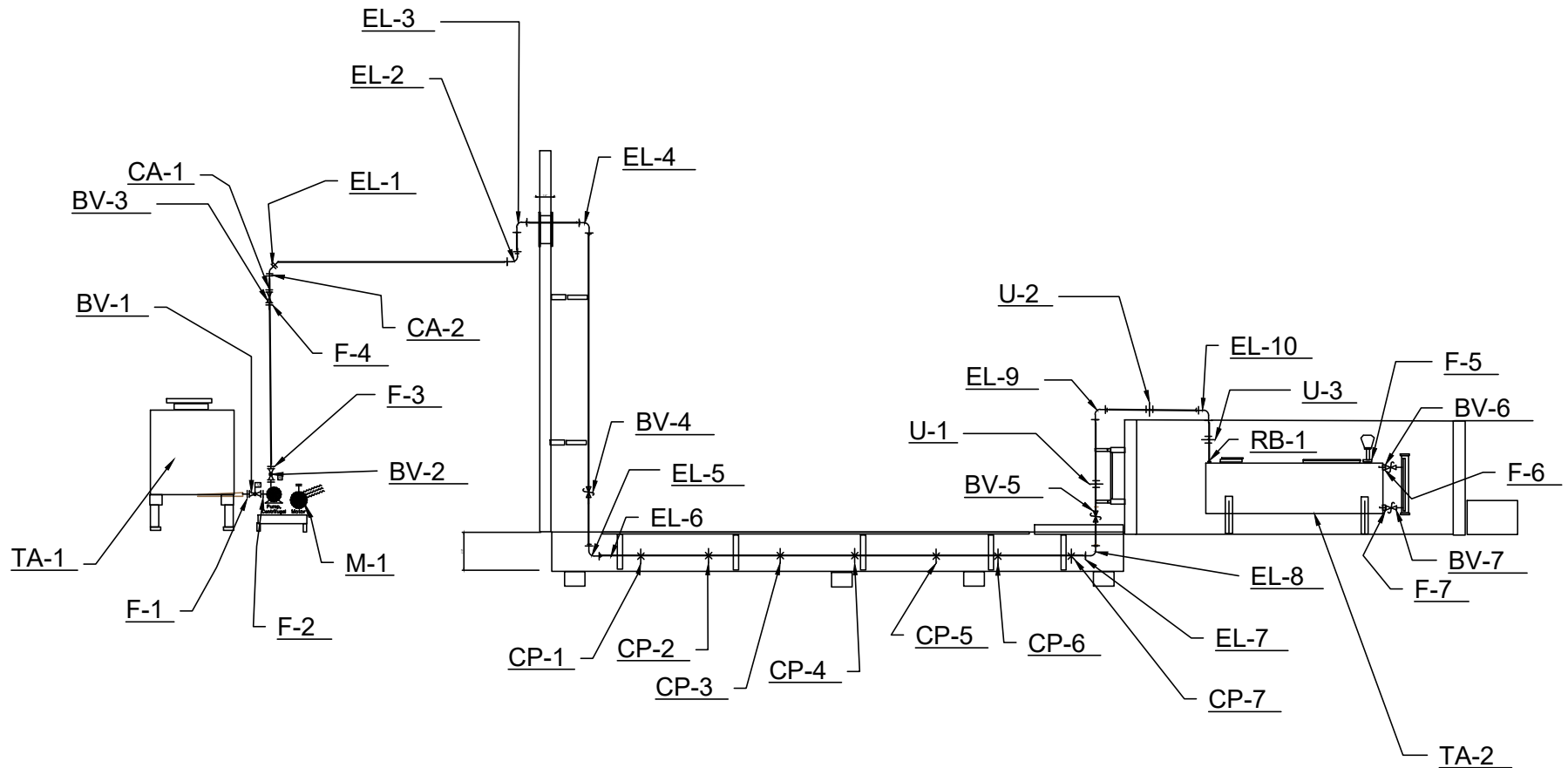


FIGURE II-S-7

**PART II
LSV FLUID TRANSFER PIPING**

**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Trihydro
CORPORATION
1252 Commerce Drive
Laramie, Wyoming 82070
www.trihydro.com
(P) 307/745.7474 (F) 307/745.7729

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PTII-LSV-FLUIDTRSPPIPE
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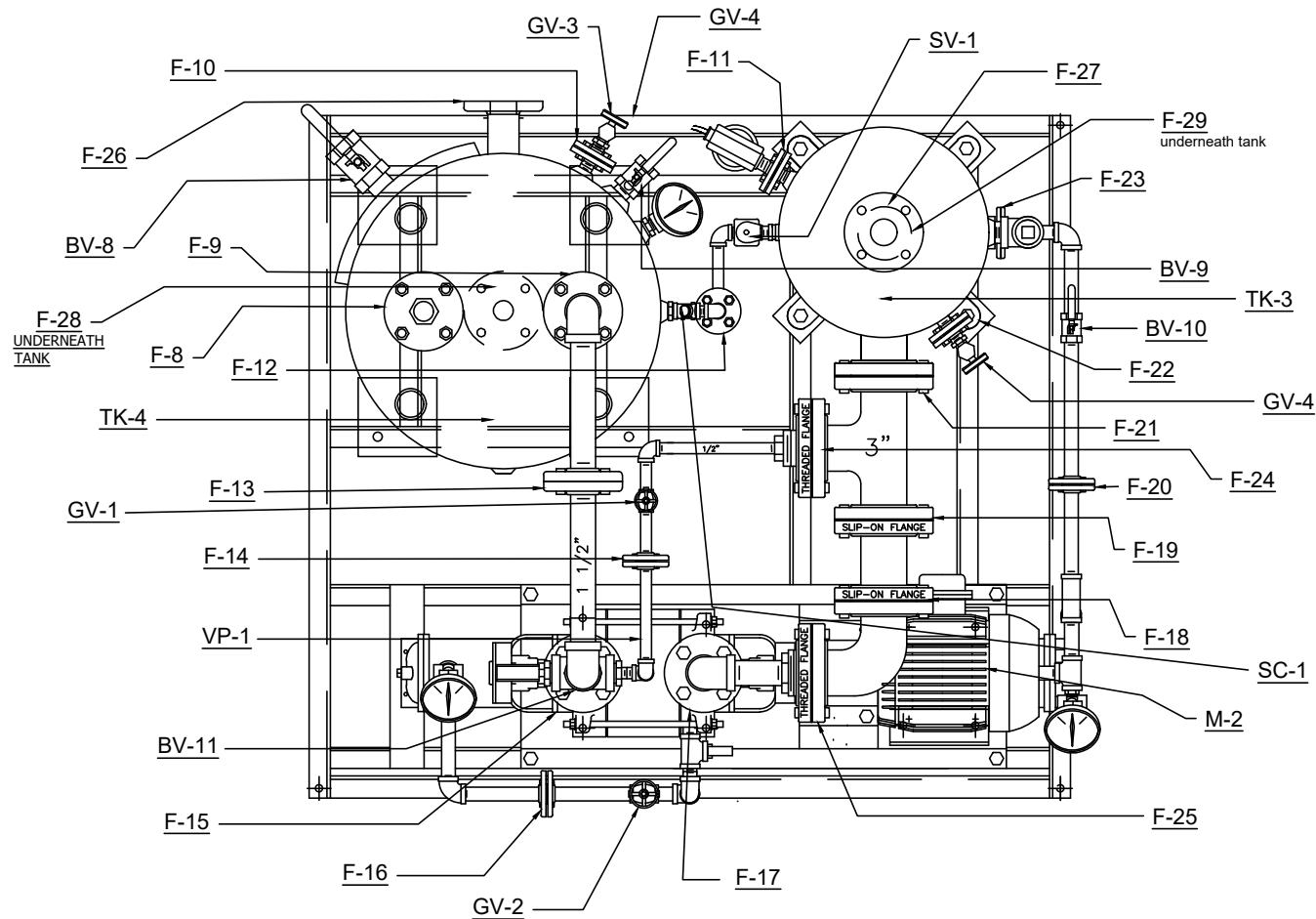


FIGURE II-S-8

PART II

**PF-II VACUUM SYSTEM -
FLANGES AND VALVING
PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

Source: Perma-Fix, 2014

Drawn By: REP	Checked By: CE	Scale: NONE	Date: 10/7/2019	File: 61A-PR-PFII-PFII-VACSYS-FLGVALV
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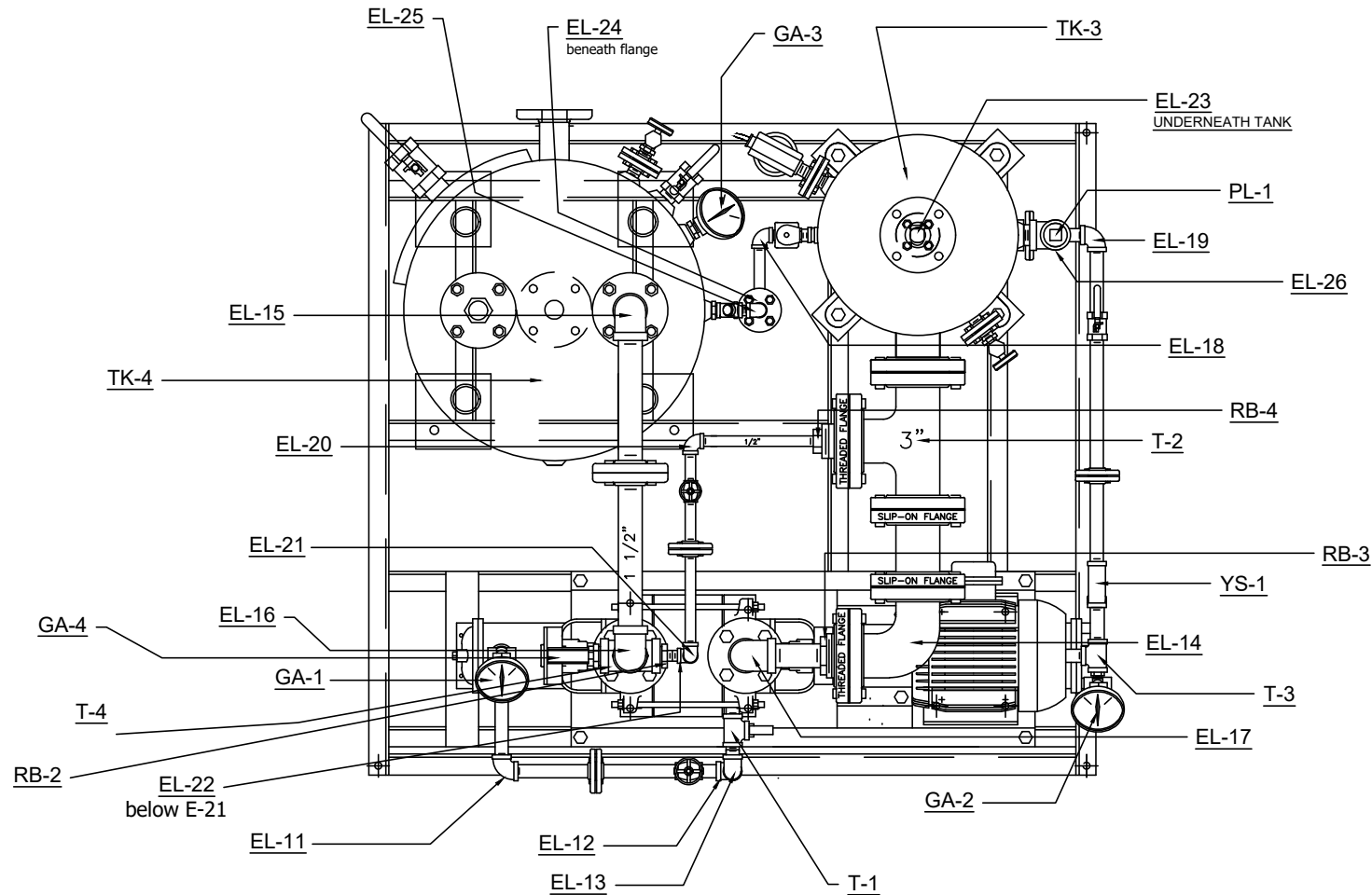


FIGURE II-S-9

PART II

**PF-II VACUUM SYSTEM -
TEES, ELBOWS, AND GAUGES**

PERMA-FIX OF FLORIDA, INC.

**1940 NW 67TH PLACE
GAINESVILLE, FLORIDA**

APPENDIX II-A-1

FINANCIAL ASSURANCE DOCUMENTATION

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

APPENDIX II-A-1. FINANCIAL ASSURANCE DOCUMENTATION
STATE OF FLORIDA
CERTIFICATE OF LIABILITY INSURANCE
HAZARDOUS WASTE TRANSPORTER AND USED OIL HANDLER

1. XL Insurance America, Inc.
(Name of Insurer)

(the "Insurer"), of 70 Seaview Ave UNIT 6, Stamford, CT 06902
(Address of Insurer)

hereby certifies that it has issued liability insurance covering bodily injury and property damage including environmental restoration for sudden accidental occurrences to

Perma-Fix of Florida, Inc.
(Name of Insured)

(the "Insured"), of 1940 NW 67th Place, Gainesville, FL 32653
(Physical Address of Insured)

in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 62-710.600(2) and 62-730.170. The coverage applies at:

<u>EPA/DEP I.D. No.</u>	<u>Name</u>	<u>Physical Address</u>
FLD 98071107	Perma-Fix of Florida, Inc.	1940 NW 67th Place, Gainesville, FL 32653

(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of \$ 1,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number AEC004445107, issued on 09/01/2021.
(date)

The effective date of said policy is 09/01/2021 and the expiration date of said policy is 09/01/2022.
(date)

This insurance is excess and the company shall not be liable for amounts in excess of \$ for each accident in excess of the underlying limit of \$ for each accident, exclusive of legal defense costs. The coverage is provided under policy number , issued on . The effective date of said policy is and the expiration date of said policy is .
(date) (date)

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:
- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
 - (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurer or the Insured and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
 - (e) The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one of more States including Florida.

Joe Catanese Digitally signed by Joe Catanese
Date: 2021.09.01 09:52:36 -04'00'

(Signature of Authorized Representative of Insurer)

Joseph S. Catanese

(Typed name)

Vice President

(Title)

Authorized Representative of

XL Insurance America, Inc.

(Name of Insurer)

505 Eagleview Blvd, Suite 100, Exton, PA, 19341-0636

(Address of Representative)

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

APPENDIX II-A-1. FINANCIAL ASSURANCE DOCUMENTATION

STATE OF FLORIDA

CERTIFICATE OF LIABILITY INSURANCE

HAZARDOUS WASTE TRANSPORTER AND USED OIL HANDLER

1. Indian Harbor Insurance Company
(Name of Insurer)

(the "Insurer"), of 70 Seaview Ave UNIT 6, Stamford, CT 06902
(Address of Insurer)

hereby certifies that it has issued liability insurance covering bodily injury and property damage including environmental restoration for sudden accidental occurrences to

Perma-Fix of Florida, Inc.
(Name of Insured)

(the "Insured"), of 1940 NW 67th Place, Gainesville, FL 32653
(Physical Address of Insured)

in connection with the insured's obligation to demonstrate financial responsibility under Florida Administrative Code Rule 62-710.600(2) and 62-730.170. The coverage applies at:

<u>EPA/DEP I.D. No.</u>	<u>Name</u>	<u>Physical Address</u>
FLD 98071107	Perma-Fix of Florida, Inc.	1940 NW 67th Place, Gainesville, FL 32653

(If coverage is for multiple facilities, identify each facility insured.)

This insurance is primary and the company shall not be liable for amounts in excess of \$ _____ for each accident, exclusive of legal defense costs. The coverage is provided under policy number _____, issued on _____.
(date)

The effective date of said policy is _____ and the expiration date of said policy is _____.
(date)

This insurance is excess and the company shall not be liable for amounts in excess of \$ 10,000,000 for each accident in excess of the underlying limit of \$ 10,000,000 for each accident, exclusive of legal defense costs. The coverage is provided under policy number UEC004445207, issued on 09/01/2021. The effective date of said policy is 09/01/2021 and the expiration date of said policy is 09/01/2022.
(date) (date)

Mail original completed form to: Department of Environmental Protection For assistance call: 850-245-8707
2600 Blair Stone Road, Mail Station 4560
Tallahassee, Florida 32399-2400

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer.
- (c) Whenever requested by the Secretary (or designee) of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Department a signed duplicate original of the policy and all endorsements.
- (d) Cancellation of the insurance, whether by the Insurer or the Insured and any other termination of the insurance (e.g., expiration, non-renewal), will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP as evidenced by certified mail return receipt.
- (e) The Insurer shall not be liable for the payment of any judgment or judgments against the Insured for claims resulting from accidents which occur after the termination of the insurance described herein, but such termination shall not affect the liability of the Insurer for the payment of any such judgment or judgments resulting from accidents which occur during the time the policy is in effect.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one of more States including Florida.

Joe Catanese Digitally signed by Joe Catanese
Date: 2021.09.01 09:50:11 -04'00'

(Signature of Authorized Representative of Insurer)

Joseph S. Catanese

(Typed name)

Vice President

(Title)

Authorized Representative of

Indian Harbor Insurance Company

(Name of Insurer)

505 Eagleview Blvd, Suite 100, Exton, PA, 19341-0636

(Address of Representative)

APPENDIX II-A-1. FINANCIAL ASSURANCE DOCUMENTATION

DEP Form # 62-730.900(4)(k)
Form Title HW Certificate of Liability Insurance
Effective Date January 5, 1995
DEP Application No. _____

STATE OF FLORIDA HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE (Primary Policy)

1. Indian Harbor Insurance Company, (the "Insurer"),

Name of Insurer

Of Seaview House, 70 Seaview Avenue, Stamford, CT 06902-6040

Address of Insurer

hereby certifies that it has issued liability insurance covering bodily injury and property damage to

PERMA-FIX ENVIRONMENTAL SERVICES, INC. (the "Insured"), of

Name of Insured

8302 Dunwoody Place, Suite 250, Atlanta, GA 30350

Address of Insured

in connection with the insured's obligation to demonstrate financial responsibility under 40 CFR 264.147 or 265.147, as adopted by reference in Section 62-730.180, Florida Administrative Code (F.A.C.). The coverage applies at

<u>EPA/DEP I.D. Number</u>	<u>Name</u>	<u>Address</u>
FLD980711071	Perma-Fix of Florida, Inc.	1940 NW 67th Place Gainesville, FL 32653

for:

- ☒ sudden accidental occurrences,
☐ non-sudden accidental occurrences,
☐ sudden and non-sudden accidental occurrences.

If coverage is for multiple facilities and the coverage is different for different facilities, indicate which facility(ies) are insured for sudden accidental occurrences, which are insured for non-sudden accidental occurrences, and which are insured for both.

The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy number PEC004445407,

issued on 9/01/21. The effective date of said policy is 9/01/21.

Date

Date

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

- (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
- (b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 264.147(f) or 265.147(f), as adopted by reference in Section 62-730.180, F.A.C.
- (c) Whenever requested by the Secretary of the Florida Department of Environmental Protection (FDEP), the Insurer agrees to furnish to the Secretary a signed duplicate original of the policy and all endorsements.

- (d) Cancellation of the insurance, whether by the Insurer or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Secretary of the FDEP.
- (e) Any other termination of the insurance (e.g., expiration, non-renewal) will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Secretary of the FDEP.

I hereby certify that the wording of this instrument is substantially identical to the wording specified in 40 CFR 264.151(j), as adopted by reference in Section 62-730.180, F.A.C., as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States including Florida.



Signature of Authorized Representative of Insurer

Mary Ann Susavidge

Type Name

Chief Underwriting Officer

Title

c/o AXA XL

505 Eagleview Boulevard

P.O. Box 636

Exton, PA 19341-0636

Authorized Representative of:

Indian Harbor Insurance Company

Name of Insurer

Seaview House, 70 Seaview Avenue, Stamford, CT 06902-6040

Address of Representative

APPENDIX II-A-2

CONTINGENCY PLAN




CONTINGENCY PLAN

019C – Revision 19


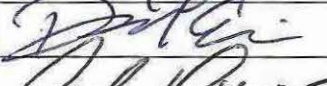


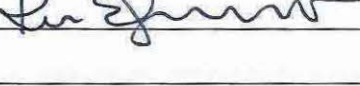
**PERMA-FIX OF FLORIDA, INC.
1940 NW 67TH PLACE
GAINESVILLE, FLORIDA 32653
(352) 373-6066**

DEP/EPA ID#: FLD 980 711 071

SINGLE USE ONLY
Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

 <p>PermaFix® environmental services A Nuclear Services and Waste Management Company</p>	<p align="center">ENVIRONMENTAL HEALTH AND SAFETY</p>	<p align="center">SOP-019C</p>	
		<p align="center">Revision: 19</p>	
<p align="center">Contingency Plan</p>			

Approvals

Title	Signature	Date
EHS Manager		2/18/2020
Radiation Safety Officer		2/18/2020
QA Manager		2/18/2020
Field Service Manager		2/18/2020
SE Regional VP**		2/18/2020

** Denotes Final Approval and Date of Issuance

Revision Control


Number	Date	Change Description
17	12/20/2019	Annual Review, updated contact info, added quick reference guide
18	1/30/2020	Updated contacts and QRG
19	2/18/2020	Updated contacts

SINGLE USE ONLY
 Tuesday, February 18, 2020
 PERMA-FIX OF FLORIDA, INC.
 STANDARD OPERATING PROCEDURE (CC)

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 <p>PermaFix® environmental services A Nuclear Services and Waste Management Company</p>	<p align="center">ENVIRONMENTAL HEALTH AND SAFETY</p>	<p align="center">SOP-019C</p>	
		<p align="center">Revision: 19</p>	
<p align="center">Contingency Plan</p>			

Approvals

Title	Signature	Date
EHS Manager		
Radiation Safety Officer		
QA Manager		
Field Service Manager		
SE Regional VP**		

** Denotes Final Approval and Date of Issuance

Revision Control

Number	Date	Change Description
17	12/20/2019	Annual Review, updated contact info, added quick reference guide
18	1/30/2020	Updated contacts and QRG
19	2/18/2020	Updated contacts
19	3/3/2020	Updated TOC, minor change

SINGLE USE ONLY
Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

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PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

1.0 SCOPE AND OBJECTIVES

This Contingency Plan (hereafter referred to as "the Plan") describes an organized course of action to be taken by Facility personnel or outside organizations in response to possible hazardous waste emergencies at the Perma-Fix of Florida, Inc. (PFF) facility (Facility). In addition, the Plan lists emergency equipment to be maintained on-site and designates the primary and alternate Emergency Coordinators. This Plan is designed to fulfill the Resource Conservation and Recovery Act (RCRA) Subpart D requirements of 40 CFR Part 264.

The Plan is designed to be a stand-alone document that provides instructions and guidance for responding to Facility emergencies. The Facility was designed and will be operated in a manner to prevent spills, fires, and explosions, in accordance with all permits and licenses. Personnel are trained to immediately implement and execute the Plan whenever there is an imminent or actual fire, explosion, or release of hazardous waste or hazardous waste constituents. Additionally, the Plan will be implemented in the event of natural disasters or bomb threats.

Updated copies of the Plan are posted within the Facility and maintained in the Facility Operating Record. Copies of the Plan and subsequent updates have been supplied to the state and local agencies that may be called upon to assist in the event of an actual emergency at the Facility. A copy of this Plan will be submitted to other agencies after receiving approval by the Florida Department of Environmental Protection (FDEP) of this Plan.

2.0 FACILITY OPERATIONS

PFF currently conducts a commercial waste bulking, storage, and transfer facility operation at its Gainesville, Florida facility. Waste managed on-site includes a wide variety of hazardous, industrial, mixed (i.e., a combination of hazardous and low-level radioactive), and non-hazardous wastes. PFF separately blends hazardous and mixed wastes into fuels for reuse (i.e., energy recovery) in permitted, off-site incinerators, industrial furnaces, boilers, etc. PFF also consolidates, repackages, and sorts waste materials for shipment and off-site treatment and/or disposal.

Permitted activities at the Facility include a variety of chemical and physical waste treatment activities. Specifically, PFF receives, stores, and treats hazardous waste. PFF is currently permitted for the following treatment operations: thermal desorption, chemical and physical extraction (extraction methods include water washing, high pressure steam, blasting, grinding, spalling etc.), chemical oxidation/reduction, size reduction and separation techniques, lab-pack decommissioning, neutralization, mercury amalgamation, deactivation, stabilization, microencapsulation, and macroencapsulation.

Existing treatment operations at the Facility include the Perma-Fix I® (PF-I) (chemical stabilization) and Perma-Fix II® (PF-II) (thermal desorption; chemical oxidation/reduction) processes, as well as treatment of hazardous debris in accordance with the alternative debris treatment standards specified in 40 CFR 268.45 (namely physical abrasion, chemical washing, and encapsulation). In addition, PFF is planning solvent recycling activities (distillation), which are exempt from RCRA permitting requirements. Complete details of these processes may be found in Part I Section D.2.1 Solvent Recycling of PFF's RCRA permit application (dated December 2019). Figure CP-1 is a Site Plan showing the locations of hazardous waste management areas at the Facility. Figure CP-2 shows the location of the facility on a street map.

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

Liquid scintillation fluid (LSF) is an example of one waste stream received at PFF. LSFs are generally received in vials and/or bulk from off-site generators. The vials are crushed, and the scintillation fluid is captured and consolidated into containers ranging from 5-gallon to 550-gallon, or pumped into a 3,000-gallon aboveground storage tank or pumped into DOT-approved containers. The containers are stored in the Processing and Storage Building (see Figure CP- 1). The scintillation fluid is then fuel blended and shipped off site for energy recovery. The broken vials are washed with an ethanol solvent and disposed as a non-hazardous solid waste.

PF-I and PF-II processes are conducted in the Treatment and Operations Building. Debris washing activities are conducted in a segregated area within the LSV processing area. The PF-II process, macroencapsulation, and solvent recycling activities are or will be carried out inside the Treatment and Operations Building. Fuel blending (bulking and de-watering) operations are conducted in the Processing and Storage Building.

Used oil is stored in the LSV Processing and Storage Warehouse (see Figure CP-1) in DOT approved containers. The used oil is generally fuel blended. Spent fluorescent lamps destined for recycling and various non-hazardous wastes are also stored in the LSV Processing and Storage Warehouse.

Additional information regarding facility operations relevant to contingency plan implementation are addressed in the procedures noted below.

3.0 EMERGENCY COORDINATORS

This Plan identifies a primary emergency coordinator and alternate emergency coordinators as indicated in Attachment CP-1. The individuals identified are familiar with all aspects of PFF operations, trained in Contingency Plan implementation, and are capable of making appropriate decisions under emergency circumstances. The primary and alternate emergency coordinators have the authority to commit the resources of PFF required to implement the Plan. The emergency coordinators have the authority to shut down and restart processing areas and evacuate plant personnel. An emergency coordinator will be able to reach the Facility in a short period of time, should it be necessary to respond after regular business hours. If the evacuation of surrounding areas is advisable as determined by the Emergency Coordinator, immediate notification will be made to appropriate local authorities and the Emergency Coordinator (or his/her designee) will be available to assist appropriate officials decide whether surrounding areas should be evacuated.

4.0 IMPLEMENTATION

The Plan will be implemented whenever an incident or emergency at the Facility threatens or has the potential to threaten human health, the environment, and public or private property. The designated emergency coordinator will implement the Plan in the event of an imminent or actual emergency. The emergency coordinator will also provide coordinated assistance to the internal personnel and outside organizations responding to the emergency incident. Criteria for implementation of the Contingency Plan at the Facility include the following scenarios and potential emergencies:

4.1 Fires and/or Explosions

- A large fire has been discovered and the fire is not extinguished using portable fire extinguishers;
- Facility personnel have exhausted locally available fire extinguishers on a small fire and the fire continues to burn or spread;
- A fire causes the release of toxic fumes affecting the surrounding area;
- Use of water or chemical fire suppressant could result in contaminated runoff;

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

- An imminent danger of an explosion exists; and/or,
- An explosion has occurred.

4.2 Spills or Releases

- A spill exceeds the size or seriousness that can be controlled and remediated by Facility personnel using portable equipment available in the immediate area of a spill or release; and/or,
- A spill or uncontrolled reaction has caused or could cause the release of hazardous waste or hazardous waste constituents to the air, surface water, or soil.

4.3 Natural Disasters

A hurricane, tornado, or severe weather event is forecast for the immediate area of the Facility or has occurred at the Facility.

4.4 Bomb Threat

A bomb threat concerning the Facility is received by Facility personnel or by other persons who make the event known to Facility personnel.

4.5 Emergency Response Procedures

4.5.1 Notification

Facility personnel will immediately notify the emergency coordinator by telephone or intercom when an actual or imminent emergency is identified. If the emergency occurs after regular business hours, the emergency coordinator (or designated alternate) will be immediately notified using the telephone numbers listed in the Emergency Coordinator Contact List (Attachment CP-1).

The Gainesville Police and Fire Department can be summoned by telephone. Telephones that are configured for dialing an outside line can be activated by dialing “9” for external communication. Telephones are located inside each building containing hazardous waste and are also capable of facility-wide notification on a dedicated paging system.

Additionally, all emergency coordinators have the capability to maintain contact by radio to key members of the process technician team. Copies of the Contingency Plan, which contains the Emergency Coordinator Contact List, are posted in several areas of the Facility in hard cover binders in close proximity to processing, storage, and certain administrative areas.

4.5.2 Identification of Hazardous Materials

As a precaution, all hazardous waste received by PFF is assumed to be ignitable and toxic. All smoke and fumes from fires and explosions will be assumed to be hazardous. The atmosphere around all spills will be assumed to be toxic and potentially reactive until determined to be otherwise. The emergency coordinator(s) or his/her alternate will make an inspection of the material(s) involved in an incident and determine the next course of action.

Whenever there is a release, fire, or explosion, the emergency coordinator(s) will (to the extent possible) immediately identify the character, source, amount, and aerial extent of any released

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materials. He/she may do this by visual observation (e.g., truck placards, container labels), review of facility records, and (if necessary) by chemical analysis. Facility records available for review include manifests, and waste analysis data on-site kept at the file cabinets in the hallway next to the copy room for at least three years, and then kept off-site with Iron Mountain at 5905 NE Waldo Road, Gainesville, Florida. Iron Mountain provides contracted service to archive the documents. The emergency coordinator may consider incident character (i.e., size of spill or type of incident) as well as weather conditions when coordinating response actions.

4.5.3 Hazard Assessment

As part of the Facility training program, Facility personnel are trained to assess the potential emergencies for which they have the capacity to respond. Facility personnel are trained in the use of locally available fire extinguishers and control equipment for minor spills. If more serious events are immediately recognized, or the event exceeds the capabilities of portable extinguishing or spill control equipment, the emergency coordinator will notify local authorities and activate the on-site fire alarm. Upon arrival of the local authorities, the emergency coordinator will provide information regarding the Facility and available materials to prevent the spread of contamination. The local fire or emergency response official, upon arrival at the Facility, shall have primary control and authority during an emergency situation at the Facility.

The need for partial or full evacuations of the Facility and surrounding areas will be assessed by the emergency coordinator and outside emergency agency personnel.

The affected employees' supervisor will assess medical emergencies. Either the Facility's local medical provider or a local emergency medical facility will treat any employee who is injured to the extent where the injury cannot be remedied by simple first aid.

Bomb threats will be treated as actual emergency events until determined otherwise. The Gainesville Police Department will make further assessments and recommendations to the Facility emergency coordinator.

The emergency coordinator has the authority to notify additional PFF employees as deemed necessary to broaden his/her capability in making assessments by utilizing trained personnel and specialized tools and equipment available to assess the extent and severity of an incident including:

- Photo-ionization detector
- Gas chromatograph
- Mass spectrometer
- Additional miscellaneous lab instruments

The emergency coordinator, or an individual he/she designates, will assess the potential environmental effects of an incident using the following criteria:

- Potential effects of gases, vapors, and smoke.
- Potential effect of water run-off from fire control.
- Potential effect of fire-fighting foams or chemicals.
- Potential effect on local surface water or groundwater.

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- Potential effect on human and animal health or life; inside and outside the facility.

4.5.4 Control Procedures

4.5.4.1 Fire and Explosion

Facility employees are trained in fire prevention and response. Employees are trained to respond to small fires with portable fire extinguishers. The Gainesville Fire Department will respond to structural or large fires. In addition, the entire facility is covered by an on-site fire suppression system supported by a diesel fire pump that feeds an array of wet and dry pipe systems and can distribute an AFFF foam/water mixture at the NFPA-required densities in any of the Facility's waste storage and processing areas. This system is monitored 24 hours a day and also has backup power to maintain all functionality in the event of AC power failure, in accordance with local and NFPA guidelines. Specific instructions for responding to a fire and explosion at PFF are contained in Attachment CP-2A, Emergency Procedures for Fire, and in Attachment CP-2B, Emergency Procedures for Explosion, respectively.

In the event of fire or explosion, the following actions will be immediately taken:

1. All work will cease, and all non-essential personnel will be evacuated to the designated assembly area.
2. All valves and conveyance systems in the LSV processing area that lead to the 3,000-gallon aboveground storage tank and those in the treatment area will be secured. All loading, processing, and unloading operations of the PF-I system, PF-II system, or other site operations in the affected area will be shut down.
3. The emergency coordinator(s) and local authorities will be notified.

4.5.4.2 Minor Spills

Minor spills may occur during waste sampling, equipment maintenance, waste transfer, and treatment operations. Waste is managed throughout the Facility within secondary containment structures. Therefore, minor spills have minimal potential for off-site migration to the local environment. In most cases, these spills occur where adequate ventilation is present to dissipate any harmful vapors. These spills can generally be remediated using absorbent pads or materials.

4.5.4.3 Major Spills

Major spills may result from overturned containers or ruptures in the storage tank, containers, piping, or hoses. Secondary spill containment has been installed around hazardous waste treatment process areas and storage locations within the Facility.

Specific instructions for responding to a spill or unplanned release at the Facility are contained in Attachment CP-3, Emergency Procedures for a Spill/Unplanned Release. Attachment CP-3 includes a step-action table that summarizes those activities that should be

taken immediately upon the discovery of a spill or release in any one of the process areas (e.g., LSV processing, PF-I, PF-II, or other treatment areas on site).

4.5.4.4 Natural Disasters

The most probable natural disasters to affect the Facility would be either a tornado or a hurricane. Warnings of approaching tornadoes and tropical storms/hurricanes will be received from the National Weather Service or local media. A NOAA emergency weather radio is kept in the offices and monitored during business hours for this purpose.

With tornadoes, there is usually little time to make preparations. The only emergency action that can be taken during a tornado warning is to have all employees move to the center of the building they are in. All employees working outside (e.g., in the PSB), will be notified and required to move inside to a safer location.

Early warning is possible with tropical storms/hurricanes. If it becomes apparent that a tropical storm or hurricane may impact the Facility, the following tasks will be completed:

- Daily entries to the operating record will be made documenting the path/progress of the storm. This will include storm-tracking maps from weather agencies, written warnings from weather services, etc.
- If the forecast predicts a tropical storm or hurricane force winds (>39 miles per hour) for the Facility, the following steps will be taken:
 - All double-stacked pallets of drums in the PSB will be placed on the floor.
 - Any empty B-25 containers on site will be placed around the outside of the PSB berm to minimize damage caused by flying debris during high winds.
 - All outside roll-off containers will be inspected to verify that covering tarps are secure.
 - Containers subject to wet weather damage will be covered in plastic (e.g., fiber containers) or moved inside the LSV Storage warehouse.
 - Any equipment/supplies and other loose objects outside the main buildings will be brought inside, such as empty drums, over-packs, forklifts, spill kits, etc.
 - Maintenance will verify that the emergency power generator and portable pumps are serviced and ready for use.
 - Emergency response equipment (respirators, protective clothing, gloves, etc.) that might be needed to respond to a spill/fire/release will be placed in a location easily accessible to responders, such as under the front stairwell.

After the event is over and it is safe to go outside, emergency coordinators will tour the facility to evaluate damage, if any, and implement the Contingency Plan as needed.

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4.5.4.5 Bomb Threats

All bomb threats will be reported to the emergency coordinator or company officials and subsequently to the Gainesville Police and Fire Departments. The Facility will be evacuated, and local authorities may conduct a bomb search. The Facility will remain unoccupied until the local authorities and emergency coordinators determine the threat no longer exists.

4.5.4.6 Power or Equipment Failure

In the event of a power failure, all transfer pumps and treatment operations will stop. Existing automatic valves inherent in the design of the fluid transfer pumping equipment prevent reversal of flow in the LSV transfer lines. The container storage facilities and conveyors in the LSV area are not rendered unsafe during a power failure. The emergency coordinator(s) and Facility maintenance personnel will survey potential damage resulting from a loss of power. Equipment will be repaired immediately after power is restored or as soon as possible. If equipment is beyond repair, it will be properly disposed or managed as scrap.

No run-away reactions will occur as a result of suspension of the PF-I process. Equipment damage would not be anticipated as a result of a power outage.

In the event of a power failure, all operations in the PF-II process line will be discontinued. The system is manually loaded and unloaded so backflow or unintended unloading of material will not occur. The process line (including the heating system) will automatically shut off and is not configured to automatically restart (i.e., in the event of a power failure, upon system shut-down, manual operator action is required for reactivation of equipment). Power failure will not be a factor for container treatment operations since these operations are manually operated. Therefore, in the event of a power failure, the process will be shut down, and all container(s) will be closed until safe processing can be resumed. No other facility operations are anticipated to potentially result in safety or damage problems if interrupted by a power outage.

Emergency exit signs and lighting are provided at critical locations throughout the facility and are supplied with battery-backup power units providing up to 90 minutes reserve power. The Facility is not equipped with automatic emergency backup generators. However, a portable gas-powered electric generator is located on site.

Equipment failure and malfunction will be recorded in the operating record. Maintenance personnel will check and repair malfunctioning equipment as needed. Equipment and instrument calibration will be performed as needed by qualified individuals to minimize the potential for equipment failure, or use of equipment in an “out of calibration” condition. The facility inspection schedule and inspection log sheets provide a mechanism for inspection of tanks and accessories and minimizes the potential for equipment failure and potential releases to the environment. Most equipment failures would not result in any release of hazardous constituents to the environment. In addition, storage and treatment areas are provided with secondary containment systems designed to prevent migration of released materials to environmental media. In the event that equipment failure results in a release, the incident

response procedures outlined in this Contingency Plan are designed to address the most likely possible scenarios.

5.0 PREVENTION OF RECURRENCE OR SPREAD OF FIRES, EXPLOSIONS, OR RELEASES

In the event of a fire, explosion, or release, transfer pumps, electric motors, heating units, mixing equipment and other equipment items will be shut off to eliminate the possibility of recurrence. The emergency coordinator shall institute this as necessary. The storage tank is equipped with a high-level alarm system to prevent overfilling. The proper functioning of this system also will mitigate the possibility of a recurrent emergency situation. The automatic power shut-off system for the PF-II process line will minimize the potential for recurrence of any fire, explosion, or release.

Plant personnel will tour affected areas of the Facility every two hours, inspecting for possible recurrences of fire or material release until the “all clear” determination has been announced.

6.0 STORAGE AND TREATMENT OF RELEASED MATERIAL

If PFF halts operations in response to a fire, explosion, or release, the emergency coordinator must monitor for potential leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever appropriate.

Immediately after an emergency, the emergency coordinator must provide for the treatment, storage, or disposal of recovered waste, contaminated soil, or surface water, or any other material that results from a release, fire, or explosion at the Facility. If the recovered material cannot be processed on-site, it will be characterized and disposed of properly in an approved off-site hazardous or non-hazardous waste management facility, as applicable. Collected waste, contaminated soil/surface water, or other material resulting from release response will be stored in a designated storage area (prior to treatment on-site or shipment off-site) based on the identity of the waste and conditions at the Facility. In most cases, the material will be containerized and stored in container storage areas used for management of the original waste. If incident conditions preclude storage in standard storage areas, temporary areas will be designated in accordance with the requirements of 40 CFR 262.34. In some cases, liquid waste may be collected directly onto a tanker and shipped off-site for proper disposal.

7.0 EMERGENCY EQUIPMENT

A list of emergency equipment available on-site is provided in Attachment CP-5, Emergency Equipment List. Locations of the facility’s emergency equipment are shown on CP-6, Emergency Equipment Locator Map. Available equipment includes fire extinguishers, portable pumps, forklift, empty containers, shovels, brooms, and absorbent.

The emergency coordinator will supervise Facility personnel in the cleanup and treatment of hazardous wastes after the emergency is mitigated. If an outside emergency response/cleanup contractor is required, the emergency coordinator will interface with the outside contractor to ensure proper response or cleanup in accordance with procedures in the Contingency Plan and with Facility permits and licenses.

Corrosive materials will be neutralized in place, then absorbed and containerized. All others will be absorbed (if liquid) and containerized, followed by waste characterization, and, if necessary, analysis and shipment off-

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site for disposal. Large volumes of liquids may be pumped into containers or tanker trucks for appropriate management.

8.0 INCOMPATIBLE WASTE

The emergency coordinator will ensure that (in the affected area(s) of the Facility) no waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed. Depending on the situation, this may require isolation of certain classes of material on-site, or loading and shipping certain classes of material off site.

9.0 POST-EMERGENCY EQUIPMENT MAINTENANCE

All emergency equipment listed in Attachment CP-5 and used during an emergency will be replenished or cleaned and inspected for integrity before operations are resumed.

After an incident, non-disposable emergency equipment listed in this Contingency Plan will be cleaned and made fit for its intended use before operations are resumed. Equipment used for emergency response will be decontaminated by steam cleaning, water washing, or other appropriate method. Used fire extinguishers will be re-charged, and depleted supplies will be restocked. Appropriate decontamination methods will be chosen based on the manufacturer's recommendation and/or the type/quantity of contamination present. Disposable equipment will be properly managed, and decontamination residues will be managed in accordance with 40 CFR 262.34.

10.0 CONTAINER SPILL AND LEAKAGE

Leaking containers will be overpacked into non-leaking secondary containers until processed; or the material in the leaking container will be transferred into another appropriate DOT container. No attempt will be made to repair leaking containers. Waste that leaked from a container will be absorbed and managed and disposed of appropriately.

The PF-I and PF-II processes will be conducted in an area equipped with secondary containment. Debris treatment, as well as container treatment activities, is conducted within secondary containment. Spills will be managed in the same manner as tank releases discussed below. Incidental spills will be removed from containment upon detection. Containment areas are subject to routine inspections to facilitate the detection of and timely response to leaking containers or accumulated liquids.

11.0 TANK SPILLS AND LEAKAGE

The bulk storage tank at the Facility is located within secondary containment. Spills will be absorbed and managed as hazardous waste for proper disposal. If the tank itself develops a leak, the remaining waste will be pumped from the tank into containers, or directly into a tanker truck. The tank will then be assessed by a Florida registered professional engineer and either repaired or closed in accordance with the approved closure plan contained in the Facility's Part B permit.

The PF-II system is also equipped with secondary containment. Spills will be managed in the same manner as tank releases discussed above. Incidental spills will be removed in a timely manner. Additionally, these areas are subject to routine inspections to facilitate the detection of and timely response to leaking containers or accumulated liquids.

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12.0 COORDINATION AGREEMENTS

Arrangements have been made with the following state and local authorities to provide emergency assistance to the facility:

<u>NAME OF ORGANIZATION</u>	<u>FUNCTION</u>
• City of Gainesville Fire and Rescue Department	• Respond to fires, explosions, spills, or releases
• City of Gainesville Police Department	• Primary responder for plant security & traffic control
• Alachua County Sheriff's Office	• Secondary responder for plant security & traffic control
• North Florida Regional Medical Center	• Emergency medical treatment
• State of Florida DEP Emergency Response Unit	• Assist in emergency response coordination efforts

Coordination agreements are intended to document each emergency response organization's ability and willingness to assist the PFF facility in the event of an emergency incident.

Complete copies of the Plan after approval from FDEP will be sent to the local police and fire departments, nearby hospital, emergency response contractor, and state and local emergency response teams to familiarize them with the Facility and those actions needed in case of an emergency. Documentation indicating that copies of the previous plans have been submitted to these organizations is maintained in the Facility Operating Record. Also, documentation of each organization's acceptance or refusal to enter into a coordination agreement is maintained in the Facility Operating Record. Example copies of these documents are provided as Attachments CP-9 and CP-10, respectively. In addition, the local hospital has been advised about the properties of hazardous waste handled at the facility and the types of injuries/illnesses that could result from fires, explosions, or releases at the facility.

Whenever the Plan is amended, copies of the amendments will be provided to these organizations. The invitation for site inspections will be offered whenever there are significant changes to Facility operations, or annually.

13.0 COORDINATION OF EMERGENCY SERVICES

This section of the Contingency Plan identifies outside organizations that are available for emergency response services. Written agreements with these organizations are maintained in the Facility operating record. These service agencies and organizations are to be summoned only by the PFF emergency coordinator or his/her alternate.

The following table summarizes those notifications and actions that should be undertaken in response to emergency situations that could arise at the Facility.

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<u>IN CASE OF A</u>	<u>THEN NOTIFY*</u>	<u>SIMULTANEOUS ACTIONS</u>
<ul style="list-style-type: none"> Fire or Explosion 	Gainesville Fire Rescue Department Call 911, or (352) 334-5078	<ul style="list-style-type: none"> Evacuate Facility employees to assembly location Take attendance for missing persons Emergency coordinator assists ranking Fire official
<ul style="list-style-type: none"> Release of harmful or toxic gases or fumes 	Gainesville Fire Rescue Department Call 911, or (352) 334-5078	<ul style="list-style-type: none"> Evacuate Facility employees to upwind assembly location Take attendance for missing persons Emergency coordinator assists ranking Fire official
<ul style="list-style-type: none"> Spill or release of hazardous materials or hazardous wastes 	Local Hazardous Materials Response Team (Gainesville Fire Rescue HAZMAT Team) Call 911, or (352) 955-1818 <u>OR</u> North Central Florida Regional Planning Council (352) 955-2200 <u>OR</u> Florida DEP State Warning Point (800) 320-0519 or (850) 413-9911 (24 hours)	<ul style="list-style-type: none"> Evacuate Facility employees to Assembly Location (as required) Take attendance for missing persons (if required) Emergency coordinator(s) evaluate the situation and potential hazards Either coordinate in-house spill response (minor spills) <u>or</u> contact outside responders (major spills).
<ul style="list-style-type: none"> Bomb threat or unauthorized trespass 	Gainesville Police Department Call 911, or (352) 334-2400 <u>OR</u> Alachua County Sheriff's Office Call (352) 955-1818	<u>BOMB THREAT</u> <ul style="list-style-type: none"> Evacuate Facility employees to assembly location Take attendance for missing persons Emergency coordinator assists ranking police official <u>TRESPASS</u> <ul style="list-style-type: none"> Emergency coordinator & operations personnel check for tampering, theft, etc. Resecure Facility
* Written reports and additional agency notifications may be required beyond those emergency notifications listed above (e.g., RQ report, or hazardous waste tank release, etc.).		

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14.0 EVACUATION PLAN

Potential emergencies requiring evacuation from hazardous waste management areas are primarily fire hazards and the associated potential release of toxic, irritating, or asphyxiating gas/fumes, or bomb threat. In either case, Facility employees will execute the procedures listed below.

All employees are trained in evacuation procedures. Periodic evacuation drills are conducted to familiarize facility personnel of the primary and secondary evacuation routes and assembly locations throughout the Facility. Evacuation routes are shown on Attachment CP-7, Emergency Evacuation Route Map.

Criteria for implementation of the Facility evacuation plan include the following scenarios and potential emergency situations:

14.1 Fire and Explosion

All Facility employees are trained in the Facility's evacuation plan procedures in the event of a fire or explosion. Employees are instructed to evacuate the Facility using either primary or alternate emergency evacuation routes, as instructed. Employees shall remain at the assembly location until the ranking fire official and/or emergency coordinator have given clearance, unless conditions warrant an off-site evacuation.

14.2 Release of Toxic, Irritating, or Asphyxiating Gases or Fumes

A remote possibility exists for the release of gases or fumes that may cause toxic, irritating, or asphyxiating effects on Facility employees. Employees are instructed to evacuate the Facility and proceed to the designated assembly point for attendance counts. If the primary evacuation routes and assembly point are unusable due to encroaching gases or fumes, employees shall use the secondary evacuation routes and assembly point, depending on wind direction or dispersal of fumes or gases. Employees shall remain at the assembly location until clearance has been given by either the emergency coordinator or ranking emergency official, unless conditions warrant an off-site evacuation.

14.3 Bomb Threat

If a bomb threat is received by the Facility, all employees are instructed to evacuate the Facility via either primary or secondary evacuation routes. All employees will evacuate and proceed to either the primary assembly area or a secondary assembly area designated by the emergency coordinator for an attendance count. Employees shall remain at the assembly location until the ranking police official or the emergency coordinator has given clearance.

14.3.1 Procedure Signals:

An internal announcement is broadcasted using the telephone public address system. All personnel and employees are instructed to evacuate the Facility through the front door or closest exit.

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- The emergency coordinator or designee will make the announcement by dialing 80 (eight zero) on the telephone and saying:
“**ATTENTION!!** THE PERMA-FIX EMERGENCY EVACUATION SYSTEM IS NOW BEING EXECUTED. A SITUATION EXISTS REQUIRING IMMEDIATE EVACUATION OF THE FACILITY. PLEASE CALMLY EXIT THE FACILITY AND ASSEMBLE AT THE DESIGNATED AREA.”
- The emergency coordinator(s) shall direct the evacuation. In the event of an issue of accountability, and if conditions allow, the emergency coordinator(s) shall re-enter the Facility to locate personnel. While emergency coordinators are inside the perimeter of the Facility, they shall maintain radio contact with other emergency coordinators and the head counter at all times.
- In a situation that does not warrant re-entry by PFF emergency coordinators, entry of the Facility shall be performed by the local emergency response authorities, with their findings communicated to on-site PFF emergency personnel.
- Primary evacuation routes have been established and are depicted on Attachment CP-7, Emergency Evacuation Route Map. Additionally, secondary evacuation routes have been established in order to provide employees with an alternate route to the assembly location so that an attendance count may be taken. Secondary routes are utilized in the event that primary routes are unusable due to fire, heat, smoke, fumes, or asphyxiating gases. Attachment CP-8 illustrates the areas where potential facility hazard locations could exist.
- Evacuation Route Maps are posted at strategic locations throughout the Facility to guide employees to assembly location by illustrating the established primary and secondary evacuation routes.
- Upon complete evacuation of the Facility, all employees will immediately assemble in the parking lot adjacent to the east side entrance (or alternate assembly location) as directed by the emergency coordinator. In the event that toxic or irritating gases are generated, the emergency coordinator shall direct further evacuation from the area to a safe upwind location. Authorized emergency response personnel remaining in the area will be required to don appropriate personal protective equipment.
- The head counter or designee shall account for all PFF and non-PFF personnel by using a current employee list and sign-in roster, and shall communicate by radio to the emergency coordinator(s) when an issue of accountability exists. The radio is located by the downstairs fax machine in the office area. (VERIFY RADIO IS SET TO CHANNEL 2.) When all personnel have been accounted for, the head counter will then report personnel accountability to the emergency coordinator(s).
- All employees will remain at the assembly point location until instructed otherwise by the emergency coordinator or outside authority.
- The emergency coordinator will advise the appropriate responding agencies if there is a need for the evacuation of the surrounding area.

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15.0 REQUIRED REPORTS

The time, date, and details of any incident that requires implementation of the Plan will be documented and kept in the Facility operating log. Within 15 days after an incident, a written report will be submitted to the FDEP. The report will include:

- (1) Name, address, and telephone number of the owner or operator;
- (2) Name, address, and telephone number of PFF;
- (3) Date, time, and nature of incident (e.g., fire, explosion);
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazards to human health or impacts to the environment, where applicable; and,
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

In case of occurrence of a fire or explosion from the facility that could threaten the environment or human health outside the facility, it will be reported verbally to the FDEP within 24 hours, and a written report will be provided within 5 days, as required by 62-4.160.17(b), F.A.C. The verbal report will include the name, address, I.D. number, and telephone number of the facility; its owner or operator; the name and quantity of materials involved; the extent of any injuries; an assessment of actual or potential hazards; and the estimated quantity and disposition of recovered material. The written submission will contain:

1. A description and cause of the fire or explosion at the facility.
2. If not corrected, the expected time of correction, and the steps being taken to reduce, eliminate, and prevent recurrence of the fire or explosion.

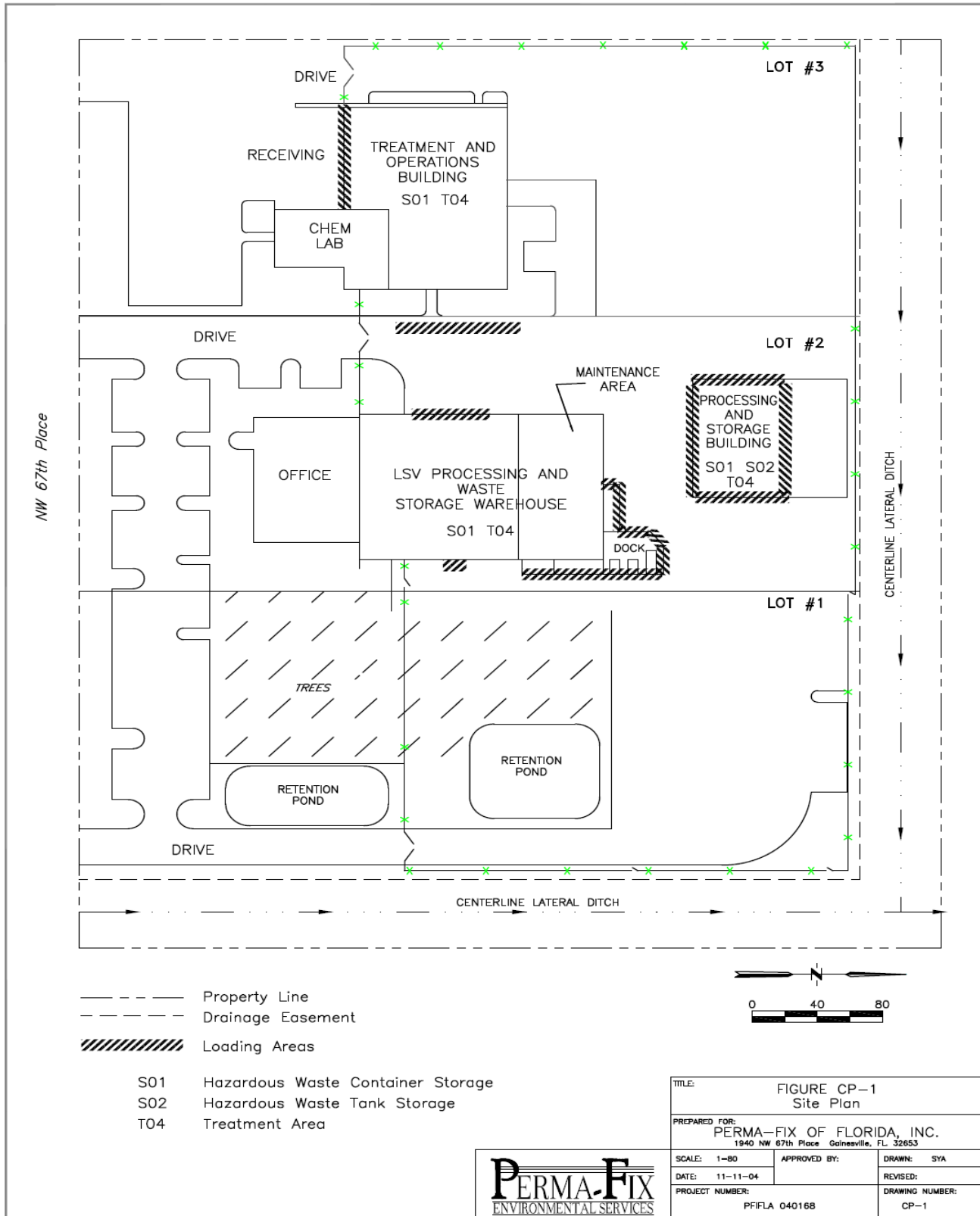
The Plan will be reviewed and immediately amended, if necessary, whenever:

- The Plan fails in an emergency;
- The list of emergency equipment changes;
- Changes occur in the Facility's design, construction, operating, maintenance, or other circumstances that materially increase the potential for fires, explosions, or releases of hazardous waste, or changes, the response necessary in an emergency;
- The list of emergency coordinators changes; or,
- The Facility permit is revised.

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FIGURE CP-1
SITE PLAN

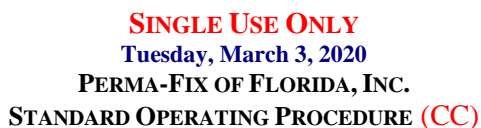
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FIGURE CP-2
STREET MAP

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ATTACHMENTS

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ATTACHMENT CP-1

EMERGENCY COORDINATORS

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CONTINGENCY PLAN TABLE 1. EMERGENCY COORDINATORS
PART II APPENDIX II-A-2 CONTINGENCY PLAN
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Primary Emergency Coordinator

Name:	Randy Self
Position/Title:	<i>General Manager</i>
Work Telephone Number:	(352) 395-1368/373-6066
Mobile Telephone Number:	(352) 317-3243
Home Address:	6411 NW 42 nd Road, Gainesville FL 32606

Alternate Emergency Coordinators*

Name:	Dwayne Singleton
Position/Title:	<i>Field Service Sales Manager</i>
Work Telephone Number:	(352) 395-1362/373-6066
Home Telephone Number:	(352) 376-9624
Mobile Telephone Number:	(352) 219-8640
Home Address:	4138 NW 48 th Place, Gainesville, FL 32606

Name:	David Fendelander
Position/Title:	<i>Environmental Health & Safety Manager</i>
Work Telephone Number:	(352) 395-1347/373-6066
Home Telephone Number:	(702) 534-9761
Mobile Telephone Number:	(702) 534-9761
Home Address:	8120 SW 60 th Rd. Gainesville, Fl. 32608

Name:	Lason Kirkland
Position/Title:	<i>Industrial Operations Manager</i>
Work Telephone Number:	(352) 395-1363/373-6066
Home Telephone Number:	(770) 630-3722
Mobile Telephone Number:	(770) 630-3722
Home Address:	5400 NW 39 th Ave, Apt Z-238, Gainesville, Fl.

Name:	Andy Owens
Position/Title:	<i>Quality Assurance Manager</i>
Work Telephone Number:	(352) 395-1357/373-6066
Home Telephone Number:	(352) 284-8064
Mobile Telephone Number:	(352) 284-8064
Home Address:	929 NE County Rd 234, Gainesville, FL 32641

Name:	Mike Owens
Position/Title:	<i>Maintenance Coordinator</i>
Work Telephone Number:	(352) 395-1360/373-6066
Home Telephone Number:	(386) 213-2208
Mobile Telephone Number:	(386) 213-2208
Home Address:	200 N Fillmore Ave. Interlachen Fl. 32148

Name:	Kiara Ashford
Position/Title:	<i>Radiation Safety Officer</i>
Work Telephone Number:	(352) 395-1345/373-6066
Home Telephone Number:	(865) 805-1673
Mobile Telephone Number:	(865) 805-1673
Home Address:	1822 NW 34 th Street, Gainesville, Fl. 32506

*** Alternate Coordinators are listed in the order in which they will assume responsibility as alternates.**

NOTE: The work address for all Coordinators is 1940 NW 67th Place, Gainesville, Florida 32653.

When PRINTED, this document is UNCONTROLLED. The person in possession is responsible for verifying that it is the most current revision PRIOR TO USE.

ATTACHMENT CP-2A

EMERGENCY PROCEDURES FOR FIRE

SINGLE USE ONLY
Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

**ATTACHMENT CP-2A
EMERGENCY PROCEDURES FOR FIRE**

The following actions should be taken upon discovery of a fire anywhere within the Facility's processing areas.

STEP	ACTION																					
1	Sound alarm using the intercom and by word of mouth, and quickly evaluate the extent of the emergency. The alarm should alert the emergency coordinator. If after hours, contact primary or alternate emergency coordinator using phone numbers in Attachment CP-1 posted by phone.																					
2	If the situation allows it, actuate the kill switch to disconnect the power to all process equipment. This should stop the flow of potentially ignitable and/or reactive materials. Lights should remain on inside the process area.																					
3	Follow the specific instructions of the emergency coordinator who will direct any internal efforts to contain, control or extinguish the fire, if the emergency coordinator is present.																					
4	If the primary or alternate emergency coordinator is not present, attempt to contain the fire as follows; otherwise, the primary or alternate emergency coordinator will conduct evaluation: <table border="1"> <thead> <tr> <th>If the fire is a...</th><th>Then respond by following these steps...</th></tr> </thead> <tbody> <tr> <td rowspan="6">Large fire (i.e., it cannot be extinguished without outside assistance)</td><td>a Call the Fire Department – 911</td></tr> <tr> <td>b The primary or alternate emergency coordinator should contact the following as necessary: • Gainesville Police Department 911 • Gainesville Fire Rescue Department (352) 995-1818</td></tr> <tr> <td>c Evacuate personnel from the affected area to the designated evacuation assembly area.</td></tr> <tr> <td>d Prevent entry into affected area if it would jeopardize the safety of an employee</td></tr> <tr> <td>e If the situation allows it, prevent the spread of fire beyond the immediate area using fire extinguishers until outside assistance arrives.</td></tr> <tr> <td>f Follow directions given by ranking fire official.</td></tr> <tr> <td></td><td>g Close appropriate valve on the storm water outfall(s), or use absorbent materials or mechanical means to prevent any contaminated fire-fighting water from exiting the facility, if it is safe to do so.</td></tr> <tr> <td></td><td>h If hazardous materials are involved in the fire, provide the MSDS or chemical information for the materials to the Fire Department.</td></tr> <tr> <td></td><td>i After the fire is extinguished, the emergency coordinator should evaluate the situation and determine whether an emergency response contractor is needed for environmental cleanup.</td></tr> <tr> <td></td><td>j Collect all contaminated absorbents in containers, and close and label the containers. Contained liquids may be pumped into a tank truck or containers.</td></tr> <tr> <td></td><td>k Resume operations only after the Fire Department and emergency coordinator have made a full inspection and have determined that the area is fit for restarting operations.</td></tr> <tr> <td></td><td>l Make proper notifications and prepare a written report regarding the incident.</td></tr> </tbody> </table>	If the fire is a...	Then respond by following these steps...	Large fire (i.e., it cannot be extinguished without outside assistance)	a Call the Fire Department – 911	b The primary or alternate emergency coordinator should contact the following as necessary: • Gainesville Police Department 911 • Gainesville Fire Rescue Department (352) 995-1818	c Evacuate personnel from the affected area to the designated evacuation assembly area.	d Prevent entry into affected area if it would jeopardize the safety of an employee	e If the situation allows it, prevent the spread of fire beyond the immediate area using fire extinguishers until outside assistance arrives.	f Follow directions given by ranking fire official.		g Close appropriate valve on the storm water outfall(s), or use absorbent materials or mechanical means to prevent any contaminated fire-fighting water from exiting the facility, if it is safe to do so.		h If hazardous materials are involved in the fire, provide the MSDS or chemical information for the materials to the Fire Department.		i After the fire is extinguished, the emergency coordinator should evaluate the situation and determine whether an emergency response contractor is needed for environmental cleanup.		j Collect all contaminated absorbents in containers, and close and label the containers. Contained liquids may be pumped into a tank truck or containers.		k Resume operations only after the Fire Department and emergency coordinator have made a full inspection and have determined that the area is fit for restarting operations.		l Make proper notifications and prepare a written report regarding the incident.
If the fire is a...	Then respond by following these steps...																					
Large fire (i.e., it cannot be extinguished without outside assistance)	a Call the Fire Department – 911																					
	b The primary or alternate emergency coordinator should contact the following as necessary: • Gainesville Police Department 911 • Gainesville Fire Rescue Department (352) 995-1818																					
	c Evacuate personnel from the affected area to the designated evacuation assembly area.																					
	d Prevent entry into affected area if it would jeopardize the safety of an employee																					
	e If the situation allows it, prevent the spread of fire beyond the immediate area using fire extinguishers until outside assistance arrives.																					
	f Follow directions given by ranking fire official.																					
	g Close appropriate valve on the storm water outfall(s), or use absorbent materials or mechanical means to prevent any contaminated fire-fighting water from exiting the facility, if it is safe to do so.																					
	h If hazardous materials are involved in the fire, provide the MSDS or chemical information for the materials to the Fire Department.																					
	i After the fire is extinguished, the emergency coordinator should evaluate the situation and determine whether an emergency response contractor is needed for environmental cleanup.																					
	j Collect all contaminated absorbents in containers, and close and label the containers. Contained liquids may be pumped into a tank truck or containers.																					
	k Resume operations only after the Fire Department and emergency coordinator have made a full inspection and have determined that the area is fit for restarting operations.																					
	l Make proper notifications and prepare a written report regarding the incident.																					

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STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-2A (continued)

STEP	ACTION		
	If the fire is a...		Then respond by following these steps...
	Small isolated fire (i.e., one that can be extinguished without outside assistance)	a	Attempt to use fire extinguishers to control the fire.
		b	Use dry chemical, foam, or CO ₂ fire extinguishers for fighting fires. Do not use water on electrical fire or liquid fires. <ul style="list-style-type: none"> • Class C extinguishers: For use on electrical fires • Class B extinguishers: For use on flammable liquid fires.
		c	Direct the stream from the extinguisher at the base of the fire from upwind and the sides. Do not stand downgradient of the fire.
		d	If the scope of the incident exceeds the capabilities of the portable fire extinguishers, activate dedicated fire suppression system.
		e	If efforts to extinguish the fire are not immediately effective, the emergency coordinator should contact the following as necessary: <ul style="list-style-type: none"> • Gainesville Police Department 911 • Gainesville Fire Rescue Department (352) 955-1818
		f	After the fire is extinguished, the emergency coordinator must conduct an inspection before resuming operations.
		g	Prepare a fire report.
5	Refer to Attachment CP-4 for reporting requirements (if applicable).		

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STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-2B

EMERGENCY PROCEDURES FOR EXPLOSIONS

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STANDARD OPERATING PROCEDURE (CC)

**ATTACHMENT CP-2B
EMERGENCY PROCEDURES FOR EXPLOSIONS**

The following actions should be taken if an explosion occurs at the Facility.

STEP	ACTION
1	Notify the Emergency Coordinator immediately if an explosion occurs at the facility. Also, provide any information pertaining to injury to employees, if available.
2	The Emergency Coordinator will notify the appropriate agencies listed in Attachment CP-5.
3	If it is safe to do so, retrieve any injured personnel and arrange for their medical help.
4	If the explosion has resulted in a fire, implement procedures listed in Attachment CP-2A.
5	If the explosion has resulted in a spill, implement procedures listed in Attachment CP-3.
6	Resume operations only after the Emergency Coordinator or his designee has made an inspection of the affected area(s) and has determined that the area(s) is fit for restarting operations.
7	Prepare a report on the explosion event.
8	Submit a written report, if applicable, to appropriate agencies listed in Attachment CP-5.

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STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-3

**EMERGENCY RESPONSE PROCEDURES
FOR SPILL/UNPLANNED RELEASE**

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Tuesday, March 3, 2020
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STANDARD OPERATING PROCEDURE (CC)

**ATTACHMENT CP-3
EMERGENCY RESPONSE PROCEDURES FOR SPILL/UNPLANNED RELEASE**

Minor spills may occur during sampling, equipment maintenance, transfer, and treatment operations. In most cases, these spills will occur where adequate ventilation is present to dissipate any harmful vapors. These spills can generally be remediated using pads and absorbent materials.

Major spills may result from overturned containers or ruptures in storage tanks, containers, piping, and hoses. Secondary spill containment has been installed at hazardous waste process and storage areas. The following actions will be taken in the event of a spill:

Step	Action		
1	Communicate the spill event to others.		
2	Assess the extent and magnitude and source of the event.		
3	Shut down processing operations, if necessary.		
4	Assess immediate health and safety concerns. Evacuate area if necessary.		
5	Attempt to remediate the spill/release as follows:		
	If spill is a...	Then respond by following these steps...	
	Minor spill (<i>may occur during sampling, equipment maintenance...</i>)	a	Remediate using pads and absorbent materials.
		b	Collect all contaminated absorbent and place in closed and labeled container.
	If spill is a...	Then respond by following these steps...	
	Major spill (may result from overturned containers or ruptures in storage tanks, containers, piping, and hoses.)	a	Deny entry into any area that would jeopardize the safety of an employee.
		b	Sound alarm. The alarm should alert the emergency coordinator. If after hours, contact the primary or alternate emergency coordinator using phone number in Attachment CP-1.
		c	Follow the specific instructions of the emergency coordinator, including evacuation of the area (if required).
		d	If it is safe to do so, stop the flow of the released material by closing valves, shutting off pumps, or rotating or “overpacking” ruptured containers.
		e	All loading and transfer activities in the area are to be ceased.

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STANDARD OPERATING PROCEDURE (CC)

Step	Action
	<p>f Contain the spill as much as possible using the following equipment:</p> <ul style="list-style-type: none"> - Absorbent booms: Use these in tandem (one placed a few inches behind the other) to help control the flow of the material. - Use other absorbent materials: Use a commercial absorbent to soak up spills. - Empty 55-gallon drums can be turned on their sides and rolled to create an “instant” dike. - Use mechanical means: Ditch and shovels, if applicable.
	<p>g Close appropriate valve on the storm water outfall(s), or use absorbent materials or mechanical means to prevent the spilled material from exiting the facility, if it is safe to do so and the potential exists for spills to flow outside the facility.</p>
	<p>h If there is a need for outside help, the primary or alternate emergency coordinator will contact the appropriate local authority, agency, or remediation contractor.</p>
	<p>i Pump free liquids into containers or drums <u>or</u> tanker trucks.</p>
	<p>j Collect all contaminated absorbent and place it in containers. Close and label containers.</p>
	<p>k If directed by the Facility Radiation Safety Officer, survey all affected areas and materials for radiation.</p>
	<p>l Begin equipment and area cleanup.</p>
	<p>m Arrange for proper management of remediation waste.</p>
	<p>n Complete a written description of the event while details are still fresh.</p>
	<p>o Refer to Attachment CP-4 to complete reporting requirements, if applicable.</p>
6	Notify local, state, and/or federal agencies listed in Attachment CP-4, as appropriate.

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PERMA-FIX OF FLORIDA, INC.

STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-4

EMERGENCY NOTIFICATION AND REPORTING INFORMATION

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PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

**ATTACHMENT CP-4
EMERGENCY NOTIFICATION AND REPORTING INFORMATION**

In the event of an emergency that could threaten human health or the environment outside of PFF, the General Manager or emergency coordinator shall immediately notify:

State of Florida Department of Environmental Protection
State Warning Point
1-800-320-0519 (24 hours)
or 1-850-413-9911 (24 hours)
and
Alachua County Environmental Protection Department
(352) 264-6800 (24 hours)

To report a release to the environment above the reportable quantity of a listed hazardous material, the PFF General Manager or emergency coordinator shall immediately notify:

National Response Center (NRC)
800-424-8802 (24 hours)
or
State Warning Point Number
1-800-320-0519
or 1-850-413-9911

If unsuccessful in reporting to the above numbers, call:

U.S. Environmental Protection Agency, Region 4, Atlanta, GA
Emergency Response Center
(404) 562-8700 (24 hours)

Within 15 days after the incident, send written report to:

State of Florida Department of Environmental Protection
7825 Baymeadows Way, Suite 200B
Jacksonville, Florida 32256
Attention: Northeast District Manager

The written report must be submitted to FDEP within 5 days in accordance with 62-4.160(17) if the emergency involves a fire or explosion at the facility that could threaten the environment or human health outside the facility.

ADDITIONAL OUTSIDE ORGANIZATIONS:

Police Departments:	Gainesville Police Department	911 (or 352-334-2400)
	Alachua County Sheriff's Office	911 (or 352-955-1818)
Fire & Rescue:	Gainesville Fire Rescue Department	911 (or 352-334-5078)
Hospital:	North Florida Regional Medical Center	352-333-4000
Local Emergency Planning Committee:	North Central Florida Regional Planning Council	352-955-2200
Outside Cleanup Contractor:	AAG Environmental	1-800-472-9251 352-472-7295

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STANDARD OPERATING PROCEDURE (CC)

Florida DOH

Bureau of Radiation Control

407-297-2095

ATTACHMENT CP-5

EMERGENCY EQUIPMENT LIST

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

**ATTACHMENT CP-5
EMERGENCY EQUIPMENT LIST**

<u>Item</u>	<u>Description/Capability</u>	<u>Location(s)</u>
Telephone	Telephone communications for emergency notification	Waste Areas, Laboratory, and Other General Locations
Fire Extinguishers	Dry chemical, CO ₂ - extinguish fires	Throughout Facility, Admin & Processing
Fire Hydrant	Fire hydrant – combat fire	Southwest Corner of Process and Storage Building
Absorbent Material	Vermiculite and absorbent material in spill kits – absorbs liquid spills	Waste Treatment Areas, Container Storage and Tank Storage Areas
Respirators	Full-face chemical cartridge, Self Contained Breathing Apparatus (SCBA)	Waste Treatment Areas, Laboratory, Main Building Storage Areas
Eye Wash	Permanent installation and portable eye wash bottles/stations – flush eyes	Waste Treatment Areas, Laboratory
First Aid Kits	Band-Aids, bandages – provide minor first aid	Laboratories and Container Storage Areas
Fork Lift(s)	Multiple units: 5-, 6-, 15-thousand-pound capacity – assist in moving materials	Designated Equipment Parking Area Adjacent to PSB
Bobcat	Small, bucketed, material-handling machine	Outside Maintenance - West Side
Automatic Fire Suppression	Fire sprinkler system, AFFF system (in LSV PSB, TOB); wet sprinkler system through remainder of building areas	Entire Facility
Protective Apron & Gloves	Cloth, Tyvek, rubber, or nitrile – body protection	Waste Management Areas & Maintenance Area
Safety Glasses and Hard Hats	Personal protective equipment – issued to employees	All Operational Areas
Emergency Exit Lighting & Signs	Emergency egress equipment	Throughout Administrative Offices, Lab, Waste Management Areas

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ATTACHMENT CP-5 (CONTINUED)
EMERGENCY EQUIPMENT LIST

<u>Item</u>	<u>Description/Capability</u>	<u>Location(s)</u>
Portable Radios and/or Cellular Phones	Communication devices	Emergency Coordinators, Process Technicians
Spill Kit(s)	Clean up minor spills	Each Waste Management Area
Emergency Generator	Gas-powered generator – to provide electricity during emergency	Maintenance Area
Shovels, Brooms	To transfer spilled material manually into containers	Kept with Spill Kits, extras kept in Maintenance Shop
Empty Containers	To collect spilled material or PPE used during cleanup	On east side of LSV storage Warehouse
Portable Pumps	To transfer spilled liquids into containers or tanker trucks	Maintenance Area
Absorbent Booms	To prevent spills from entering surface waters or to absorb spilled material from the surface water	Mezzanine above LSV entry/exit Area
Field Monitoring Equipment (e.g., dosimeters, PID)	To assess an emergency and screen releases	Dosimeters in Radiation Lab; PID in office of the EHS Manager

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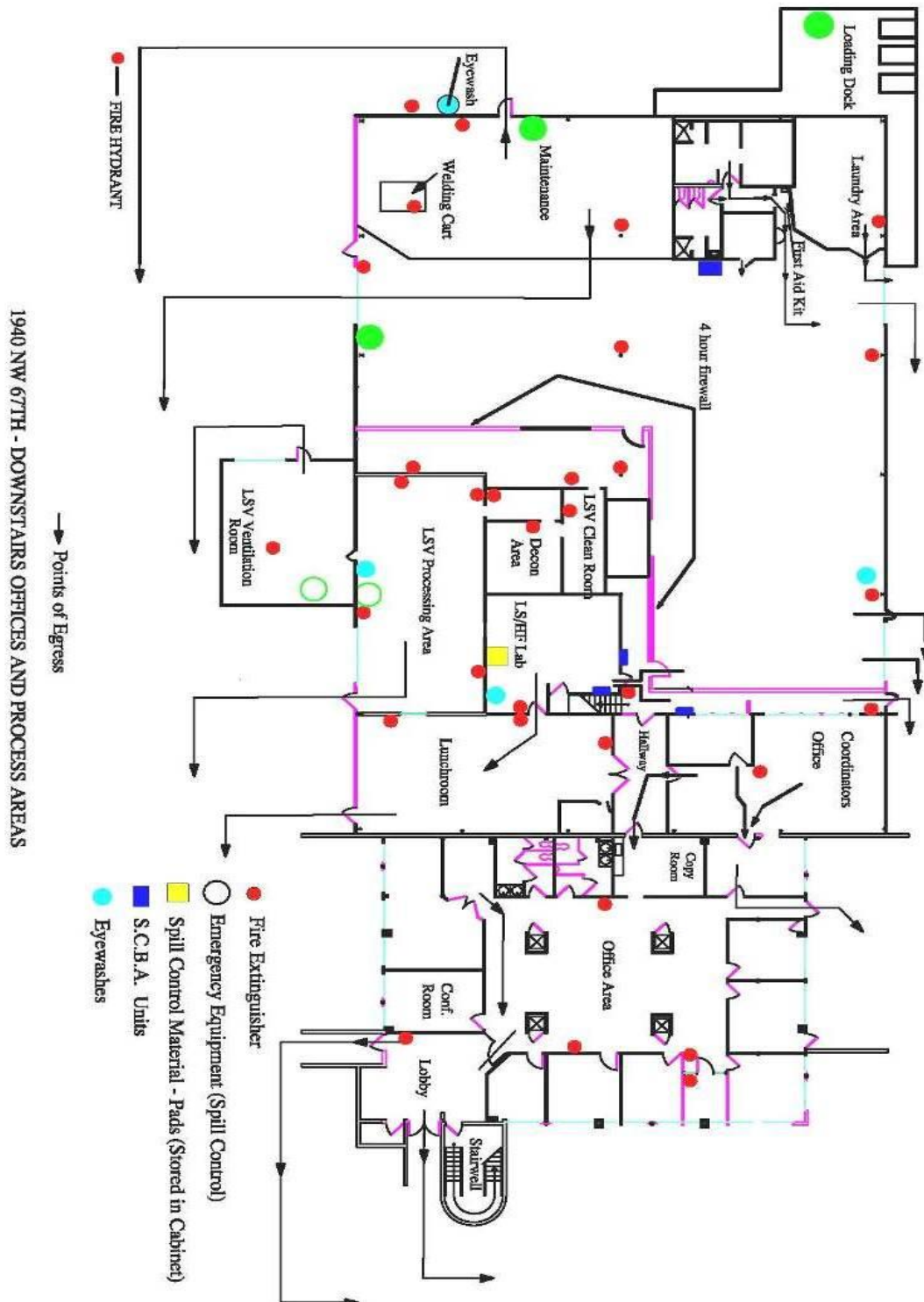
**ATTACHMENT CP-6
EMERGENCY EQUIPMENT LOCATION MAPS**

- A: Downstairs Offices and LSV Process Areas**
- B: Upstairs Offices**
- C: TOB (Nelson) Building**
- D: PSB Building**

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A – DOWNSTAIRS OFFICES & LSV PROCESS AREAS MAPS

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STANDARD OPERATING PROCEDURE (CC)

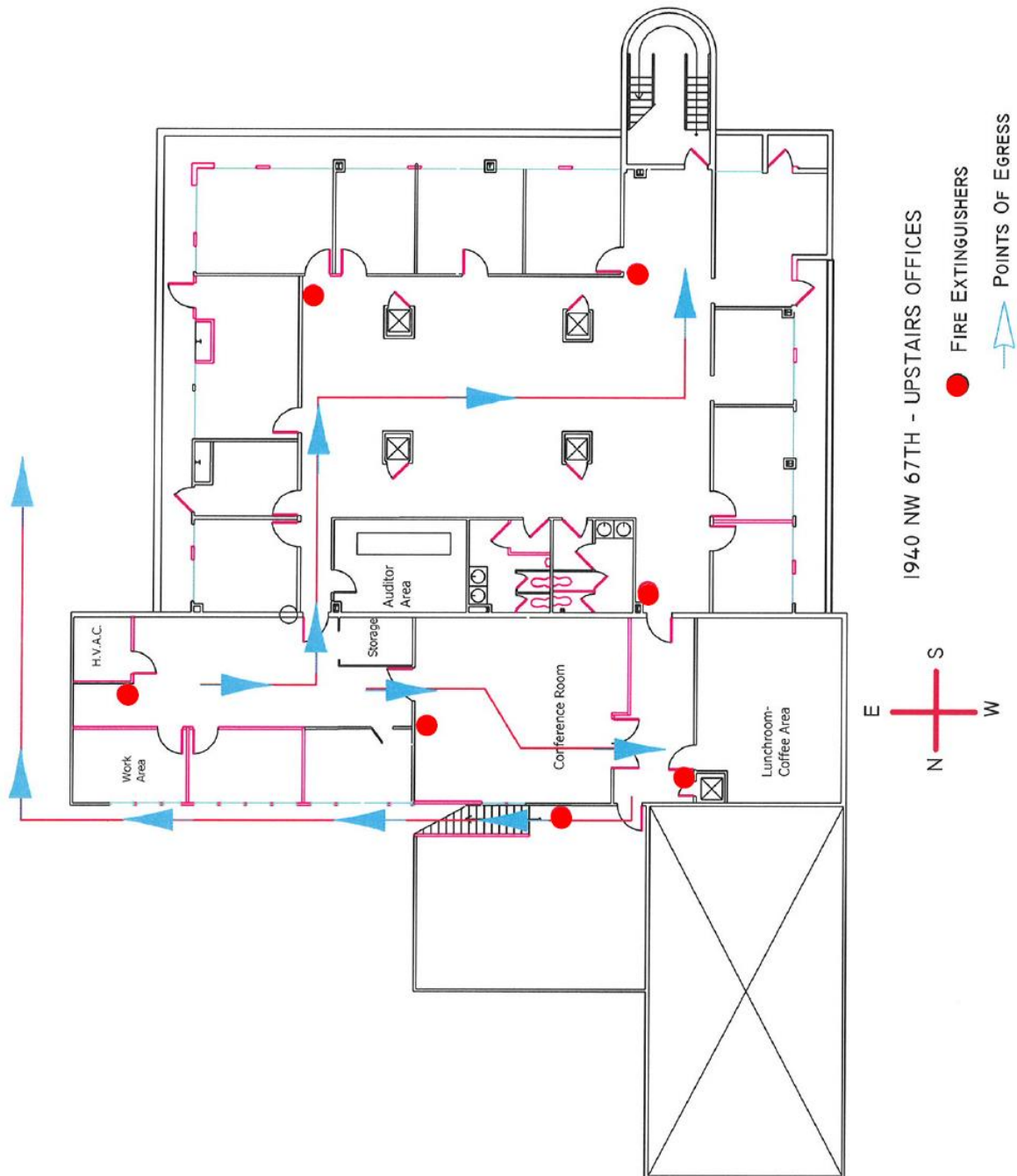


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STANDARD OPERATING PROCEDURE (CC)

B – UPSTAIRS OFFICES

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STANDARD OPERATING PROCEDURE (CC)

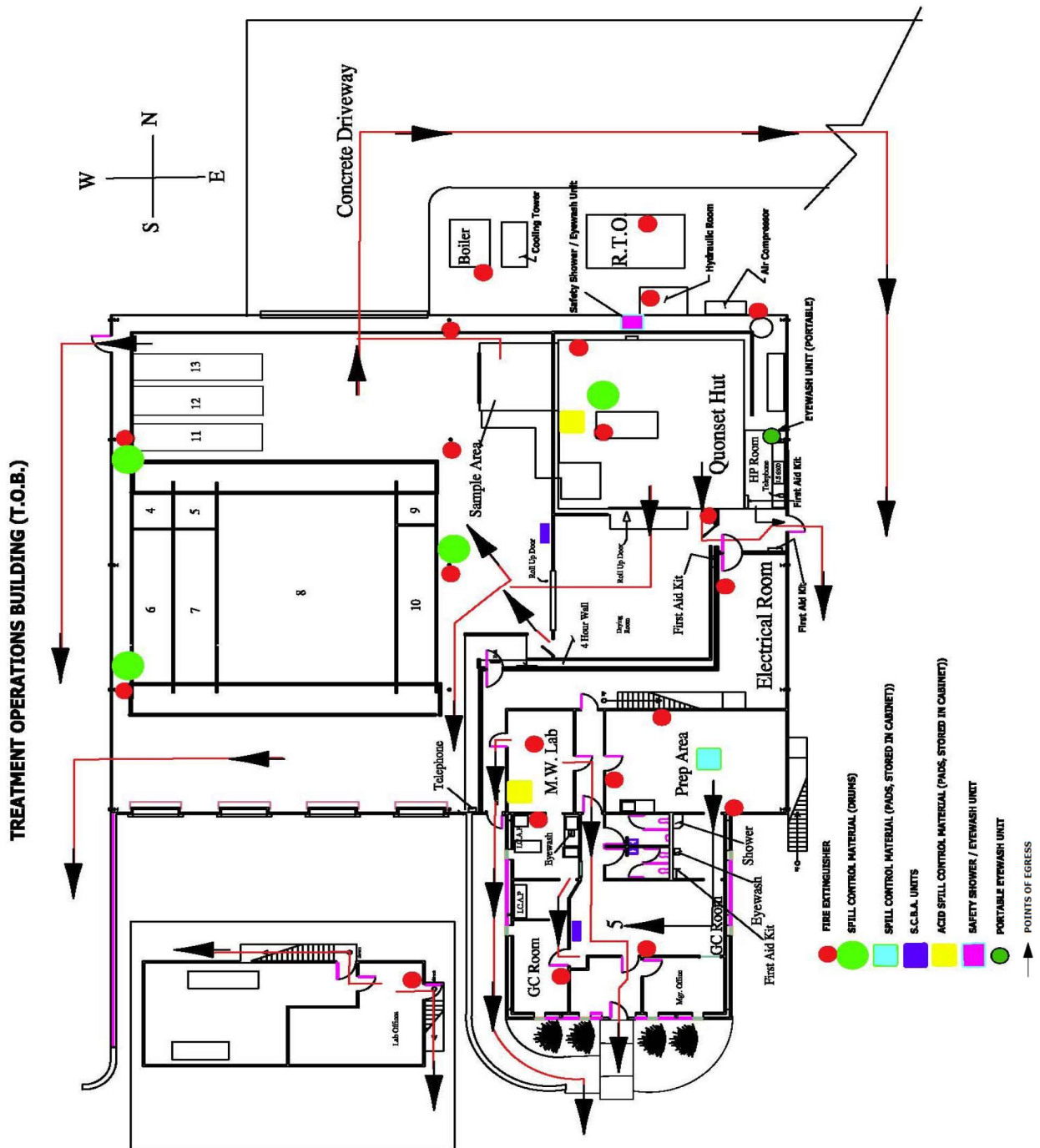
B - Upstairs Offices



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C – TOB (NELSON) BUILDING

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STANDARD OPERATING PROCEDURE (CC)



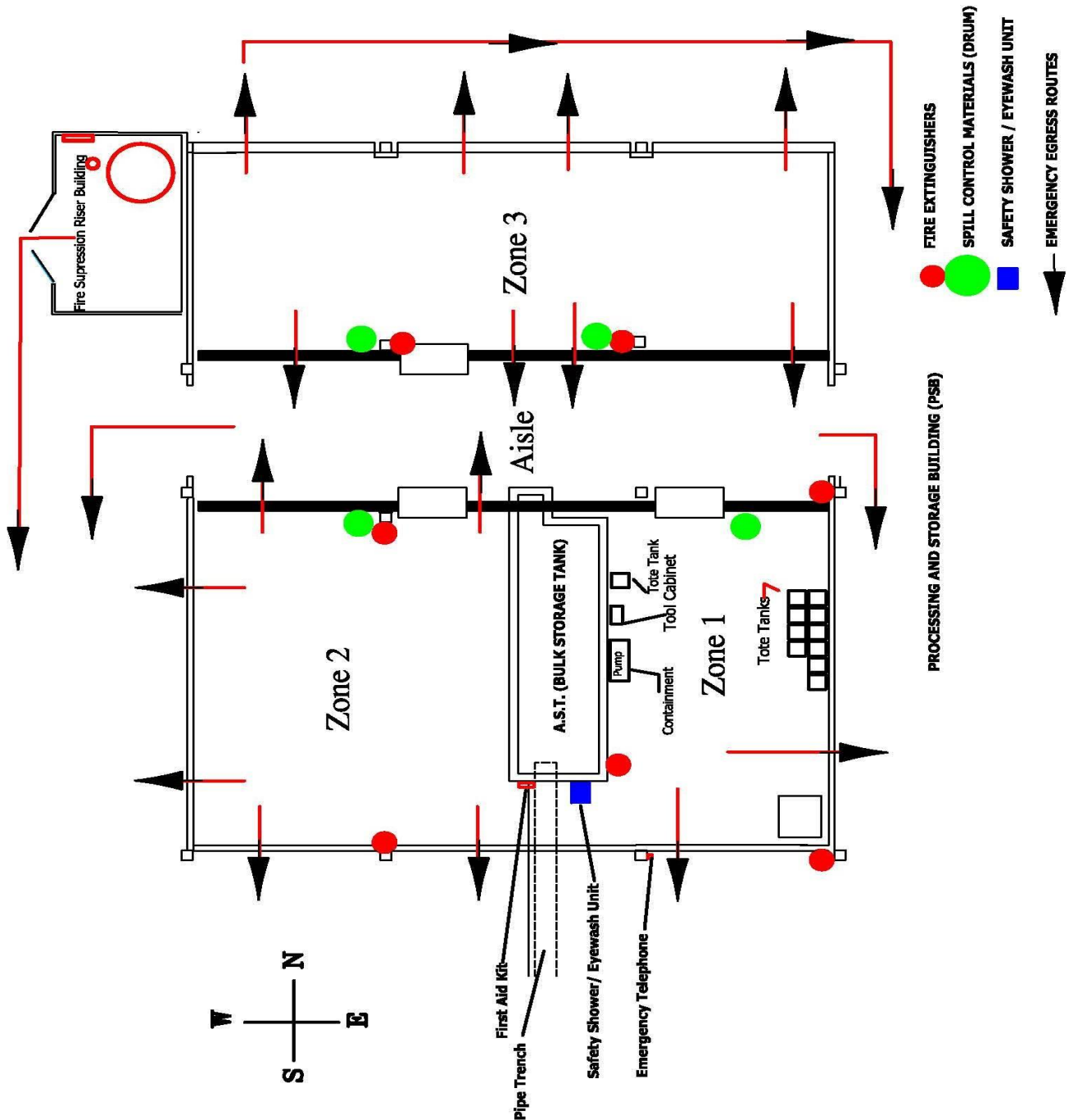
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D – PSB BUILDING

ATTACHMENT CP-7

EMERGENCY EVACUATION ROUTE MAP

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STANDARD OPERATING PROCEDURE (CC)



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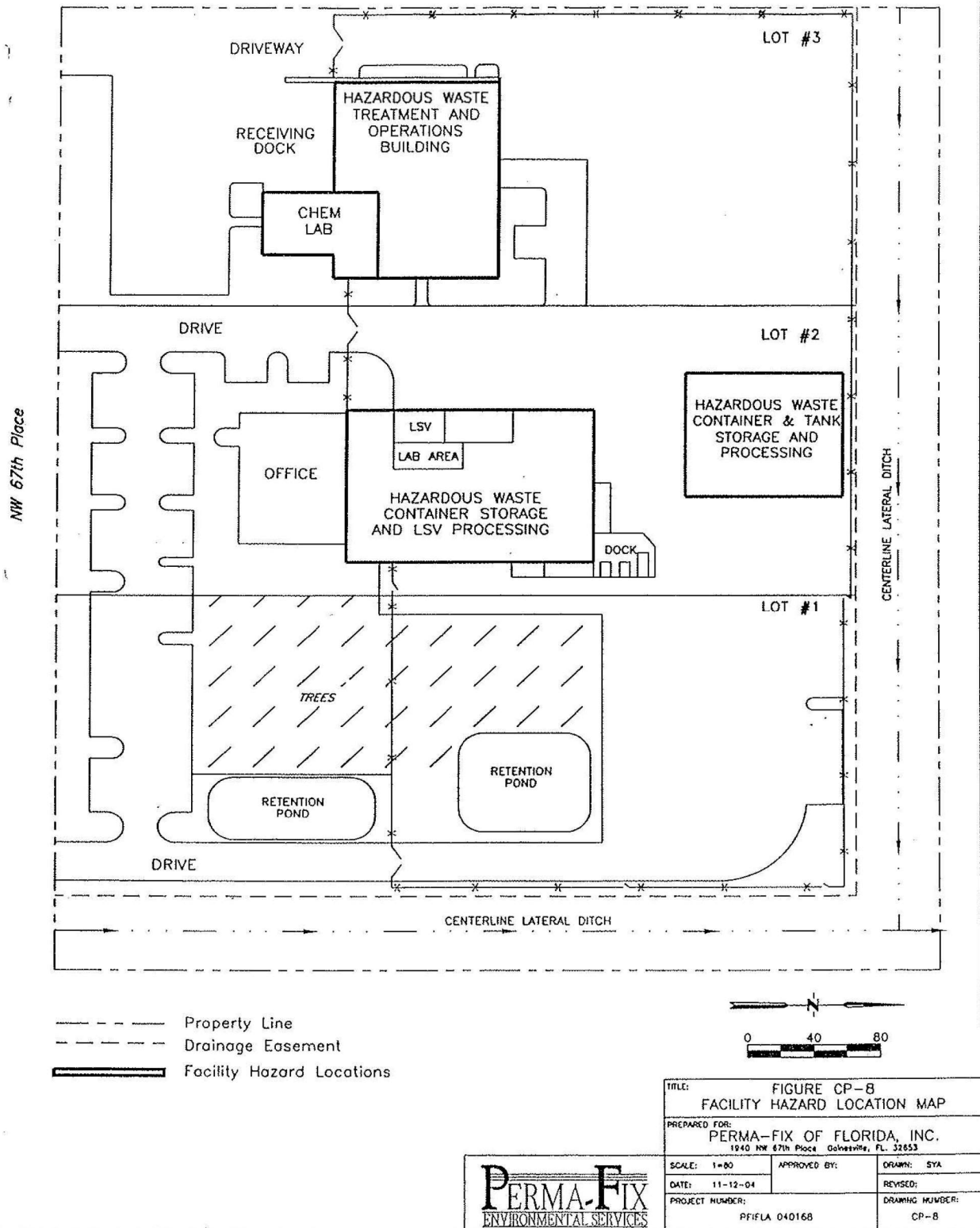
Tuesday, March 3, 2020

PERMA-FIX OF FLORIDA, INC.

STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-8
FACILITY HAZARD LOCATION MAP

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STANDARD OPERATING PROCEDURE (CC)



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STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-9

COORDINATION AGREEMENTS/RECEIPT DOCUMENTATION

EXAMPLE

Certified Mail

Return Receipt Request

ACCEPTANCE

I certify that on this _____ day of _____, I received a copy of the Contingency Plan for Perma-Fix of Florida located at 1940 NW 67th Place in Gainesville, Florida 32653. Further, this organization agrees to respond to, or assist in, emergency situations which may arise at the subject facility should the need arise.

REFUSAL



By checking this box, the undersigned organization refuses to enter into an agreement to provide emergency response services to the subject facility. However, we do acknowledge receipt of the Contingency Plan being offered by Perma-Fix of Florida, Inc.

Signature:	
Printed Name:	
Title:	
Organization:	

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PERMA-FIX OF FLORIDA, INC.

STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-10

CONTINGENCY PLAN REVISIONS - TRANSMITTAL LETTER

EXAMPLE

Certified Mail

Return Receipt Request

DATE: _____

TO: _____

RE: Contingency Plan Revisions - Perma-Fix of Florida, Inc.

Dear _____:

Perma-Fix of Florida, Inc. has revised the facility's Contingency Plan document. Our facility is required to supply your organization with a complete copy of the Contingency Plan document, and all subsequent revisions in accordance with federal EPA regulations listed at 40 CFR 264.53/264.54.

Copies of the revised pages are enclosed for insertion within your organization's copy of the Perma-Fix Contingency Plan document. Please make the necessary updates to your copy of the plan and discard all outdated pages.

The regulation also requires Perma-Fix to document a coordination agreement with your department to respond to, or assist in, emergency services in the event of an emergency situation which may arise at our facility. A separate form and envelope is enclosed for you to complete and return to the facility in order to assure Perma-Fix is in compliance with these regulations.

If you have any questions regarding the information received or your organization's role in contingency planning for the Perma-Fix of Florida facility, please contact me at (352) 395-1356.

Sincerely,

Perma-Fix of Florida, Inc.

Dan Cain
Environmental Health and Safety Manager

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PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

ATTACHMENT CP-11

CONTINGENCY PLAN QUICK REFERENCE GUIDE

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)

Perma-Fix of Florida stores and processes a wide variety of Hazardous, Low Level Radioactive and Mixed (Hazardous & Low Level Radioactive) Waste

Hazards from these wastes include:

- Ignitibility
- Corrosive
- Reactive
- Toxic

The maximum amounts present onsite are as follows

- Treatment Operations Building: 35,200 gallons
- Processing and Storage Building: 72,105 gallons
- LSV Processing and Storage Building: 54,340 gallons

Exposure to wastes in these areas might require specialized medical treatment.

The facility has alarms and a notification/paging system, and a fire suppression system that delivers 2200 gpm.

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STANDARD OPERATING PROCEDURE (CC)

EMERGENCY COORDINATORS

SINGLE USE ONLY

Tuesday, March 3, 2020

PERMA-FIX OF FLORIDA, INC.

STANDARD OPERATING PROCEDURE (CC)

EMERGENCY COORDINATORS

Primary Emergency Coordinator

Name:	Dwayne Singleton
Position/Title:	Field Service Manager
Work Telephone Number:	(352) 395-1362/373-6066
Home Telephone Number:	(352) 376-9624
Mobile Telephone Number:	(352) 219-8640
Address:	4138 NW 48 th Place, Gainesville, FL 32606

Alternate Emergency Coordinators*

Name:	Andy Owens
Position/Title:	Quality Assurance Manager
Work Telephone Number:	(352) 395-1357/373-6066
Home Telephone Number:	(352) 284-8064
Mobile Telephone Number:	(352) 284-8064
Address:	929 N.E. County Road 234, Gainesville, Florida 32641

Name:	Mike Owens
Position/Title:	Maintenance Coordinator
Work Telephone Number:	(352) 395-1360/373-6066
Home Telephone Number:	(904) 684-3108
Mobile Telephone Number:	(386) 937-6770
Address:	200 N Fillmore Ave. Interlachen Fl. 32148

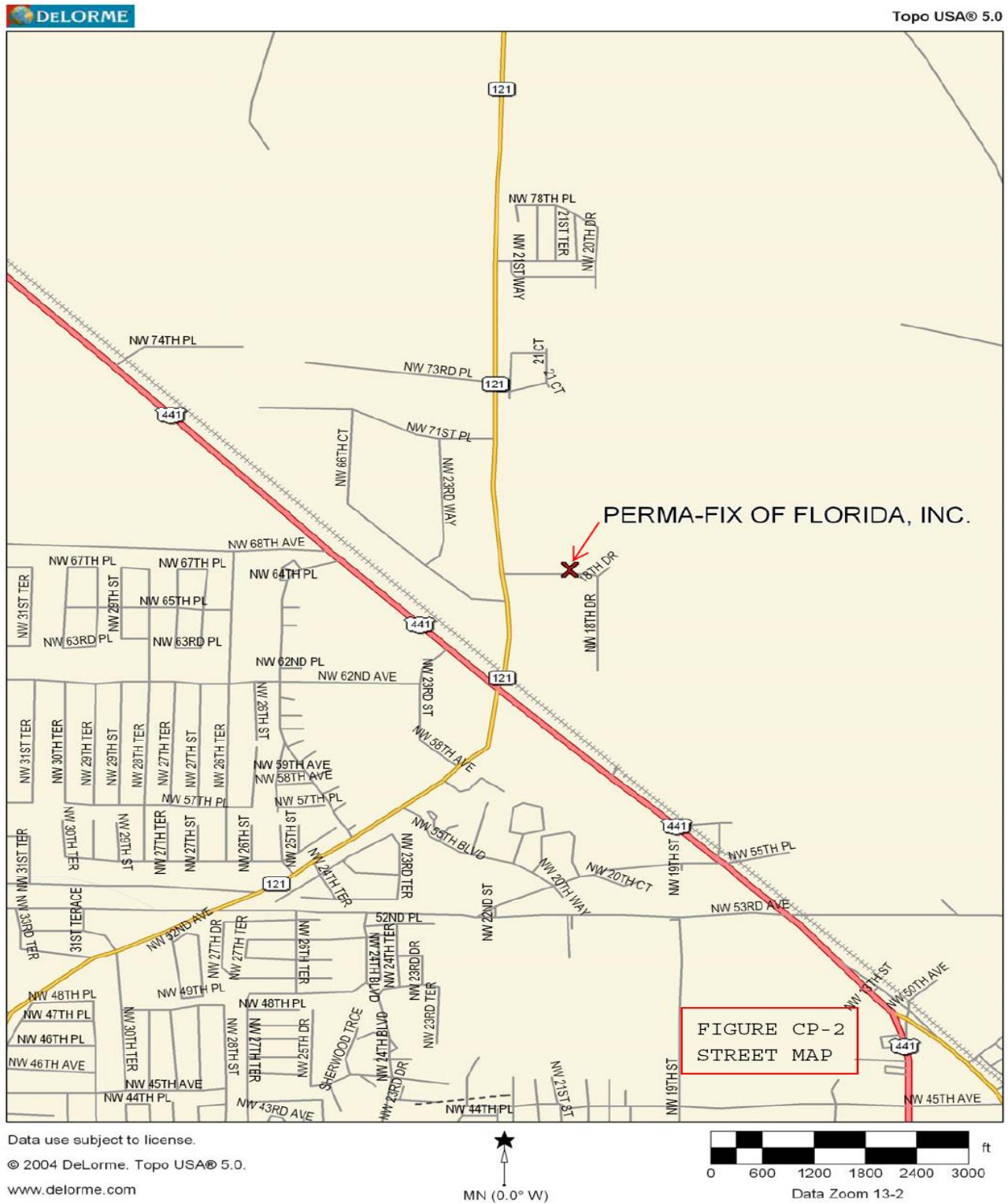
Name:	Dan Cain
Position/Title:	Environmental Health & Safety Manager
Work Telephone Number:	(352) 395-1347/373-6066
Mobile Telephone Number:	(503) 200-8082
Address:	2210 SW Old Bellamy Rd, Ft White, FL 32038

Name:	Dan Cain
Position/Title:	Radiation Safety Officer
Work Telephone Number:	(352) 395-1347/373-6066
Mobile Telephone Number:	(503) 200-8082
Address:	2210 SW Old Bellamy Rd, Ft White, FL 32038

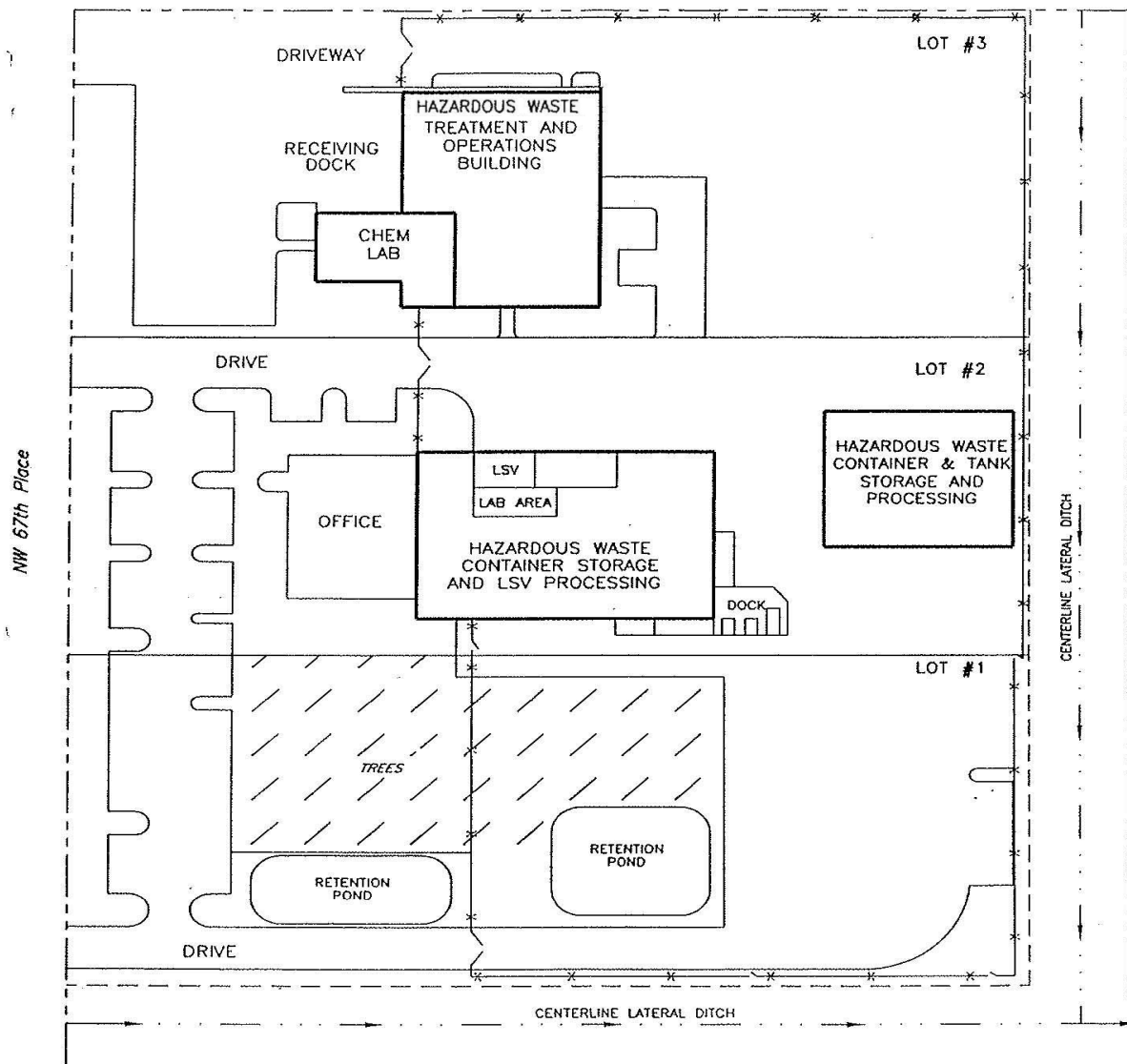
* Alternate Coordinators are listed in the order in which they will assume responsibility as alternates.

NOTE: The work address for all Coordinators is 1940 NW 67th Place, Gainesville, Florida 32653.

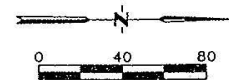
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STANDARD OPERATING PROCEDURE (CC)



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Tuesday, March 3, 2020
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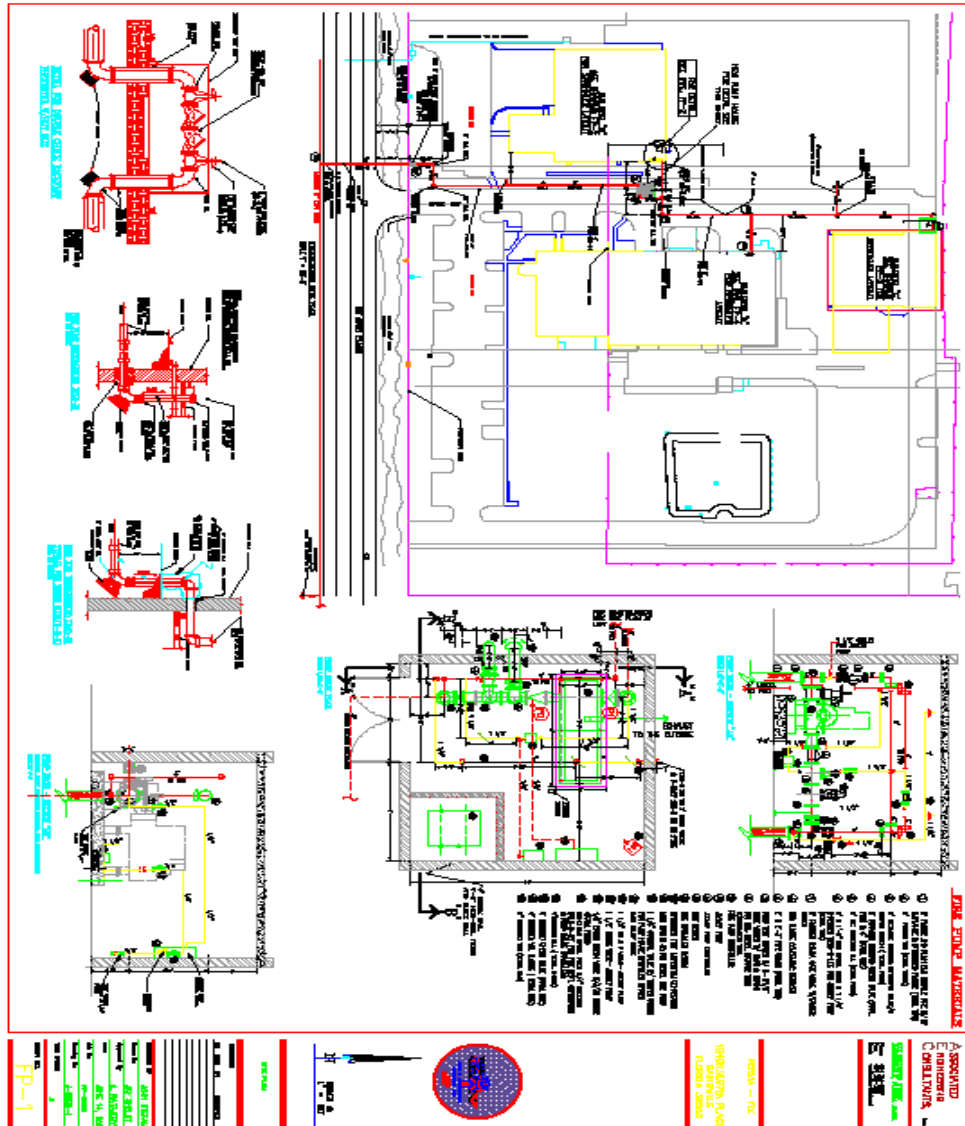


--- Property Line
--- Drainage Easement
== Facility Hazard Locations



TITLE: FIGURE CP-8 FACILITY HAZARD LOCATION MAP		
PREPARED FOR: PERMA-FIX OF FLORIDA, INC. 1940 NW 67th Place, Gainesville, FL 32653		
SCALE: 1"=80'	APPROVED BY:	DRAWN: SYA
DATE: 11-12-04		REVISED:
PROJECT NUMBER: PFFLA 040168		DRAWING NUMBER: CP-8

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Tuesday, March 3, 2020
PERMA-FIX OF FLORIDA, INC.
STANDARD OPERATING PROCEDURE (CC)



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STANDARD OPERATING PROCEDURE (CC)

APPENDIX II-A-3

PERSONNEL TRAINING PROGRAM

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

1.0 PERSONNEL TRAINING PROGRAM

This section outlines, in accordance with 40 CFR 264.16, the initial and continuing training that Perma-Fix of Florida (PFF) employees at the Gainesville waste management facility (Facility) will receive. Training methods include lecture, discussion, hands-on skill training, on-the-job training (OJT), and video or movie viewing followed by discussions. Subject matter for training includes:

- Job content and responsibilities;
- Hazard recognition;
- Hazard communication;
- Health effects and physical hazards of hazardous wastes;
- Communication and alarm systems;
- Process and safety controls and operating procedures;
- Inspection, repair, and replacement of emergency equipment and supplies;
- Use of personal protective equipment (PPE);
- Emergency response procedures and review of the facility's Contingency Plan;
- Record keeping connected with the storage and management of hazardous wastes;
- Standards for owners and operators of transfer, storage, and disposal facilities (TSDFs);
- Other applicable RCRA regulations.

FF's personnel training program is designed to provide all facility employees with a level of training that is directly related and pertinent to their level of responsibility and specific job functions.

1.1 OUTLINE OF THE TRAINING PROGRAM

A description of the content of the classroom training sessions, drills, and OJT is presented in the Personnel Training Plan (Training Plan) which is included as Attachment A to this section.

The Training Plan will be modified in response to changes in government regulations, upon direction of the U.S. Environmental Protection Agency (EPA) or the Florida Department of Environmental Protection (FDEP), or when required as a condition of an issued permit.

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

1.2 JOB TITLE, JOB DESCRIPTION, AND DUTIES

The job title, job description, and name of each employee filling a job at the facility related to hazardous waste management will be kept as part of the Facility Operating Record. Job descriptions include minimum educational and other necessary qualifications, as well as the assigned duties and responsibilities for each position.

1.3 TRAINING CONTENT, FREQUENCY, AND TECHNIQUES

This Section of the Permit Application and Attachment 1, the Personnel Training Plan describes the training that is provided at PFF for employees involved in hazardous waste management.

1.3.1 JOB ASSIGNMENT AND TRAINING PREREQUISITES

No employee shall be assigned the duties of transferring, handling, sorting, or mixing hazardous waste unless that employee has demonstrated his/her capabilities to:

1. Read and comprehend label instructions, operational procedures, contingency plans, regulatory directives, and where applicable, inspection procedures.
2. Understand the basic nature of the hazardous materials that he/she is assigned to transfer, handle, sort, or mix relative to the material's reactivity, toxicity, explosiveness, flammability, and corrosivity.
3. Operate all equipment that he/she is assigned to operate, including personal safety and emergency equipment.

No employee of the facility shall be assigned the duties of transferring, handling, sorting, or mixing hazardous waste unless that employee meets the minimum requirements set out in 40 CFR 264.16(a), (b), and (c). The job prerequisites will be verified during pre-employment interviews or through observation and knowledge of present employees and will be documented in each employee's training file.

1.3.2 INITIAL TRAINING PERIOD

All newly hired, transferred, or cross-trained personnel will receive the instruction and OJT relating to the specific job assignments at the facility within six months of hire and assignment or reassignment to a job position involved in hazardous waste management. Employees will not work in unsupervised positions until they have completed the following minimum training requirements and have demonstrated they can safely perform their duties in compliance with applicable regulations and company operating procedures:

1. Procedures for using, inspecting, repairing, and replacing facility emergency, safety, and monitoring equipment applicable to their job tasks
2. Key parameters for automatic waste feed cut-off systems

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

3. Communications or alarm systems
4. Response to fires or explosions
5. Response to spills or releases of hazardous wastes
6. Shutdown of operations
7. Security provisions

The initial training will vary in duration for each job title as presented in the training matrices presented as Figure 2 in the Personnel Training Plan, which is found in Attachment A.

1.3.3 ON-THE-JOB TRAINING

The Training Plan lists specific OJT tasks for each job title. The acquisition and mastery of specific skills or operational procedures will be accomplished through supervised OJT activities, which will continue during and after the initial training period. Supervisory personnel will observe and evaluate the performance and competence of trainees during the period of OJT.

1.3.4 ANNUAL REVIEW, UPDATE TRAINING, AND RETRAINING

The Training Topic Matrix, Figure 2, of the Training Plan lists facility personnel who will attend eight hours of annual update training and review. The annual review and update program consists of an abbreviated review of the introductory training program, updates, and a detailed review of existing emergency response procedures as contained in the Facility's Contingency Plan. Emphasis is placed on any changes in waste constituents and characteristics, equipment, operating procedures, or regulations that affect the Contingency Plan and emergency response activities. Question and answer periods will allow for focused discussion of any employee concerns, operational difficulties, equipment malfunctions, and incidents or emergencies that may have occurred in the preceding six months.

Employees may be required to participate in retraining activities under the discretion of their supervisor or the Training Director. Examples of this situation include a return to work from an extended leave of absence, new job assignment, unsatisfactory or unsafe job performance, a return to a previous job assignment, or involvement in an accident or incident where review is appropriate to prevent recurrence.

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

1.4 TRAINING DIRECTOR

The PFF Environmental Health & Safety Manager will serve as the Facility Training Director. That person shall be qualified by way of training and experience to serve in this function through regular attendance to environmental seminars, workshops, and refresher courses to maintain and ensure competent training skills and knowledge of regulatory changes or updates. Records documenting the training and qualifications of the Training Director will be maintained in the Facility Operating Record. The Facility Training Director may be assisted by qualified outside training consultants or other qualified staff persons in executing the duties of this function.

1.5 RELEVANCE OF TRAINING TO JOB POSITION

The personnel training program seeks to accomplish two goals:

- Preparation of facility personnel to safely, effectively, and efficiently manage the hazardous materials that are received for storage or processing.
- Protection of human health and the environment.

OJT supplements more formal classroom training and provides the practical training and experience in daily waste-handling operations that are related to each employee's particular duties. OJT builds upon PFF's formal classroom training to provide specific job skills an employee will need to function efficiently and safely in his/her position.

1.6 TRAINING FOR EMERGENCY RESPONSE

Facility personnel will receive training in implementing the Contingency Plan during initial training and thereafter during annual refresher training and annual evacuation drills. Facility employees will be trained to be familiar with the Facility's emergency procedures, equipment, and systems so that they can promptly, safely, and effectively respond to emergency situations consistent with the level of emergency response training that each employee has received.

2.0 IMPLEMENTATION OF TRAINING PROGRAM

Facility employees will receive, or have received, introductory training in accordance with the Training Plan in Attachment A (or an earlier version) and will receive continuing training in accordance with the training frequency described in Section 1.3 above. Refresher training will be conducted annually and documented in the Facility's Operating Record. The following records will be maintained in the Facility's Operating Record to document the training status of each employee:

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

- The job title for each position at the Facility relating to hazardous waste management and the name of the employee filling each position.
- A written job description for each position, including the requisite skills, education, qualifications, and duties of the employees assigned to each position.
- A written description of the type or amount of both introductory and continuing training that will be given to each employee filling a position.
- A written record that confirms that the appropriate training and OJT outlined in the Training Plan has been given to, and completed by, Facility employees.

Training records on current personnel will be kept until closure of the Facility. Training records on former employees will be kept for at least three (3) years from the date the employee last worked at the Facility. Records that will be kept in the Operating Record within each employee's training file to show compliance with the requirements of 40 CFR 264.16(a), (b), and (c) shall include.

- An attendance record for individual training sessions.
- A certificate of training that is used to verify completion of training classes or modules by individual employees and is the basis of entries to the employee training record.
- The individual training record for each employee.

TABLES

**PERSONNEL TRAINING PROGRAM TABLE 1. JOB TITLES RELATED TO HAZARDOUS WASTE MANAGEMENT
PART II APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA**

Job Titles Related to Hazardous Waste Management:
Assistant Analytical Chemistry Lab Manager (AACLM)
Assistant Manager Technical Services (AMTS)
Analytical Chemistry Lab Manager (ACLM)
Environmental Chemistry Lab Technician (ECLT)
Environmental Chemistry Lab Technician - Metals (ECLT(M))
Environmental Health & Safety Manager (EHSM)
Industrial Coordinator (IC)
Industrial Area Supervisor (IAS)
Maintenance Coordinator (MC)
Maintenance Technician 1 (MT1)
Maintenance Technician 2 (MT2)
Nuclear Operations Supervisor (NOS)
Process Technician III (PT III)
Quality Assurance Inspector (QAI)
Quality Assurance Manager (QAM)
Radiation Safety Officer (RSO)
Route Truck Driver (RTD)
Senior Lab Technician, Radiological (SLTR)
Support Technician Supervisor (STS)
Support Technician Radiological (STR)
Transportation Supervisor (TS)
Transportation Specialist 1 (TS1)
Treatment Coordinator (TC)
Treatment Technician (TT)

Note: Job description for the above positions is maintained at the PFF Gainesville facility.

Each job description contains those duties typically performed by an individual filling each position.

PERSONNEL TRAINING PROGRAM TABLE 2. JOB TITLES OF EMERGENCY COORDINATORS
PART II APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Job Titles of Emergency Coordinators:
General Manager
EH&S Manager
Quality Assurance Manager
Treatment Coordinator
Industrial Coordinator
Maintenance Coordinator

PERSONNEL TRAINING PROGRAM TABLE 3. JOB TITLES NOT INVOLVED WITH HAZARDOUS WASTE OPERATIONS OR EMERGENCY RESPONSE
PART II APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Job Titles Not Involved with Haz Waste Operations or Emergency Response:
Controller (CO)
Document Specialist (DS)
Administration/Marketing Support Specialist(AMSS)
Accounting Specialist (AS)
Receptionist (RE)
Manager, Customer Service (MCS)
Customer Service Support Specialist (CSSS)
Manager, Technical Services (MTS)
Staff Accountant (SA)
All Sales Positions

PERSONNEL TRAINING PROGRAM TABLE 4. TRAINING TOPICS EXAMPLE RECORD
PART II APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

PERMA-FIX OF FLORIDA, INC.
EMPLOYEE INITIAL/ANNUAL TRAINING TOPICS EXAMPLE RECORD

NAME: _____ START DATE: _____

TITLE: _____

HAZARDOUS WASTE MANAGEMENT TRAINING			
COURSE TOPIC	DATE	INSTRUCTOR	LENGTH
HAZWOPER 24-Hour (New Hire)			
HAZWOPER 8-Hour Annual Refresher			
Respiratory Protection			
Hazard Communication			
Personal Protective Equipment			
Contingency Plan			
Facility Inspection Plan			
Waste Operations Procedures			
Equipment Procedures			
Lab (Non-Rad) Procedures			
D.O.T. Training			

PERSONNEL TRAINING PROGRAM TABLE 5. ON-THE-JOB TRAINING TOPICS
PART II APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

On-the-Job Training Topics:	
TASK	
1.	Sampling
2.	Off Loading
3.	Maintenance
4.	Tank Management Practices
5.	Container Management Practices
6.	Repackaging Operations
7.	Laboratory
8.	Inspection and Remedial Action
9.	Record Keeping
10.	Administration
11.	Personal Protective Equipment
12.	Emergency Procedures and Controls
13.	Supervisory Duties

PERSONNEL TRAINING PROGRAM TABLE 6. JOB ASSIGNMENTS - TRAINING TOPICS MATRIX
PART II APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

DESCRIPTION	GENERAL PERSONNEL	WASTE OPERATIONS	LAB PERSONNEL	MAINTENANCE	TRANSPORTATION
Annual Facility Fire Drill	X	X	X	X	X
HAZWOPER 8 hour Refresher (Annual)	X	X	X	X	X
HAZWOPER 24 Hour (NEW HIRE)	X	X	X	X	X
Respiratory Protection - 29 CFR 1910.134	X	X	X	X	X
Hazard Communication - 29 CFR 1910.1200	X	X	X	X	X
Personal Protective Equipment. - 29 CFR 1910 Subpart 1	X	X	X	X	X
Contingency Plan - 29 CFR 1910.120 / 40 CFR 264.16(3)	X	X	X	X	X
Facility Inspection Plan	X	X	X	X	X
Annual RCRA Training	X	X	X	X	
Periodic Professional Development Training			X		
WASTE OPERATIONS PROCEDURES		X			
EQUIPMENT PROCEDURES				X	
LAB (NON RAD) PROCEDURES			X		
D.O.T. (49 CFR TRAINING)					X

Positions included under each category that involves hazardous waste management:

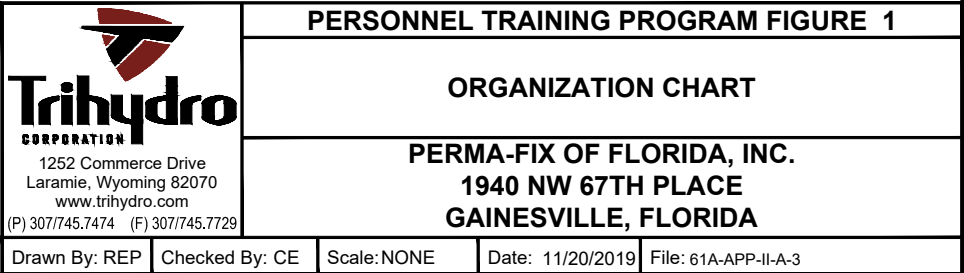
General Personnel: General Manager, EHSM, QAI, QAM, RSO, MTS, AMTS

Waste Operations: IC, IAS, NOS, PTIII, TC, TT Lab Personnel: AAACL, ACLM, ECLT, ECLT(M), SLTR, STS, STR

Maintenance: MC, MT1, MT2

Transportation: RTD, TS, TS1

FIGURE



APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

ATTACHMENT A

PERSONNEL TRAINING PLAN

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM ATTACHMENT A. PERSONNEL TRAINING PROGRAM

1.0 INTRODUCTION

Perma-Fix of Florida, Inc. (PFF) operates a RCRA-regulated treatment and storage facility (Facility) located at 1940 N.W. 67th Place in Gainesville, Florida. The EPA ID# for the facility is FLD 980 711 071.

Currently, hazardous waste management operations conducted on-site include the storage and treatment of a wide variety of industrial wastes. The Facility receives shipments of hazardous wastes from industrial generators and subsequently blends similar waste types into a fuel that will be beneficially reused as a hazardous waste-derived fuel at off-site permitted facilities. The Facility also repackages, sorts, and consolidates other hazardous wastes for shipment and treatment off-site. A variety of chemical and physical treatment activities are also conducted at the Facility.

This document is PFF's Hazardous Waste Related Training Plan, referred to herein as the "Training Plan," for routine and emergency waste-handling operations. The Training Plan enumerates the job titles of and necessary training for those employees who work directly with hazardous wastes and employees who have emergency response duties. Hazard awareness and recognition training is provided to PFF personnel whose job function does not include direct waste handling activities but are trained as first responders.

This Training Plan describes the integral components of PFF's comprehensive training and resources used to train employees, in addition to methods used to evaluate employee training. Table 4 contains examples of training topic records that will be maintained in the Facility Operating Record.

Training assignments are made through the designation of specific Training Modules to employees filling the job titles listed in this Training Plan. Instructor Manuals, which contain the lesson outlines and course outlines for each training topic, and master sets of participant resource materials are not contained in this Training Plan, but are supplementary materials maintained by the Facility Training Director, or his designee.

2.0 SCOPE OF TRAINING PLAN

The objective of this Training Plan is to provide a comprehensive program whereby PFF personnel who work directly with hazardous wastes receive training in the following areas, as appropriate:

- Management of hazardous waste materials in a manner that is safe, effective, efficient, and in compliance with applicable laws and regulations.
- Emergency response procedures, equipment, and emergency systems.
- Safety and health-related matters.

All employees who work directly with hazardous waste are trained to perform their job duties in a manner that ensures the operation of the Gainesville hazardous waste management facility in compliance with the requirements of EPA and FDEP regulations. The degree of training that each person receives depends upon his/her job duties, as well as that person's assigned tasks or responsibilities involving hazardous waste in a routine or emergency response capacity.

In addition to providing a training program for employees who work directly with hazardous waste, this Training Plan provides for the training of PFF employees who have emergency response duties. These employees are

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

ATTACHMENT A. PERSONNEL TRAINING PROGRAM

responsible for implementing the Facility's Contingency Plan. The degree of training of these employees is consistent with their role in emergency response, as specified in the Facility's Contingency Plan.

PFF recognizes that there are potential safety and health hazards associated with the improper handling and storage of hazardous waste. This Training Plan is prepared with a goal that Facility personnel, the community, the environment, and PFF property be adequately protected. The Training Plan is meant to be flexible and will be reviewed at least annually by the PFF Environmental Health & Safety Manager. The Training Plan will be modified based on Facility or process changes, the Facility's needs, changing government regulations, or when modification is required as a condition of a permit.

3.0 LOCATION OF TRAINING

The majority of personnel training will be conducted on-site at the Facility. Adequate classroom facilities and training aids are available. Documented On the Job Training (OJT) will be conducted on the premises in the related work areas.

Some training courses may be offered away from the Facility due to small numbers of personnel needing training in specialty subjects or when special facilities are necessary.

4.0 PERSONNEL TO BE TRAINED

An organizational chart for the PFF Gainesville Facility as it relates to hazardous waste management activities is shown in Figure 1. The jobs that are directly involved with hazardous waste operations are listed in Table 1. The job titles of personnel who have emergency response duties are listed in Table 2. Other jobs at the Facility that have no direct relationship to hazardous waste management and no emergency response duties under the Facility's Contingency Plan are listed in Table 3.

Job descriptions and qualifications for the various jobs OTJ that are directly involved with waste management operations have been developed and included in the Facility Operating Record, which is maintained on-site. Each job qualification requires the completion of specific training topics, as described in this Training Plan, including on-the-job training and annual refresher training. Section H of this Training Plan provides details about the training topics and the specific training assignments required for personnel in each job classification.

Not all personnel are required to be trained in all of the training topics. The training that an employee receives depends upon his or her assigned job duties, as contained in his/her job description.

No employee shall be assigned to work in an unsupervised position in the waste management Facility until he/she has demonstrated his/her capabilities and has successfully completed the training topics assigned to his/her job description, in compliance with 40 CFR 264.16(a) and (b) or any condition of the Facility's Part B permit.

5.0 INSTRUCTORS AND TRAINING METHODS

With the exception OJT, training conducted at the Facility will be under the direction of the Facility Training Director. The Training Director is experienced in hazardous waste management procedures and other appropriate areas of instruction. On-the-job training is under the direction of the employee's supervisor. Supervisors have

APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM

ATTACHMENT A. PERSONNEL TRAINING PROGRAM

received classroom training and OJT appropriate to their positions and job functions and are qualified and authorized to provide OJT under this Training Plan.

Methods of training may include lecture, discussion, hands-on skill training, on-the-job training, and video or movie viewing followed by discussions. This Training Plan incorporates simulation or case study/scenario training where pertinent. Some training materials may be recorded and subsequent trainees will view the recording. The Training Director or an authorized designee may facilitate training by video or movie viewing by introducing the material and leading discussion after the recording has been reviewed. Training videos may also be made available to the trainees for viewing on electronic devices or through a web browser.

Individual instructors may be PFF employees or outside consultants depending upon the course, the topic, and the schedule. All instructors will be knowledgeable in the subjects that they teach. The instructors will be familiar with PFF Gainesville and hazardous waste operations. Instructors will be qualified through education, credentials, or experience. The Training Director's qualifications will be maintained on-site in the Facility Operating Record.

6.0 EVALUATION

The evaluation technique will vary by course, purpose, and format. Techniques may include written exam, skills observation, skills performance checklists, or questionnaires. Occasionally, other representatives of PFF may participate in evaluating course instruction. OJT will be evaluated by the employee's supervisor or the Training Director.

7.0 RECORD KEEPING AND CERTIFICATION

As required by EPA and FDEP, documentation of attendance, method of instruction, instructor's qualifications, and successful completion of each training topic will be maintained in the Facility Operating Record. Table 4 contains an example of employee training topic records that will be maintained in the Facility Operating Record.

A record of successful completion of OJT Task Training will be completed by the employee's supervisor and maintained in the training file of each employee.

Records documenting completion of the various training topics by current personnel will be kept until closure of the Facility. Records documenting former employees' completion of the various training topics will be kept for at least three (3) years from the date the employee last worked at the Facility. Training records will be maintained in the Facility Operating Record.

Additional records required by 40 CFR 264.16(d), including job titles, names of incumbents in those jobs, and job descriptions, will be maintained in the Facility Operating Record.

8.0 TRAINING TOPICS AND SCHEDULING

This Training Plan provides numerous training topics. Each job classification is assigned specific training topics related to the successful performance of that job in a manner that is safe and healthful to self, co-worker, environment, and property. These training assignments are listed on Figure 2 in this Training Plan. Table 4 lists an example record of description of each training topic assigned to employees.

**APPENDIX II-A-3 PERSONNEL TRAINING PROGRAM
ATTACHMENT A. PERSONNEL TRAINING PROGRAM**

The Facility normally operates one shift per day, five (5) days per week. It is the responsibility of the Facility Training Director or his/her authorized designee to schedule the necessary training for each person and to document attendance and successful course completion. The General Manager will advise the Facility Training Director of new hires and personnel classification changes that result in the need for training. The Facility Training Director will be responsible for scheduling timely refresher training for current employees when annual refresher training comes due.

Supervisors are responsible for providing OJT and for assuring that employees will not work in unsupervised positions until they have completed the training requirements of their job classification. Supervisors evaluate OJT and document the completion of each assigned OJT task. The OJT training documentation is provided to the Facility Training Director for appropriate record keeping. Table 5 contains a list of OJT tasks. Supervisors also provide refresher OJT to appropriate personnel and document the completion of assigned OJT tasks for record keeping at the Facility.

APPENDIX II-A-4

WASTE ANALYSIS PLAN

APPENDIX II-A-4. WASTE ANALYSIS PLAN

1.0 INTRODUCTION

The Perma-Fix of Florida (PFF) Facility (Facility) receives wastes from off-site generators for storage and treatment. Wastes received on-site are managed using the following methods: Perma-Fix I® Process (PF-I) solidification/stabilization, Perma-Fix II® Process (PF-II) (thermal desorption and/or chemical oxidation/reduction), waste bulking activities, storage, and miscellaneous treatment processes (e.g., chemical and physical extraction, deactivation, and fuel blending). The facility accepts hazardous waste, non-hazardous waste, and mixed waste for these processes. This section provides details on the types of hazardous wastes received, the analyses performed, and acceptance limits. This section also provides information regarding post-treatment analysis, where applicable.

1.1 GENERAL DESCRIPTION OF THE WASTES

PFF receives wastes in both pumpable and non-pumpable forms from various generators. In general, the pumpable wastes received at the PFF Facility are received from industrial, manufacturing, and service industries. PFF typically receives solids from service industries and environmental remediation sites.

The wastes accepted at the facility can be divided into the following five major categories:

- Non-hazardous, non-radioactive wastes such as:
 - Diesel-contaminated soils;
 - Oil-contaminated pads, booms, and absorbent;
 - Off-spec greases and lubricants;
 - Petroleum contact waters; and,
 - Used oil and oily waters
- Non-hazardous, radioactive wastes such as:
 - Dry active waste (DAW) containing personal protective equipment (PPE), rags, wipes, glassware, pipettes, etc.; and,
 - Debris
- Hazardous, radioactive wastes (mixed wastes) such as:
 - Lab packs;
 - Bulk liquids (flammables, acids, bases, oxidizers);
 - Solids (soils, sludges); and,
 - Debris
- Hazardous, non-radioactive wastes such as:
 - Flammable liquids;
 - Hazardous waters;
 - Solids (paint solids/sludges, debris); and,
 - Lab packs
- PCB Wastes

APPENDIX II-A-4. WASTE ANALYSIS PLAN

This Waste Analysis Plan is specifically designed for the hazardous wastes received from off-site and for the hazardous waste generated on-site (e.g., treatment residuals). PBC wastes are managed in accordance with EPA's Approval to Commercially Store PBCs dated July 24, 2013.

A list of acceptable hazardous waste codes is included in Waste Analysis Plan Table 1.

2.0 WASTE ANALYSIS PLAN

The Waste Analysis Plan for the PFF facility incorporates procedures to meet three main objectives:

1. Pre-Acceptance Analyses performed by or at the request of PFF to determine whether a hazardous waste will be accepted from off-site generators;
2. Waste Receipt Analyses used to confirm that wastes, when received, are consistent with the profile; and,
3. Post-Treatment Analyses to confirm that the PF-I and/or PF-II treatment processes, as well as the other treatment processes (i.e., non-elementary neutralization, mercury amalgamation, and deactivation) have successfully treated the waste, as required.

The following provides details regarding the Pre-Acceptance Analysis, the Waste Receipt Analysis, and the Post-Treatment Analysis for the wastes received at the facility. PFF may collect and analyze process control samples at its discretion for evaluating factors such as process efficiency and recipe for treatment. Such process control sampling and analysis is not performed for regulatory compliance under RCRA; hence it is outside the scope of this Waste Analysis Plan.

2.1 PRE-ACCEPTANCE ANALYSIS

2.1.1 WASTE PROFILE SHEET

Before approving hazardous wastes for management at the Facility, PFF conducts a preliminary evaluation to determine if the material is suitable for management at the Facility. A Waste Profile summarizing waste characteristics is required to be completed by the generator for each hazardous waste stream. An example of such Waste Profile is included in Attachment A. The Waste Profile will include the following information, at a minimum:

- Hazardous waste generator's name;
- Description of process generating the hazardous waste;
- Physical and chemical characteristics of the hazardous waste; and,
- Regulatory information (e.g., land disposal restriction).

2.1.2 WASTE STREAM PRE-APPROVAL ANALYSIS

The Waste Profile is reviewed by appropriate PFF personnel prior to its approval/disapproval.

For a waste profile of a waste stream containing the following waste codes, PFF will follow the procedure in the Attachment C to ensure that chemical constituents of the waste codes contained in a single container do not exceed the amount predicted by the Off-site Consequence Analysis submitted with the December 4, 2009 (revised March 10, 2010) permit renewal: F010, F011, F012, F019, F020, F021, F022, F023, F026, F027, F028, F032,

APPENDIX II-A-4. WASTE ANALYSIS PLAN

F034, F035, F037, F038, K001, K048, K049, K050, K051, K052, K061, K062, K086, K156, K157, K158, K159, K161, K169, K170, K171, K172, AND U395.

For hazardous wastes, generator knowledge, Material Safety Data Sheets (MSDSs) or Safety Data Sheets (SDSs), technical bulletins, etc., often provide all the information needed to make a pre-approval determination. However, for those wastes for which limited or questionable information is available, a pre-approval laboratory analysis may be required. This analysis may be performed by the generator, PFF, or an independent laboratory. Any PFF management personnel reviewing the profile may request additional information or analyses prior to waste stream approval. A typical example of chemical and physical analyses is included in Attachment D. Records of the chemical and physical data are maintained at the Facility in file cabinets in the hallway next to the copy room for at least 3 years.

The analysis required for a pre-approval sample will vary from sample to sample. For example, a hazardous solids sample submitted for pre-approval may only need a BTU determination to distinguish it as a fuel candidate or a material that will be bulked for disposal at a Class C landfill.

A listing of the analytical methods that may be used by the on-site laboratory for pre-approval analysis is included in Waste Analysis Plan Table 2. In any event, characterization of the waste remains the responsibility of the generator.

2.1.3 WASTE STREAM RECERTIFICATION

Approved Hazardous Waste Profiles are valid for one year and must be recertified annually by the generator. If a generator can certify that the chemical and physical characteristics and the process generating the waste have not changed over the past year, the initial waste analysis requirements (if applicable) will not be repeated. A periodically shipped waste will be recertified with the first shipment after the annual recertification date.

Recertification of a waste stream will be required for generators who have not manifested the profiled waste stream to the Facility during the preceding 12-month period. Additionally, when a generator notifies PFF that the process or operation generating a profiled waste stream has changed, the waste must be re-characterized. In the event PFF has reason to believe that the process or operation generating the waste has changed without notice from the generator, a re-characterization will also be required. In order to re-characterize its waste stream, the generator may be required to complete a new Waste Profile and undergo the waste stream pre-approval process as outlined in Subsection 2.1.2 above.

For certain emergency response situations and generator spills, some of the initial waste analysis parameters for on-site management may be waived until after the waste is received at PFF. This will only occur if the generator can adequately make the hazardous waste determination of 40 CFR 262.11. The available analytical data and supporting MSDSs will be evaluated prior to receipt of the waste at the facility.

2.2 WASTE RECEIPT ANALYSIS

Every waste stream received at the Facility is inspected and/or analyzed when it arrives. The following sections describe the different categories of wastes received at the Facility, the verification analysis performed, and rationale used in determining what analysis to perform.

APPENDIX II-A-4. WASTE ANALYSIS PLAN

2.2.1 WASTE NOT SUBJECT TO SAMPLING

The following types of waste streams will be routinely subject to visual inspection only, unless it is determined by PFF that additional sample analysis is needed:

- Lab Packs; and
- Hazardous Only Solids, such as
 - Paint solids;
 - Soils; and
 - Debris

2.2.2 HAZARDOUS FUELS (HF), FUEL BLEND (B), FUELS WITH HIGH HALOGENS (BH), FUEL BLEND WITH SLUDGE (BS), HIGH SOLID FUEL BLEND (BSO), AND FUEL WITH HIGH WATER (BW)

If a waste stream includes more than one drum, a composite sample made up of individual samples from at least 10% of the drums in that waste stream is collected for analysis.

These waste stream composites will be tested for specific gravity and % water. If the % water is >20%, the pH will be determined. If the waste reacts (i.e., fumes, smokes, effervesces, or raises the temperature significantly) with the Karl Fischer reagent during the water determination, a compatibility test will be performed.

These waste streams are primarily paint-related materials or solvents from hospitals, labs, manufacturing operations, etc. Historically, these tests have been sufficient for screening. A sample from the tanker these materials are bulked into is analyzed for each off-site shipment. Such samples have shown that the combined wastes are consistent with the profiled materials. The bulked liquids from this category are sent to a RCRA-permitted facility.

2.2.3 HAZARDOUS WATERS (HW)

If the waste stream includes more than one drum, a composite sample made up of individual samples from at least 10% of the drums in that waste stream is collected for analysis.

This waste stream composite will be tested for density, % water, and pH. If the waste reacts (i.e., fumes, smokes, effervesces, or raises the temperature significantly) with the Karl Fischer reagent during the water determination, a compatibility test will be performed.

This waste stream consists of water that has been contaminated with hazardous constituents such as solvents or metals. Examples include oily water from sumps and gasoline-contaminated water from monitoring wells. Historically, these tests have been sufficient for screening. A sample from the tanker these materials are bulked into is analyzed for each off-site shipment. Such samples have shown that the combined wastes are consistent with the profiled materials. The liquids from this waste stream are sent to a permitted hazardous waste facility.

2.2.4 MIXED WASTES

All mixed wastes (with the exception of lab packs and debris) received at PFF are subjected to one or more fingerprint analyses consisting of 1) specific gravity, 2) % water, 3) pH, and 4) flashpoint. Applicability of each

APPENDIX II-A-4. WASTE ANALYSIS PLAN

fingerprint analysis is indicated in Waste Analysis Plan Table 2. Fingerprint analysis results are provided for comparison to corresponding parameter values specified in the generator's waste profile. This allows verification that the identity of the waste received in a particular shipment is the same as the waste profiled and approved for that generator. Additional process control samples may also be analyzed at the discretion of PFF.

2.2.5 NON-CONFORMING WASTE

Wastes are considered to be non-conforming under the following conditions:

1. Analytical results are significantly different from data provided on the profile:
 - The pH is more than +2 units from the pH range shown on the profile;
 - The difference in water content is greater than +30% by weight of the profiled range;
 - The flashpoint is more than +30% different from the profiled range in degrees C; or
 - The specific gravity is more than +30% different from the profiled range.
2. Analytical results indicate that the waste exhibits a RCRA characteristic not shown on the profile.

Non-conforming waste will be handled in the following manner.

- A non-conformance report will be generated detailing why the waste is non-conforming. If the waste is still one that PFF can process, in accordance with the applicable provisions of the RCRA permit, the generator or broker will be contacted to get their permission to:
 - Make changes to the profile so that it matches the analytical results;
 - Generate a Hazardous Waste Manifest if the material has been determined to be hazardous and was shipped as non-hazardous. Also, an Unmanifested Waste Report will be submitted to FDEP within 15 days of receipt.
 - Make any necessary changes to the Hazardous Waste Manifest (add codes, change shipping description, etc.) if the waste was shipped as hazardous.
- If the generator disputes the analytical results generated from the incoming waste analysis, PFF may agree to send a sample of the waste to an independent outside lab. Another option will be to return the waste to the generator.
- If the waste is not acceptable for processing under the PFF RCRA permit, it will be returned to the generator or shipped to a properly permitted treatment, storage, or disposal facility. Unacceptable wastes will not be stored at PFF.

2.3 POST-TREATMENT ANALYSIS

Residues remaining after on-site treatment of wastes will either be sent off-site for further treatment (e.g., combustion) or sent off-site for disposal, depending on whether the residues meet Land Disposal Restrictions (LDR) treatment standards as specified in 40 CFR 268.40. Hazardous waste/residues sent off-site will be sent to facilities with interim status or final hazardous waste permits. PFF will follow procedures outlined in this subsection to determine whether the treatment residues meet LDR treatment standards.

APPENDIX II-A-4. WASTE ANALYSIS PLAN

Treatment residues that exceed applicable LDR treatment standards will be sent off-site for further treatment (e.g., combustion). LDR notifications will be supplied and will contain the information required under 40 CFR 268.7.

Several types of waste may be generated by the various steps in the PF-II process. Waste characterization will be conducted on these wastes in accordance with the requirements of 40 CFR 262 and may include application of process knowledge and/or analytical testing. Residuals from the PF-II process will be assumed to retain detectable radioactivity levels. The anticipated disposition of these wastes is discussed below. Alternative treatment/disposal options may be used if additional facilities become available.

Treatment residues that are shipped off-site for land disposal will be analyzed to verify that the wastes meet LDR treatment standards as specified in 40 CFR 268.40. If the residue to be disposed exhibits a hazardous characteristic and/or possesses a listed waste code, the residue will be disposed at a Subtitle C facility. Otherwise, the residue may be shipped to a Subtitle D facility.

For treatment residue that is sent to a Subtitle C facility:

- Analytical results will be used to ensure that accurate LDR notifications and certifications are prepared.
- LDR notifications and certifications will be supplied and will contain the information required under 40 CFR 268.7.
- Analytical results completed in support of LDR requirements will be retained within the Facility Operating Record.

For treatment residue that is sent to a Subtitle D facility:

- Analytical results will be used to ensure that accurate LDR notifications and certifications are prepared.
- Any LDR notifications and certifications required per 40 CFR 268.7 will be submitted to FDEP.
- LDR notifications and certifications will be placed in the Facility Operating Record.

Identification of the parameters to be tested are determined based on pretreatment waste stream knowledge, RCRA waste identification information (i.e., 40 CFR Part 261, Appendix VII – the basis for listing hazardous waste, and Appendix VIII – Hazardous Constituents) and the generator's land disposal restriction notification information. For LDR treatment standards expressed as concentrations in the residue extract, the TCLP (EPA SW-846 Method 1311) will be employed to obtain an extract of the waste. Then, the extract and/or residue sample will be analyzed for TCLP and/or total waste concentrations, respectively.

After the non-elementary neutralization, the treated material will be sampled and analyzed for pH to ensure that it is no longer a D002 hazardous waste. The treated material after the deactivation process is no longer a RCRA-regulated hazardous waste since it has undergone a specific treatment method (i.e., deactivation) prescribed by 40 CFR 268.40. The amalgam formed after the mercury amalgamation is no longer a RCRA-regulated hazardous waste if it passes the TCLP test. The amalgamated waste does not require sampling or analyses if it is disposed of in a Subtitle C landfill, unless required by the receiving facility. If amalgamated waste is to be disposed of in a Subtitle D landfill, a TCLP analysis for mercury or generator knowledge will be used to ensure that it is not a D009 hazardous waste.

APPENDIX II-A-4. WASTE ANALYSIS PLAN

2.4 WASTE ANALYSIS PARAMETERS AND RATIONALE

Summaries of the waste analysis parameters selected and the rationales for selection are shown in Waste Analysis Plan Table 2.

2.5 ANALYTICAL TEST METHODS

Analytical test methods used by PFF to test for waste parameters are standard laboratory methods or methods developed specifically for waste managed on-site. Waste Analysis Plan Table 2 provides analytical test methods that may be used to evaluate physical/chemical waste analysis parameters for pre-accepted and received waste.

The analytical test methods performed for the post-treatment organic and inorganic constituents follow SW-846 Test Methods or American Society for Testing and Materials (ASTM) methodologies, or equivalent. Such analyses may be performed at an off-site laboratory.

2.6 SAMPLING METHODS

Sampling methods used at the Facility will be those listed in Florida DEP SOP-001/01, FS 5000 Waste Sampling, or equivalent. PFF recognizes the importance of collecting a representative sample (as defined in 40 CFR 260) of each waste stream. If standard facility sampling techniques do not provide a representative sample for analysis, an appropriate alternate method will be used.

2.6.1 AS-RECEIVED WASTES

Wastes are primarily received at the Facility in containers (e.g., drums). However, wastes may also be received at the Facility in vials, lab packs, tanker trucks, and roll-off boxes. For waste streams that consist of multiple containers, a grab sample will be drawn from at least ten percent (10%) of the total number of containers for each waste stream. Drum thieves are generally used for sampling containerized liquids. Sampling devices for other than containerized liquids may be weighted bottles, dippers, coliwassas, triers, or other equivalent devices depending upon the characteristics of waste to be sampled. Sludges and/or solids are sampled using a scoop or similar device in order to obtain a representative sample.

2.6.2 POST-TREATMENT WASTES

For batch treatment operations, PFF will either:

1. collect and analyze one grab sample from the residue generated from each batch; or,
2. if residues are generated from multiple treatment batches from the same waste stream, collect one random grab sample from no less than 10% of the total number of containers of residues generated, composite the grab samples, and analyze the composite sample. In some cases, PFF may analyze each grab sample.

The treatment residues will be sampled using one of the following:

- Coliwasa, dipper (liquids); or,
- Trier, auger, scoop, tube sampler, dipper (solids, sludges).

Once a sample is drawn, the sample is placed in a sample container. The samples are stored in glass or polyethylene bottles, depending on whether organic analyses are to be conducted. In addition, the samples will be cooled if necessary to preserve volatile constituents.

APPENDIX II-A-4. WASTE ANALYSIS PLAN

2.7 PROCEDURES FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTES

PFF may handle ignitable, reactive, or incompatible wastes. Prior to co-mingling wastes, PFF operations personnel will use existing waste analysis information provided by the generator and/or published literature to determine if there is a potential danger in mixing wastes. Potentially incompatible wastes will also be bench-tested in the on-site laboratory, in accordance with the method listed in Attachment B or by operations personnel in the waste treatment area.

Materials will be considered incompatible and will not be mixed together in containers, tanks, or treatment processes if they:

- Generate extreme heat or pressure, fire or explosions, or violent reactions;
- Produce uncontrolled toxic mists, fumes, dusts, or gases in sufficient quantities to threaten human health or the environment;
- Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;
- Damage the structural integrity of the container, tank, or treatment process or facility; or,
- May otherwise threaten human health or the environment.

PFF will manage ignitable and reactive waste in accordance with the following procedures. Ignitable or reactive wastes are either stored in containers or tanks and are protected from sources of ignition or reaction. Activities that would produce open flames, hot surfaces, frictional heat, sparks, spontaneous ignition, or radiant heat will not occur in the vicinity of ignitable wastes. As a safeguard for handling ignitable and reactive wastes, smoking is not allowed within the Facility (except in designated areas).

Incompatible wastes are placed in separate secondary containment areas. Incompatible wastes are physically separated by the use of a berm or dike, or by placing them in separate buildings. Incompatible wastes will not be placed in the same container or tank.

3.0 QUALITY ASSURANCE/QUALITY CONTROL

3.1 SAMPLING QUALITY ASSURANCE/QUALITY CONTROL

The quality assurance (QA) of sampling is controlled through the proper training of all personnel who are involved in sampling. In addition, sample identity information is documented on each sample taken, usually in the form of a label attached to the sample container, or written directly on the container.

Quality control (QC) on samples is measured by comparing the analytical results of the sample against its Pre-Acceptance Analysis, if any. If a discrepancy is noted, a second sample may be obtained and analyzed to verify the results of the first analysis, or the instruments that yielded the discrepant result may be checked for proper calibration, programmed dilution factors, etc. Where applicable and depending on the specific QA/QC requirements of a test procedure, a duplicate sample analysis will be performed to verify sampling quality control.

3.2 LABORATORY QUALITY CONTROL

The PFF on-site laboratory uses standard QC procedures as part of the overall QA program. These QC procedures specify that QC checks must be conducted to verify that all analyses are accurate and precise. Each analytical procedure uses the following QC checks, where applicable:

APPENDIX II-A-4. WASTE ANALYSIS PLAN

Calibration and Reagent Standardization:

Each time an instrument is calibrated or a reagent is standardized, a record is kept of the results. The analytical methods specify the procedure and frequency required to maintain accuracy.

Known Standards:

Calibration or analysis of a known standard will be performed when the instrument is being used for laboratory analyses and per the specific requirements of the analytical method.

Blanks:

Where applicable, blanks are run for each analytical method on a daily basis, and the results are recorded in the laboratory operating record.

Duplicates:

A duplicate or matrix spike duplicate sample is run in accordance with the frequency specified in the analytical method and when the instrument is being used for laboratory analyses. The results are recorded in the laboratory operating record.

Spiked Samples:

Where applicable, samples are spiked with the analyte and analyzed. Spikes are conducted at the frequency specified in the analytical method.

TABLES

WASTE ANALYSIS PLAN TABLE 1. WASTE CODES ACCEPTED AT THE FACILITY
PART II APPENDIX II-A-4 WASTE ANALYSIS PLAN
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

List of Waste Codes Accepted at the Facility												
D001	D037	K050	P021	P063	P106	U002	U038	U076	U113	U149	U185	U225
D002	D038	K051	P022	P064	P108	U003	U039	U077	U114	U150	U186	U226
D003	D039	K052	P023	P065	P109	U004	U041	U078	U115	U151	U187	U227
D004	D040	K061	P024	P066	P110	U005	U042	U079	U116	U152	U188	U228
D005	D041	K062	P026	P067	P111	U006	U043	U080	U117	U153	U189	U234
D006	D042	K086	P027	P068	P112	U007	U044	U081	U118	U154	U190	U235
D007	D043	K156	P028	P069	P113	U008	U045	U082	U119	U155	U191	U236
D008	F001	K157	P029	P070	P114	U009	U046	U083	U120	U156	U192	U237
D009	F002	K158	P030	P071	P115	U010	U047	U084	U121	U157	U193	U238
D010	F003	K159	P031	P072	P116	U011	U048	U085	U122	U158	U194	U239
D011	F004	K161	P033	P073	P118	U012	U049	U086	U123	U159	U196	U240
D012	F005	K169	P034	P074	P119	U014	U050	U087	U124	U160	U197	U243
D013	F006	K170	P036	P075	P120	U015	U051	U088	U125	U161	U200	U244
D014	F007	K171	P037	P077	P121	U016	U052	U089	U126	U162	U201	U246
D015	F008	K172	P038	P078	P122	U017	U053	U090	U127	U163	U202	U247
D016	F009		P039	P081	P123	U018	U055	U091	U128	U164	U203	U248
D017	F010		P040	P082	P127	U019	U056	U092	U129	U165	U204	U249
D018	F011	P001	P041	P084	P128	U020	U057	U093	U130	U166	U205	U271
D019	F012	P002	P042	P085	P185	U021	U058	U094	U131	U167	U206	U278
D020	F019	P003	P043	P087	P188	U022	U059	U095	U132	U168	U207	U279
D021	F020	P004	P044	P088	P189	U023	U060	U096	U133	U169	U208	U280
D022	F021	P005	P045	P089	P190	U024	U061	U097	U134	U170	U209	U328
D023	F022	P006	P046	P092	P191	U025	U062	U098	U135	U171	U210	U353
D024	F023	P007	P047	P093	P192	U026	U063	U099	U136	U172	U211	U359
D025	F026	P008	P048	P094	P194	U027	U064	U101	U137	U173	U213	U364
D026	F027	P009	P049	P095	P196	U028	U066	U102	U138	U174	U214	U367
D027	F028	P010	P050	P096	P197	U029	U067	U103	U140	U176	U215	U372
D028	F032	P011	P051	P097	P198	U030	U068	U105	U141	U177	U216	U373
D029	F034	P012	P054	P098	P199	U031	U069	U106	U142	U178	U217	U387
D030	F035	P013	P056	P099	P201	U032	U070	U107	U143	U179	U218	U389
D031	F037	P014	P057	P101	P202	U033	U071	U108	U144	U180	U219	U394
D032	F038	P015	P058	P102	P203	U034	U072	U109	U145	U181	U220	U395
D033	F039	P016	P059	P103	P204	U035	U073	U110	U146	U182	U221	U404
D034	K001	P017	P060	P104	P205	U036	U074	U111	U147	U183	U222	U409
D035	K048	P018	P062	P105	U001	U037	U075	U112	U148	U184	U223	U410
D036	K049	P020										U411

WASTE ANALYSIS PLAN TABLE 2. WASTE ANALYSIS PARAMETERS, RATIONALE, AND APPLICABILITY
PART II APPENDIX II-A-4 WASTE ANALYSIS PLAN
PERMA-FIX FLORIDA, 1940 NW 67TH PLACE, GAINESVILLE, FLORIDA

Parameter	Rationale	PFF Method No.*	Reference Analytical Methods**	Applicability***
Non-Purge Volatiles (GC/FID)	Pre-approval sample analysis	4000-001	SW-846 8000B, SW-846 8015C	Liquid fuels
Flashpoint (Miniflash)	Pre-approval and received waste fingerprint property, determine ignitability	4000-002	SW-846 1020B	Liquid waste streams not characterized as ignitable. Not applicable to corrosives.
Percent Water (KF)	Pre-approval and received waste fingerprint property	4000-003	SW-846-9000	Waste liquid fuel streams
pH Electrode	Pre-approval and received waste fingerprint property	4000-004	SW-846 9040C, SW-846 9045D	Liquid waste streams >20% H ₂ O
Flashpoint (Pensky-Martin)	Pre-approval and received waste fingerprint property, determine ignitability	4000-005	SW-846-1010A	Liquid waste streams not characterized as ignitable. Not applicable to corrosives.
Semi-Volatiles (GC/MS)	Optional process control sample analysis	4000-006	SW-846 8270D	Non-debris solid mixed wastes accepted for treatment at PFF rather than bulking
Inorganic Chlorides	May be required by the RCRA permit	4000-007	SW-846 9212	PF-II solid stream input
Btu Content	Pre-approval sample analysis	4000-008	Parr Operations Manual	Non-radioactive fuels
Density/Specific Gravity	Pre-approval and received waste fingerprint property	4000-009	PFF Protocol	All liquid waste streams
PCB (GC/ECD)	Screen for TSCA wastes, receipt analysis	4000-010	SW-846 8000B, SW-846 8082A	Non-debris mixed waste
Metals Prep. & Digestion	Process control sample analysis	4000-011	SW-846 3005A, SW-846 3010A, SW-846 3050B	Wastes accepted for metals stabilization treatment by PFF
pH (Indicator Paper)	Pre-approval and received waste fingerprint property	4000-012	SW-846 9041A	Liquid waste streams >20% H ₂ O
Fuel Compatibility	Pre-approval sample analysis	4000-013	PFF Protocol	Waste fuels
Metals (ICP)	Process control sample analysis	4000-015	SW-846 6010C, SW-846 6020A	Wastes accepted for metals stabilization treatment by PFF
Volatiles (GC/MS)	Optional process control sample analysis	4000-016	SW-846 8260B	Non-debris solid mixed wastes accepted for treatment at PFF rather than bulking
Mercury (CVAA)	Process control sample analysis	4000-017	SW-846 7470A	Wastes accepted for metals stabilization treatment at PFF
TCLP Extraction for Metals	Pre-approval and process control sample analysis	4000-018	SW-846 1311	Wastes accepted for metals stabilization treatment at PFF
Free Liquids (Paint Filter Test)	Identification of free liquids	4000-019	SW-846 9095B	Optional analysis
Cyanide Screen	Optional process control sample analysis	4000-020	Drager Tube Handbook	Wastes requiring acidification for metals stabilization treatment at PFF
Sulfide Screen	Optional process control sample analysis	4000-021	Drager Tube Handbook	Wastes requiring acidification for metals stabilization treatment at PFF
Flash Point (Setaflash)	Pre-approval and received waste fingerprint property, determine ignitability	4000-022	SW-846 1020B	Liquid waste streams not characterized as ignitable. Not applicable to corrosives.
Total Halides	Optional process control sample analysis and for meeting used oil requirements	4000-014	SW-846 9023 SW-846 9056A SW-846 9076	Liquid, solid or sludge waste streams

Notes:

*Refers to PFF method revision currently in effect.

**PFF methods were developed specifically for waste managed on site using the listed standard methods as guidelines.

***Refers to RCRA-regulated waste only.

APPENDIX II-A-4 WASTE ANALYSIS PLAN

ATTACHMENT A

EXAMPLE WASTE PROFILE FORM

**APPENDIX II-A-4 WASTE ANALYSIS PLAN
ATTACHMENT A. EXAMPLE WASTE PROFILE FORM**

WASTE PROFILE		Profile Number
<small>Perma-Fix Nuclear Services: DSSI * M&EC * Perma-Fix of Florida * Perma-Fix Northwest</small>		
Generator Information:		Billing Information:
EPA ID#		<input type="checkbox"/> Electronic users: check here to copy Generator info, if same.
Generator Name		Broker/Site
Generator Address		Address
City/State/Zip		City/St/Zip
Telephone		Telephone
Fax		Fax
Check all that apply		
<input type="checkbox"/> Hazardous Waste - Include LDR-UHC Constituent Form		
<input type="checkbox"/> TSCA Regulated PCB		
<input type="checkbox"/> Radioactive Waste		
<input type="checkbox"/> Non-Hazardous Waste		
<input type="checkbox"/> Mercury >260 PPM		
<input type="checkbox"/> Oxidizers		
<input type="checkbox"/> PCB Bulk Products		
<input type="checkbox"/> Universal Waste		
<input type="checkbox"/> Elemental Mercury		
<input type="checkbox"/> PCB Remediation Waste		
<input type="checkbox"/> Used Oil Filter		
<input type="checkbox"/> Reactives - specify:		
<input type="checkbox"/> PCB Articles		
<input type="checkbox"/> Used Oil		
Please provide a detailed description of the process that generated this waste. Attach additional sheets if needed. Note: for a line break, press alt-return.		
Characterization Method: (check ONE only)		
<input type="checkbox"/> Laboratory Analysis <input type="checkbox"/> MSDS <input type="checkbox"/> Generator Knowledge		
Physical Description: (check all that apply)		
<input type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Sludge <input type="checkbox"/> Debris <input type="checkbox"/> Labpack (add inventory form)		
<input type="checkbox"/> Other:		
Volume:	Gross Weight:	Container Type:
<small>(include units: 30 liters, 5 gal., etc)</small>	<small>(include units: 75 lbs, 10 kg, etc.)</small>	
Overpacked: <input type="checkbox"/> Yes <input type="checkbox"/> No	US DOT Hazardous Material: <input type="checkbox"/> Yes <input type="checkbox"/> No	Proper Shipping Name:
DOT Hazard Class:		
<small>primary</small>	<small>subsidiary</small>	
<input type="checkbox"/> This waste stream is subject to the Land Disposal Restriction of 40 CFR 268. <small>(If checked, complete a Land Disposal Restriction Notification form)</small>		
<input type="checkbox"/> This waste stream contains Benzene. <small>(If checked, complete the Benzene NESHP Worksheet)</small>		
<input type="checkbox"/> This waste stream consists of off-spec used oil.		
<input type="checkbox"/> This is a CERCLA waste.		
CHEMICAL PROPERTIES AND COMPOSITION:		
Percent Free Liquid:	Percent Settled Solids:	Viscosity:
<small>% (None=0%, all=100%)</small>	<small>% (None=0%, all=100%)</small>	<small>Centistokes</small>
pH Actual:	Specific Gravity Actual:	
OR Range:	OR Range:	
CERTIFICATION		
I certify that all hazards, known or suspected, have been disclosed on this profile. Further I understand that a surcharge may be imposed for any material which is rejected or requires additional handling due to the material being inconsistent with the profile, improper or damaged containers, or improper shipping documents.		
1. Any sample submitted is representative as defined in 40 CFR 261-Appendix I or is obtained using an equivalent method.		
2. I authorize Perma-Fix to obtain a sample from any waste shipment for purposes of verification.		
Name	Title	Date
Perma-Fix Use Only		
<input type="checkbox"/> Accepted <input type="checkbox"/> Accepted with the following conditions:		
<input type="checkbox"/> Rejected for the following reasons:		
Designated Facility:		
<input type="checkbox"/> DSSI		
<input type="checkbox"/> M&EC		
<input type="checkbox"/> PF Florida		
<input type="checkbox"/> PFNW		
Perma-Fix has all of the necessary permits and licenses for the waste that has been characterized and identified by this approved profile and accepted by Perma-Fix		
Name	Title	Date

APPENDIX II-A-4 WASTE ANALYSIS PLAN

ATTACHMENT B

POTENTIAL INCOMPATIBILITY TESTING PROCEDURE

APPENDIX II-A-4 WASTE ANALYSIS PLAN
ATTACHMENT B. POTENTIAL INCOMPATIBILITY TESTING PROCEDURE

PFF currently mixes different waste streams during bulking operations for its waste-derived fuels blending operations. Although it is not anticipated that different waste streams will be routinely mixed and treated in the same batch during Perma-Fix® treatment operations, the need exists to confirm the compatibility of individual waste streams that may come into contact with other waste streams and with treatment additives used in the Perma-Fix treatment processes. In addition to avoiding undesirable chemical reactions such as those listed in 40 CFR 264.17(b), potential reactions that may be incompatible with the treatment processes or equipment (e.g., polymerization of liquid wastes into a solid inside process equipment, excessive foaming, synergistic interference with the effectiveness of a treatment process, etc.) need to be identified.

In situations where there is a need to mix different waste streams together or to mix treatment additives with waste streams, samples of the wastes (and additives as appropriate) will first be segregated into compatibility groups based on the available waste generator material profile and analytical data. Next, samples from within each of these groups will be blended together and observed for changes in temperature, pH, and other signs of chemical reactions such as fumes, smoke, bubbles, color changes, and changes in viscosity. See 40 CFR 264.17(b). Next, the sample will be observed for the first five minutes after blending. The samples will then be periodically (every 5-10 minutes) inspected during a 30-minute period following blending. Any counter-indications to mixing or treatment will be evaluated further. For example, tests may be conducted to determine whether blending with different wastes or in smaller or more dilute quantities would allow the mixing or treatment to proceed in a safe manner. Mixing of wastes will be prohibited or managed in accordance with the observations and determinations made as described above.

Samples of wastes and treatment additives intended for treatment using the Perma-Fix treatment processes will be mixed in a manner simulating the entire treatment processes (PF-I and/or PF-II) on a bench scale prior to full scale processing. In addition, samples of waste streams intended for fuel blending will be tested for compatibility prior to blending.

APPENDIX II-A-4 WASTE ANALYSIS PLAN

ATTACHMENT C

PFF PROCEDURE FOR CERTAIN WASTE CODES

**APPENDIX II-A-4 WASTE ANALYSIS PLAN
ATTACHMENT C. PFF PROCEDURE FOR CERTAIN WASTE CODES**

PFF will implement the following procedure to ensure that the quantity of a chemical stored at the facility in a single container is not more than the amount predicted in the Off-site Consequence Analysis (OCA) report submitted with the previous renewal application in 2010. This procedure applies to the following waste codes:

F010, F011, F012, F019, F020, F021, F022, F023, F026, F027, F028, F032, F034, F035, F037, F038, K001, K048, K049, K050, K051, K052, K061, K062, K086, K156, K157, K158, K159, K161, K169, K170, K171, K172 and U395.

1. Prior to receiving any waste streams, a profile review and approval process is conducted by PFF personnel. Any waste stream containing the above-listed waste codes will undergo additional scrutiny to identify container size and, if necessary, concentration of chemical constituent(s) for which the waste is listed.
2. If the waste profile does not provide the concentrations of constituents, PFF will assume that the entire content of the shipment container has 100% of the constituent of concern for the waste code. Based on this assumption, the quantity of the relevant constituent will be calculated. If this quantity does not exceed the amount predicted by the OCA, no additional information is necessary. Calculations will be kept in facility records.
3. If the quantity calculated in item 2 is above the quantity predicted by the OCA, then PFF must obtain the concentration of the relevant constituent(s) through analysis and/or generator knowledge.
4. The waste stream will not be approved during the waste profile review if the quantity calculated exceeds the amount predicted in the OCA. At this point, the generator may choose to ship the new waste code in smaller containers. However, PFF will repeat this evaluation in such a case.
5. PFF will keep records of calculations showing that the container shipped from the generator does not have constituent amounts in the container above the amount predicted by the OCA for these waste codes.

APPENDIX II-A-4 WASTE ANALYSIS PLAN

ATTACHMENT D

EXAMPLE OF TYPICAL CHEMICAL AND PHYSICAL ANALYSIS

**APPENDIX II-A-4 WASTE ANALYSIS PLAN
ATTACHMENT D. EXAMPLE OF TYPICAL CHEMICAL AND PHYSICAL ANALYSIS**



PERMA-FIX ANALYTICAL SERVICES
1940 N.W. 67th Place
Gainesville FL 32653
(352) 373-6066 Fax: (352) 338-7922

CERTIFICATE OF ANALYSIS

PAS Number : 94628	Date Sampled : 08/13/14
Sample I.D. : NUC-113-63	Date Received : 08/13/14
Chain of Custody # : MW-3658	Project # : Profile Verification

GENERAL SAMPLE INFORMATION (Visual Inspection)

Analysis Performed on : Shaken	Solid/Sludge Level : <1% by volume
No. of Liquid Layers : Single	Solid Form : Debris

Comments :

Parameter	Result (1,2)	W.A.C. Limits	Method Detection Limits (3)	Practical Quantitation Limits (4)	Units	Dilution Factor	Analyst Initials	Date Analyzed	PAS SOP 4000-
Density	0.8450	N/A	0.05	0.25-20.0	g/mL	1	VTT	08/15/14	009
Percent Water	<MDL	+/- 30%	0.73	2.92	% by wt.	2	TWY	08/15/14	003
Flashpoint	>70	+/- 30%	0-200	23-70	Deg. C	1	MGT	09/04/14	002/022
Total Halogens (TX)	311	+/- 10%	51	400	ppm	10	MCN	08/20/14	014
Extractable Halogens(EOX)	N/A	+/- 10%	0	0					014
pH	7.34	+/- 2	0-14.0	1.68-12.45	Std. units	1	VTT	08/20/14	004/012
PCB 1242	<MDL	N/A	1.51	10.50	ppm	105	RMB	08/21/14	010
PCB 1254	<MDL	N/A	0.315	10.50	ppm	105	RMB	08/21/14	010
PCB 1260	<MDL	N/A	2	10.50	ppm	105	RMB	08/21/14	010

- NOTES:** 1. Unless otherwise indicated, concentrations are reported on an as-received rather than dry weight basis.
2. Results Reported as N/A were not analyzed for.
3. Results reported as <M.D.L. were analyzed for, but not detected, above detection limit.
4. Results with reported values outside the range of quantitation limits must be regarded as estimated values. If no upper quantitation limit is listed, it is assumed to be 100%.
5. Perma-Fix Analytical Services is not a state certified lab, therefore these results cannot be used to make regulatory determinations. Perma-Fix Analytical Services analytical method S.O.P.s are based on modified SW-846 methods where applicable.

This report has been prepared and reviewed in accordance with Perma-Fix of Florida, Inc. standard operating procedures. Please direct any questions to Ken Justice, Laboratory Manager.

Data reviewed by

Waste approved for acceptance

Date

APPENDIX II-A-4 WASTE ANALYSIS PLAN
ATTACHMENT D. EXAMPLE OF TYPICAL CHEMICAL AND PHYSICAL ANALYSIS



PERMA-FIX ANALYTICAL SERVICES

2010 N.W. 67th Place
Gainesville, FL 32653
(352) 373-6066 Fax: (352) 338-7922

REPORT OF TOTAL METALS ANALYSIS
ICP-MS; AGILENT MODEL 7700X

PAS Number : PAS-94628
Project : Profile Verification
Sample ID : NUC-113-63
Sample Matrix : Liquid

Chain of Custody : MW-3658
Date Analyzed : 08/20/14
Analyst : MGT
Digestion Method : PFF-4000-011

<u>ANALYTE</u>	<u>RESULT</u>	<u>UNITS</u>	<u>MDL</u> <u>LIMIT</u>	<u>PQL</u> <u>LIMIT</u>	<u>PAS</u> <u>SOP</u>
ANTIMONY, (Sb)	<PQL	ppm	0.0456	1.00	4000-015
ARSENIC, (As)	<PQL	ppm	0.0509	1.00	4000-015
BARIUM, (Ba)	<PQL	ppm	0.0554	1.00	4000-015
BERYLLIUM, (Be)	<PQL	ppm	0.0934	1.00	4000-015
CADMIUM, (Cd)	<PQL	ppm	0.0488	1.00	4000-015
CHROMIUM, (Cr)	<PQL	ppm	0.110	1.00	4000-015
LEAD, (Pb)	1.47	ppm	0.0875	1.00	4000-015
MERCURY, (Hg)	<PQL	ppm	0.00278	0.10	4000-015
NICKEL, (Ni)	<PQL	ppm	0.0423	1.00	4000-015
SELENIUM, (Se)	<PQL	ppm	0.222	1.00	4000-015
SILVER, (Ag)	<PQL	ppm	0.0102	0.10	4000-015
THALLIUM, (Tl)	<PQL	ppm	0.0276	1.00	4000-015
VANADIUM, (V)	<PQL	ppm	0.0387	1.00	4000-015
ZINC, (Zn)	285	ppm	1.17	5.00	4000-015
ALUMINUM, (Al)	<PQL	ppm	1.03	10.0	4000-015
COPPER, (Cu)	2.19	ppm	0.0453	1.00	4000-015
IRON, (Fe)	<PQL	ppm	0.467	10.0	4000-015
MAGNESIUM, (Mg)	1.72	ppm	0.227	1.00	4000-015
PHOSPHORUS, (P)	40.7	ppm	2.25	10.0	4000-015
POTASSIUM, (K)	<PQL	ppm	2.33	10.0	4000-015
SODIUM, (Na)	<PQL	ppm	2.14	10.0	4000-015
SULFUR, (S)	929	ppm	136	544	4000-015
URANIUM 238, (U)	<PQL	ppm	0.0231	1.00	4000-015

NOTES:

NR: Not Requested

1. Unless otherwise indicated, concentrations are reported on an as-received rather than dry weight basis.
2. The PQL (Practical Quantitation Level) is based on 4X the MDL or the lowest calibration standard.
3. Perma-Fix Analytical Services is not a state certified lab, therefore these results cannot be used to make regulatory determinations.
4. Perma-Fix Analytical Services analytical method S.O.P. s are based on modified SW-846 methods where applicable.

All QC Passes

This report has been prepared and reviewed in accordance with Perma-Fix of Florida, Inc. standard operating procedures.
Please direct any questions to Ken Justice, Laboratory Manager.

Data reviewed by _____

/ /
Date

94620 Totals

APPENDIX II-A-5

FEDERAL ENVIRONMENTAL LEGISLATION

APPENDIX II-A-5. FEDERAL ENVIRONMENTAL LEGISLATION



FLORIDA DEPARTMENT OF STATE

Sandra B. Mortham

Secretary of State

DIVISION OF HISTORICAL RESOURCES

R.A. Gray Building

500 South Bronough Street

Tallahassee, Florida 32399-0250

Director's Office
(904) 488-1480

Telecopier Number (FAX)
(904) 488-3353

April 10, 1996

Ms. Jennifer B. Hazard
Perma-Fix
1940 N.W. 67th Place
Gainesville, Florida 32653

In Reply Refer To:
Robin D. Jackson
Historic Sites Specialist
(904) 487-2333
Project File No. 961234

RE: Cultural Resource Assessment Request
Permit Renewal - Existing Treatment, Storage and Disposal Facility
Gainesville, Alachua County, Florida

Dear Ms. Hazard:

In accordance with the procedures contained in 36 C.F.R., Part 800 ("Protection of Historic Properties"), we have reviewed the referenced project(s) for possible impact to historic properties listed, or eligible for listing, in the National Register of Historic Places. The authority for this procedure is the National Historic Preservation Act of 1966 (Public Law 89-665), as amended.

It is the opinion of this agency that because of the project nature it is considered unlikely that archaeological or historical sites will be affected. Therefore, it is the opinion of this office that the proposed project will have no effect on any sites listed, or eligible for listing in the National Register.

If you have any questions concerning our comments, please do not hesitate to contact us. Your interest in protecting Florida's historic properties is appreciated.

Sincerely,

Laura L. Kammerer
for George W. Percy, Director
Division of Historical Resources
and
State Historic Preservation Officer

GWP/Jrj

Archaeological Research
(904) 487-2299

Florida Folklife Programs
(904) 397-2192

Historic Preservation
(904) 487-2333

Museum of Florida History
(904) 488-1484

APPENDIX II-A-5. FEDERAL ENVIRONMENTAL LEGISLATION



April 2, 1996

Mr. George W. Percy, Compliance Review Department
Division of Historical Resources
R A Gray Building, 500 South Bronough
Tallahassee, Florida 32399

CERTIFIED MAIL

Dear Mr. Percy:

Perma-Fix of Florida, Inc. (PFF) is an existing Treatment, Storage and Disposal (TSD) facility located in Gainesville, Florida. PFF received its Final Part B Permit in September of 1989 and we are presently in the renewal phase of our permit with the Florida Department of Environmental Protection (FDEP).

On April 2, 1996, I spoke with Gary Goodwin, Historical Preservation Planner, to determine if any historically significant sites exist in the vicinity of the PFF facility. After reviewing an extensive list of sites and concluding no sites existed in the PFF vicinity, Mr. Goodwin transferred me to Ms. Robin Jackson, of your office. Ms. Jackson suggested that I submit a facility description and a USGS map for an archaeological review.

In accordance with 40 CFR 270.3(b), PFF requests an evaluation of the presence of any historically significant sites in the area of our facility.

Should you have any questions or concerns, please contact me at (352) 395-1356.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jennifer B. Hazard".

Jennifer B. Hazard
Southeast Regional Compliance Coordinator

Enclosures: Facility Description and USGS Map

JBH96.049

1940 N.W. 67TH PLACE · GAINESVILLE, FLORIDA 32653 · TEL (352) 373-6066 · FAX (352) 372-8963

EPA-PERMITTED TSD FACILITY · HAZARDOUS WASTE · NON-HAZARDOUS WASTE · MIXED WASTE

APPENDIX II-A-5. FEDERAL ENVIRONMENTAL LEGISLATION



FLORIDA GAME AND FRESH WATER FISH COMMISSION

K. MORRIS
Sarasota

QUINTON L. HEDGEPEETH, DDS
Miami

MRS. GILBERT W. HUMPHREY
Miccosukee

THOMAS B. KIBLER
Lakeland

ALLAN L. EGBERT, Ph.D., Executive Director
WILLIAM C. SUMNER, Assistant Executive Director

NORTHEAST REGION
LT. COL. LARRY L. MARTIN, Director
Route 7, Box 440
Lake City, FL 32055
(904) 758-0525

April 5, 1996

Ms. Jennifer B. Hazard
Southeast Regional Compliance Coordinator
Perma-Fix Environmental Services
1940 N.W. 67th Place
Gainesville, FL 32653

Dear Ms. Hazard:

This responds to your inquiry dated April 3, 1996 regarding the potential occurrence of listed species in the vicinity of your facility in Alachua County, Florida. You defined the location as Latitude 29°43'00" and Longitude 82°20'58". We have conducted a search on our computer database and other pertinent records of wildlife observations. To facilitate this, we searched an area whose boundaries are two miles north, east, south, and west of your facility:

Latitude: >29°41'00"N and <29°45'00"N

Longitude: >82°18'58"W and <82°22'58"W

As for wildlife species over which this agency has jurisdiction, at least one wading bird rookery is known to occur in close proximity of the searched area. It is located at 29°45'30"N, 82°23'42"W, T8S, R19E, Sec. 12SW. Cattle egret (Bubulcus ibis), little blue heron (Egretta caerulea), a Species of Special Concern, and other unidentified small white wading birds have been known to occur there.

Please note, however, that our database is not necessarily inclusive of all listed species which may occur in a given area. For various reasons, occurrence records for some species are not necessarily input into our database on a site-specific basis. The indigo snake, gopher tortoise and most listed mammal species are notable examples of that. Moreover, some species which are accounted for in the database may occur in areas we are unaware of. Only through systematic field surveys could such data be factored in with respect to your request.

1943 - 1993

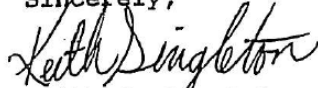
50 YEARS AS STEWARD OF FLORIDA'S FISH AND WILDLIFE

APPENDIX II-A-5. FEDERAL ENVIRONMENTAL LEGISLATION

Ms. Jennifer B. Hazard
April 5, 1996
Page 2

Thank you for consulting us in this matter. As for occurrence records for listed plants and plant communities of concern, the appropriate contact would be the Florida Natural Areas Inventory, 1018 Thomasville Road, Suite 200C, Tallahassee, FL 32303, 904/224-8207.

Sincerely,



Keith G. Singleton
Nongame Wildlife Biologist

KGS/
WLD 4-3-5
Enclosure
listed13.ltr

APPENDIX II-B-1

EXAMPLE CONCRETE SEALER/HARDENER SPECIFICATIONS

APPENDIX II-B-1. EXAMPLE CONCRETE SEALER/HARDNER SPECIFICATIONS



U.S. Department of Labor
Occupational Safety and Health Administration
(Non-Mandatory Form)
Form Approved
OMB No. 1218-0072

Material Safety Data Sheet

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200.
Standard must be consulted for specific requirements.

IDENTITY (As Used on Label and List)

Ashford Formula

Note: Blank spaces are not permitted. If any item is not applicable or no information is available, the space must be marked to indicate that.

SECTION I

Manufacturer's Name

Curecrete Chemical Company, Inc.

Emergency Telephone Number **800-728-2482**

International Emergency Number (call collect) **801-629-0667**

Telephone Number for Information **801-489-5663**

Address (Number, Street, City, State, and Zip Code)

1203 West Spring Creek Place

Springville, Utah 84663

Date Prepared **September 19, 2012**

SECTION II – HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components (Specific Chemical Identity: Common Name(s))	OSHA PEL	ACGIH TLV Recommended	Other Limits	% (Optional)
---	----------	--------------------------	--------------	--------------

N/A – Water-based, catalytically modified inorganic sodium silicate material.

SECTION III – PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point	230°F (110°C)	Specific Gravity (H ₂ O = 1)	1.1 - 1.2 @ 20°C
Vapor Pressure (mm Hg.) 25°F (-3.89°C)	23.756	Melting Point	N/A
Vapor Density (AIR=1) 25°F (-3.89°C)	0.9996	Evaporation Rate Butyl Acetate = 1 (Water = 1)	1
Solubility in Water	100%	pH	11.3 - 11.6

Appearance and Odor **Clear liquid, odorless**

SECTION IV – FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used) N/A	Flammable Limits N/A	LEL	VEL
--------------------------------------	-----------------------------	-----	-----

Extinguishing Media **Non-flammable (water-based)**

Special Fire Fighting Procedures **N/A**

Unusual Fire and Explosion Hazards **N/A**

SECTION V – REACTIVITY DATA

Stability	Unstable		Conditions to Avoid
	Stable	X	N/A

APPENDIX II-B-1. EXAMPLE CONCRETE SEALER/HARDNER SPECIFICATIONS

Incompatibility (Materials to Avoid) Strong acids			
Hazardous Decomposition or By Products N/A			
Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	N/A

SECTION VI – HEALTH HAZARD DATA

Route(s) of Entry:	Inhalation? If atomized.	Skin? N/A	Ingestion? Irritation of intestinal tract.
Health Hazards (Acute and Chronic)	Avoid direct contact with eyes and mucous membranes (caustic). Breathing of atomized mist may cause bronchial irritation (caustic). Use low-pressure sprayer. Extended exposure may dry natural oils of skin and cause skin irritation (caustic).		
Carcinogenicity:	NTP? N/A	IARC Monographs? N/A	OSHA Regulated? N/A
Signs and Symptoms of Exposure	Burning and itching in nose and throat (inhalation if atomized). Pain, redness and tearing (eye exposure), itching or burning (prolonged skin exposure).		
Medical Conditions Generally Aggravated by Exposure	Asthma and lung diseases, skin diseases.		
Emergency and First Aid Procedures	Flush eyes with water for 15 minutes. If ingested, do not induce vomiting. Drink large amounts of milk or water. Call a physician immediately. Remove contaminated clothing.		

SECTION VII – PRECAUTIONS FOR SAFE HANDLING USE

Steps to Be Taken in Case Material is Released or Spilled	Clean up with water.
Waste Disposal Method	Observe all local, state and federal regulations. May be flushed down a sanitary sewer with large volumes of water.
Precautions to Be Taken in Handling and Storing	N/A
Other Precautions	Floors may become slippery during application of the Ashford Formula.

SECTION VIII – CONTROL MEASURES

Respiratory Protection (Specify Type)	Use NIOSH approved mist respirator if atomized.		
Ventilation Not required unless atomized.	Local Exhaust	Use with adequate ventilation.	Special
	Mechanical (General)		Other
Protective Gloves Use rubber gloves where extended contact may occur.	Eye Protection Avoid contact with eyes.		
Other Protective Clothing or Equipment	N/A		
Work/Hygienic Practices	Wash hands after handling. Wash contaminated clothing before reuse.		

APPENDIX II-B-2

NELSON BUILDING FLOOR SLAB INSPECTION

APPENDIX II-B-2. NELSON BUILDING FLOOR SLAB INSPECTION



13 October 1997

Perma-Fix of Florida, Inc.
Attention: **Mr. George Harder**
1940 NW 67th Place
Gainesville, FL 32653

RE: **Floor Slab Inspection**
Nelson Building, Perma-Fix Plant
Gainesville, Florida

Gentlemen:

At your request Bodo and Associates, Inc. performed an evaluation of the floor at the Nelson Building located at the Perma-Fix Plant in Gainesville, Florida. This letter presents our findings and opinions.

The purpose of our work was to assess the capacity of the existing floor slab to support the loads due to storage of hazardous and radioactive waste. The materials are stored in drums on pallets with four drums per pallet. Each drum weighs a maximum of 800 lb when full. Two pallets may be stacked on top of each other. The pallets are moved around on a forklift with a rated capacity of 6000 lb.

Five core samples were drilled in order to verify the thickness of the slab. The sampling points were located in the approximate center of the floor area and as near to the four corners as was practical and accessible. The subgrade was also evaluated qualitatively at each of the five locations by measuring the distance that a $\frac{3}{4}$ " diameter steel rod moved through under ten hammer blows.

Visual inspection of the general floor area revealed no significant cracks or other signs of distress. Concrete quality, as seen in the core samples, appeared to be good, with a fairly uniform distribution of coarse aggregate and no large voids or air pockets. The slab has welded wire fabric reinforcement which is generally located near the bottom. Slab thickness varied from 4" to 6½" with the average estimated as 5". The subgrade appeared to be uniform and dense.

728 NW 23rd Avenue

New Area Code: 352

◆ (904) 378-8806 ◆ FAX (904) 378-6488

Mailing Address: P.O. Box 698, Gainesville, Florida 32602

APPENDIX II-B-2. NELSON BUILDING FLOOR SLAB INSPECTION

Perma-Fix of Florida, Inc.
13 October 1997
Page 2


The slab was analyzed for the loads using procedures derived from *Slab Thickness Design for Industrial Concrete Floors on Grade*, a publication of the Portland Cement Association. The modulus of subgrade reaction was conservatively assumed as 250 pci. The modulus of rupture of concrete was taken as 530 psi.

Results of the numerical analysis imply a factor of safety with respect to flexural fatigue failure of about 1.7 which is the recommended value for moderate-to-heavy traffic. A value of 2.0 would permit unlimited repetitions of the design load.

Based on our observations and analysis we conclude that the slab can be expected to continue to perform satisfactorily as described above.

We appreciate the opportunity to provide our services to you. If you have any questions or require additional assistance, please do not hesitate to call.

Sincerely,
BODO AND ASSOCIATES, INC.


Attila A. Bodo, P.E. 10-20-97
President

APPENDIX II-B-2. NELSON BUILDING FLOOR SLAB INSPECTION

**DARABI
AND
ASSOCIATES, INC.**

Environmental Consultants

Suite A • 730 North Weido Road, Gainesville, Florida 32601 • Phone: 904/378-6533

December 1, 1989

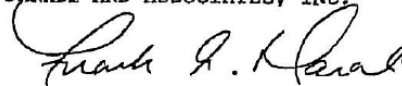
Mr. Dennis Fleetwood
Quadrex Environmental
1940 N.W. 67th Place
Gainesville, Florida 32606

Dear Dennis:

Attached is the structural review of the slab by Bodo & Associates. Please include this in the package that is being prepared for submittal to the Department of Environmental Regulation.

Sincerely,

DARABI AND ASSOCIATES, INC.




Frank A. Darabi, P.E.
President

FAD/ns[514]

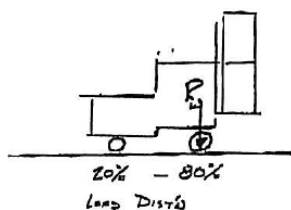
APPENDIX II-B-2. NELSON BUILDING FLOOR SLAB INSPECTION

BODO & ASSOCIATES, INC.	
DESIGN CRITERIA	Designed by: DWG Checked by: AAB Date Checked: 29 Nov 84

1. Project Number: 193-00-04
2. Project Name: QUINTREX HPS: STORAGE AREA SLAB
3. Location: DAINVILLE, FL
4. General Use of Structure:
STORAGE AREA
5. Applicable Building Codes, Design Standards and Publications:
BUILDING CODE REQUIREMENTS FOR REINFORCED CONCRETE, ACI 318-83 (26)
NAVFAC DIV 7.2 FOUNDATIONS & EARTH STRUCTURES
STANDARD BUILDING CODE, 1988
6. Design Loads:
STORAGE DRUMS : 375[#]/EA.
FORK LIFT : 7085[#]
7. Assumptions:
 $f_y = 60 \text{ ksi}$
 $f'_c = 3000 \text{ psi}$
MODULUS OF SUBGRADE REACTION: 300 pci
8. Checklists Required:


4.2.90

APPENDIX II-B-2. NELSON BUILDING FLOOR SLAB INSPECTION



$$R_w = .8 \left[\frac{1}{2} (7100 + 2(375)) \right] = 3140^{\text{lb}}$$

$$R_w = 1.7 \times 3140^{\text{lb}} = 5340^{\text{lb}} \text{ say } 6000^{\text{lb}}$$

$k = 300 \text{ pci}$ CONCRETE PLACED OVER EXISTING ASPHALT PAVEMENT

FROM FIG 23-8 HIGHWAY ENGINEERING HANDBOOK (ORIGINALLY IN "CONCRETE PAVEMENT DESIGN", 1951, PCA, FIG. E. P. 20)

FOR 6" SLAB w/ 6000^{lb} wheel load if $k = 300 \text{ pci}$
the flexural stress in the concrete $\sim 310 \text{ psi}$

$$\text{Modulus of rupture} = 7.5 \sqrt{f'_c} = 7.5 \sqrt{3000} = 410 \text{ psi} > 310 \text{ psi} \text{ OK}$$

Therefore the slab should perform satisfactorily.

17-00-04

APPENDIX II-C-1

WASTE STORAGE TANK EVALUATION AND CERTIFICATION

APPENDIX II-C-1. WASTE STORAGE TANK EVALUATION AND CERTIFICATION

Lewis Engineering and Consulting, Inc.

2106 NW 67th Place, Suite #2
Gainesville, FL 32653

Richard O. Lewis, P. E.

(352) 375-7687
Facsimile: (352) 375-7689

November 19, 2004

Mr. Ken Shoemake
Environmental, Health and Safety Manager
PermaFix Environmental Services
1940 N.W. 67th Place
Gainesville, FL 32653

Subj: Inspection and Certification of 3,000 Gallon Stainless Steel Storage Tank

Dear Mr. Shoemake:

A visual and ultrasonic thickness inspection of the 3,000 gallon Type 316 stainless steel solvent storage tank was performed on November 4, 2004. Information provided regarding the tank manufactured by Tampa Tank, Inc. in 1999 and installed at PermaFix was that it had never been put into service since date of installation. A design submittal prepared by the tank manufacturer, Drawing No. D-99085-01, was utilized in conducting the tank inspection and verifying that the tank complied with the manufacturer's specifications.

It was readily apparent via visual inspection of the interior and exterior of the tank that it had never been in service. All surfaces were in the as-manufactured condition aside from the presence of dust on the exterior of the tank. All dimensions recorded complied with the tank dimensions specified in the shop drawing. The tank length was measured to be 21'-0", the diameter was 5'-0", and the head and shell thickness as determined by pulse echo ultrasonic thickness testing, calibrated for austenitic stainless steel, was nominally 0.250 inch. All appurtenances and supports were located as indicated on the shop drawing.

On the basis of this inspection and testing, I certify that the 3,000 gallon stainless steel tank is in new condition, and that the attached shop drawing by the tank manufacturer accurately reflects the as-built construction of the tank.

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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering

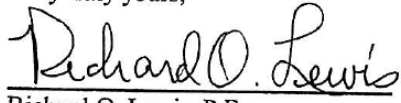
APPENDIX II-C-1. WASTE STORAGE TANK EVALUATION AND CERTIFICATION

**CERTIFICATION OF PERMAFIX 3,000 GALLON STAINLESS STEEL STORAGE TANK
NOVEMBER 19, 2004**

Page 2

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.

Very truly yours,



Richard O. Lewis, P.E.

NOVEMBER 19, 2004

Attachment: Tank Shop Drawing

Lewis Engineering and Consulting, Inc.

APPENDIX II-C-2

FOUNDATION CALCULATIONS

APPENDIX II-C-2. FOUNDATION CALCULATIONS

No. 5505
Engineer's Computation Pad

DESIGN CALCULATIONS PERMIT - FIA FLORIDA

Tank Weight

$$\begin{aligned} W_s &= \text{Weight of shell} \\ &= G_{cs} \times (t_s \times \pi \times D \times L) \\ &= 0.283 (.25 \times \pi \times 5 \times 21) \times 144 \\ &= 3360 \text{ lb.} \end{aligned}$$

$$\begin{aligned} G_{cs} &= 0.283 \text{ lb/in}^3 \\ t_s &= 0.25 \text{ in} \\ D &= 5' \\ L &= 21' \end{aligned}$$

$$\begin{aligned} W_e &= \text{Weight of tank ends} \\ &= G_{cs} \times (t_e \times \pi \times \frac{D^2}{4}) \times 2 \\ &= 0.283 (.25 \times \pi \times \frac{25}{4}) 144 \times 2 \\ &= 400 \text{ lb.} \end{aligned}$$

$$t_e = 0.25 \text{ in}$$

$$W_T = \text{Weight of tank} = 3360 + 400 = 3760 \text{ lb.}$$

Tank Contents Weight

$$\begin{aligned} W_c &= \text{Full tank at Specific Gravity of 1.05} \\ &= \pi \times \frac{D^2}{4} \times L \times SG \times 62.4 \\ &= 3.1416 \times \frac{25}{4} \times 21 \times 1.05 \times 62.4 \\ &= 27000 \text{ lb.} \end{aligned}$$

Tank Fittings including Tank Support Weights

$$\begin{aligned} W_F &= 15\% \text{ of tank weight} \\ &= 3760 \times 0.15 = 560 \text{ lb.} \end{aligned}$$

APPENDIX II-C-2. FOUNDATION CALCULATIONS

No. 5505
Engineer's Computation Pad



Tank Support Bearing Pressure

3 Carbon Steel Supports Used with a concrete surface bearing area of 12" x 7'8"

$$\begin{aligned}\text{Bearing Pressure} &= \frac{W_T + W_C + W_F}{1' \times 7.67' \times 3} \\ &= \frac{3760 + 27000 + 560}{3 \times 7.67 \times 144} \\ &= 9 \text{ psi}\end{aligned}$$

Compressive Strength of Concrete = 3000 psi

∴ OK.

Soil Bearing Load

$$\text{Soil Load} = W_T + W_C + W_F + W_{\text{conc. base}} + W_{\text{walls}} + W_{\text{footings}}$$

$$W_{\text{conc. base}} = 4" \times 38.67' \times 9.00 \times \frac{1}{12} \times \frac{150 \text{ lb}}{\text{ft}^3} = 17400 \text{ lb}$$

$$W_{\text{footings}} = 8" \times 7.75' \times 1'8" \times \frac{150 \text{ lb}}{\text{ft}^3} \times 3 = 3870 \text{ lb}$$

$$W_{\text{walls}} = 8' \times (2 \times (38'8" + 7'8")) \times \frac{78 \text{ lb}}{\text{ft}^2} = 57800 \text{ lb}$$

$$\text{Area of Base} = 38.67 \times 9 = 348 \text{ ft}^2$$

$$\begin{aligned}\text{Soil Bearing Pressure} &= \frac{\text{Soil Load}}{\text{Area}} \\ &= \frac{3760 + 27000 + 560 + 17400 + 57800 + 3870}{348} \\ &= \frac{110390}{348} = 317 \text{ lb/ft}^2\end{aligned}$$

Average bearing capacity of soil = 2000-4000 lb/ft²

∴ OK

APPENDIX II-C-2. FOUNDATION CALCULATIONS

No. 5505
Engineer's Computation Pad



3000 Gallon Tank

Tank built 1983, Installed September, 1983

Bodo Ultrasonic Measurements September, 1995

Average shell thickness = 0.228 in.

Average corrosion rate

$$= \frac{0.250 - 0.228}{12} = 0.0018 = 0.002 \text{ in/year}$$

Minimum Structural Thickness = 0.125 in.

$$\text{Estimated tank life} = \frac{\text{Lowest Thickness} - \text{min. struct. Thick.}}{\text{Avg. Corrosion rate}}$$

Lowest thickness reading (1995) = 0.210 in.

$$\text{Estimated tank life} = \frac{0.210 - 0.125}{0.002} = 42.5 \text{ years.}$$

APPENDIX II-C-3

SECONDARY CONTAINMENT CERTIFICATION

APPENDIX II-C-3. SECONDARY CONTAINMENT CERTIFICATION

**DARABI
AND
ASSOCIATES, INC.**

Environmental Consultants

Suite A, 730 North Waldo Road, Gainesville, Florida 32601

Phone: 904/376-6533

January 21, 1988

Mr. Ashwin Patel
Hazardous Waste Section
Dept. of Environmental Regulation
3426 Bills Road
Jacksonville, FL 32207

RE: Quadrex HPS
Secondary Containment Certification

Dear Mr. Patel:

Please be advised that we have examined and reviewed the secondary containment holding capacity for the 3000 gallon storage tank at the Quadrex Facility in Gainesville, Florida.

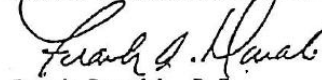
Our calculations indicate that the secondary containment should have a total capacity of 4152 gallons to contain the content of the tank (3000 gallons) and rainfall generated from a 25 year, 24 hour storm (7.66 inches or 1152 gallons). The secondary containment is capable of holding 4871 gallons of liquid.

The secondary containment structural integrity has been reviewed by the structural engineering consulting firm of Bodo and Associates. Their certificate is attached for your review.

Should you have any questions or require any additional information, please let me know.

Sincerely,

DARABI & ASSOCIATES, INC.


Frank Darabi, P.E.
President

FD/sb

xc: Ben Warren

APPENDIX II-C-3. SECONDARY CONTAINMENT CERTIFICATION

3720 N.W. 43rd Street
Gainesville, Florida
Tel: (904) 378-8806



Mailing Address:
P.O. Box 698
Gainesville, FL 32602

January 11, 1988

Mr. Frank A. Darabi, PE
Darabi and Associates, Inc.
Suite A
730 North Waldo Road
Gainesville, FL 32601

RE: Containment Structure at Quadrex HPS
Gainesville, Florida

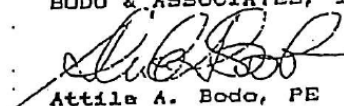
Dear Frank:

Pursuant to your request and authorization, Bodo & Associates, Inc. performed a structural evaluation of the existing containment structure referenced above. The evaluation was limited to a determination of the adequacy of the existing wall to withstand the lateral fluid pressure that would result from a rupture of the storage tank. Information and details of the structure were provided by you.

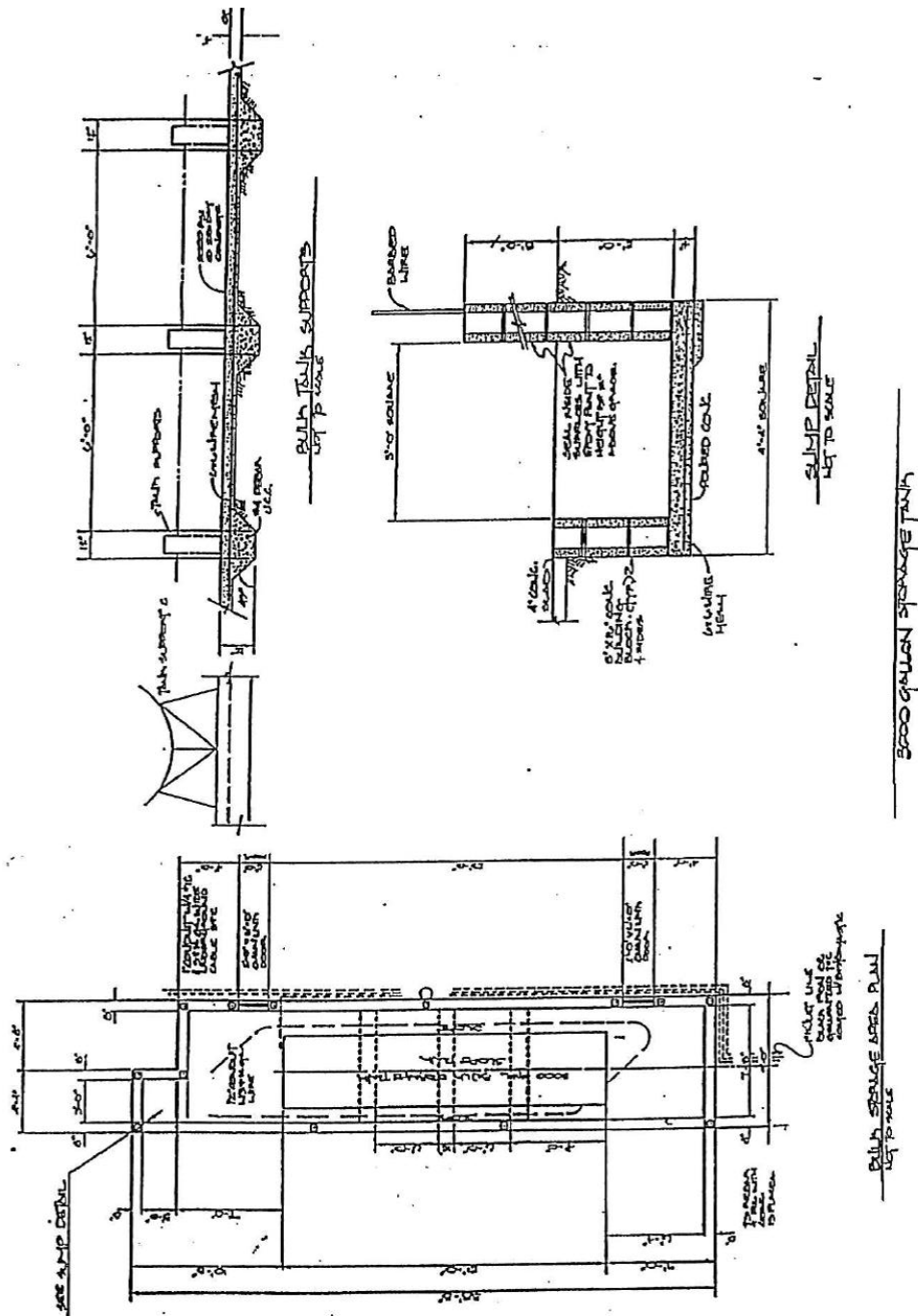
Based on our investigation we conclude that the wall will safely resist a lateral pressure due to a liquid height of 19 inches.

We appreciate this opportunity to provide our services to you. If you have any questions, or require any additional assistance, please do not hesitate to call.

Sincerely,
BODO & ASSOCIATES, INC.


Attila A. Bodo, PE
President





APPENDIX II-C-4

EXAMPLE CONCRETE SEALER/HARDENER SPECIFICATIONS

APPENDIX II-C-4. EXAMPLE CONCRETE SEALER/HARDNER SPECIFICATIONS



U.S. Department of Labor
Occupational Safety and Health Administration
(Non-Mandatory Form)
Form Approved
OMB No. 1218-0072

Material Safety Data Sheet

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200.
Standard must be consulted for specific requirements.

IDENTITY (As Used on Label and List) Ashford Formula	Note: Blank spaces are not permitted. If any item is not applicable or no information is available, the space must be marked to indicate that.
--	--

SECTION I

Manufacturer's Name Curecrete Chemical Company, Inc.	Emergency Telephone Number 800-728-2482 International Emergency Number (call collect) 801-629-0667 Telephone Number for Information 801-489-5663
Address (Number, Street, City, State, and Zip Code) 1203 West Spring Creek Place Springville, Utah 84663	Date Prepared September 19, 2012

SECTION II – HAZARDOUS INGREDIENTS/IDENTITY INFORMATION

Hazardous Components (Specific Chemical Identity: Common Name(s))	OSHA PEL	ACGIH TLV Recommended	Other Limits	% (Optional)
N/A – Water-based, catalytically modified inorganic sodium silicate material.				

SECTION III – PHYSICAL/CHEMICAL CHARACTERISTICS

Boiling Point	230°F (110°C)	Specific Gravity (H ₂ O = 1)	1.1 - 1.2 @ 20°C
Vapor Pressure (mm Hg.) 25°F (-3.89°C)	23.756	Melting Point	N/A
Vapor Density (AIR=1) 25°F (-3.89°C)	0.9996	Evaporation Rate Butyl Acetate = 1 (Water = 1)	1
Solubility in Water	100%	pH	11.3 - 11.6

Appearance and Odor **Clear liquid, odorless**

SECTION IV – FIRE AND EXPLOSION HAZARD DATA

Flash Point (Method Used) N/A	Flammable Limits N/A	LEL	VEL
Extinguishing Media Non-flammable (water-based)			
Special Fire Fighting Procedures N/A			
Unusual Fire and Explosion Hazards N/A			

SECTION V – REACTIVITY DATA

Stability	Unstable		Conditions to Avoid
	Stable	X	N/A

APPENDIX II-C-4. EXAMPLE CONCRETE SEALER/HARDNER SPECIFICATIONS

Incompatibility (Materials to Avoid) Strong acids			
Hazardous Decomposition or By Products N/A			
Hazardous Polymerization	May Occur		Conditions to Avoid
	Will Not Occur	X	N/A
SECTION VI – HEALTH HAZARD DATA			
Route(s) of Entry:	Inhalation? If atomized.	Skin? N/A	Ingestion? Irritation of intestinal tract.
Health Hazards (Acute and Chronic)	Avoid direct contact with eyes and mucous membranes (caustic). Breathing of atomized mist may cause bronchial irritation (caustic). Use low-pressure sprayer. Extended exposure may dry natural oils of skin and cause skin irritation (caustic).		
Carcinogenicity:	NTP? N/A	IARC Monographs? N/A	OSHA Regulated? N/A
Signs and Symptoms of Exposure	Burning and itching in nose and throat (inhalation if atomized). Pain, redness and tearing (eye exposure), itching or burning (prolonged skin exposure).		
Medical Conditions Generally Aggravated by Exposure	Asthma and lung diseases, skin diseases.		
Emergency and First Aid Procedures	Flush eyes with water for 15 minutes. If ingested, do not induce vomiting. Drink large amounts of milk or water. Call a physician immediately. Remove contaminated clothing.		
SECTION VII – PRECAUTIONS FOR SAFE HANDLING USE			
Steps to Be Taken in Case Material is Released or Spilled	Clean up with water.		
Waste Disposal Method	Observe all local, state and federal regulations. May be flushed down a sanitary sewer with large volumes of water.		
Precautions to Be Taken in Handling and Storing	N/A		
Other Precautions	Floors may become slippery during application of the Ashford Formula.		
SECTION VIII – CONTROL MEASURES			
Respiratory Protection (Specify Type)	Use NIOSH approved mist respirator if atomized.		
Ventilation Not required unless atomized.	Local Exhaust	Use with adequate ventilation.	Special
	Mechanical (General)		Other
Protective Gloves Use rubber gloves where extended contact may occur.	Eye Protection Avoid contact with eyes.		
Other Protective Clothing or Equipment	N/A		
Work/Hygienic Practices	Wash hands after handling. Wash contaminated clothing before reuse.		

APPENDIX II-C-5

SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN

(PERMA-FIX OF FLORIDA, INC., APRIL 2006, REVISED AUGUST 2019)

SPILL PREVENTION, CONTROL AND COUNTERMEASURE PLAN

PERMA-FIX OF FLORIDA, INC.

**APRIL 2006
Revised August 2019**

Prepared for:

**PERMA-FIX OF FLORIDA, INC.
1940 N.W. 67TH PLACE
GAINESVILLE, FLORIDA 32653**

Prepared by:

**PERMA-FIX OF FLORIDA, INC.
1940 N.W. 67TH PLACE
GAINESVILLE, FLORIDA 32653**

**SPILL PREVENTION, CONTROL
AND COUNTERMEASURE PLAN**

**PERMA-FIX OF FLORIDA, INC.
1940 N.W. 67TH PLACE
GAINESVILLE, FLORIDA 32653**

MANAGEMENT APPROVAL

I certify that the manager of this facility has the authority to commit resources as necessary to implement this Spill Prevention, Control and Countermeasure Plan.

This Spill Prevention, Control and Countermeasure Plan will be implemented as herein described.

SIGNATURE: 

DATE: 08/21/19

NAME: Raymond Whittle

TITLE: General Manager

PROFESSIONAL ENGINEER'S CERTIFICATION

I hereby certify that I, or my authorized representative, have examined the Perma-Fix of Florida, Inc. Gainesville Facility and, being familiar with the provisions of 40 CFR 112, attest that this Spill Prevention, Control and Countermeasure Plan has been prepared in accordance with good engineering practices.

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.

Signature:

Printed Name:

Title:

Company:

P.E. License No.:

Date:

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SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

SECTION 1

INTRODUCTION

In December 1973, the United States Environmental Protection Agency (U.S. EPA) promulgated regulations that established procedures and required equipment to prevent the discharge of oil from non-transportation-related facilities into or upon the navigable waters of the United States. These regulations, which are codified in 40 CFR 112, were issued pursuant to Section 311(j)(1)(c) of the Federal Water Pollution Control Act (as amended) and were amended effective August 16, 2002. The regulations apply to facilities that store petroleum materials in excess of 1,320 gallons above ground (only containers of 55 gallons or more used for storage are counted) and/or facilities that store greater than 42,000 gallons of petroleum materials under ground. This Spill Prevention, Control and Countermeasure Plan (SPCCP or Plan) has been prepared for the petroleum storages within the Perma-Fix of Florida, Inc. (PFF) Facility located at 1940 NW 67th Place, Gainesville, Florida. Table 1 provides a summary of the petroleum product storages provided at this facility. Figure 1 provides a location map for the facility. Figures 2 and 3 show the layout and the drainage from the facility.

Section 2 of this SPCCP provides detailed information regarding the Facility and its storage locations. Section 3 provides a discussion of Facility conformance to the regulations in the format of the regulations. Section 4 provides a spill response procedure to be implemented in the event of a spill. Finally, Section 5 provides information regarding the necessity and timing required for SPCC Plan updates.

SECTION 2

FACILITY IDENTIFICATION

FACILITY:	PERMA-FIX OF FLORIDA, INC.
------------------	----------------------------

FACILITY NAME & LOCATION: Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, Florida 32653

NAME OF RESPONSIBLE PERSON AT THE FACILITY: Raymond Whittle, General Manager

DESCRIPTION OF ACTIVITIES: This Facility is a mixed and hazardous waste management facility. Materials received are tested, classified and bulked. All wastes are ultimately shipped to other facilities for recovery, reuse or disposal.

PETROLEUM STORAGE CAPACITY: Miscellaneous totes and drums, having a total capacity of about 161,370 gallons of hazardous waste. The majority of these wastes are not petroleum materials. The largest tank has a capacity of 3000 gallons.

GEOGRAPHIC LOCATION: Latitude N 29° 43' 0"
Longitude W 82° 20' 58"

DESCRIPTION OF NEARBY NAVIGABLE WATER THAT COULD BE IMPACTED: Drainage from the site enters open stormwater ditches that drain to Hidden Lake. The area around Hidden Lake slopes to the east where low lying marsh and shallow lake areas including Hidden Lake drain to Hatchet Creek which drains to Newnan Lake.

YEAR OF INITIAL OPERATION October, 1985

FACILITY DESCRIPTION:

Perma-Fix of Florida, Inc. (PFF), a subsidiary of Perma-Fix Environmental Services, Inc. is located in Alachua County in an industrial area of Gainesville, Florida. Figure 1 shows the location of the Facility, which is situated on approximately 6.5 acres. Figures 2 and 3 show the overall Facility layout, including stormwater outfalls and the site drainage for the Facility.

PFF Facility is a mixed and hazardous waste management Facility subject to the treatment, storage, and disposal (TSD) Facility requirements under the Resource Conservation and Recovery Act (RCRA). Although the Facility is permitted to store up to 161,370 gallons of hazardous waste, only a small quantity of these wastes is petroleum materials. The Facility has one aboveground tank which has never been used, but is included here for completeness. Drums

and totes are used for bulk storage of hazardous waste. There are three truck/transport loading/unloading areas.

Waste managed on-site includes a wide variety of hazardous, industrial, universal, mixed, radioactive-only and non-hazardous wastes. Currently, the Facility blends hazardous, non-hazardous, and mixed wastes into fuels for use in off-site incinerators, industrial furnaces, etc., for energy use. The Facility also consolidates, repackages, and sorts waste for shipment off-site for treatment and/or disposal. Current activities at the facility also include the receipt and non-permanent storage of mixed wastes pursuant to a license issued by the Florida Department of Health, Bureau of Radiation Control. Current treatment processes at the facility include thermal desorption, fuel blending, chemical and physical extraction, chemical oxidation/reduction, stabilization, fixation, microencapsulation, lab pack decommissioning, and Perma-Fix of Florida, Inc. Processes (i.e., PF-I® and PF-II®), as well as treatment of hazardous debris in accordance with certain alternative treatment standards specified in 40 CFR 268.45. The Facility also conducts transfer facility operations for used oil regulated under FAC 62-710 (and 40 CFR 279).

The waste managed at the Facility will come from a variety of sources, including medical and research institutions, government agencies, paint and coatings manufacturers and users, solvent users, and other industries that generate hazardous wastes. Waste received will come from Large Quantity, Small Quantity, and Conditionally Exempt Small Quantity Generators. In addition, waste collected during various county or other household hazardous waste collection campaigns will be managed at the Facility.

The following information generally describes the waste management activities that are being renewed or are proposed pending permit approval:

- The Treatment and Operations Building is used to receive, store, and treat mixed wastes via thermal desorption, chemical oxidation/reduction, solvent extraction, stabilization, blending, bulking, solidification and microencapsulation. Future solvent recycling (RCRA exempt) via a solvent recovery distillation unit is also planned for this area. The current PF-II treatment equipment will be replaced with a continuous PF-II thermal desorption unit, including batch-operated feed preparation equipment.
- The Processing and Storage Building is used to receive, store, and blend hazardous and mixed waste into fuel for use at off-site facilities and to bulk wastes for transfer to off-site treatment and/or disposal facilities.
- The Liquid Scintillation Vials (LSV) Processing and Waste Storage Warehouse, in addition to the storage of hazardous and non-hazardous waste, is used to receive, empty, and decontaminate LSVs and other small containers, and to treat hazardous waste debris via chemical and physical extraction (e.g., water washing, liquid-phase solvent extraction).

TABLE 1

SUMMARY OF STORAGE AND TRUCK LOADING LOCATIONS

LOCATION	MAXIMUM QUANTITY STORED (GALLON)	MATERIAL STORED	SECONDARY CONTAINMENT
Processing and Storage Building (PSB)	72,105 (718 gallon totes and 55 gallon drums)	Containerized hazardous waste (not necessarily petroleum materials)	13,920 gallons. Curbed and sloped concrete slabs and sumps with 4" high rollover berms inside a building.
Treatment and Operations Building (TOB)	35,200 (718 gallon totes and 55 gallon drums)	Virgin chemical storage and containerized hazardous waste (not necessarily petroleum materials)	5,755 gallons. Concrete slab with 6" high concrete berms completely under roof.
LSV Processing and Waste Storage Warehouse	54,350 (718 gallon totes and 55 gallon drums)	Virgin chemical storage, used oil and containerized hazardous waste (not necessarily petroleum materials)	6,547 gallons. Concrete slab with 2.75" high rollover berms inside a building.
3000 gallon steel AST in PSB	3000	Liquid mixed waste including ethanol, toluene or xylene	4870 gallon coated concrete block with coated poured concrete floor (under roof).
TOB loading dock	None	None, drums and totes are offloaded	50,000 gallons
LSV Warehouse loading dock	None	None, drums and totes are offloaded	None. Manual closing of outfalls to maintain containment is required during loading.
PSB tanker loading	None	None, drums and containers are loaded into tanker trucks	None. Manual closing of outfalls to maintain containment is required during loading.
Maintenance storage area	10 drums and parts washer	Miscellaneous lubricating oils, hydraulic fluid and diesel for parts washer	Containment pallets, inside building containment system.

TABLE 2
POTENTIAL SPILLS

Source of Spill	Location	Potential Type Of Failure	Estimated Quantity (gallons)	Rate of Spill (gal/hr)	Direction Of Spill	Secondary Containment	Potential for Occurrence
Drums/Containers	PSB, TOB,LSV, maintenance, virgin chemical storage	Complete spillage or rupture of container	55 to 450	450	Inside secondary containment	Concrete floor with curbing	Low as drums are handled properly
		Leak/puncture	5 to 450	Less than 450			Low to moderate as drums/containers are secured when moved around and inspected periodically
Truck Loading	PSB tanker loading area	Tanker leakage	Varies 1 to 6,000 gallons	Varies	Onto pavement through the facility to the north drainage ditch or the detention basins	None. Manual closing of outfall to maintain containment is required during loading	Low as personnel are always present
		Transfer hose uncoupling or breakage	Varies 1 to 6,000 gallons	Varies			Low due to monthly inspections and high visibility; quick disconnect provided
Truck Unloading Drums and Containers	LSV warehouse loading dock	Leak/puncture	55 to 450	450	Onto pavement to the north drainage ditch	None	Low as drums are handled properly
	TOB loading dock					50,000 gallons	
Aboveground Storage Tank	PSB	Overfilling	Varies	Varies	Inside secondary containment	4870 gallons	Low due to loading procedures
		Tank leakage or failure	3,000	Varies	Inside secondary containment		Low due to monthly inspections and high visibility

Figure 1

Figure 2

Figure 3

SECTION 3

FACILITY CONFORMANCE

Section 112.4 requires certain notifications be made if a facility has a discharge of more than 1,000 gallons of oil in a single discharge or more than 42 gallons of oil in each of two discharges. This section also requires a facility amend the Plan if the Regional Administrator requests amendments to the Plan.

This Facility will make required notification when appropriate and will either amend the SPCCP when requested by the Regional Administrator or will appeal.

Section 112.5(a) requires the amendment of the SPCCP when there is a change to the Facility design, construction, operation, or maintenance that materially affects its potential for discharge.

This requirement is discussed in Section 5, SPCCP Updates.

Section 112.5(b) requires a review and evaluation of the SPCCP at least once every five years. The completion of the review must be documented and must include a statement as to whether the SPCCP will be amended.

The five-year review is noted in Section 5. A standard form to document this review is provided in Section 5.

Section 112.5(c) requires a Professional Engineer certify any Technical Amendments to this Plan.

Any Technical Amendments to this Plan will be certified by a Professional Engineer.

Section 112.7(a)(1) requires a discussion of the Facility's conformance with SPCCP requirements.

The PFF SPCCP developed herein shall conform to the regulatory format provided by the regulation. Full approval of management is included in the SPCCP's cover documents.

Section 112.7(a)(2) requires a description of non-conforming issues and the equivalent measures adopted by the Facility.

Any issues of non-conformance are described in the discussion provided in response to the specific requirement.

Section 112.7(a)(3) requires a physical description of the Facility, including site diagrams showing container storage locations and contents, transfer stations, piping and buried tanks;

This information is provided in Section 2 of this SPCCP, with specific reference to Figures 1, 2, and 3.

i) information defining the types and capacities of oil storage;

This information is provided by Table 1 in Section 2 of this SPCCP.

ii) a procedure for the prevention of discharges during routine handling of products;

This procedure is provided in Appendix A in a format that may be copied and laminated for posting and reference in product-handling areas.

iii) a description of secondary containment for storage sites;

All interior storage tanks, drums and totes containing petroleum materials are provided with secondary containment consisting of an impervious floor and curbing of sufficient height.

The procedure for PSB tanker loading requires that the outfall from the containment area be manually closed during loading. The truck unloading areas have adequate secondary containment.

iv) procedures for the discovery of, control of, and response to a discharge;

These procedures are provided by Section 4 of this SPCCP.

v) methods of disposal of recovered materials;

Methods for disposal of recovered material are also considered in Section 4.

vi) and, a contact list and phone numbers for appropriate individuals and agencies to be notified in the event of a spill.

This contact list is provided in Appendix B and may be copied and laminated for posting in key areas.

Section 112.7(a)(4) requires provision of guidance to Facility staff that will assure adequate reporting of any spill.

Appendix C provides a Spill Response Record Form that addresses each required data subject. Facility personnel are trained in completing the form and communicating to the relevant agencies. Use of this form is discussed in Section 4 of this SPCCP.

Section 112.7(a)(5) requires SPCCP organization that simplifies and makes possible ready use of the SPCCP in an emergency.

This SPCCP incorporates training and the use of one-page sections that can be easily referenced and used. A training documentation form is provided in Appendix F.

Section 112.7(b) requires a prediction of spill flow direction, rates of flow, and quantities that could be discharged.

Details regarding possible spills of petroleum products from this Facility, with respect to each source, location, type of failure, quantity, spill rate, direction, type of containment, and potential, are provided in Table 2 and the drainage sketches, Figures 2 and 3.

Based upon natural and engineered drainage and containment provisions, the probability of a spill or release of product beyond containment structures is considered to be low. In the unlikely event of a major release of material, it appears (based upon the slope of the Facility and topography of the area) that a spill at the Truck Unloading Area would drain through Outfalls 001, 002 or 003 to the stormwater ditch along the north property line.

Section 112.7(c) requires provision of containment system and/or diversionary structures or equipment capable of containing a spill and must be constructed so that any discharge from a primary containment system will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following or its equivalent: dikes, berms, retaining walls, curbing, culverting, gutters, weirs, booms, other barriers, spill diversion ponds, or sorbent materials.

This Facility provides secondary containment as described by Table 1.

Section 112.7(d) requires an explanation of impracticability, conduct of periodic integrity testing of bulk containers, conduct of periodic integrity and leak testing of valves and piping, development of an oil spill contingency plan in cooperation with local authorities, and a written commitment of adequate response resources if structural secondary containment can not be provided.

This action is considered unnecessary due to the secondary containment provided.

Section 112.7(e) requires written procedures and records for periodic inspection and tests of the storage areas and containers.

Appendix D provides an optional inspection form for conducting inspections aimed at preventing and detecting spill threats. However, as long as inspections are conducted and documented per the RCRA permit, this inspection form need

not be used. Records of the RCRA inspections are kept on-site for a minimum of three years.

Section 112.7(f)(1), (2), and (3) require training of oil-handling personnel at least annually and designation of a person at the Facility accountable for discharge prevention.

The person designated as being accountable for discharge prevention is the Environmental Health and Safety Manager (EM). The EM or designee will instruct oil-handling personnel in the proper operation and maintenance of equipment to prevent petroleum spills.

Initial training: The initial training sessions will include a review of the SPCCP. Oil-handling personnel will be trained in the appropriate responses to spills, in the proper loading and transfer of liquids, in the operation and maintenance of equipment to prevent the discharge of liquids, discharge procedure protocols, general facility operations, and in applicable pollution control laws, rules, and requirements. The training will also include the use of the Spill Response Record Form from Appendix C and notification procedures.

Briefings: Annual refresher training sessions are held to assure that oil-handling personnel are familiar with the SPCCP. Past spill events (if applicable) and failures are described, malfunctioning components are discussed, and recently developed or changed precautionary measures are addressed. Appendix F provides a typical form for recording attendance at such briefings.

General Training: The SPCCP Training may be combined with similar training to meet other regulatory requirements. The facility has a RCRA permit to handle hazardous wastes and conducts extensive training for safe handling of these wastes. This training includes initial, annual update, and on-the-job training sessions and includes emergency response procedures for spills and other situations. This training includes steps taken to control spill events.

Section 112.7(g)(1) requires facilities handling, processing, and storing oil to be fully fenced with entrance gates locked or guarded, when the facility is unattended.

The Facility is surrounded by a high-quality chain-linked fence topped with three strands of barbed wire. The fence is in good condition and is periodically inspected. Entry into the facility is controlled by gate access. The entrance gates are closed and locked at all times, and only authorized personnel are allowed into the facility.

Section 112.7(g)(2) requires securing of valves, which may permit direct outward flow of the containers contents to the surface, to assure remaining in the closed position when not in operation.

The only exterior tank is located inside containment and there is no valve that would permit direct flow from the tank outside the containment.

Section 112.7(g)(3) requires pump starter controls to be locked in the “off” position and to be located at a site accessible only to authorized personnel when the pump is not operating.

The 3000 gallon tank located in the LSV building is not in service. In the event the tank is used for petroleum materials, any pump starter controls will be locked in the “off” position when not in use.

Section 112.7(g)(4) requires pipe loading/unloading connections to be securely capped or blank flanged when not in service or in standby service for an extended time.

All fill openings are capped when not in service.

Section 112.7(g)(5) requires adequate lighting to prevent vandalism and to aid in discovery of discharges during night hours.

PFF has adequate lighting surrounding the Facility. The lighting is such that it would assist in the discovery of spills at night and assist in the prevention of acts of vandalism.

Section 112.7(h)(1) requires quick drainage systems for loading/unloading areas not provided with catchment.

The PSB tanker loading area requires manual closing of the outfall for adequate containment. The PSB tanker loading procedure requires inspection of the loading area after tanker departure and prior to reopening the outfall to assure no spillage has occurred. In the event that spillage is found to have occurred, the spillage will be cleaned up prior to reopening the outfall.

Section 112.7(h)(2) requires measures to prevent vehicles from departing before complete disconnection of transfer lines.

The truck loading/unloading procedure of Appendix A provides that all drivers must assure disconnection of transfer lines before departing the loading/unloading area.

Section 112.7(h)(3) requires inspection of the lower-most drain and all outlets prior to filling and departure of any tank truck to prevent spillage on site or during transit from the site.

The truck loading/unloading procedure of Appendix A provides that all drivers must check all valves and other closures to be sure they are free of leak and closed before departing the loading/unloading area.

Section 112.7(i) requires evaluation of a container for risk of failure due to brittle fracture upon repair, alteration, reconstruction, or change of service.

The stainless steel tank has never been in service, has been inspected and certified to be in “new condition” and brittle failure is not a factor of concern for this tank.

Section 112.8(a) requires compliance with Section 112.7 provisions.

As previously addressed, compliance with Section 112.7 provisions has been established.

Section 112.8(b)(1) requires control of drainage from diked storage areas.

Rainfall accumulation is observed for evidence of oil sheen or other contamination as described in Appendix E prior to discharge.

Section 112.8(b)(2) limits valve use to manual, open-and-closed design valves. Flapper-type drain valves are not allowed.

No flapper-type drain valves are used.

Section 112.8(b)(3) requires design of Facility drainage systems for undiked areas subject to discharge to flow into catchment basins. Catchment basins may not be located in areas subject to periodic flooding.

Undiked areas of this facility are not considered subject to discharges of stored oil or oil being transferred or processed.

Section 112.8(b)(4) requires that a diversion system be provided if Section 112.8(b)(3) cannot be met.

This section is not applicable to the PFF Facility.

Section 112.8(b)(5) requires fail-safe design for systems requiring pumped transfer.

This section is not applicable to the PFF Facility.

Section 112.8(c)(1) requires the use of containers constructed of oil-compatible materials.

The aboveground storage tank and containers used at the PFF Facility are constructed of steel or plastic that is compatible with the material being stored.

Section 112.8(c)(2) requires provision of secondary containment for bulk storage areas for the capacity of the largest container to be stored plus precipitation freeboard.

The secondary containment for bulk storage areas is adequate for the largest tank or container present. Precipitation freeboard is not a concern as all petroleum storages are inside buildings.

Section 112.8(c)(3) requires all dike water discharges to be controlled by: keeping bypass valve closed, inspecting retained rainwater prior to discharge, open and close the valve under responsible management, and keep records of such events.

Rainfall accumulation is observed for evidence of oil sheen or other contamination as described in Appendix E prior to discharge.

Section 112.8(c)(4)&(c)(5) require protection of buried and partially buried metallic storage tanks from corrosion by coatings or cathodic protection backed by periodic leak testing.

PFF has no buried or partially buried petroleum storage tanks. .

Section 112.8(c)(6) requires integrity testing of aboveground containers by frequent visual inspections and by regularly scheduled non-destructive methods. All inspections and tests must be recorded.

The aboveground storage tank at the PFF Facility is visually inspected as described in the RCRA permit application. The inspections are kept on site for a minimum of three years.

The tank capacity is less than 30,000 gallons, is shop-built, and is maintained on an impermeable surface. Non-destructive testing is, therefore, not required. However, the tank was inspected and certified by a PE in 2004.

Section 112.8(c)(7) requires monitoring for oil contamination of internal heating coil discharges to open watercourses or the provision of predischage storage or treatment.

This section is not applicable to the PFF Facility because no internal heating coil systems are present or in use in petroleum storage tanks.

Section 112.8(c)(8) requires engineering of containers to provide for high level alarms, high liquid level pump cutoff, or manning direct level reading devices. Regular testing of liquid level sensing devices is required.

The bulk storage tank at PFF has an intrinsically safe high-level alarm that emits an audible signal and shuts off the power to the tank feed pump when the tank level reaches 80% of its capacity. This alarm is tested on a regular basis.

Section 112.8(c)(9) requires observation of effluent treatment facilities.

There are no plant effluents other than storm water discharged by this facility.

Section 112.8(c)(10) requires prompt correction of visible discharges.

Facility procedures require that any oil or petroleum discharges be investigated and corrected as soon as possible.

Section 112.8(c)(11) requires provision of secondary containment for mobile containers.

All mobile containers holding petroleum materials are stored in areas having adequate secondary containment.

Section 112.8(d)(1) requires cathodic protection and protective wrapping and coating of piping buried after 8/16/02. Inspection for corrosion of buried piping exposed for any reason is required. Corrosion damage must be repaired.

There is no underground piping at this Facility.

Section 112.8(d)(2) requires capping or blank flanging of transfer piping when not in service. The transfer piping must also be marked as to origin.

Transfer points are capped when not in service. Transfer piping is marked as to origin.

Section 112.8(d)(3) requires proper design of piping supports to minimize abrasion and corrosion and allow for expansion and contraction.

Above ground piping supports are properly designed as demonstrated by years of trouble-free use.

Section 112.8(d)(4) requires regular inspection of all valves, piping, and appurtenances.

As described by the response to Section 112.7(e), the tank and associated piping are inspected on a regular basis. The inspections are documented and maintained at the facility for a period of at least three years.

Section 112.8(d)(5) requires signs warning vehicles entering the facility of the presence of overhead piping.

PFF has appropriate signage warning about the presence of overhead piping.

SECTION 4

SPILL RESPONSE PROCEDURES

I. Response to a Major and Minor Spills

Minor spills may occur during sampling, equipment maintenance, transfer, and treatment operations. In most cases, these spills will occur where adequate ventilation is present to dissipate any harmful vapors. These spills can generally be remediated using pads and absorbent materials.

Major spills may result from overturned containers or ruptures in storage tanks, containers, piping, and hoses. Secondary spill containment has been installed at hazardous waste process and storage areas. The following actions will be taken in the event of a major spill:

Initial Response

- Assess the extent and magnitude of the event.
- No entry into any area that would jeopardize the safety of an employee will be allowed.
- Sound alarm using the intercom and by word of mouth. If after hours, contact the emergency coordinator using the phone numbers in Appendix B (Emergency Notification List).
- FOLLOW THE SPECIFIC INSTRUCTIONS OF THE EMERGENCY COORDINATOR, including evacuation of the facility and surrounding areas.
- If it is safe to do so, stop the flow of the released material by closing valves, shutting off pumps, or rotating ruptured containers.
- Stop loading and transfer activities within the affected area.

Spill Control Procedure

- Close stormwater outfalls potentially affected by the spill.
- Contain the spill as much as possible using the following equipment:
 1. Absorbent booms
Use these in tandem (one placed a few inches behind the other) to help control the flow of the material.

Absorbent booms should be used on any surface water that could be contaminated.
 2. Use other absorbent materials
Use a commercial absorbent to soak up spills.

Empty 55-gallon drums can be turned on their sides and rolled to create an "instant" dike.

3. Use mechanical means (where applicable)

Ditch with shovels.

Ditch with a Bobcat.

Sustained Response

- Use on-site monitoring equipment to determine safety of area.
- If there is a need for outside help, the emergency coordinator will contact the appropriate agency.
- Pump free liquids into containers, drums, or tanker truck.
- Collect all contaminated absorbent and place in closed and labeled containers.
- If directed by the Emergency Coordinator, survey all affected areas and materials for radiation.

Emergency Terminated

- Begin equipment and area cleanup.
- Employee shall initiate disposal of cleanup material in accordance with regulations.
- Complete a written description of the event while details are still fresh.

The following actions should be taken immediately upon discovery of a spill or release of hazardous materials within the facility:

	Action												
1	Communicate the spill event to others.												
2	Assess the extent and magnitude and source of the event.												
3	Shut down processing operations, if necessary.												
4	Assess immediate health and safety concerns. Evacuate area if necessary.												
5	Attempt to remediate the spill/release as follows:												
	<table> <tr> <th>If spill is a...</th><th colspan="2">Then respond by following these steps...</th></tr> <tr> <td rowspan="2">Minor spill (may occur during sampling, equipment maintenance...)</td><td>a</td><td>Remediate using pads and absorbent materials.</td></tr> <tr> <td>b</td><td>Collect all contaminated absorbent and place in closed and labeled container.</td></tr> <tr> <th>If spill is a...</th><th colspan="2">Then respond by following these steps...</th></tr> </table>	If spill is a...	Then respond by following these steps...		Minor spill (may occur during sampling, equipment maintenance...)	a	Remediate using pads and absorbent materials.	b	Collect all contaminated absorbent and place in closed and labeled container.	If spill is a...	Then respond by following these steps...		
If spill is a...	Then respond by following these steps...												
Minor spill (may occur during sampling, equipment maintenance...)	a	Remediate using pads and absorbent materials.											
	b	Collect all contaminated absorbent and place in closed and labeled container.											
If spill is a...	Then respond by following these steps...												
	Major spill (may result from	a Deny entry into any area that would jeopardize the safety of an employee.											
	overturned containers or ruptures in storage tanks, containers, piping, and hoses.)	b Sound alarm. The alarm should alert the Emergency Coordinator. If after hours, contact the primary or alternate Emergency Coordinator using phone number in Attachment CP-1.											
		c Follow the specific instructions of the Emergency Coordinator, including evacuation of the area (if required).											
		d If it is safe to do so, stop the flow of the released material by closing valves, shutting off pumps, or rotating or "overpacking" ruptured containers.											
		e All loading and transfer activities in the area are to be ceased.											
		f Contain the spill as much as possible using the following equipment: <ul style="list-style-type: none"> - Absorbent booms: Use these in tandem (one placed a few inches behind the other) to help control the flow of the material. - Use other absorbent materials: Use a commercial absorbent to soak up spills. - Empty 55-gallon drums can be turned on their sides and rolled to create an "instant" dike. - Use mechanical means: Ditch and shovels, if applicable. 											
		g If there is a need for outside help, the primary or alternate Emergency Coordinator will contact the appropriate local authority, agency, or remediation contractor.											

		Action	
		h	Pump free liquids into containers or drums <u>or</u> tanker trucks.
		i	Collect all contaminated absorbent and place in closed and labeled containers.
		j	If directed by the Facility Radiation Safety Officer, survey all affected areas and materials for radiation.
		k	Begin equipment and area cleanup.
		l	Arrange for proper management of remediation waste.
		m	Complete a written description of the event while details are still fresh.
		n	Refer to Attachment CP-4 to complete reporting requirements, if applicable
6	Notify local, state, and/or federal agencies listed in Attachment CP-4, as appropriate.		
7	If the incident required implementation of the Contingency Plan, notify the FDEP that the Facility is in compliance with 40 CFR 264.56(h) before operations are resumed in affected areas of the Facility.		

II. Spill Response Equipment

EMERGENCY EQUIPMENT LIST

<u>Item</u>	<u>Description/Capability</u>	<u>Location(s)</u>
Telephone	Telephone communications for emergency notification	Waste Areas, Laboratory, and Other General Locations
Fire Extinguishers	Dry chemical, CO ₂ , extinguish fires	Throughout Facility, Admin & Processing
Fire Hydrant	Fire hydrant – combat fire	Southwest Corner of Process and Storage Building
Absorbent Material	Vermiculite and absorbent material in spill kits – absorbs liquid spills	Waste Treatment Areas, Container Storage and Tank Storage Areas
Respirators	Full-face chemical cartridge, Self Contained Breathing Apparatus (SCBA)	Waste Treatment Areas, Laboratory, Main Building Storage Areas
Eye Wash	Permanent installation and portable eye wash bottles – flush eyes	Waste Treatment Areas, Laboratory
First Aid Kits	Band-Aids, bandages – provide minor first aid	Laboratory, Shop, and Other Locations
Fork Lift(s)	Multiple units: 5-, 6-, 15-thousand-pound capacity – assist in moving materials	Designated Equipment, Parking Area Adjacent to Container Storage
Bobcat	Small, bucketed, material-handling machine	Outside Maintenance – West Side
Automatic Fire Suppression	Fire sprinkler system, AFF system (in LSV PSB, TOB); wet sprinkler system through remainder of building areas	Entire Facility
Protective Apron & Gloves	Cloth, Tyvek, rubber, or nitrile – body protection	Waste Management Areas & Maintenance Area

EMERGENCY EQUIPMENT LIST (continued)

<u>Item</u>	<u>Description/Capability</u>	<u>Location(s)</u>
Safety Glasses	Personal protective eyewear – issued to employees	All Operational Areas
Emergency Exit Lighting & Signs	Emergency egress equipment	Throughout Administrative Offices, Lab, Waste Management Areas
Portable Radios and/or Cellular Phones	Communication devices	Emergency Coordinators, Process Technicians
Spill Kit(s)	Clean up minor spills	Each Waste Management Area
Emergency Generator	Gas-powered generator – to provide electricity during emergency	Maintenance Cage
Shovels, Brooms	To transfer spilled material manually into containers	Kept with Spill Kits, extras kept in Maintenance Shop
Empty Containers	To collect spilled material or PPE used during cleanup	On east side of LSV storage warehouse
Portable Pumps	To transfer spilled liquids into containers or tanker trucks	Maintenance Cage

SECTION 5

SPCCP UPDATES

The SPCCP shall be updated:

- within six months after significant changes occur in the Facility operations;
- if the SPCCP fails to provide the desired degree of protection;
- when a period of five (5) years has elapsed since the last revision(s); or
- as required by changes in the 40 CFR 112 regulations.

DOCUMENTATION OF REVIEW
OF SPCC PLAN
IN ACCORDANCE WITH 40 CFR 112.5(b)

I have completed a review of the Spill Prevention, Control and Countermeasure Plan for Perma-Fix of Florida, Inc. Gainesville Facility, Inc. on 08/20/19.

I will (will not) amend the SPCCP as a result of this review.

Raymond Whittle CE VP/CM
Name Title

APPENDIX A

LOADING/UNLOADING PROCEDURES

Bulk Loading/Unloading Procedures

The following Standard Operating Procedures (SOPs) will be observed to reduce the chance of a spill during a transfer of bulk oil to a tank truck and comply with Department of Transportation regulations.

1. Block the outfall/storm drain so a spill will not migrate off facility property.
2. To minimize the release of any material during transfer operations, drip pans or buckets should be used under all hose connections. Drip pans and buckets must be cleaned up before leaving the area. Oil dry, rags, shovels, etc. are available at the facility for cleanup in the event of a spill or drip.
3. A PFF employee shall be present during the loading/unloading of tanker trucks.
4. The tank truck operator shall remain with the truck while loading/unloading.
5. The tank truck operator shall disconnect all lines before departure. During the disconnecting of the lines, a catch bucket shall be placed to contain any drips or leakage of the process.
6. The tank truck operator shall ensure the tanker is not leaking before departure.
7. The responsible PFF employee shall ensure all items in this section of the plan are being followed and shall inspect the loading/unloading area after the tanker's departure to determine whether spillage has occurred.
8. Any spillage of oil or other petroleum material shall be promptly reported and cleaned up.
9. All oil transfer lines shall be blank-flanged when not in use.
10. After inspection has assured no spillage is present, the storm drainage outfall may be reopened.

Container Transport and Transfer Procedures

1. Company policy prohibits smoking in placarded trucks and in any material-handling areas.
2. All containerized hazardous materials must be secured prior to transport.
3. During loading and unloading, the truck should be moved into the unloading area with the engine stopped and hand brake set.
4. The operator and driver must be aware of the material they are handling and must be trained in the procedures to follow in an emergency.
5. Containers must not be opened or tampered with while in transit. Any released material must be cleaned up and containerized prior to transport.
6. Company housekeeping standards prohibit the spillage of any hazardous material. All areas, including concrete containment are to be kept free of spilled material.
7. All spills must be reported to the Environmental Health and Safety Manager.
9. The General Manager has ultimate responsibility for the condition of the site and may require all employees to take any steps necessary to maintain the facility at high standards.

APPENDIX B

EMERGENCY NOTIFICATION LIST

EMERGENCY COORDINATORS

Name: Randy Self
Position/Title: Treatment Coordinator
Work Telephone Number: (352) 395-1368 373-6066
Mobile Telephone Number: (352) 317-3243
Zip Code for Home Address: 32606

Name: Dwayne Singleton
Position/Title: Industrial Coordinator
Work Telephone Number: (352) 395-1362 373-6066
Mobile Telephone Number: (352) 219-8640
Zip Code for Home Address: 32606

Name: Andy Owens
Position/Title: Quality Assurance Manager
Work Telephone Number: (352) 395-1357 373-6066
Mobile Telephone Number: (352) 284-8064
Zip Code for Home Address: 32641

Name: Mike Owens
Position/Title: Maintenance Coordinator
Work Telephone Number: (352) 395-1360 373-6066
Mobile Telephone Number: (386) 213-2208
Zip Code for Home Address: 32148

Name: Dan Cain
Position/Title: Environmental Health & Safety Manager
Work Telephone Number: (352) 395-1347 373-6066 ext 1347
Mobile Telephone Number: (352) 359-1007
Zip Code for Home Address: 32606

Name: TBD
Position/Title: Radiation Safety Officer Work
Telephone Number: (352) 395-1356 373-6066
Mobile Telephone Number: (352) 318-4737
Zip Code for Home Address: 32605

*Alternate Emergency Coordinators are listed in the order in which they will assume responsibility as alternates. NOTE: The work address for all Emergency Coordinators is 1940 NW 67th Place, Gainesville, Florida 32653.

EMERGENCY NOTIFICATION INFORMATION

In the event of an emergency that could threaten human health or the environment outside of PFF, the General Manager or Emergency Coordinator shall immediately notify:

State of Florida Department of Environmental Protection
State Warning Point
1-800-320-0519 (24 hours)
and
Alachua County Environmental Protection Department
(352) 264-6800 (24 hours)

To report a release to the environment above the reportable quantity of a listed hazardous material, the PFF General Manager or Emergency Coordinator shall immediately notify:

National Response Center (NRC)
800-424-8802 (24 hours)
or
State Warning Point Number
1-800-320-0519

If unsuccessful in reporting to the above numbers, call:

U.S. Environmental Protection Agency, Region 4, Atlanta, GA
Emergency Response Center
(404) 562-8700 (24 hours)

Other organizations which may require notification include:

Gainesville Fire Department & Rescue 911, or (352) 334-2586

Local Hazardous Materials Response Team (Gainesville Fire Department) 911, or (352) 955-1818

North Central Florida Regional Planning Council OR (352) 955-2200

Florida DEP State Warning Point OR (800) 320-0519 (24 hours)

Alachua County Sheriff's Office (352) 367-4000

Hospital: North Florida Regional Medical Center (352) 333-4800

Local Emergency Planning Committee:

North Central Florida Regional Planning Council (352) 955-2200 ext 108

APPENDIX C
SPILL RESPONSE RECORD FORM

SPILL RESPONSE RECORD FORM

Reporter's Full Name: _____
Position: _____
Phone Numbers: Day _____
Evening _____
Company: Perma-Fix of Florida, Inc.
Address: 1940 NW 67th Placse
City, State, Zip: Gainesville, Florida 32653
Facility Latitude: N 29° 43' 0" Longitude: W 82° 20' 58"

INCIDENT DESCRIPTION

Incident Address/Location: _____ Tank # _____
Container Type: _____
Date and Time of Discharge: _____ AM/PM
Material Discharged: _____
Discharged Quantity: _____ Gallons
Did Material Reach Water? _____ (Y/N) If so, What Quantity? _____ Gallons
Media Affected? Air? Y or N Water? Y or N Land? Y or N
Description of Medium Affected: _____

Source and/or Cause of Incident: _____

RESPONSE ACTION AND IMPACTS

Actions Taken to Correct, Control, or Mitigate Incident: _____

Number of Injuries: _____ Number of Deaths: _____
Evacuation Required? _____ (Y/N) Number Evacuated: _____
Damage Incurred: _____ (Y/N) Damage Cost Estimate: \$ _____

NOTIFICATIONS

USEPA? _____ (Y/N) STATE? _____ (Y/N) Other? See Notification List

ADDITIONAL INFORMATION: _____

APPENDIX D

FACILITY INSPECTION PROCEDURE AND FORM

MONTHLY TANK INSPECTION PROCEDURE

Inspections for the SPCCP are not required as long as the inspections required by the Facility RCRA Permit are conducted and documented.

APPENDIX E

DIKE WATER TRACKING FORM AND PROCEDURE

SECONDARY CONTAINMENT DRAINAGE PROCEDURE

1. Inspect secondary containment on a monthly basis or as necessary for drainage.
2. Visually inspect the secondary containment. Indicate the condition of the accumulated water.
3. Record the depth of accumulation.
4. Follow the appropriate drainage procedure.
 - A. Observe the water surface for a sheen or oil presence.
 - B. If the water is possibly contaminated, a sample can be taken for closer observation and possible testing.
 - C. If the water is considered contaminated, call the facility emergency coordinator to direct cleanup or further action.
 - D. If in doubt of the appropriate action, contact a supervisor immediately.
5. Sign and date the inspection form.
6. Return the completed inspection form to the facility Emergency Coordinator.

DIKE DRAINAGE LOG

LOCATION:

[illegible]

Condition:

1. Accumulation clear & free of oil, sheen, or discoloration.
2. Accumulation has very small quantity of oil, film, sheen, or discoloration.
3. Accumulation has heavy oil content.

Procedure:

1. Drain valve opened with no treatment required.
2. Residual oil removed by means of sorbent material, and clear water drained.
3. Entire accumulation pumped to drum or tank truck for disposal.

NOTE: If in doubt on procedure or condition, contact supervisor immediately.

APPENDIX F

SPCCP TRAINING FORM

APPENDIX G

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION FORM

FACILITY NAME: Perma-Fix of Florida, Inc.

FACILITY ADDRESS: 1940 NW 67th Place, Gainesville, Florida 32653

1. Does the Facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfer of oil to or from vessels?

Yes _____ No X

2. Does the Facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the Facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area?

Yes _____ No X

3. Does the Facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the Facility could cause injury to an environmentally sensitive area as defined in Appendix D?

Yes _____ No X

4. Does the Facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula* considered acceptable by the RA) such that a discharge from the Facility would shut down a public drinking water intake?

Yes _____ No X

5. Does the Facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and, within the past 5 years, has the Facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?

Yes _____ No X

*If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature

Randy Self

Name (please type or print)

Operations Manager

Title

Date

APPENDIX II-I-1

PROPOSED PERMA-FIX II PROCESS

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

1.0 PROPOSED PERMA-FIX II® PROCESS

The existing batch Perma-Fix II® (PF-II) treatment equipment is planned to be replaced with an “in-kind” batch fed PF-II treatment equipment and feed preparation equipment in the Treatment and Operations Building (TOB). The existing Quonset Hut will remain in place unmodified. The permitted container storage area in the TOB will not be affected by this modification since different container storage zones and the containment will remain the same. The new PF-II process details are outlined herein.

1.1 PROCESS DESCRIPTION

The first step of the process will remain the same as discussed in Part II Section I.1. Figure II-I-1 provides a general layout of the new unit, along with the batch fed PF-II process.

1.1.1 PUG MILLS

Two dual-shaft, batch pug mills will be used, one for blending raw/incoming waste with bulking agents (e.g., alumina silicate), and the other for stabilizing thermally processed material or material that does not need to be thermally processed.

The pug mills will have a capacity between 48 to 96 cu ft (350 to 700 gallons) per batch. They will be capable of handling up to 2” top size and material from fine to coarse and dry to wet. Both will be provided with water spray bars. The pug mills will be equipped with variable frequency drives (VFD) to allow slow start, particularly when wetting dusty or reactive material.

For the raw waste pug mill, blending of raw wet waste with a bulking agent will produce little in the way of dust. However, any particulate matter generated will be exhausted through a side draft hood to a HEPA filter, and then to the RTO.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

In the stabilizing pug mill, water and stabilizing regents will be added and blended with thermal desorber product or waste that does not need to be thermally processed. The stabilizing pug mill will be equipped with a retractable hood, with an 8" duct for exhaust, which will be through a carbon filter, and then a HEPA filter.

The pug mills will be filled by dumping waste containers using a drum hoist and bridge crane. Discharge will be into containers up to 55-gallon size or B-25 boxes, through a liquid-tight slide gate valve and a chute.

The feed preparation operations (screen, crusher, shredder, raw waste pug mill) are independent, and are carried out in batch mode. The unit operations may or may not operate simultaneously. This overall process is intended to be highly flexible. The feed preparation operations are iterative processes aimed at achieving required feed material size and consistency.

1.1.2 THERMAL DESORPTION

Figures II-I-2-A and II-I-2-B provides a process flow diagram for the thermal desorption unit (i.e., thermal desorber), which will be electrically heated, with a treatment capacity of 1,500 lb/batch (3,000 lb/day). The thermal desorber will be a 40" diameter and 76" long reactor vessel. The thermal desorber is designed to operate at temperatures up to 1,200°F. Normal operating temperature is expected to be 1,200°F. The thermal desorber will be purged with nitrogen while in operation to prevent fires/explosions.

The vapor phase resulting from the thermal desorber will pass through a FeCr alloy filter prior to two water-cooled condensers. The condensate will be collected in an 18-gallon top accumulator tank and a 125-gallon bottom accumulator tank associated with the condensers. The uncondensed portion will be routed to the RTO.

The non-volatile residual solids from the thermal desorber will be cooled. The discharged solids may either be treated through the PF-I process or be disposed of off-site without PF-I treatment.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

2.0 PF-II EQUIPMENT LIST AND DESCRIPTION

The equipment associated with the batch fed PF-II process includes the reactor vessel, condensers, accumulator tank, cooling tower, air compressor, pumps, mist eliminator, and thermal oxidizer. The existing cooling tower, air compressors, pumps, and thermal oxidizer will be incorporated in the new process as possible. The description of the new equipment is as follows.

2.1 REACTOR VESSEL

- Lochhead Haggerty electrically heated thermal desorber, 40” dia x 76” long, Model MR-15EX with retort vessel and jacket for heating and cooling
- Maximum power input for electric heating elements 100 kW
- Rated capacity, 1,500 lb/batch (3,000 lb/day) for waste with 20% moisture and 5% organic, 75% inorganic
- Emissions controlled by condenser, particulate filter, mist eliminator, HEPA filter, and regenerative thermal oxidizer

2.2 CONDENSERS AND HIGH TEMPERATURE FILTER

- Dust collector upstream of vacuum pumps
- Lochhead Haggerty condenser, 2-stage: 4” diameter x 9’ 9” long tubes for the primary condenser, and 4” diameter x 99” long tube and a 4” diameter x 97” long tube for the secondary condensers
- Shell and tube, carbon steel jacket
- Single pass, condensate exits into horizontal accumulator tank

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

2.3 CONDENSATE TANKS

- One 125-gallon horizontal SS accumulator tank (bottom)
- One 18-gallon horizontal SS accumulator tank (top)

2.4 MIST ELIMINATOR FILTER

- 12" long x 16" OD coalescing type, downstream of condensers, inside condensate storage tank

3.0 ENVIRONMENTAL PERFORMANCE STANDARDS

3.1 RELEASE PREVENTION

The hydrogeologic, geologic, and meteorological factors of concern for the PFF Facility site and surrounding areas are addressed in Section A of this permit application. For purposes of ensuring protection of human health and the environment, PFF will operate the PF-II process equipment in conformance with applicable container and tank standards. Appropriate secondary containment and air emission controls will be incorporated into the design and operation of the equipment.

3.2 PREVENTION OF RELEASES TO GROUNDWATER OR SUBSURFACE ENVIRONMENT

Releases to groundwater or the subsurface environment from the PF-II treatment process are extremely unlikely for the following reasons:

- The process will manage relatively small volumes of material; i.e., approximately 1,500 lb per batch.
- The unit will be located within a secondary containment system designed to meet the requirements of 40 CFR 264, Subparts I and J. The containment system is designed to contain the entire volume of the waste being treated plus the volume of containers staged for processing. Ashford Formula, which is a concrete sealer and hardener, has been applied to the containment system floor and walls.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

- The PF-II process area will be inspected each operating day in accordance with the Facility inspection plan. Leaks or spills from the system will be cleaned up immediately upon detection or as soon as it is practicable and safe to do so.
- The system is located within the TOB; i.e., the system is physically separated from the subsurface environment and groundwater.
- PFF maintains a Contingency Plan to provide a framework for PFF responses to emergencies such as spills, fires, or explosions. This plan provides procedures to respond to threats to human health or the environment from the PF-II process.

3.3 PREVENTION OF RELEASES TO SURFACE WATER, WETLANDS, OR SOIL SURFACE

Releases to surface water, wetlands, or soil surface from the PF-II process are also extremely unlikely for the reasons listed above.

3.4 PREVENTION OF RELEASES TO AIR

Releases to air from the PF-II process are extremely unlikely for the following reasons:

- The system will be located within an enclosure inside the TOB. The enclosure will be equipped with an emissions control system. The emissions control system is designed to handle the volume of organic emissions anticipated from the process. See air emissions control system description below.
- Organic vapors released from the waste streams in the reactor vessel during processing will be routed to two condensers. Liquids from the condensers will be transferred to containers, while uncondensed vapors will be routed through the RTO.
- Emissions at loading points will be minimized by limiting the time the containers are kept open prior to processing.
- Emissions during unloading of the reactor vessel are minimal because the potential air contaminants will be significantly removed during processing.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

3.5 AIR EMISSIONS CONTROL SYSTEM

PFF has installed and operates an organic emissions control system consisting of a regenerative (heat recovering) thermal oxidizer designed to control the emission of VOCs from the LSV processing area and the PF-II treatment operations enclosure in the TOB. The RTO will use thermal energy to destroy VOCs. The following provides an overview of the current system.

Process VOCs are delivered to the air emission control system fan. This fan provides the motive force for the system. From the fan, the air stream moves to a switching valve for distribution into one of two heat recovery chambers filled with ceramic media to provide heat transfer. Recovery of up to 95% of thermal energy is accomplished using ceramic media. The air stream travels upward through the ceramic media and is preheated by the heat previously absorbed (retained in the ceramic media) to a temperature of approximately 1,300°F prior to entry into the combustion chamber. In the combustion chamber, the temperature is raised to approximately 1,500°F by a burner, and the VOCs in the air stream are destroyed.

After destruction in the combustion chamber, the cleaned hot gases (air stream) pass downward through the second heat recovery chamber, where heat is absorbed by the ceramic media. The cooled air stream then discharges from the heat recovery chamber through a valve to the exhaust stack.

The RTO was designed, installed, and is operated in accordance with the applicable requirements of 40 CFR 264 Subpart AA (Air Emission Standards for Process Vents). See also Section II.R of this permit application.

3.6 MONITORING AND INSPECTIONS

PFF personnel will monitor the PF-II process during process operations. The PF-II process area and equipment will be visually inspected each operating day for evidence of leaks or spills. The inspection will be in accordance with the requirements of the PFF inspection plan. The secondary containment system will also be inspected each operating day for evidence of cracks or breaches in containment as specified in the PFF inspection plan.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

4.0 POTENTIAL PATHWAYS OF EXPOSURE OF HUMANS OR ENVIRONMENTAL RECEPTORS

PFF workers within the PF-II treatment enclosure are the most likely human receptors of exposure to chemicals or chemical constituents released from the PF-II process. The exposure is anticipated to be minimal because of the negative pressure maintained in the process area and the air emission control system provided for the PF-II process area. The primary pathway for human exposure from the PF-II process is air emissions (volatiles or particulates) generated during the loading and unloading of the feed preparation equipment and reactor vessels.

Personnel operating the system (or personnel present in the PF-II treatment enclosure for any other reason) are required to wear PPE selected to address the potential hazards identified for the wastes to be managed and the operating parameters of the system. The PPE selected will be in accordance with OSHA standards.

Environmental receptors outside of the PF-II treatment enclosure, such as soil, surface water, groundwater, and air, are unlikely to be impacted by the PF-II system due to the air pollution control system, the containment system, and the location of process equipment within a building that physically separates the process area from groundwater, the subsurface environment, and precipitation.

5.0 EFFECTIVENESS OF PERMA-FIX II® PROCESS

The effectiveness of the PF-II process is dependent on the complexity of individual waste streams and individual hazardous waste organic constituents. Waste streams are subjected to the PF-II process until a sample of the treated waste indicates that it meets applicable land disposal restriction treatment levels. Experience has shown that preconditioning of the waste streams followed by thermal desorption has been highly successful and repeat processing cycles are rare.

6.0 APPLICABLE TANK STANDARDS

The PF-II process contains several components that have been certified in accordance with certain tank standards, as specified in 40 CFR 264.192. Management practices for ignitable, reactive, and incompatible wastes at the

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

facility have been designed to minimize the potential for fires, explosions, gaseous emission, leaching, or other discharge of hazardous waste or hazardous waste constituents that could result from the mixing of incompatible wastes or materials if tank systems ruptured or failed. PFF will not place incompatible wastes or incompatible wastes and materials in the same tank or tank-like system per the requirements of 40 CFR 264.17(b). In addition, hazardous waste will not be placed in a tank or tank-like system that previously held an incompatible waste or material and has not been decontaminated per the requirements of 40 CFR 264.17(b).

Where ignitable or reactive waste will be stored or treated in a tank or tank-like system, the permittee will comply with the requirements for the maintenance of protective distances between the waste management area and any public ways, streets, alleys, or an adjoining property line that can be built upon as required in the NFPA code⁴.

In addition, ignitable or reactive waste will not be placed in tank or tank-like systems, unless the waste is treated, rendered, or mixed before or immediately after placement in the tank system so that:

- The resulting waste, mixture, or dissolved material no longer meets the definition of ignitable or reactive waste under 40 CFR 261.21 or 261.23 and the requirements of 40 CFR 264.17(b) are complied with; or
- The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to ignite or react; or
- The tank system is used solely for emergencies.

⁴ National Fire Protection Association (NFPA), "Flammable and Combustible Liquids Code," Tables 2-1 through 2-6, 1990. NFPA Tables 2-1 through 2-6, 1977 or 1981, are incorporated by reference into 40 CFR 260.11.

6.1 NEW TANK STANDARDS – TANK ASSESSMENT

An as-built written certification by a qualified, professional engineer registered in the state of Florida for the PF-II process components for handling hazardous waste will be submitted to the FDEP after the construction is completed.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

6.2 EXTERNAL CORROSION PROTECTION

The PF-II process equipment is located indoors; hence, it is protected from the weather.

6.3 TANK INSTALLATION AND TESTING

Prior to placement of a tank or tank-like system in hazardous waste service, an independent, qualified installation inspector or a qualified professional engineer will inspect the tank system for the following items:

- Weld breaks
- Punctures
- Scrapes of protective coatings
- Cracks
- Corrosion
- Other structural damage or inadequate construction/installation

6.4 DESCRIPTIONS OF FEED SYSTEMS, SAFETY CUT-OFFS, BYPASS SYSTEMS, AND PRESSURE CONTROLS

The PF-II treatment process retort is loaded and unloaded via a loading door.

Piping between components will be regulated by valves or equivalent devices. Typically, rigid lines are attached by flanges. The pressure control system includes relief devices for overpressure. A nitrogen purge system will be used to minimize the potential for fires or explosions.

6.5 PIPING, INSTRUMENTATION, AND PROCESS FLOW

Details of piping and instrumentation will be provided as as-built drawings to FDEP. A conceptual process flow diagram for the PF-II system is provided in Figures II-I-2-A and II-I-2-B.

APPENDIX II-I-1. PROPOSED PERMA-FIX II® PROCESS

6.6 CONTAINMENT OF RELEASES

The PF-II process line is located within secondary containment in accordance with the applicable requirements of 40 CFR 264.192. PFF operating procedures include inspections designed to identify spilled wastes in a timely manner. Detailed inspection logs are maintained in the Facility Operating Record for a period of at least three years. After discovery, spilled liquids will be removed from the collection area in as timely a manner as is necessary to prevent overflow of the collection system. Spilled wastes will be identified by visual observation, review of Facility records, and, if necessary, by chemical analysis. If required, analyses will be conducted in accordance with the Facility WAP.

7.0 FACILITY CLOSURE PLAN UPDATE

The facility Closure Plan (i.e., Part K of the permit application) will be updated to include the new PF-II equipment, and this updated Closure Plan will be submitted to FDEP prior to operating such equipment.

8.0 SUBPART AA, BB, AND CC AIR EMISSION STANDARDS

Parts R and S of the current permit application will be revised appropriately to include the modified PF-II process and will be submitted to FDEP prior to operating the new PF-II equipment.

APPENDIX II-I-2

EXAMPLE WASTE PROFILE

APPENDIX II-I-2. EXAMPLE WASTE PROFILE

WASTE PROFILE		Profile Number
<small>Perma-Fix Nuclear Services: DSSI * M&EC * Perma-Fix of Florida * Perma-Fix Northwest</small>		
Generator Information:		
EPA ID#		
Generator Name		
Generator Address		
City/State/Zip		
Telephone		
Fax		
Billing Information:		
<input type="checkbox"/> Electronic users: check here to copy Generator info. if same.		
Broker/Site		
Address		
City/St/Zip		
Telephone		
Fax		
Check all that apply		
<input type="checkbox"/> Hazardous Waste - Include LDR-UHC Constituent Form	<input type="checkbox"/> TSCA Regulated PCB	<input type="checkbox"/> Radioactive Waste
<input type="checkbox"/> Mercury >260 PPM	<input type="checkbox"/> PCB Bulk Products	<input type="checkbox"/> Non-Hazardous Waste
<input type="checkbox"/> Elemental Mercury	<input type="checkbox"/> PCB Remediation Waste	<input type="checkbox"/> Universal Waste
<input type="checkbox"/> Reactives - specify: _____	<input type="checkbox"/> PCB Articles	<input type="checkbox"/> Used Oil Filter
		<input type="checkbox"/> Used Oil
Please provide a detailed description of the process that generated this waste. Attach additional sheets if needed. Note: for a line break, press alt-return.		
Characterization Method: (check ONE only)		
<input type="checkbox"/> Laboratory Analysis	<input type="checkbox"/> MSDS	<input type="checkbox"/> Generator Knowledge
Physical Description: (check all that apply)		
<input type="checkbox"/> Solid	<input type="checkbox"/> Liquid	<input type="checkbox"/> Sludge
<input type="checkbox"/> Debris	<input type="checkbox"/> Labpack (add inventory form)	
<input type="checkbox"/> Other:	_____	
Volume: _____ <small>(include units: 30 liters, 5 gal., etc.)</small>	Gross Weight: _____ <small>(include units: 75 lbs, 10 kg, etc.)</small>	Container Type: _____
Total Number of Containers: _____		
Overpacked: <input type="checkbox"/> Yes <input type="checkbox"/> No	US DOT Hazardous Material: <input type="checkbox"/> Yes <input type="checkbox"/> No	Proper Shipping Name: _____
DOT Hazard Class: _____ <div style="text-align: center;"><small>primary subsidiary</small></div>		
<input type="checkbox"/> This waste stream is subject to the Land Disposal Restriction of 40 CFR 268. <small>(If checked, complete a Land Disposal Restriction Notification form)</small>	For Broker Use Only I certify the following: The packages used to ship this material meet the requirements of 40 CFR 173 Subpart B (HazMat). This material will be inspected for consistency with the preapproved profile at the time of transportation. <div style="border: 1px solid black; padding: 5px; margin-top: 5px;">Name _____ Date _____</div>	
<input type="checkbox"/> This waste stream contains Benzene. <small>(If checked, complete the Benzene NESHAP Worksheet)</small>		
<input type="checkbox"/> This waste stream consists of off-spec used oil.		
<input type="checkbox"/> This is a CERCLA waste.		
CHEMICAL PROPERTIES AND COMPOSITION:		
Percent Free Liquid: _____ % (None=0%, all=100%)	Percent Settled Solids: _____ % (None=0%, all=100%)	Viscosity: _____ Centistokes
pH Actual: _____ OR Range: _____ to _____	Specific Gravity Actual: _____ OR Range: _____ to _____	
CERTIFICATION		
I certify that all hazards, known or suspected, have been disclosed on this profile. Further I understand that a surcharge may be imposed for any material which is rejected or requires additional handling due to the material being inconsistent with the pr		
<div style="border: 1px solid black; padding: 5px; margin-top: 10px;">Name _____ Title _____ Date _____</div>		
Perma-Fix Use Only		
<input type="checkbox"/> Accepted	<input type="checkbox"/> Accepted with the following conditions: _____	Designated Facility: <input type="checkbox"/> DSSI <input type="checkbox"/> M&EC <input type="checkbox"/> PF Florida <input type="checkbox"/> PFNW
<input type="checkbox"/> Rejected for the following reasons: _____		
Perma-Fix has all of the necessary permits and licenses for the waste that has been characterized and identified by this approved profile and accepted by Perma-Fix.		
<div style="border: 1px solid black; padding: 5px; margin-top: 5px;">Name _____ Title _____ Date _____</div>		

APPENDIX II-I-3

EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

APPENDIX II-I-3. EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

LAND DISPOSAL RESTRICTION & CERTIFICATION FORM <small>DSSI • M&EC • Perma-Fix of Florida • Perma-Fix Northwest</small>																	
Generator Name <input style="width: 90%;" type="text"/>					Generator USEPA ID No. <input style="width: 90%;" type="text"/>												
Generator Address <input style="width: 90%;" type="text"/>					City/ST/Zip <input style="width: 90%;" type="text"/>												
State Manifest No. <input style="width: 90%;" type="text"/>					Manifest Doc. No. <input style="width: 90%;" type="text"/>												
Instructions 1 In Column 1 identify all USEPA hazardous waste codes that apply to this waste shipment. 2 In Column 2, choose the appropriate treatability group: Non-Wastewater (NWW) or Wastewater (WW). 3 In Column 3, enter the appropriate Subcategory, if applicable, and also enter "Contaminated Soil" or "Debris" if the waste can be treated using one of the alternative treatment technologies provided by 268.49(c) (soil) or 268.45 (debris). 4 In Column 4, circle the letter of the appropriate LDR management categories on the back of this form. 5 In Column 5, enter the Reference Number(s) from the LDR-UHC Constituent Table for any constituents subject to treatment in your waste stream.																	
Go to LDR-UHC Constituent Table																	
Manifest Line Item #	1. USEPA HAZARDOUS WASTE CODES	2. NWW or WW	3. SUBCATEGORY	4. HOW MUST THE WASTE BE MANAGED (Check one)										5. REFERENCE NUMBER(s) of Hazardous Constituents contained in the waste.			
				A	B	C	D	E	F	G	H	Soil Only					
11.A		NWW												Does		is subject to	
		WW												Does Not		complies with	
11.B		NWW												Does		is subject to	
		WW												Does Not		complies with	
11.C		NWW												Does		is subject to	
		WW												Does Not		complies with	
11.D		NWW												Does		is subject to	
		WW												Does Not		complies with	
I hereby certify that all information submitted on this and all associated documents is complete and accurate to the best of my knowledge and information.																	
Generator Name					Title					Date							
A. <u>THIS RESTRICTED WASTE REQUIRES TREATMENT TO THE APPLICABLE STANDARD.</u> This waste must be treated to the applicable performance based treatment standard set forth in 40CFR Part 268 Subpart C, 268.32, Subpart D, 268.40 or RCRA Section 3004(d) prior to land d																	
B. <u>THIS HAZARDOUS DEBRIS MAY BE TREATED USING THE DEBRIS ALTERNATIVE TREATMENT STANDARDS OF 40 CFR 268.45.</u> I certify under penalty of law that I personally have examined and am familiar with the waste and that the statement above is true and that this waste m																	
C. <u>THIS RESTRICTED WASTE HAS BEEN TREATED TO THE APPLICABLE TREATMENT STANDARD(S).</u> I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this ce																	
D. <u>THIS RESTRICTED DEBRIS HAS BEEN TREATED IN ACCORDANCE WITH 40 CFR 268.45.</u> I certify under penalty of law that the debris has been treated in accordance with the requirements of 40 CFR 268.45. I am aware that there are significant penalties for making fals																	
E. <u>THIS LAB PACK DOES NOT CONTAIN ANY WASTES IDENTIFIED AT APPENDIX IV TO PART 268.</u> I certify under penalty of law that I personally have examined and am familiar with the waste and that the statement above is true and that this lab pack will be sent to a co																	
F. <u>THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC.</u> I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized																	
G. <u>THIS RESTRICTED WASTE HAS BEEN TREATED TO REMOVE THE HAZARDOUS CHARACTERISTIC AND BEEN TREATED FOR UNDERLYING HAZARDOUS CONSTITUENTS.</u> I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to re																	
H. <u>THIS RESTRICTED WASTE IS SUBJECT TO AN EXEMPTION FROM LAND DISPOSAL.</u> (Please include the date the waste is subject to the prohibitions in Column 5) This waste is subject to an exemption from a prohibition on the type of land disposal method utilized for t																	
S. <u>THIS CONTAMINATED SOIL (DOES / DOES NOT) CONTAIN LISTED HAZARDOUS WASTE AND (DOES / DOES NOT) EXHIBIT A CHARACTERISTIC OF HAZARDOUS WASTE AND / IS SUBJECT TO / COMPLIES WITH) THE SOIL TREATMENT STANDARDS AS PROVIDED BY 268.49(c) OR THE UNIVERSAL TREATMENT.</u>																	

APPENDIX II-I-3. EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

Resource Guide
Underlying Hazardous Constituent (UHC)
Land Disposal Restriction (LDR) Constituents

Ref #:	Hazardous Constituent	CAS NO.	NWW (mg/kg)	WW (mg/kg)	Concentration			
					11a	11b	11c	11d
1	Acenaphthene	83-32-9	3.4	0.059				
2	Acenaphthylene	208-96-8	3.4	0.059				
3	Acetone	67-64-1	160	0.28				
4	Acetonitrile	75-05-8	38	5.6				
5	Acetophenone	96-86-2	9.7	0.01				
6	2-Acetylaminofluorene	53-96-3	140	0.059				
7	Acrolein	107-02-8	NA	0.29				
8	Acrylonitrile	107-13-1	84	0.24				
9	Acrylamide	79-06-1	23	19				
10	Aldrin	309-00-2	0.066	0.021				
11	4-Aminobiphenyl	92-67-1	NA	0.13				
12	Aniline	62-53-3	14	0.81				
13	Anthracene	120-12-7	3.4	0.059				
14	Aramite	140-57-8	NA	0.36				
15	alpha-BHC	319-84-6	0.066	0.00014				
16	beta-BHC	319-85-7	0.066	0.00014				
17	delta-BHC	319-86-8	0.066	0.023				
18	gamma-BHC (Lindane)	58-89-9	0.066	0.0017				
19	Benz(a)anthracene	56-55-3	3.4	0.059				
20	Benzal chloride	98-87-3	6	0.055				
21	Benzene	71-43-2	10	0.14				
22	Benzo(a)pyrene	50-32-8	3.4	0.061				
23	Benzo(b)fluoranthene	205-99-2	6.8	0.11				
24	Benzo(k)fluoranthene	207-08-9	6.8	0.11				
25	Benzo(g,h,i)perylene	191-24-2	1.8	0.0055				
26	bis(2-Chloroethoxy)methane	111-91-1	7.2	0.036				
27	bis(2-Chloroethyl)ether	111-44-4	6	0.033				
28	bis(2-Chloroisopropyl) ether	39638-32-9	7.2	0.055				
30	Bromodichloromethane	75-27-4	15	0.35				
31	Bromomethane (Methyl bromide)	74-83-9	15	0.11				
32	4-Bromophenyl phenyl ether	101-55-3	15	0.055				
33	n-Butyl alcohol	71-36-3	2.6	5.6				
34	Butyl benzyl phthalate	85-68-7	28	0.017				
35	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)	88-85-7	2.5	0.066				
36	Carbon disulfide	75-15-0	4.8*	3.8				
37	Carbon tetrachloride	56-23-5	6	0.057				
38	Chlordane (alpha and gamma isomers)	57-74-9	0.26	0.0033				
39	p-Chloroaniline	106-47-8	16	0.46				
40	Chlorobenzene	108-90-7	6	0.057				
41	Chlorobenzilate	510-15-6	NA	0.1				
42	2-Chloro-1, 3-butadiene (Chloroprene)	126-99-8	0.28	0.057				
43	Chlorodibromomethane	124-48-1	15	0.057				
44	Chloroethane	75-00-3	6	0.27				
45	Chloroform	67-66-3	6	0.046				
46	p-Chloro-m-cresol	59-50-7	14	0.018				
47	2-Chloroethyl vinyl ether	110-75-8	NA	0.062				
48	Chloromethane (Methyl chloride)	74-87-3	30	0.19				
49	2-Chloronaphthalene	91-58-7	5.6	0.055				
50	2-Chlorophenol	95-57-8	5.7	0.044				

APPENDIX II-I-3. EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

51	3-Chloropropylene (Allyl Chloride)	107-05-1	30	0.036				
52	Chrysene	218-01-9	3.4	0.059				
53	o-Cresol (2-Methyl phenol)	95-48-7	5.6	0.11				
54	m-Cresol (3-Methyl phenol)	108-39-4	5.6	0.77				
55	p-Cresol (4-Methyl phenol)	106-44-5	5.6	0.77				
56	Cyclohexanone	108-94-1	0.75 *	0.36				
57	o,p'-DDD	53-19-0	0.087	0.023				
58	p,p'-DDD	72-54-8	0.087	0.023				
59	o,p'-DDE	3424-82-6	0.087	0.031				
60	p,p'-DDE	72-55-9	0.087	0.031				
61	o,p'-DDT	789-02-6	0.087	0.0039				
62	p,p'-DDT	50-29-3	0.087	0.0039				
63	Dibenz(a,h)anthracene	53-70-3	8.2	0.055				
64	Dibenz(a,e)pyrene	192-65-4	NA	0.061				
65	1,2-Dibromo-3-chloropropane	96-12-8	15	0.11				
66	1,2-Dibromoethane (Ethylene dibromide)	106-93-4	15	0.028				
67	Dibromomethane	74-95-3	15	0.11				
68	m-Dichlorobenzene (1,3-Dichlorobenzene)	541-73-1	6	0.036				
69	o-Dichlorobenzene (1,2-Dichlorobenzene)	95-50-1	6	0.088				
70	p-Dichlorobenzene (1,4-Dichlorobenzene)	106-46-7	6	0.09				
71	Dichlorodifluoromethane	75-71-8	7.2	0.23				
72	1,1-Dichloroethane	75-34-3	6	0.059				
73	1,2-Dichloroethane	107-06-2	6	0.21				
74	1,1-Dichloroethylene	75-35-4	6	0.025				
75	trans-1,2-Dichloroethylene	156-60-5	30	0.054				
76	2,4-Dichlorophenol	120-83-2	14	0.044				
77	2,6-Dichlorophenol	87-65-0	14	0.044				
78	2,4-Dichlorophenoxyacetic acid (2,4-D)	94-75-7	10	0.72				
79	1,2-Dichloropropane	78-87-5	18	0.85				
80	cis-1,3-Dichloropropylene	10061-01-5	18	0.036				
81	trans-1,3-Dichloropropylene	10061-02-6	18	0.036				
82	Dieldrin	60-57-1	0.13	0.017				
83	Diethyl phthalate	84-66-2	28	0.2				
84	p-Dimethylaminoazobenzene	60-11-7	NA	0.13				
85	2,4-Dimethyl phenol	105-67-9	14	0.036				
86	Dimethyl phthalate	131-11-3	28	0.047				
87	Di-n-butyl phthalate	84-74-2	28	0.057				
88	1,4-Dinitrobenzene	100-25-4	2.3	0.32				
89	4,6-Dinitro-o-cresol	534-52-1	160	0.28				
90	2,4-Dinitrophenol	51-28-5	160	0.12				
91	2,4-Dinitrotoluene	121-14-2	140	0.32				
92	2,6-Dinitrotoluene	606-20-2	28	0.55				
93	Di-n-octyl phthalate	117-84-0	28	0.017				
94	Di-n-propylnitrosamine	621-64-7	14	0.4				
95	1,4-Dioxane	123-91-1	170	12				
96	Diphenylamine	122-39-4	13	0.92				
97	Diphenylnitrosamine	86-30-6	13	0.92				
98	1,2-Diphenylhydrazine	122-66-7	NA	0.087				
99	Disulfoton	298-04-3	6.2	0.017				
100	Endosulfan I	959-98-9	0.066	0.023				
101	Endosulfan II	33213-65-9	0.13	0.029				
102	Endosulfan sulfate	1031-07-8	0.13	0.029				
103	Endrin	72-20-8	0.13	0.0028				
104	Endrin aldehyde	7421-93-4	0.13	0.025				
105	2-Ethoxyethanol (FO05)+			INCIN				

APPENDIX II-I-3. EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

106	Ethyl acetate	141-78-6	33	0.34				
107	Ethyl benzene	100-41-4	10	0.057				
108	Ethyl ether	60-29-7	160	0.12				
109	Ethyl methacrylate	97-63-2	160	0.14				
110	Ethylene oxide	75-21-8	NA	0.12				
111	Famphur	52-85-7	15	0.017				
112	Fluoranthene	206-44-0	3.4	0.068				
113	Fluorene	86-73-7	3.4	0.059				
114	Heptachlor	76-44-8	0.066	0.0012				
115	Heptachlor epoxide	1024-57-3	0.066	0.016				
116	Hexachlorobenzene	118-74-1	10	0.055				
117	Hexachlorobutadiene	87-68-3	5.6	0.055				
118	Hexachlorocyclopentadiene	77-47-4	2.4	0.057				
119	HxCDDs (All Hexachlorodibenzo-p-dioxin	NA	0.001	0.000063				
120	HxCDFs (All Hexachlorodibenzofurans)	NA	0.001	0.000063				
121	Hexachloroethane	67-72-1	30	0.055				
122	Hexachloropropylene	1888-71-7	30	0.035				
123	Indeno (1,2,3-c,d) pyrene	193-39-5	3.4	0.0055				
124	Iodomethane	74-88-4	65	0.19				
125	Isobutyl alcohol (Isobutanol)	78-83-1	170	5.6				
126	Isodrin	465-73-6	0.066	0.021				
127	Isosafrole	120-58-1	2.6	0.081				
128	Kepone	143-50-0	0.13	0.0011				
129	Methacrylonitrile	126-98-7	84	0.24				
130	Methanol	67-56-1	0.75 *	5.6				
131	Methapyriline	91-80-5	1.5	0.081				
132	Methoxychlor	72-43-5	0.18	0.25				
133	3-Methylchloroanthrene	56-49-5	15	0.0055				
134	4,4-Methylene bis (2-chloroaniline)	101-14-4	30	0.5				
135	Methylene chloride	75-09-2	30	0.089				
136	Methyl ethyl ketone	78-93-3	36	0.28				
137	Methyl isobutyl ketone	108-10-1	33	0.14				
138	Methyl methacrylate	80-62-6	160	0.14				
139	Methyl methanesulfonate	66-27-3	NA	0.018				
140	Methyl parathion	298-00-0	4.6	0.014				
141	Naphthalene	91-20-3	5.6	0.059				
142	2-Naphthylamine	91-59-8	N/A	0.52				
143	o-Nitroaniline	88-74-4	14	0.27				
144	p-Nitroaniline	100-01-6	28	0.028				
145	Nitrobenzene	98-95-3	14	0.068				
146	5-Nitro-o-toluidine	99-55-8	28	0.32				
147	o-Nitrophenol	88-75-5	13	0.028				
148	p-Nitrophenol	100-02-7	29	0.12				
149	2-Nitropropane (FO05)+			INCIN				
150	N-Nitrosodiethylamine	55-18-5	28	0.4				
151	N-Nitrosodimethylamine	62-75-9	2.3	0.4				
152	N-Nitroso-di-n-butylamine	924-16-3	17	0.4				
153	N-Nitrosomethylethylamine	10595-95-6	2.3	0.4				
154	N-Nitrosomorpholine	59-89-2	2.3	0.4				
155	N-Nitrosopiperidine	100-75-4	35	0.013				
156	N-Nitrosopyrrolidine	930-55-2	35	0.013				
157	Parathion	56-38-2	4.6	0.014				
158	Total PCBs	1336-36-3	10	0.1				
159	Pentachlorobenzene	608-93-5	10	0.055				
160	PeCDDs (All Pentachlorodibenzo-p-dioxin	NA	0.001	0.000063				

APPENDIX II-I-3. EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

161	PeCDFs (All Pentachlorodibenzofurans)	NA	0.001	0.000035				
162	Pentachloroethane	76-01-7	6	0.055				
163	Pentachloronitrobenzene	82-68-8	4.8	0.055				
164	Pentachlorophenol	87- 86-5	7.4	0.089				
165	Phenacetin	62-44-2	16	0.081				
166	Phenanthrene	85-01-8	5.6	0.059				
167	Phenol	108-95-2	6.2	0.039				
168	Phorate	298-02-2	4.6	0.021				
169	Phthalic acid	100-21-0	28	0.055				
170	Phthalic anhydride	85-44-9	28	0.055				
171	Pronamide	23950-58-5	1.5	0.093				
172	Propanenitrile (Ethyl cyanide)	107-12-0	360	0.24				
173	Pyrene	129-00-0	8.2	0.067				
174	Pyridine	110-86-1	16	0.014				
175	Safrole	94-59-7	22	0.081				
176	Silvex (2,4,5-TP)	93-72-1	7.9	0.72				
177	1,2,4,5-Tetrachlorobenzene	95-94-3	14	0.055				
178	TCDDs (All Tetrachlorodibenzo-p-dioxins)	NA	0.001	0.000063				
179	TCDFs (All Tetrachlorodibenzofurans)	NA	0.001	0.000063				
180	1,1,1,2-Tetrachloroethane	630-20-6	6	0.057				
181	1, 1,2,2-Tetrachloroethane	79-34-5	6	0.057				
182	Tetrachloroethylene	127-18-4	6	0.056				
183	2,3,4,6-Tetrachlorophenol	58-90-2	7.4	0.03				
184	Toluene	108-88-3	10	0.08				
185	Toxaphene	8001-35-2	2.6	0.0095				
186	Tribromomethane (Bromoform)	75-25-2	15	0.63				
187	1,2,4-Trichlorobenzene	120-82-1	19	0.055				
188	1, 1, 1 -Trichloroethane	71-55-6	6	0.054				
189	1, 1,2-Trichloroethane	79-00-5	6	0.054				
190	Trichloroethylene	79-01-6	6	0.054				
191	Trichloromonofluoromethane	75-69-4	30	0.02				
192	2,4,5-Trichlorophenol	95-95-4	7.4	0.18				
193	2,4,6-Trichlorophenol	88-06-2	7.4	0.035				
194	2,4,5-Trichlorophenoxyacetic acid/2,4,5-	93-76-5	7.9	0.72				
195	1,2,3-Trichloropropane	96-18-4	30	0.85				
196	1,1,2-Trichloro- 2,2,2-trifluoroethane	76-13-1	30	0.057				
197	tris-(2,3-Dibromopropyl) phosphate	126-72-7	0.1	0.011				
198	Vinyl chloride	75-01-4	6	0.27				
199	Xylenes	1330-20-7	30	0.32				
200	Antimony	7440-36-0	1.15 *	1.9				
201	Arsenic	7440-38-2	5.0 *	1.4				
202	Barium	7440-39-3	21 *	1.2				
203	Beryllium	7440-41-7	1.22 *	0.82				
204	Cadmium	7440-43-9	0.11 *	0.69				
205	Chromium (Total)	7440-47-3	0.60 *	2.77				
206	Cyanides (Total)	57-12-5	590	1.2				
207	Cyanides (Amenable)	57-12-5	30	0.86				
208	Fluoride	16984-48-8	NA	35				
209	Lead	7439-92-1	0.75 *	0.69				
210	Mercury (retort residues)	7439-97-6	0.2 *	NA				
211	Mercury (all others)	7439-97-6	0.025 *	0.15				
212	Nickel	7440-02-0	11 *	3.98				
213	Selenium	7782-49-2	5.7 *,**	0.82				
214	Silver	7440-22-4	0.14	0.43				
215	Sulfide	18496-25-8	NA	14				

APPENDIX II-I-3. EXAMPLE LAND DISPOSAL RESTRICTION AND CERTIFICATION FORM

216	Thallium	7440-28-0	0.2	1.4				
217	Vanadium	7440-62-2	1.6**	4.3				
218	Zinc	7440-66-6	4.3**	2.61				
220	Aldicarb sulfone	1646-88-4	0.28	0.056				
221	Barban	101-27-9	1.4	0.056				
222	Bendiocarb	22781-23-3	1.4	0.056				
224	Benomyl	17804-35-2	1.4	0.056				
225	Butylate	2008-41-5	1.4	0.042***				
226	Carbaryl	63-25-2	0.14	0.006				
227	Carbenzodim	10605-21-7	1.4	0.056				
228	Carbofuran	1563-66-2	0.14	0.006				
229	Carbofuran phenol	1563-38-8	1.4	0.056				
230	Carbosulfan	55285-14-8	1.4	0.028				
231	m-Cumenyl methylcarbamate	64-00-6	1.4	0.056				
233	Diethylene glycol, dicarbamate	5952-26-1	1.4	0.056				
235	Dithiocarbamates (total)	137-30-4	28	0.028				
236	EPTC	759-94-4	1.4	0.042				
237	Formetanate hydrochloride	23422-53-9	1.4	0.056				
241	Methiocarb	2032-65-7	1.4	0.056				
242	Methomyl	16752-77-5	0.14	0.028				
243	Metolcarb	1129-41-5	1.4	0.056				
244	Mexacarbate	315-18-4	1.4	0.056				
245	Molinate	2212-67-1	1.4	0.042				
246	Oxamyl	23135-22-0	0.28	0.056				
247	Pebulate	1114-71-2	1.4	0.042				
249	Physostigmine	57-47-6	1.4	0.056				
250	Physostigmine salicylate	57-64-7	1.4	0.056				
251	Promecarb	2631-37-0	1.4	0.056				
252	Propham	122-42-9	1.4	0.056				
253	Propoxur	114-26-1	1.4	0.056				
254	Prosulfocarb	52888-80-9	1.4	0.042				
255	Thiodicarb	59669-26-0	1.4	0.019				
256	Thiophanate-methyl	23564-05-8	1.4	0.056				
258	Triallate	2303-17-5	1.4	0.042				
259	Triethylamine	101-44-8	1.5	0.081				
260	Vernolate	1929-77-7	1.4	0.042				

* "Concentration in mg/l TCLP"

** Not Underlying Hazardous Constituents. (See 60 FR, Jan. 3, 1995)

*** The preamble to the final rule (61 FR 15584) clearly indicates that the wastewater treatment standard for thiocarbamate constituents has been revised to 0.042mg/l. However, the 268.48 universal treatment standards table still shows 0.003 mg/l.

These UTS levels are effective on August 24, 1998 as established in 63 FR 28556-28753, the finalized Phase IV-Part 2 land disposal restrictions (LDR) rule.

APPENDIX II-I-4

PF-II EQUIPMENT LIST AND DESCRIPTION

APPENDIX II-I-4. PF-II EQUIPMENT LIST AND DESCRIPTION

Equipment Required

1. Reactor Vessel (externally heated)
2. Condenser
3. Accumulator
4. Chiller Unit
5. Pumps
6. Pneumatic Drum Tumbler

Equipment Specifications

1. Reactor Vessel (Plough Share)
 - Model MR-15EX, Electric Thermal Desorber
 - Retort Vessel c/w 6 Boats and 6 extra boats
 - Jacket for heating or cooling down retort total capacity 60 cubic feet
 - Working capacity for waste mixture: 15 cubic feet
 - Pressure relief devices
 - Emissions from vessel to be controlled via a hood placed over the charging door and venting to a HEPA filter (particulate control) and thermal oxidizer (organic emissions control).

APPENDIX II-I-4. PF-II EQUIPMENT LIST AND DESCRIPTION

2. Condenser

- Built by Lochhead Haggerty
- Two step cooling condensers and accumulator
- TP316L stainless steel tubes, tube sheets and heads
- Double pipe 4" primary condenser stainless steel inner pipe and carbon steel outer pipe; followed by secondary condenser, carbon steel outer shell, inner stainless tubes.
- Vapors leaving the condensers are vented to the RTO and HEPA filters.

3. Accumulator

- One 125-gallon horizontal SS accumulator tank (bottom)
- One 18-gallon horizontal SS accumulator tank (top)
- and 15-gallon horizontal SS tanks.

4. Chiller

- 10 Ton Chiller unit and coolant circulating pump
- Water surge/expansion tank, Make-up water inlet
- Shut-off valves, strainers, and stainless-steel flex hoses

5. Pumps

- (2) Vacuum Pump Gast 6066 and Motor, requiring VFD's
- (2) Vacuum Pump Busch R5 RC0010 and Motor, requiring VFD's

6. Pneumatic Drum Tumbler

- Manufactured by Morse Mfg. Co., Inc.
- Capable of rotating up to two drums of up to 85 gallons end over end.

APPENDIX II-I-4. PF-II EQUIPMENT LIST AND DESCRIPTION

7. Thermal Oxidizer (air emissions control system)

- Manufactured by Turner Envirologic
- Natural gas-fired burner
- 95% VOC minimum reduction efficiency (EPA Method 25A)

APPENDIX II-I-5

CERTIFICATION REPORT

(Due to the bulk of the entire report, only the appropriate text portion is included herewith. The entire as-built certification and report was transmitted to FDEP on October 26, 2000 as indicated on the attached cover letter.)

APPENDIX II-I-5. CERTIFICATION REPORT



October 26, 2000

Ashwin Patel
Supervisor, Hazardous Waste Section
Department Of Environmental Protection
7825 Baymeadows way, Suite B200
Jacksonville, FL 32256-7590

Re: As-Built Certification of Perma-Fix Facility: Phase III of Construction Activities

Dear Mr. Patel:

I am submitting the attached as-built certification statement and documentation for Perma-Fix of Florida, Gainesville. As noted in the certification, the phase III construction activities of this project have been completed and inspected, as of October 18, 2000.

Phase III of the construction activities included the following items:

- Perma-Fix II process equipment, incl. Plough-Share Unit, Vacuum Pump, and associated ancillary equipment
- Perma-Fix I process equipment (mixer) and work area enclosure
- Ventilation Ducting System for Perma-Fix I & II system (incl. ducting connection to the RTO, plough-share, absorber & dust control equipment)
- Air Pollution Control System for Perma-Fix I & II system (incl. pulse-back filter, condenser, absorber, cartridge filter, HEPA filter & RTO)
- Air pollution control & ventilation system for the Quonset Hut
- Minor Modifications to the Perma-Fix II unit and the Quonset Hut, as described in the attached certification report.

The RTO will now be able to operate at full load condition provided the PFII process is operated at full load capacity of 3000 pounds per day, and the LSV process is also being operated at full load capacity.


The newly constructed hazardous waste facility utilizing the Perma-Fix I and II processes for treatment, meet all the performance and regulatory requirements as of October 26, 2000, and is therefore ready to operate, pending final FDEP approval.

407 South Washington Avenue, Suite 1 • Titusville, Florida 32796 • Telephone (407) 269-2950 • FAX (407) 269-2951

APPENDIX II-I-5. CERTIFICATION REPORT

If there any questions or comments related to this submittal, please call me at (407) 269-2950 or (407) 468-5551.

Sincerely,


Suresh Chandnani, P.E.
Project Manager
JEA Inc.

Enclosures

Cc: Steven Douglas-PFF
Larry McNamara-PFF
Raymond Whittle-PFF
Ben Warren-PFF
Scott Ellis-SYA

APPENDIX II-I-5. CERTIFICATION REPORT

PERMA-FIX PF I AND PF II PROCESS FACILITY AND EQUIPMENT SYSTEM INSPECTION AND AS-BUILT CERTIFICATION

INTRODUCTION

Lewis Engineering and Consulting, Inc. (LEC) Gainesville, Florida, was requested in October, 2000, to perform a survey and inspection of the Perma-Fix PF II process facility and equipment located at their Gainesville, Florida site for the purpose of certifying the as-built construction of the physical plant and the PF I and PF II process equipment. Several tasks were performed in the course of completing this project, including, (1) installed equipment was inspected and compared with vendor information submitted to *Perma-Fix* for individual components or component systems for compliance verification of materials of construction, (2) dimensions were measured and recorded for preparation of drawings that would properly describe the physical plant and the relative location of the process equipment, and (3) process schematics were prepared illustrating the flow of materials through the PF II treatment process, and the supporting utilities, steam and cooling water, to the process equipment.

The majority of the PF II process equipment is newly acquired and installed, but two of the components were existing from previous applications and remained as important elements of the PF II process. Those two units are the *Lodige* Plough-Share unit and the *Ohmstede* shell and tube condenser. LEC had on two previous occasions conducted inspections of the *Lodige* Plough-Share unit for the purpose of certifying the condition and serviceability. Reports of those inspections and certifications were published to *Perma-Fix* on November 9, 1998 and June 30, 2000. Those two inspections separately focused on the internal construction of the Plough-Share, and the integrity of the cooling jacket, respectively.

DOCUMENTATION

As an aid to review of the as-built certification, a series of photographs of the PF II facility were recorded and are included in this report along with seven drawings depicting various elements of the facility's construction. Those drawings are included at the following tabs in the report document:

Lewis Engineering and Consulting, Inc.

APPENDIX II-I-5. CERTIFICATION REPORT

PERMA-FIX PF I & II PROCESS FACILITY AND EQUIPMENT
AS-BUILT CERTIFICATION
OCTOBER 23, 2000

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PF I & II SYSTEM DRAWINGS

- Tab 1: PERMAFIX PF II PROCESS SCHEMATIC
- Tab 2: STEAM/CONDENSATE SYSTEM SCHEMATIC
- Tab 3: COOLING WATER SYSTEM SCHEMATIC
- Tab 4: PF I & II EQUIPMENT BLDG OVERVIEW
- Tab 5: PF I & II FLOOR PLAN
- Tab 6: PF II PRIMARY PROCESS EQUIPMENT ELEV(ATION) VIEW
- Tab 7: PF I & II QUONSET HUT VENT(ILATION) LAYOUT

Figures 1 through 20 immediately following this narrative description show the various component elements of the PF I and PF II process, and the physical plant containing the equipment. The sample room area, roll-up door open, and closed, is shown in Figures 1 and 2, respectively. The drum conveyor tunnel adjoins the sample room with the entrance air-lock shown at the right in Figure 2. A side view of the drum conveyor tunnel as it intersects the side of the Quonset Hut that houses the PF II process equipment, and the exit air-lock from the tunnel, is shown in Figure 3. The portion of the drum conveyor tunnel parallel to the side of the Quonset hut is shown in Figure 4.

Drums of material for processing enter the Quonset hut via the conveyor tunnel and are held for initial processing, as necessary, in the Drum Mixing Station shown in Figure 5. At the left is the internal air-lock where drums exit the Quonset Hut. The external air-lock for the drum exit is shown in Figure 6.

The PF II process equipment is most readily reviewed by comparison of the physical equipment photographs with the drawing PF II PROCESS SCHEMATIC at the first tab. The processing equipment begins with the Plough-Share unit shown in Figure 7. This unit is located on top of a support frame at an elevation that allows drums for removal of processed material to be located beneath the discharge knife gate. Specific terminology regarding the component parts of the Plough-Share is provided in the drawing included at the tab titled PF II PRIMARY PROCESS ELEVATION VIEW.

The Plough-Share inspection report included under the tab titled PLOUGH-SHARE

Lewis Engineering and Consulting, Inc.

APPENDIX II-I-5. CERTIFICATION REPORT

PERMA-FIX PF I & II PROCESS FACILITY AND EQUIPMENT
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UNIT 11/9/98 INSPECTION describes the internal condition of the Plough-Share which was noted by inspection of the unit and review of the *Lodige* assembly drawing attached to the November 9, 1998 inspection report to be constructed primarily of Type 304 stainless steel (T304 SS). All internal surface components were found to be in excellent physical condition at that time. The external insulation was not removed at that time which prevented inspection and testing of the carbon steel heating/cooling jacket. The insulation was removed in June, 2000, so that the carbon steel jacket could be inspected. The jacket was surveyed via ultrasonic non-destructive testing (NDT) methods and the internal jacket annulus space was inspected visually and recorded on video tape using a flexible light-guide boroscope. A report of those findings and recommendations submitted to *Perma-Fix* on June 30, 2000, is included at the tab titled PLOUGH-SHARE UNIT 6/30/00 INSPECTION.

The Plough-Share was externally modified as compared to the configuration documented at the time of the November 9, 1998 and June 30, 2000 inspections. As shown in **Figure 7**, a large insulated cylindrical vessel is attached at the top left, and a dark carbon steel hopper is fitted to the top right. The cylindrical vessel is the PulseBack Filter manufactured by *MAC Equipment, Inc.* A detailed description of the function of the unit, and its construction are attached at the tab titled MAC EQUIPMENT PULSE FILTER SYSTEM. Inspection of the system confirmed that the unit supplied and installed on the Plough-Share unit was in conformance with the vendor's drawing and product specifications.

All volatilized gases liberated by the thermal desorption process in the steam heated Plough-Share are vented to the top of the *Ohmstede* vertical shell-and-tube condenser. A schematic is attached at the tab titled STEAM/CONDENSATE SYSTEM SCHEMATIC that identifies the boiler system external to the building that supplies steam for heating the Plough-Share and receives spent steam and condensate from the system. A portion of the steam feed is directed to the Pulse-Back Filter which is indicated in the schematic.

The condenser is described in the drawing included at the tab titled OHMSTEDE CONDENSER. All internal construction components in contact with the PF II process stream, specifically the tubes and tubesheets, are constructed from T316L SS. The gases enter at the top flanged port and condensed liquids and gases exit at the bottom side flanged port. A valved bottom drain for additional liquids removal is provided. Cooling water enters the shell at the bottom and exits at the top. The condenser is shown in several views in **Figures 8 through 12**. A schematic of the cooling water system illustrating the external package Marley cooling tower

Lewis Engineering and Consulting, Inc.

APPENDIX II-I-5. CERTIFICATION REPORT

PERMA-FIX PF I & II PROCESS FACILITY AND EQUIPMENT
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and the cooling water supply/return piping to the PF II process is included at the tab titled COOLING WATER SYSTEM SCHEMATIC.

Removal of volatilized gases from the Plough-Share is generated by the package *Squire-Cogswell* vacuum/absorber system shown in **Figures 9 and 10**. Vendor documentation provided with the package system are attached at the tab titled SQUIRE-COGSWELL VACUUM/ABSORBER. Gases and condensed liquids flow first into the stainless steel accumulator tank. Gas flow continues from the accumulator tank via the vacuum pump to the stainless steel kerosene absorber tank. All process lines and both tanks in the *Squire-Cogswell* system are constructed from T304SS. Gases not absorbed in the absorber tank vent from the top of the absorber tank via welded T304SS Sch.05 pipe to the fan induced exhaust ventilation system. The portion of the stainless steel piping exhaust system within the interior of the Quonset Hut is shown in **Figure 12**.

The balance of the PF II process is the exhaust ventilation system. Vertical drops from the exterior piping system into the open space of the Quonset Hut are shown in **Figure 13**. A description of the exhaust ventilation system is included at the tab titled PF I & II QUONSET HUT VENT LAYOUT. A 4200 CFM fan induced draft gathers PF II dust from the Infeed Hopper and unabsorbed gases from the Vacuum/Absorber system, and interior space air from the Quonset Hut, and draws them through an *AAF OptiFlo* Cartridge Filter system and an *AAF Astrocel* HEPA filter bank. Vendor information on the design and construction of the cartridge filter system is included at the tab titled AAF OPTIFLOW 2RC8 CARTRIDGE FILTER, and the hardware and filter media for the HEPA system is included at the tab titled HEPA FILTER.

The relative location of these systems are shown in the drawing at tab PF I & II FLOOR PLAN, and in the ventilation system drawing previously noted. The cartridge filter system is shown in **Figure 14**, and the Fan and HEPA filter module are shown in **Figure 15**. All of the piping for the exhaust ventilation system is welded Sch.05 T304SS. Exhaust gases exiting the fan are discharged via welded T304SS duct piping to the RTO unit. That piping and the RTO unit are shown in **Figures 16 through 18**.

Ventilation air to the Quonset Hut and PF II process is supplied by a 3,000 CFM fan shown in **Figures 19 and 20**. Spiral formed 16 gage T304SS pipe delivers air from the supply fan to the Sample Room and the Quonset Hut as indicated in the Ventilation System drawing.

APPENDIX II-I-5. CERTIFICATION REPORT

PERMA-FIX PF I & II PROCESS FACILITY AND EQUIPMENT
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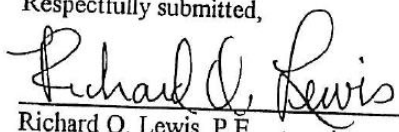
CONCLUSIONS

1. Thorough review of the Quonset Hut physical plant, the PF II process equipment and the vendor information and specifications has shown that the PF II process system as constructed complies with the materials specified for all components and component systems, and that the equipment is physically connected with respect to process streams and utilities as indicated in the attached drawings.
2. All of the PF II gas transfer and wetted system piping and components are constructed from either T304 or T316L stainless steel. Steam, steam condensate and cooling water piping and component hardware are constructed typically with carbon steel piping and ductile iron fittings.
3. The supply and exhaust ventilation system piping is constructed from T304SS, either spiral formed and welded for the supply air system, or all welded Sch 05 pipe for the PF II process and Quonset Hut airspace exhaust ventilation.
4. It is the opinion of the undersigned that the documentation provided in this as-built certification of the facility and process equipment faithfully and accurately describes the equipment as installed.

As required by EPA 40 CFR 270.11(d):

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 gather and evaluate 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.

Respectfully submitted,


Richard O. Lewis, P.E.
October 23, 2000 10/23/00

APPENDIX II-K-1

CLOSURE SAMPLING AND ANALYSIS PLAN

APPENDIX II-K-1. CLOSURE SAMPLING AND ANALYSIS PLAN

1.0 PURPOSE

The purpose of this plan is to provide an outline of the sampling and analysis that will be performed during closure of the Facility and also define the criteria for “clean” closure.

2.0 MEDIA TO BE SAMPLED AND ANALYZED

Samples of soil, rinse water, and possibly concrete will be collected during the performance of closure activities.

Sampling will be done in accordance with FDEP’s Standard Operating Procedures (SOPs) located at <http://www.dep.state.us/water/sas/sop/sops.htm>. Analyses will be performed in accordance with the appropriate most-recent USEPA SW-846 or standard ASTM methods at the time of partial or final closure.

Soil, rinsewater, and concrete samples (if applicable) will be analyzed for 40 CFR 261 Appendix VIII constituents that have been stored at the Facility.

3.0 FIELD SAMPLING PROCEDURES

3.1 RINSATE SAMPLES

The rinsate sampling procedure will consist of collecting samples of the final rinsate from each tank, secondary containment areas, and ancillary equipment.

Rinsewater samples will be collected utilizing standard sample collection techniques and placed into an appropriate sample jar. QA/QC samples will also be collected as described in Section 5.0. Appropriate personnel protective equipment (PPE) and sample collection procedures will be utilized in order to minimize exposure and potential cross-contamination of samples.

3.2 CONCRETE SAMPLES

Concrete samples may be collected as a means of verifying clean closure of concrete surfaces. Concrete chip samples, if collected, will be obtained utilizing a drill with a concrete bit or a hammer and chisel. The concrete dust and chips will be collected and placed into an appropriate sample jar. QA/QC samples will be collected as described in Section 5.0.

3.3 SUBSURFACE INVESTIGATION

Subsurface investigation activities will be conducted at the following areas:

- Processing and Storage Building (see Figure II-K-1).
- LSV Processing and Waste Storage Warehouse (see Figure II-K-2).
- Treatment and Operations Building (see Figure II-K-3).

Soil boring samples will be collected utilizing standard soil sample collection techniques at the locations identified on Figures II-K-1 through II-K-3. The proposed soil borings are located so as to provide qualitative information for characterizing the shallow surface where hazardous waste could have potentially migrated. The proposed soil borings will extend to a depth of two feet. Biased samples will be taken in concrete areas that

APPENDIX II-K-1. CLOSURE SAMPLING AND ANALYSIS PLAN

exhibit cracks or breaches in the concrete at the time of closure. Two soil samples will be collected throughout the two-foot sampling interval; one immediately beneath the ground surface, at the soil surface (at zero to six inches) and the second at a depth from approximately eighteen inches to two feet. The sample collected from the lower interval (18-24 inches) will be preserved and retained at the laboratory and analyzed only if the first soil sample result indicates concentrations above the Closure Performance Standard (Section K6).

If the eighteen-inch to two-foot depth sample at any of the given locations indicate concentrations above the Closure Performance Standards, additional soil samples will be collected during a subsequent sampling event at intervals to be determined in the field until the extent of vertical and horizontal contamination has been determined.

Prior to conducting additional subsurface investigations, a written work plan will be submitted to FDEP for review and approval. In lieu of a work plan proposal, FDEP may require that assessment and remediation (if needed) be performed in accordance with Chapter 62-780, F.A.C.

4.0 SAMPLING METHODS, EQUIPMENT, AND DECONTAMINATION

Split spoon, stainless steel tube, and/or other comparable sampling equipment will be used to collect the soil samples. Water samples will be collected with a Coliwasa or similar device. Concrete chip samples will be collected using a drill with a concrete bit or a chisel and hammer. Proper cleaning and decontamination of all sampling implements that contact the samples will be ensured to prevent cross-contamination and assure valid analytical results.

Workers who clean or use the sampling implements shall wear protective gloves to protect themselves and to prevent the equipment from being contaminated. During the decontamination procedures, all rinsate material will be accumulated and characterized whether hazardous waste or not, in accordance with all applicable regulations.

4.1 SAMPLE PRESERVATION AND HOLDING TIMES

The samples will be collected in accordance with FS 1006 (Preservation, Holding Times and Container Types).

5.0 QA/QC

5.1 QA/QC PLAN FOR FIELD SAMPLING

In order to ensure reliable sampling results, trip blanks, field blanks, and duplicate samples will be taken in accordance with FDEP's SOPs, FQ1210 (Quality Control Blanks) and FQ 1220 (Field Duplicates). Strict chain-of-custody procedures (FS1009 Sample Documentation and Evidentiary Custody) would be followed in transferring the samples to the selected analytical laboratory.

5.2 QA/QC PLAN FOR LABORATORY ANALYSIS

In order to ensure reliable analytical results, an independent laboratory that has been certified by the Florida Department of Health Environmental Laboratory Certification Program will be retained to perform the analyses on all rinsewater, concrete, and soil samples collected for closure purposes, unless such certification is not specifically required per Rule 62-160.300 F.A.C.

APPENDIX II-K-2

CLOSURE COST ESTIMATE

**PERMA-FIX of FLORIDA(RCRA)
FLD980711071**

Address: 1940 NW67th Place
Gainesville
FLORIDA
32653

Contact: Kurt Fogleman
352-395-1356

Comments: RCRA closure cost-2014

Activity	Units	Closure Cost
Container Storage Area	3	\$3,340,929.20
Tank Systems	3	\$205,060.55

\$3,545,989.75

Additional Costs \$0.00

Total Estimated Cost **\$3,545,989.75**

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Summary (CS_02-1)

Removal of Waste (CS-03)	\$4,857.07	
Demolition and Removal of Pads (CS-04)	\$0.00	
Removal of Process Equipment (CS-05)	\$0.00	
Removal of Soil (CS-06)	\$0.00	
Backfill and Grading (BF-01)	\$0.00	
Decontamination (DC-01)	\$1,867.87	
Sampling and Analysis (SA-02)	\$9,405.83	
Monitoring Well Installation (MW-01)	\$0.00	
Transportation (TR-01)	\$0.00	
Treatment and Disposal (TD-01)	\$783,293.98	
User Defined Cost (UD-01)	\$0.00	
Subtotal of Closure Costs	\$799,424.75	
Percentage of Engineering Expenses	10.0	%
Engineering Expenses	\$79,942.48	
Certification of Closure (CS-07)	\$4,118.00	
Subtotal	\$883,485.23	
Percentage of Contingency Allowance	20.0	%
Contingency Allowance	\$176,697.05	
Landfill Closure (Cover Installation) (CI-02)	\$0.00	
TOTAL COST OF CLOSURE	\$1,060,182.28	

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Inventory (CS_01-1)

MAXIMUM PERMITTED CAPACITY

Volume of liquid waste	72,105.0	gal
Volume of solid waste	0.0	yd3
Percent of loose solid debris	0.0	%
Percent of drummed solid waste	0.0	%
Percent of baled waste or other monolithic waste	0.0	%
Volume of loose solid debris	0.0	yd3
Volume of solid waste in drums	0.0	yd3
Volume of monolithic waste	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM PAD

Length (excluding any curbs or berm)	90.0	ft
Width (excluding any curbs or berm)	75.0	ft
Surface Area of Containment System Pad	6,750.0	ft2
Surface Area of Containment System Pad in yd2	750.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM PAD

Thickness	0.0	ft
Volume of Containment System Pad	0.0	ft3
Volume of Containment System Pad in yd3	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM BERM

Inside Perimeter	330.0	ft
Height	0.5	ft
Surface Area of Containment System Berm	165.0	ft2
Surface Area of Containment System Berm in yd2	18.3	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM BERM

Thickness	0.0	ft
Volume of Containment System Berm	0.0	ft3
Volume of Containment System Berm in yd3	0.0	yd3

SURFACE AREA OF OTHER STRUCTURES

Surface Area of Other Structures	0.0	ft2
Surface Area of Other Structures in yd2	0.0	yd2

VOLUME OF OTHER STRUCTURES

Volume of Other Structures	0.0	yd3
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Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

VOLUME OF CONTAMINATED SOIL TO BE REMOVED

Length	0.0	ft
Width	0.0	ft
Depth	0.0	ft
Volume of Contaminated Soil to be Removed	0.0	ft3
Volume of Contaminated Soil to be Removed in yd3	0.0	yd3

AREA OF SITE TO BE GRADED WITHOUT SOIL REMOVAL

Length	0.0	ft
Width	0.0	ft
Area of Site to be Graded Without Soil Removal	0.0	ft2
Area of Site to be Graded Without Soil Removal in yd2	0.0	yd2

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Removal of Waste (CS_03-1)

REMOVAL OF LOOSE SOLID DEBRIS

Volume of loose debris waste	0.0	yd3
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per yd3	\$2.06	per yd3
Cost to Remove Loose Solid Debris	\$0.00	

REMOVAL OF DRUMMED WASTE

Number of Drums	1,311	Drums
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per drum	\$3.57	
Cost to Remove Waste in Drums	\$4,680.27	

REMOVAL OF SOLID MONOLITHIC WASTE

Number of monolithic forms	0.0	Forms
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per form	\$14.26	per Form
Cost to Remove Monolithic Waste	\$0.00	

DRY SWEEP STORAGE PROCESS, HANDLING AREA

Surface area to dry sweep	6,750.0	ft2
Surface area to dry sweep in thousand square feet (MSF)	6.8	MSF
Labor and equipment cost per ft2	\$26.00	per MSF
Cost to Dry Sweep Area	\$176.80	
TOTAL COST OF WASTE REMOVAL	\$4,857.07	

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Certification of Closure (CS_07-1)

Number of units requiring certification of closure	1	Units
Cost of certification of closure per unit	\$4,118.00	
TOTAL COST OF CERTIFICATION OF CLOSURE	\$4,118.00	

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Decontamination Summary (DC_01-1)

Decontamination of Unit by Steam Cleaning or Pressure Washing (DC-02)	\$1,867.87
Decontamination of Unit by Sandblasting (DC-03)	\$0.00
Decontamination of Heavy Equipment (DC-04)	\$0.00
TOTAL COST OF DECONTAMINATION	\$1,867.87

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Decontamination by Steam Cleaning or Pressure Wash (DC_02-1)

Area of unit to be decontaminated	6,915.0	ft2
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$65.77	per Work Hour
Work rate to steam clean or pressure wash one ft2	0.0041	Work hr per ft2
Number of hours required to steam clean or pressure wash the unit	28.4	Work hrs
Subtotal of labor and equipment costs to decontaminate unit by steam cleaning or pressure washing	\$1,867.87	
Ratio of decontamination fluid to area	1.0	gals per ft2
Volume of decontamination fluid generated	6,915.0	gal
Decontamination fluid container type:		Bulk
Number of drums required to contain decontamination fluid for removal	0	Drums
Cost of one drum	\$83.85	per Drum
Cost of drums needed to contain decontamination fluid	\$0.00	
TOTAL COST OF DECONTAMINATION OF UNIT BY STEAM CLEANING OR PRESSURE WASHING	\$1,867.87	

Notes: Work rate for steam cleaning or pressure wash of 0.0041 hour/ft2 is more realistic and was obtained from the previous CostPro version.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Sampling and Analysis Inventory (SA_01-1)

Number of Drilling and Subsurface Soil Samples (2.5-inch boring)	8	Samples
Number of Drilling and Subsurface Soil Samples (4-inch boring)	0	Samples
Number of Concrete Core Samples	4	Samples
Number of Wipe Sample Locations	0	Sample Location
Number of Surface Water and Liquid Sample Locations	1	Sample Location
Number of Soil, Sludge, and Sediment Soil Samples	0	Sample Location
Number of Groundwater Sample Locations	0	Sample Location
Number of Lysimeters to be Sampled	0	Lysimeters

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Sampling and Analysis Summary (SA_02-1)

Drilling and Subsurface Soil Sample - 2.5-Inch-Diameter-Holes (SA-03)	\$5,766.37
Drilling and Subsurface Soil Sample - 4-Inch-Diameter-Holes (SA-04)	\$0.00
Concrete Core Sample (SA-05)	\$2,935.64
Wipe Sample (SA-06)	\$0.00
Surface Water and Liquid Sample (SA-07)	\$703.82
Soil, Sludge, and Sediment Sample (SA-08)	\$0.00
Groundwater Sample (SA-09)	\$0.00
Soil-Pore Liquid Sample (SA-10)	\$0.00
Analysis of Subsurface Soil Sample (SA-11)	\$0.00
TOTAL SAMPLING AND ANALYSIS COST	\$9,405.83

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03-1)

DRILLING AND SUBSURFACE SOIL SAMPLE COSTS - 2.5-INCH-DIAMETER-HOLES

Number of borings to be drilled	8	Borings
Enter depth of boreholes (sum of all)	16	ft
Choose the appropriate drilling method	Auger Boring - Level D	
Labor and equipment cost per work hour	\$102.72	per Work Hour
Choose the appropriate drilling method	Hollow-Stem Auger 2.5-Inch	
Work rate to drill 2.5-inch-diameter hole	0.3050	Work hr per Ft
Number of hours required to drill 2.5-inch diameter hole	4.9	Work hrs
Cost of Drilling 2.5-Inch Borings per Sampling Event	\$503.33	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$5,263.04	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR CLOSURE - 2.5- INCH-DIAMETER-HOLES	\$5,766.37	
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR POST-CLOSURE CARE PER EVENT - 2.5-INCH-DIAMETER-HOLES	\$5,766.37	per Event

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	8	\$718.42	0	\$2,873.68
Metals (SW 6010), per each metal	Both	\$13.73	64	\$27.46	0	\$878.72
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	8	\$377.66	0	\$1,510.64

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Concrete Core Samples (SA_05-1)

COLLECTION OF CORE SAMPLES

Number of corings to be drilled	4	Coring Samples
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$76.03	per Work Hour
Work rate to drill each core sample to a 6-inch depth	1.0000	Work hrs per Sample
Number of hours required to drill 3-inch-diameter boring	4.0	Work hrs
Cost of Collection per Sampling Event	\$304.12	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$2,631.52	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events per yr
TOTAL COST OF SAMPLING AND ANALYSIS OF CORE SAMPLES	\$2,935.64	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Concrete Core Samples (SA_05)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	4	\$718.42	0	\$1,436.84
Metals (SW 6010), per each metal	Both	\$13.73	32	\$27.46	0	\$439.36
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	4	\$377.66	0	\$755.32

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Surface Water and Liquid Samples (SA_07-1)

COLLECTION OF SURFACE WATER AND LIQUID SAMPLES

Number of sampling locations	1	Sample Location
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$91.88	per Work Hour
Work rate required to collect samples from one sampling location	0.5000	Work hrs per Sample
Number of hours required to collect all samples	0.5	Work hrs
Cost of Collection per Sampling Event	\$45.94	per Event

ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES

Cost of Analysis per Sampling Event	\$657.88	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES	\$703.82	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB Container Storage 11/10/2014

Surface Water and Liquid Samples (SA_07)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base neutral & acid extractable organics (SW 3510/SW 8270)	Liquid	\$359.21	1	\$718.42	0	\$359.21
Metals (SW 6010), per each metal	Both	\$13.73	8	\$27.46	0	\$109.84
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	1	\$377.66	0	\$188.83

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Treatment and Disposal Summary (TD_01-1)

Treatment and Disposal of Wastes (TD-02)	\$774,407.70
Treatment and Disposal of Decontamination Fluids (TD-03)	\$8,886.28
Total Cost of Treatment and Disposal	\$783,293.98

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Treatment and Disposal of Waste (TD_02-1)

SOLID WASTE TREATMENT AND DISPOSAL

Solid Waste Type (Optional: Enter Name)		
Volume in yd3 of solid waste to be treated and disposed of	0.0	yd3
Treatment and disposal costs per yd3	\$0.00	per yd3
Cost to Treat and Dispose of Solid Waste	\$0.00	

LIQUID WASTE TREATMENT AND DISPOSAL

Liquid Waste Type (Optional: Enter Name)	0	
Volume in gallons of liquid waste to be treated and disposed of	72,105.0	gal
Treatment and disposal costs per gallon	\$10.74	per Gallon
Cost to Treat and Dispose of Liquid Waste	\$774,407.70	

DRUMMED WASTE TREATMENT AND DISPOSAL

Drummed Waste Type (Optional: Enter Name)	0	
Number of drums to be treated and disposed of	1,311	Drums
Treatment and disposal costs per drum	\$0.00	per Drum
Cost to Treat and Dispose of Drummed Waste	\$0.00	
TOTAL COST FOR TREATMENT AND DISPOSAL OF WASTE	\$774,407.70	

Notes: Treatment & Disposal Cost includes Transportation cost also. Treatment & Disposal Cost/gal is derived as weighted average cost of 7425 gals of LSV waste @ 15/gal; 11275 gals of mixed waste liquids @ 15/gal; 7425 gals of mixed waste solids @ 60.90/gal; 22055 gals of HW liquid fuel @ 0.37/gal; 6875 gals of HW solids for fuel blending @ 2.05/gal; 9075 gals of Haz debris @ 1.05/gal; and 7975 gal of high water-low BTU wastewater @ 1.25/gal.

Facility: PERMA-FIX of FLORIDA **Unit:** PSB Container Storage 11/10/2014
(RCRA)

Treatment and Disposal of Decon Fluid (TD_03-1)

Volume of decontamination fluid generated from closure activities

Volume of decontamination fluid from Primary Unit	0.0	gal
Volume of decontamination fluid generated by steam cleaning or pressure washing (DC-02)	6,915.0	gal
Volume of decontamination fluid from heavy equipment (DC-04)	0.0	gal
Total Volume of Decontamination Fluid	6,915.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$77.41	per Work Hour
Work rate to pump decontamination fluid to a holding tank	0.0001	Work hr per gal
Number of hours required to pump decontamination fluid to a holding tank	0.6915	Work hrs
Subtotal of labor and equipment costs to pump decontamination fluid to a holding tank	\$53.53	
Number of days required to rent a holding tank	1	Days
Holding tank rental fee (10,000 gal tank per day)	\$189.00	per Day
Number of tanks required	1	Tanks
Subtotal of tank rental costs	\$189.00	
Cost for treatment and disposal	\$1.25	per Gallon
Treatment and disposal costs for bulk liquid	\$8,643.75	
TOTAL COST TO TREATMENT AND DISPOSE OF DECONTAMINATION FLUID AS A BULK LIQUID	\$8,886.28	

Notes: Treatment and Disposal cost includes Transportation also.

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Summary (CS_02-1)

Removal of Waste (CS-03)	\$2,355.00	
Demolition and Removal of Pads (CS-04)	\$0.00	
Removal of Process Equipment (CS-05)	\$0.00	
Removal of Soil (CS-06)	\$0.00	
Backfill and Grading (BF-01)	\$0.00	
Decontamination (DC-01)	\$756.36	
Sampling and Analysis (SA-02)	\$7,938.01	
Monitoring Well Installation (MW-01)	\$0.00	
Transportation (TR-01)	\$0.00	
Treatment and Disposal (TD-01)	\$685,884.16	
User Defined Cost (UD-01)	\$0.00	
Subtotal of Closure Costs	\$696,933.53	
Percentage of Engineering Expenses	10.0	%
Engineering Expenses	\$69,693.35	
Certification of Closure (CS-07)	\$0.00	
Subtotal	\$766,626.88	
Percentage of Contingency Allowance	20.0	%
Contingency Allowance	\$153,325.38	
Landfill Closure (Cover Installation) (CI-02)	\$0.00	
TOTAL COST OF CLOSURE	\$919,952.26	

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Inventory (CS_01-1)

MAXIMUM PERMITTED CAPACITY

Volume of liquid waste	35,200.0	gal
Volume of solid waste	0.0	yd3
Percent of loose solid debris	0.0	%
Percent of drummed solid waste	0.0	%
Percent of baled waste or other monolithic waste	0.0	%
Volume of loose solid debris	0.0	yd3
Volume of solid waste in drums	0.0	yd3
Volume of monolithic waste	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM PAD

Length (excluding any curbs or berm)	52.3	ft
Width (excluding any curbs or berm)	52.3	ft
Surface Area of Containment System Pad	2,735.3	ft2
Surface Area of Containment System Pad in yd2	303.9	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM PAD

Thickness	0.5	ft
Volume of Containment System Pad	1,367.6	ft3
Volume of Containment System Pad in yd3	50.7	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM BERM

Inside Perimeter	209.0	ft
Height	0.3	ft
Surface Area of Containment System Berm	62.7	ft2
Surface Area of Containment System Berm in yd2	7.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM BERM

Thickness	0.0	ft
Volume of Containment System Berm	0.0	ft3
Volume of Containment System Berm in yd3	0.0	yd3

SURFACE AREA OF OTHER STRUCTURES

Surface Area of Other Structures	0.0	ft2
Surface Area of Other Structures in yd2	0.0	yd2

VOLUME OF OTHER STRUCTURES

Volume of Other Structures	0.0	yd3
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Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

VOLUME OF CONTAMINATED SOIL TO BE REMOVED

Length	0.0	ft
Width	0.0	ft
Depth	0.0	ft
Volume of Contaminated Soil to be Removed	0.0	ft3
Volume of Contaminated Soil to be Removed in yd3	0.0	yd3

AREA OF SITE TO BE GRADED WITHOUT SOIL REMOVAL

Length	0.0	ft
Width	0.0	ft
Area of Site to be Graded Without Soil Removal	0.0	ft2
Area of Site to be Graded Without Soil Removal in yd2	0.0	yd2

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Removal of Waste (CS_03-1)

REMOVAL OF LOOSE SOLID DEBRIS

Volume of loose debris waste	0.0	yd3
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per yd3	\$2.06	per yd3
Cost to Remove Loose Solid Debris	\$0.00	

REMOVAL OF DRUMMED WASTE

Number of Drums	640	Drums
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per drum	\$3.57	
Cost to Remove Waste in Drums	\$2,284.80	

REMOVAL OF SOLID MONOLITHIC WASTE

Number of monolithic forms	0.0	Forms
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per form	\$14.26	per Form
Cost to Remove Monolithic Waste	\$0.00	

DRY SWEEP STORAGE PROCESS, HANDLING AREA

Surface area to dry sweep	2,735.3	ft2
Surface area to dry sweep in thousand square feet (MSF)	2.7	MSF
Labor and equipment cost per ft2	\$26.00	per MSF
Cost to Dry Sweep Area	\$70.20	
TOTAL COST OF WASTE REMOVAL	\$2,355.00	

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Container Storage Areas Certification of Closure (CS_07-1)

Number of units requiring certification of closure	1	Units
Cost of certification of closure per unit	\$0.00	
TOTAL COST OF CERTIFICATION OF CLOSURE	\$0.00	

Notes: Page A-10 of CostPro user manual states that if a number of units of the same type are being closed in the same manner at the same time the user may choose the cost of certification only once for all similar units. Certification cost is included in the PSB container storage area.

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Decontamination Summary (DC_01-1)

Decontamination of Unit by Steam Cleaning or Pressure Washing (DC-02)	\$756.36
Decontamination of Unit by Sandblasting (DC-03)	\$0.00
Decontamination of Heavy Equipment (DC-04)	\$0.00
TOTAL COST OF DECONTAMINATION	\$756.36

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Decontamination by Steam Cleaning or Pressure Wash (DC_02-1)

Area of unit to be decontaminated	2,798.0	ft2
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per hour	\$65.77	per Work Hour
Work rate to steam clean or pressure wash one ft2	0.0041	Work hr per ft2
Number of hours required to steam clean or pressure wash the unit	11.5	Work hrs
Subtotal of labor and equipment costs to decontaminate unit by steam cleaning or pressure washing	\$756.36	
Ratio of decontamination fluid to area	1.0	gals per ft2
Volume of decontamination fluid generated	2,798.0	gal
Decontamination fluid container type:		Bulk
Number of drums required to contain decontamination fluid for removal	0	Drums
Cost of one drum	\$83.85	per Drum
Cost of drums needed to contain decontamination fluid	\$0.00	
TOTAL COST OF DECONTAMINATION OF UNIT BY STEAM CLEANING OR PRESSURE WASHING	\$756.36	

Notes: Work rate for steam cleaning or pressure wash of 0.0041 hour/ft2 is more realistic and was obtained from the previous CostPro version.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Sampling and Analysis Inventory (SA_01-1)

Number of Drilling and Subsurface Soil Samples (2.5-inch boring)	8	Samples
Number of Drilling and Subsurface Soil Samples (4-inch boring)	0	Samples
Number of Concrete Core Samples	2	Samples
Number of Wipe Sample Locations	0	Sample Location
Number of Surface Water and Liquid Sample Locations	1	Sample Location
Number of Soil, Sludge, and Sediment Soil Samples	0	Sample Location
Number of Groundwater Sample Locations	0	Sample Location
Number of Lysimeters to be Sampled	0	Lysimeters

Notes:

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Sampling and Analysis Summary (SA_02-1)

Drilling and Subsurface Soil Sample - 2.5-Inch-Diameter-Holes (SA-03)	\$5,766.37
Drilling and Subsurface Soil Sample - 4-Inch-Diameter-Holes (SA-04)	\$0.00
Concrete Core Sample (SA-05)	\$1,467.82
Wipe Sample (SA-06)	\$0.00
Surface Water and Liquid Sample (SA-07)	\$703.82
Soil, Sludge, and Sediment Sample (SA-08)	\$0.00
Groundwater Sample (SA-09)	\$0.00
Soil-Pore Liquid Sample (SA-10)	\$0.00
Analysis of Subsurface Soil Sample (SA-11)	\$0.00
TOTAL SAMPLING AND ANALYSIS COST	\$7,938.01

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03-1)

DRILLING AND SUBSURFACE SOIL SAMPLE COSTS - 2.5-INCH-DIAMETER-HOLES

Number of borings to be drilled	8	Borings
Enter depth of boreholes (sum of all)	16	ft
Choose the appropriate drilling method	Auger Boring - Level D	
Labor and equipment cost per work hour	\$102.72	per Work Hour
Choose the appropriate drilling method	Hollow-Stem Auger 2.5-Inch	
Work rate to drill 2.5-inch-diameter hole	0.3050	Work hr per Ft
Number of hours required to drill 2.5-inch diameter hole	4.9	Work hrs
Cost of Drilling 2.5-Inch Borings per Sampling Event	\$503.33	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$5,263.04	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR CLOSURE - 2.5- INCH-DIAMETER-HOLES	\$5,766.37	
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR POST-CLOSURE CARE PER EVENT - 2.5-INCH-DIAMETER-HOLES	\$5,766.37	per Event

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	8	\$718.42	0	\$2,873.68
Metals (SW 6010), per each metal	Both	\$13.73	64	\$27.46	0	\$878.72
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	8	\$377.66	0	\$1,510.64

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Concrete Core Samples (SA_05-1)

COLLECTION OF CORE SAMPLES

Number of corings to be drilled	2	Coring Samples
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$76.03	per Work Hour
Work rate to drill each core sample to a 6-inch depth	1.0000	Work hrs per Sample
Number of hours required to drill 3-inch-diameter boring	2.0	Work hrs
Cost of Collection per Sampling Event	\$152.06	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$1,315.76	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events per yr
TOTAL COST OF SAMPLING AND ANALYSIS OF CORE SAMPLES	\$1,467.82	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Concrete Core Samples (SA_05)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	2	\$718.42	0	\$718.42
Metals (SW 6010), per each metal	Both	\$13.73	16	\$27.46	0	\$219.68
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	2	\$377.66	0	\$377.66

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Surface Water and Liquid Samples (SA_07-1)

COLLECTION OF SURFACE WATER AND LIQUID SAMPLES

Number of sampling locations	1	Sample Location
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$91.88	per Work Hour
Work rate required to collect samples from one sampling location	0.5000	Work hrs per Sample
Number of hours required to collect all samples	0.5	Work hrs
Cost of Collection per Sampling Event	\$45.94	per Event

ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES

Cost of Analysis per Sampling Event	\$657.88	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES	\$703.82	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB Container Storage 11/10/2014

Surface Water and Liquid Samples (SA_07)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base neutral & acid extractable organics (EPA 625)	Liquid	\$359.21	1	\$718.42	0	\$359.21
Metals (SW 6010), per each metal	Both	\$13.73	8	\$27.46	0	\$109.84
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	1	\$377.66	0	\$188.83

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Treatment and Disposal Summary (TD_01-1)

Treatment and Disposal of Wastes (TD-02)	\$682,176.00
Treatment and Disposal of Decontamination Fluids (TD-03)	\$3,708.16
Total Cost of Treatment and Disposal	\$685,884.16

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Treatment and Disposal of Waste (TD_02-1)

SOLID WASTE TREATMENT AND DISPOSAL

Solid Waste Type (Optional: Enter Name)	0	
Volume in yd3 of solid waste to be treated and disposed of	0.0	yd3
Treatment and disposal costs per yd3	\$0.00	per yd3
Cost to Treat and Dispose of Solid Waste	\$0.00	

LIQUID WASTE TREATMENT AND DISPOSAL

Liquid Waste Type (Optional: Enter Name)	0	
Volume in gallons of liquid waste to be treated and disposed of	35,200.0	gal
Treatment and disposal costs per gallon	\$19.38	per Gallon
Cost to Treat and Dispose of Liquid Waste	\$682,176.00	

DRUMMED WASTE TREATMENT AND DISPOSAL

Drummed Waste Type (Optional: Enter Name)	0	
Number of drums to be treated and disposed of	640	Drums
Treatment and disposal costs per drum	\$0.00	per Drum
Cost to Treat and Dispose of Drummed Waste	\$0.00	
TOTAL COST FOR TREATMENT AND DISPOSAL OF WASTE	\$682,176.00	

Notes: Treatment & Disposal Cost includes Transportation cost also. Treatment & Disposal and Transportation Cost/gal is derived as weighted average cost of 16610 gals of mixed waste liquids @ 15/gal; 6875 gals of mixed waste solids @ 60.90/gal; 2365 gals of Haz debris @ 1.05/gal; 3575 gal of high water-low BTU wastewater @ 1.25/gal ; and 5775 gals of hazardous solids/toxics @ 1.25/gal.

Facility: PERMA-FIX of FLORIDA **Unit:** TOB Container Storage 11/10/2014
(RCRA)

Treatment and Disposal of Decon Fluid (TD_03-1)

Volume of decontamination fluid generated from closure activities

Volume of decontamination fluid from Primary Unit	0.0	gal
Volume of decontamination fluid generated by steam cleaning or pressure washing (DC-02)	2,798.0	gal
Volume of decontamination fluid from heavy equipment (DC-04)	0.0	gal
Total Volume of Decontamination Fluid	2,798.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$77.41	per Work Hour
Work rate to pump decontamination fluid to a holding tank	0.0001	Work hr per gal
Number of hours required to pump decontamination fluid to a holding tank	0.2798	Work hrs
Subtotal of labor and equipment costs to pump decontamination fluid to a holding tank	\$21.66	
Number of days required to rent a holding tank	1	Days
Holding tank rental fee (10,000 gal tank per day)	\$189.00	per Day
Number of tanks required	1	Tanks
Subtotal of tank rental costs	\$189.00	
Cost for treatment and disposal	\$1.25	per Gallon
Treatment and disposal costs for bulk liquid	\$3,497.50	
TOTAL COST TO TREATMENT AND DISPOSE OF DECONTAMINATION FLUID AS A BULK LIQUID	\$3,708.16	

Notes: Treatment and Disposal Cost includes Transportation cost.

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Container Storage Areas Summary (CS_02-1)

Removal of Waste (CS-03)	\$3,646.76	
Demolition and Removal of Pads (CS-04)	\$0.00	
Removal of Process Equipment (CS-05)	\$0.00	
Removal of Soil (CS-06)	\$0.00	
Backfill and Grading (BF-01)	\$0.00	
Decontamination (DC-01)	\$1,282.52	
Sampling and Analysis (SA-02)	\$9,619.32	
Monitoring Well Installation (MW-01)	\$0.00	
Transportation (TR-01)	\$0.00	
Treatment and Disposal (TD-01)	\$1,016,356.45	
User Defined Cost (UD-01)	\$0.00	
Subtotal of Closure Costs	\$1,030,905.05	
Percentage of Engineering Expenses	10.0	%
Engineering Expenses	\$103,090.50	
Certification of Closure (CS-07)	\$0.00	
Subtotal	\$1,133,995.55	
Percentage of Contingency Allowance	20.0	%
Contingency Allowance	\$226,799.11	
Landfill Closure (Cover Installation) (CI-02)	\$0.00	
TOTAL COST OF CLOSURE	\$1,360,794.66	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Container Storage Areas Inventory (CS_01-1)

MAXIMUM PERMITTED CAPACITY

Volume of liquid waste	54,340.0	gal
Volume of solid waste	0.0	yd3
Percent of loose solid debris	0.0	%
Percent of drummed solid waste	0.0	%
Percent of baled waste or other monolithic waste	0.0	%
Volume of loose solid debris	0.0	yd3
Volume of solid waste in drums	0.0	yd3
Volume of monolithic waste	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM PAD

Length (excluding any curbs or berm)	68.0	ft
Width (excluding any curbs or berm)	68.0	ft
Surface Area of Containment System Pad	4,624.0	ft2
Surface Area of Containment System Pad in yd2	513.8	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM PAD

Thickness	0.0	ft
Volume of Containment System Pad	0.0	ft3
Volume of Containment System Pad in yd3	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM BERM

Inside Perimeter	272.0	ft
Height	0.5	ft
Surface Area of Containment System Berm	136.0	ft2
Surface Area of Containment System Berm in yd2	15.1	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM BERM

Thickness	0.0	ft
Volume of Containment System Berm	0.0	ft3
Volume of Containment System Berm in yd3	0.0	yd3

SURFACE AREA OF OTHER STRUCTURES

Surface Area of Other Structures	0.0	ft2
Surface Area of Other Structures in yd2	0.0	yd2

VOLUME OF OTHER STRUCTURES

Volume of Other Structures	0.0	yd3
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Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

VOLUME OF CONTAMINATED SOIL TO BE REMOVED

Length	0.0	ft
Width	0.0	ft
Depth	0.0	ft
Volume of Contaminated Soil to be Removed	0.0	ft3
Volume of Contaminated Soil to be Removed in yd3	0.0	yd3

AREA OF SITE TO BE GRADED WITHOUT SOIL REMOVAL

Length	0.0	ft
Width	0.0	ft
Area of Site to be Graded Without Soil Removal	0.0	ft2
Area of Site to be Graded Without Soil Removal in yd2	0.0	yd2

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Container Storage Areas Removal of Waste (CS_03-1)

REMOVAL OF LOOSE SOLID DEBRIS

Volume of loose debris waste	0.0	yd3
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per yd3	\$2.06	per yd3
Cost to Remove Loose Solid Debris	\$0.00	

REMOVAL OF DRUMMED WASTE

Number of Drums	988	Drums
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per drum	\$3.57	
Cost to Remove Waste in Drums	\$3,527.16	

REMOVAL OF SOLID MONOLITHIC WASTE

Number of monolithic forms	0.0	Forms
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per form	\$14.26	per Form
Cost to Remove Monolithic Waste	\$0.00	

DRY SWEEP STORAGE PROCESS, HANDLING AREA

Surface area to dry sweep	4,624.0	ft2
Surface area to dry sweep in thousand square feet (MSF)	4.6	MSF
Labor and equipment cost per ft2	\$26.00	per MSF
Cost to Dry Sweep Area	\$119.60	
TOTAL COST OF WASTE REMOVAL	\$3,646.76	

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Container Storage Areas Certification of Closure (CS_07-1)

Number of units requiring certification of closure	1	Units
Cost of certification of closure per unit	\$0.00	
TOTAL COST OF CERTIFICATION OF CLOSURE	\$0.00	

Notes: Page A-10 of CostPro user manual states that if a number of units of the same type are being closed in the same manner at the same time the user may choose the cost of certification only once for all similar units. Certification cost is included in the PSB container storage area.

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Decontamination Summary (DC_01-1)

Decontamination of Unit by Steam Cleaning or Pressure Washing (DC-02)	\$1,282.52
Decontamination of Unit by Sandblasting (DC-03)	\$0.00
Decontamination of Heavy Equipment (DC-04)	\$0.00
TOTAL COST OF DECONTAMINATION	\$1,282.52

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Decontamination by Steam Cleaning or Pressure Wash (DC_02-1)

Area of unit to be decontaminated	4,760.0	ft2
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$65.77	per Work Hour
Work rate to steam clean or pressure wash one ft2	0.0041	Work hr per ft2
Number of hours required to steam clean or pressure wash the unit	19.5	Work hrs
Subtotal of labor and equipment costs to decontaminate unit by steam cleaning or pressure washing	\$1,282.52	
Ratio of decontamination fluid to area	1.0	gals per ft2
Volume of decontamination fluid generated	4,760.0	gal
Decontamination fluid container type:		Bulk
Number of drums required to contain decontamination fluid for removal	0	Drums
Cost of one drum	\$83.85	per Drum
Cost of drums needed to contain decontamination fluid	\$0.00	
TOTAL COST OF DECONTAMINATION OF UNIT BY STEAM CLEANING OR PRESSURE WASHING	\$1,282.52	

Notes: Work rate for steam cleaning or pressure wash of 0.0041 hour/ft2 is more realistic and was obtained from the previous CostPro version.

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Sampling and Analysis Inventory (SA_01-1)

Number of Drilling and Subsurface Soil Samples (2.5-inch boring)	8	Samples
Number of Drilling and Subsurface Soil Samples (4-inch boring)	0	Samples
Number of Concrete Core Samples	4	Samples
Number of Wipe Sample Locations	0	Sample Location
Number of Surface Water and Liquid Sample Locations	1	Sample Location
Number of Soil, Sludge, and Sediment Soil Samples	0	Sample Location
Number of Groundwater Sample Locations	0	Sample Location
Number of Lysimeters to be Sampled	0	Lysimeters

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Sampling and Analysis Summary (SA_02-1)

Drilling and Subsurface Soil Sample - 2.5-Inch-Diameter-Holes (SA-03)	\$5,979.86
Drilling and Subsurface Soil Sample - 4-Inch-Diameter-Holes (SA-04)	\$0.00
Concrete Core Sample (SA-05)	\$2,935.64
Wipe Sample (SA-06)	\$0.00
Surface Water and Liquid Sample (SA-07)	\$703.82
Soil, Sludge, and Sediment Sample (SA-08)	\$0.00
Groundwater Sample (SA-09)	\$0.00
Soil-Pore Liquid Sample (SA-10)	\$0.00
Analysis of Subsurface Soil Sample (SA-11)	\$0.00
TOTAL SAMPLING AND ANALYSIS COST	\$9,619.32

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03-1)

DRILLING AND SUBSURFACE SOIL SAMPLE COSTS - 2.5-INCH-DIAMETER-HOLES

Number of borings to be drilled	8	Borings
Enter depth of boreholes (sum of all)	16	ft
Choose the appropriate drilling method	Auger Boring - Level C	
Labor and equipment cost per work hour	\$146.29	per Work Hour
Choose the appropriate drilling method	Hollow-Stem Auger 2.5-Inch	
Work rate to drill 2.5-inch-diameter hole	0.3050	Work hr per Ft
Number of hours required to drill 2.5-inch diameter hole	4.9	Work hrs
Cost of Drilling 2.5-Inch Borings per Sampling Event	\$716.82	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$5,263.04	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR CLOSURE - 2.5- INCH-DIAMETER-HOLES	\$5,979.86	
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR POST-CLOSURE CARE PER EVENT - 2.5-INCH-DIAMETER-HOLES	\$5,979.86	per Event

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	8	\$718.42	0	\$2,873.68
Metals (SW 6010), per each metal	Both	\$13.73	64	\$27.46	0	\$878.72
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	8	\$377.66	0	\$1,510.64

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Concrete Core Samples (SA_05-1)

COLLECTION OF CORE SAMPLES

Number of corings to be drilled	4	Coring Samples
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$76.03	per Work Hour
Work rate to drill each core sample to a 6-inch depth	1.0000	Work hrs per Sample
Number of hours required to drill 3-inch-diameter boring	4.0	Work hrs
Cost of Collection per Sampling Event	\$304.12	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$2,631.52	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events per yr
TOTAL COST OF SAMPLING AND ANALYSIS OF CORE SAMPLES	\$2,935.64	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Concrete Core Samples (SA_05)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	4	\$718.42	0	\$1,436.84
Metals (SW 6010), per each metal	Both	\$13.73	32	\$27.46	0	\$439.36
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	4	\$377.66	0	\$755.32

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Surface Water and Liquid Samples (SA_07-1)

COLLECTION OF SURFACE WATER AND LIQUID SAMPLES

Number of sampling locations	1	Sample Location
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$91.88	per Work Hour
Work rate required to collect samples from one sampling location	0.5000	Work hrs per Sample
Number of hours required to collect all samples	0.5	Work hrs
Cost of Collection per Sampling Event	\$45.94	per Event

ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES

Cost of Analysis per Sampling Event	\$657.88	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES	\$703.82	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Surface Water and Liquid Samples (SA_07)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base neutral & acid extractable organics (SW 3510/SW 8270)	Liquid	\$359.21	1	\$718.42	0	\$359.21
Metals (SW 6010), per each metal	Both	\$13.73	8	\$27.46	0	\$109.84
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	1	\$377.66	0	\$188.83

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Treatment and Disposal Summary (TD_01-1)

Treatment and Disposal of Wastes (TD-02)	\$1,010,180.60
Treatment and Disposal of Decontamination Fluids (TD-03)	\$6,175.85
Total Cost of Treatment and Disposal	\$1,016,356.45

Facility: PERMA-FIX of FLORIDA **Unit:** LSV Container Storage 11/10/2014
(RCRA)

Treatment and Disposal of Waste (TD_02-1)

SOLID WASTE TREATMENT AND DISPOSAL

Solid Waste Type (Optional: Enter Name)	0	
Volume in yd3 of solid waste to be treated and disposed of	0.0	yd3
Treatment and disposal costs per yd3	\$0.00	per yd3
Cost to Treat and Dispose of Solid Waste	\$0.00	

LIQUID WASTE TREATMENT AND DISPOSAL

Liquid Waste Type (Optional: Enter Name)	0	
Volume in gallons of liquid waste to be treated and disposed of	54,340.0	gal
Treatment and disposal costs per gallon	\$18.59	per Gallon
Cost to Treat and Dispose of Liquid Waste	\$1,010,180.60	

DRUMMED WASTE TREATMENT AND DISPOSAL

Drummed Waste Type (Optional: Enter Name)	0	
Number of drums to be treated and disposed of	988	Drums
Treatment and disposal costs per drum	\$0.00	per Drum
Cost to Treat and Dispose of Drummed Waste	\$0.00	
TOTAL COST FOR TREATMENT AND DISPOSAL OF WASTE	\$1,010,180.60	

Notes: Treatment & Disposal Cost includes Transportation cost also. Treatment & Disposal and Transportation Cost/gal is derived as weighted average cost of 11440 gals of mixed waste liquids @ 15/gal; 13200 gals of mixed waste solids @ 60.90/gal; 11550 gals of Haz debris @ 1.05/gal; 10175 gal of high water-low BTU wastewater @ 1.25/gal ; and 7975 gals of hazardous solids/toxics @ 1.25/gal.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV Container Storage 11/10/2014

Treatment and Disposal of Decon Fluid (TD_03-1)

Volume of decontamination fluid generated from closure activities

Volume of decontamination fluid from Primary Unit	0.0	gal
Volume of decontamination fluid generated by steam cleaning or pressure washing (DC-02)	4,760.0	gal
Volume of decontamination fluid from heavy equipment (DC-04)	0.0	gal
Total Volume of Decontamination Fluid	4,760.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$77.41	per Work Hour
Work rate to pump decontamination fluid to a holding tank	0.0001	Work hr per gal
Number of hours required to pump decontamination fluid to a holding tank	0.476	Work hrs
Subtotal of labor and equipment costs to pump decontamination fluid to a holding tank	\$36.85	
Number of days required to rent a holding tank	1	Days
Holding tank rental fee (10,000 gal tank per day)	\$189.00	per Day
Number of tanks required	1	Tanks
Subtotal of tank rental costs	\$189.00	
Cost for treatment and disposal	\$1.25	per Gallon
Treatment and disposal costs for bulk liquid	\$5,950.00	
TOTAL COST TO TREATMENT AND DISPOSE OF DECONTAMINATION FLUID AS A BULK LIQUID	\$6,175.85	

Notes: Treatment and Disposal cost includes transportation cost.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Tank Systems Summary (TS_02-1)

Removal of Waste (TS-03)	\$52.78	
Tank System Purging (ignitable waste only) (TS-04)	\$49.59	
Flushing the Tank and Piping (TS-05)	\$105.57	
Excavation, Disassembly, and Loading (TS-06)	\$5,496.36	
Demolition and Removal of Containment System (TS-07)	\$0.00	
Removal of Soil (TS-08)	\$0.00	
Backfill and Grading (BF-01)	\$0.00	
Decontamination (DC-01)	\$190.73	
Sampling and Analysis (SA-02)	\$2,861.79	
Monitoring Well Installation (MW-01)	\$0.00	
Transportation (TR-01)	\$1,692.00	
Treatment and Disposal (TD-01)	\$15,439.96	
User Defined Cost (UD-01)	\$0.00	
Subtotal of Closure Costs	\$25,888.78	
Percentage of Engineering Expenses	10.0	%
Engineering Expenses	\$2,588.88	
Certification of Closure (TS-09)	\$4,118.00	
Subtotal	\$32,595.66	
Percentage of Contingency Allowance	20.0	%
Contingency Allowance	\$6,519.13	
Landfill Closure (Cover Installation) (CI-02)	\$0.00	
TOTAL COST OF CLOSURE	\$39,114.79	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Tank Systems Inventory (TS_01-1)

UNIT DESCRIPTION AND MAXIMUM PERMITTED CAPACITY

Type of tank system		Underground
Height or length of tank	0.0	ft
Diameter of tank	0.0	ft
Maximum permitted capacity of the tank	906.0	gal
Total length of ancillary piping	400.0	ft
Nominal diameter of ancillary piping	2.0	in
Maximum capacity of ancillary piping	65.3	gal
Maximum capacity of tank and ancillary piping	971.3	gal

SURFACE AREA OF TANK SYSTEM

Surface area of tank (interior and exterior)	350.0	ft2
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VOLUME OF TANK SYSTEM TO BE REMOVED

Volume of Tank System to be Removed	129.8	ft3
Volume of Tank System to be Removed in yd3	4.8	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM PAD

Length	0.0	ft
Width	0.0	ft
Surface Area of Secondary Containment System Pad	0.0	ft2
Surface Area of Secondary Containment System Pad in yd2	0.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM PAD

Thickness	0.0	ft
Volume of Secondary Containment Pad	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM BERM

Total Length	0.0	ft
Height	0.0	ft
Surface Area of Secondary Containment System Berm	0.0	ft2
Surface Area of Secondary Containment System Berm in yd2	0.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM BERM

Thickness	0.0	ft
Volume of Secondary Containment System Berm	0.0	yd3

SURFACE AREA OF OTHER STRUCTURES IN SECONDARY CONTAINMENT SYSTEM

Surface Area of Other Structures	0.0	ft2
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Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Surface Area of Other Structures in yd2 0.0 yd2

VOLUME OF OTHER STRUCTURES IN SECONDARY CONTAINMENT SYSTEM

Volume of Other Structures 0.0 yd3

VOLUME OF CONTAMINATED SOIL TO BE REMOVED

Length 0.0 ft

Width 0.0 ft

Depth 0.0 ft

Volume of Contaminated Soil to be Removed 0.0 ft3

Volume of Contaminated Soil to be Removed in yd3 0.0 yd3

Notes: This tank system includes 521 gal debris vat 275 gal liq.scintillation fluid test tank and 110 gal outfeed conveyor holding tank. Ancilliary piping surface area = $3.14 \times 2/12 \times 400\text{ft} = 209$ ft2. Surface area of the 3 tanks is assumed to be 350 ft2.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Tank Systems Removal of Waste (TS_03-1)

Maximum volume of waste to be removed from the tank and ancillary piping	971.3	gal
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$175.95	per Work Hour
Work rate required to remove waste from tank and ancillary piping	0.0003	Work hr per gal
Number of hours required to remove waste from tank and ancillary piping	0.3	Work hrs
TOTAL COST OF REMOVAL OF WASTE FROM TANK AND ANCILLARY PIPING	\$52.78	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Tank Systems Purging (TS_04-1)

Maximum capacity of the tank system	906.0	gal
Amount of solid carbon dioxide (dry ice) needed per gal capacity	1.5	lb per 100 gal
Amount of dry ice needed to purge tank system	13.6	lb
Cost of dry ice	\$2.64	per Pound
Cost of dry ice needed to purge tank system	\$35.90	
Choose the appropriate level of PPE	Protection Level D	
Labor cost per work hour	\$68.45	per Work Hour
Work rate required to purge tank	0.0002	Work hr per gal
Number of hours required to purge tank	0.2	Work hrs
Labor Cost to Purge Tank System	\$13.69	
TOTAL COST OF TANK SYSTEM PURGING	\$49.59	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Flushing the Tank and Piping (TS_05-1)

Maximum capacity of the tank and ancillary piping	971.3	gal
Number of times tank and ancillary piping are flushed	1	
Total volume of flushing solution	971.3	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$175.95	per Work Hour
Work rate required to flush tank and ancillary piping	0.0006	Work hr per gal
Number of hours required to flush tank and ancillary piping	0.6	Work hrs
Subtotal of labor and equipment cost to flush tank and ancillary piping	\$105.57	
Flushing solution is contained in:		Bulk
Number of drums required to contain flushing solution	0	Drums
Cost of one drum	\$83.85	
Cost of drums needed to contain flushing solution	\$0.00	
TOTAL COST TO FLUSH TANK AND ANCILLARY PIPING	\$105.57	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Tank Systems Excavation, Disassembly, and Loading (TS_06-1)

DISASSEMBLY OF ANCILLARY PIPING

Length of ancillary piping to be disassembled	400.0	ft
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$77.17	per Work Hour
Work rate required to disassemble one foot of pipe	0.1500	Work hr per Ft
Number of hours required to disassemble ancillary piping	60.0	Work hrs
Cost of Disassembly of Ancillary Piping	\$4,630.20	

EXCAVATION AND LOADING (FOR IN-GROUND AND UNDERGROUND TANKS ONLY)

Capacity of Tank	906.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$541.35	per Work Hour
Work rate required to excavate and load tank per gallon capacity	0.001800	Work hr per gal
Number of hours required to excavate and load tank	1.6	Work hrs
Cost to Excavate and Load Tank	\$866.16	

REMOVE TANK (FOR ON-GROUND AND ABOVEGROUND TANKS ONLY)

Capacity of Tank	0.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$0.00	per Work Hour
Work rate required to load tank per gallon capacity	0.000000	Work hr per gal
Number of hours required to load tank	0	Work hrs
Cost to Load Tank	\$0.00	
TOTAL COST OF EXCAVATION, DISASSEMBLY, AND LOADING	\$5,496.36	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Tank Systems Certification of Closure (TS_09-1)

Number of units requiring certification of closure	1	Units
Cost of certification of closure per unit	\$4,118.00	
TOTAL COST OF CERTIFICATION OF CLOSURE	\$4,118.00	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Decontamination Summary (DC_01-1)

Decontamination of Unit by Steam Cleaning or Pressure Washing (DC-02)	\$190.73
Decontamination of Unit by Sandblasting (DC-03)	\$0.00
Decontamination of Heavy Equipment (DC-04)	\$0.00
TOTAL COST OF DECONTAMINATION	\$190.73

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Decontamination by Steam Cleaning or Pressure Wash (DC_02-1)

Area of unit to be decontaminated	700.0	ft2
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$65.77	per Work Hour
Work rate to steam clean or pressure wash one ft2	0.0041	Work hr per ft2
Number of hours required to steam clean or pressure wash the unit	2.9	Work hrs
Subtotal of labor and equipment costs to decontaminate unit by steam cleaning or pressure washing	\$190.73	
Ratio of decontamination fluid to area	1.0	gals per ft2
Volume of decontamination fluid generated	700.0	gal
Decontamination fluid container type:		Bulk
Number of drums required to contain decontamination fluid for removal	0	Drums
Cost of one drum	\$83.85	per Drum
Cost of drums needed to contain decontamination fluid	\$0.00	
TOTAL COST OF DECONTAMINATION OF UNIT BY STEAM CLEANING OR PRESSURE WASHING	\$190.73	

Notes: Work rate for steam cleaning or pressure wash of 0.0041 hour/ft2 is more realistic and was obtained from the previous CostPro version.

Facility: PERMA-FIX of FLORIDA
(RCRA)

Unit: LSV processing tank
system

11/10/2014

Sampling and Analysis Inventory (SA_01-1)

Number of Drilling and Subsurface Soil Samples (2.5-inch boring)	1	Samples
Number of Drilling and Subsurface Soil Samples (4-inch boring)	0	Samples
Number of Concrete Core Samples	0	Samples
Number of Wipe Sample Locations	0	Sample Location
Number of Surface Water and Liquid Sample Locations	3	Sample Location
Number of Soil, Sludge, and Sediment Soil Samples	0	Sample Location
Number of Groundwater Sample Locations	0	Sample Location
Number of Lysimeters to be Sampled	0	Lysimeters

Facility: PERMA-FIX of FLORIDA
(RCRA)

Unit: LSV processing tank
system

11/10/2014

Sampling and Analysis Summary (SA_02-1)

Drilling and Subsurface Soil Sample - 2.5-Inch-Diameter-Holes (SA-03)	\$750.33
Drilling and Subsurface Soil Sample - 4-Inch-Diameter-Holes (SA- 04)	\$0.00
Concrete Core Sample (SA-05)	\$0.00
Wipe Sample (SA-06)	\$0.00
Surface Water and Liquid Sample (SA-07)	\$2,111.46
Soil, Sludge, and Sediment Sample (SA-08)	\$0.00
Groundwater Sample (SA-09)	\$0.00
Soil-Pore Liquid Sample (SA-10)	\$0.00
Analysis of Subsurface Soil Sample (SA-11)	\$0.00
TOTAL SAMPLING AND ANALYSIS COST	\$2,861.79

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03-1)

DRILLING AND SUBSURFACE SOIL SAMPLE COSTS - 2.5-INCH-DIAMETER-HOLES

Number of borings to be drilled	1	Borings
Enter depth of boreholes (sum of all)	3	ft
Choose the appropriate drilling method	Auger Boring - Level D	
Labor and equipment cost per work hour	\$102.72	per Work Hour
Choose the appropriate drilling method	Hollow-Stem Auger 2.5-Inch	
Work rate to drill 2.5-inch-diameter hole	0.3050	Work hr per Ft
Number of hours required to drill 2.5-inch diameter hole	0.9	Work hrs
Cost of Drilling 2.5-Inch Borings per Sampling Event	\$92.45	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$657.88	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR CLOSURE - 2.5-INCH-DIAMETER-HOLES	\$750.33	
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR POST-CLOSURE CARE PER EVENT - 2.5-INCH-DIAMETER-HOLES	\$750.33	per Event

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	1	\$718.42	0	\$359.21
Metals (SW 6010), per each metal	Both	\$13.73	8	\$27.46	0	\$109.84
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	1	\$377.66	0	\$188.83

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Surface Water and Liquid Samples (SA_07-1)

COLLECTION OF SURFACE WATER AND LIQUID SAMPLES

Number of sampling locations	3	Sample Location
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$91.88	per Work Hour
Work rate required to collect samples from one sampling location	0.5000	Work hrs per Sample
Number of hours required to collect all samples	1.5	Work hrs
Cost of Collection per Sampling Event	\$137.82	per Event

ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES

Cost of Analysis per Sampling Event	\$1,973.64	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES	\$2,111.46	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Surface Water and Liquid Samples (SA_07)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base neutral & acid extractable organics (SW 3510/SW 8270)	Liquid	\$359.21	3	\$718.42	0	\$1,077.63
Metals (SW 6010), per each metal	Both	\$13.73	24	\$27.46	0	\$329.52
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	3	\$377.66	0	\$566.49

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Treatment and Disposal Summary (TD_01-1)

Treatment and Disposal of Wastes (TD-02)	\$14,569.50
Treatment and Disposal of Decontamination Fluids (TD-03)	\$870.46
Total Cost of Treatment and Disposal	\$15,439.96

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Treatment and Disposal of Waste (TD_02-1)

SOLID WASTE TREATMENT AND DISPOSAL

Solid Waste Type (Optional: Enter Name)	0	
Volume in yd3 of solid waste to be treated and disposed of	0.0	yd3
Treatment and disposal costs per yd3	\$0.00	per yd3
Cost to Treat and Dispose of Solid Waste	\$0.00	

LIQUID WASTE TREATMENT AND DISPOSAL

Liquid Waste Type (Optional: Enter Name)	0	
Volume in gallons of liquid waste to be treated and disposed of	971.3	gal
Treatment and disposal costs per gallon	\$15.00	per Gallon
Cost to Treat and Dispose of Liquid Waste	\$14,569.50	

DRUMMED WASTE TREATMENT AND DISPOSAL

Drummed Waste Type (Optional: Enter Name)	0	
Number of drums to be treated and disposed of	0	Drums
Treatment and disposal costs per drum	\$0.00	per Drum
Cost to Treat and Dispose of Drummed Waste	\$0.00	
TOTAL COST FOR TREATMENT AND DISPOSAL OF WASTE	\$14,569.50	

Notes: Treatment and Disposal cost includes transportation cost.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Treatment and Disposal of Decon Fluid (TD_03-1)

Volume of decontamination fluid generated from closure activities

Volume of decontamination fluid from Primary Unit	971.3	gal
Volume of decontamination fluid generated by steam cleaning or pressure washing (DC-02)	700.0	gal
Volume of decontamination fluid from heavy equipment (DC-04)	0.0	gal
Total Volume of Decontamination Fluid	1,671.3	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$77.41	per Work Hour
Work rate to pump decontamination fluid to a holding tank	0.0001	Work hr per gal
Number of hours required to pump decontamination fluid to a holding tank	0.16713	Work hrs
Subtotal of labor and equipment costs to pump decontamination fluid to a holding tank	\$12.94	
Number of days required to rent a holding tank	1	Days
Holding tank rental fee (10,000 gal tank per day)	\$189.00	per Day
Number of tanks required	1	Tanks
Subtotal of tank rental costs	\$189.00	
Cost for treatment and disposal	\$0.40	per Gallon
Treatment and disposal costs for bulk liquid	\$668.52	
TOTAL COST TO TREATMENT AND DISPOSE OF DECONTAMINATION FLUID AS A BULK LIQUID	\$870.46	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** LSV processing tank system 11/10/2014

Transportation of Waste (TR_01-1)

TRANSPORTATION OF WASTE IN DRUMS

Number of drums of waste	0	Drums
Number of truckloads needed to transport waste in drums	0	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of 55-gallon drums	\$1,692.00	per Truckload
Cost to transport Waste in Drums	\$0.00	

TRANSPORTATION OF BULK LIQUID

Gallons of liquid waste	2,089.3	gal
Number of truckloads needed to transport bulk free liquid waste	1	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of bulk liquids	\$1,692.00	per Truckload
Cost to Transport Bulk Liquid Wastes	\$1,692.00	

TRANSPORTATION OF BULK WASTE

Number of waste debris boxes	0	Containers
Number of truckloads needed to transport bulk waste	0	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of bulk waste	\$1,692.00	per Truckload
Cost to Transport Bulk Waste	\$0.00	
TOTAL COST OF TRANSPORTATION OF WASTE	\$1,692.00	

Notes: Bulk waste includes 2089.3 gal of decontamination fluids. Transportation cost for waste is included in the treatment and disposal cost on Form TD_02-1.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Tank Systems Summary (TS_02-1)

Removal of Waste (TS-03)	\$0.00	
Tank System Purging (ignitable waste only) (TS-04)	\$159.87	
Flushing the Tank and Piping (TS-05)	\$316.71	
Excavation, Disassembly, and Loading (TS-06)	\$3,942.81	
Demolition and Removal of Containment System (TS-07)	\$0.00	
Removal of Soil (TS-08)	\$0.00	
Backfill and Grading (BF-01)	\$0.00	
Decontamination (DC-01)	\$440.66	
Sampling and Analysis (SA-02)	\$1,421.45	
Monitoring Well Installation (MW-01)	\$0.00	
Transportation (TR-01)	\$1,692.00	
Treatment and Disposal (TD-01)	\$47,168.56	
User Defined Cost (UD-01)	\$0.00	
Subtotal of Closure Costs	\$55,142.06	
Percentage of Engineering Expenses	10.0	%
Engineering Expenses	\$5,514.21	
Certification of Closure (TS-09)	\$0.00	
Subtotal	\$60,656.27	
Percentage of Contingency Allowance	20.0	%
Contingency Allowance	\$12,131.25	
Landfill Closure (Cover Installation) (CI-02)	\$0.00	
TOTAL COST OF CLOSURE	\$72,787.52	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Tank Systems Inventory (TS_01-1)

UNIT DESCRIPTION AND MAXIMUM PERMITTED CAPACITY

Type of tank system		Aboveground
Height or length of tank	0.0	ft
Diameter of tank	0.0	ft
Maximum permitted capacity of the tank	3,000.0	gal
Total length of ancillary piping	225.0	ft
Nominal diameter of ancillary piping	0.8	in
Maximum capacity of ancillary piping	5.9	gal
Maximum capacity of tank and ancillary piping	3,005.9	gal

SURFACE AREA OF TANK SYSTEM

Surface area of tank (interior and exterior)	816.0	ft2
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VOLUME OF TANK SYSTEM TO BE REMOVED

Volume of Tank System to be Removed	401.8	ft3
Volume of Tank System to be Removed in yd3	14.9	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM PAD

Length	0.0	ft
Width	0.0	ft
Surface Area of Secondary Containment System Pad	0.0	ft2
Surface Area of Secondary Containment System Pad in yd2	0.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM PAD

Thickness	0.0	ft
Volume of Secondary Containment Pad	0.0	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM BERM

Total Length	0.0	ft
Height	0.0	ft
Surface Area of Secondary Containment System Berm	0.0	ft2
Surface Area of Secondary Containment System Berm in yd2	0.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM BERM

Thickness	0.0	ft
Volume of Secondary Containment System Berm	0.0	yd3

SURFACE AREA OF OTHER STRUCTURES IN SECONDARY CONTAINMENT SYSTEM

Surface Area of Other Structures	0.0	ft2
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Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Surface Area of Other Structures in yd2 0.0 yd2

VOLUME OF OTHER STRUCTURES IN SECONDARY CONTAINMENT SYSTEM

Volume of Other Structures 0.0 yd3

VOLUME OF CONTAMINATED SOIL TO BE REMOVED

Length 0.0 ft

Width 0.0 ft

Depth 0.0 ft

Volume of Contaminated Soil to be Removed 0.0 ft3

Volume of Contaminated Soil to be Removed in yd3 0.0 yd3

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Tank Systems Removal of Waste (TS_03-1)

Maximum volume of waste to be removed from the tank and ancillary piping	3,005.9	gal
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$175.95	per Work Hour
Work rate required to remove waste from tank and ancillary piping	0.0003	Work hr per gal
Number of hours required to remove waste from tank and ancillary piping	0.9	Work hrs
TOTAL COST OF REMOVAL OF WASTE FROM TANK AND ANCILLARY PIPING	\$158.35	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Tank Systems Purging (TS_04-1)

Maximum capacity of the tank system	3,000.0	gal
Amount of solid carbon dioxide (dry ice) needed per gal capacity	1.5	lb per 100 gal
Amount of dry ice needed to purge tank system	45.0	lb
Cost of dry ice	\$2.64	per Pound
Cost of dry ice needed to purge tank system	\$118.80	
Choose the appropriate level of PPE	Protection Level D	
Labor cost per work hour	\$68.45	per Work Hour
Work rate required to purge tank	0.0002	Work hr per gal
Number of hours required to purge tank	0.6	Work hrs
Labor Cost to Purge Tank System	\$41.07	
TOTAL COST OF TANK SYSTEM PURGING	\$159.87	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Flushing the Tank and Piping (TS_05-1)

Maximum capacity of the tank and ancillary piping	3,005.9	gal
Number of times tank and ancillary piping are flushed	1	
Total volume of flushing solution	3,005.9	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$175.95	per Work Hour
Work rate required to flush tank and ancillary piping	0.0006	Work hr per gal
Number of hours required to flush tank and ancillary piping	1.8	Work hrs
Subtotal of labor and equipment cost to flush tank and ancillary piping	\$316.71	
Flushing solution is contained in:		Bulk
Number of drums required to contain flushing solution	0	Drums
Cost of one drum	\$83.85	
Cost of drums needed to contain flushing solution	\$0.00	
TOTAL COST TO FLUSH TANK AND ANCILLARY PIPING	\$316.71	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Tank Systems Excavation, Disassembly, and Loading (TS_06-1)

DISASSEMBLY OF ANCILLARY PIPING

Length of ancillary piping to be disassembled	225.0	ft
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$77.17	per Work Hour
Work rate required to disassemble one foot of pipe	0.1500	Work hr per Ft
Number of hours required to disassemble ancillary piping	33.8	Work hrs
Cost of Disassembly of Ancillary Piping	\$2,608.35	

EXCAVATION AND LOADING (FOR IN-GROUND AND UNDERGROUND TANKS ONLY)

Capacity of Tank	0.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$541.35	per Work Hour
Work rate required to excavate and load tank per gallon capacity	0.000000	Work hr per gal
Number of hours required to excavate and load tank	0.0	Work hrs
Cost to Excavate and Load Tank	\$0.00	

REMOVE TANK (FOR ON-GROUND AND ABOVEGROUND TANKS ONLY)

Capacity of Tank	3,000.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$222.41	per Work Hour
Work rate required to load tank per gallon capacity	0.002000	Work hr per gal
Number of hours required to load tank	6	Work hrs
Cost to Load Tank	\$1,334.46	
TOTAL COST OF EXCAVATION, DISASSEMBLY, AND LOADING	\$3,942.81	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Decontamination Summary (DC_01-1)

Decontamination of Unit by Steam Cleaning or Pressure Washing (DC-02)	\$440.66
Decontamination of Unit by Sandblasting (DC-03)	\$0.00
Decontamination of Heavy Equipment (DC-04)	\$0.00
TOTAL COST OF DECONTAMINATION	\$440.66

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Decontamination by Steam Cleaning or Pressure Wash (DC_02-1)

Area of unit to be decontaminated	1,632.0	ft2
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$65.77	per Work Hour
Work rate to steam clean or pressure wash one ft2	0.0041	Work hr per ft2
Number of hours required to steam clean or pressure wash the unit	6.7	Work hrs
Subtotal of labor and equipment costs to decontaminate unit by steam cleaning or pressure washing	\$440.66	
Ratio of decontamination fluid to area	1.0	gals per ft2
Volume of decontamination fluid generated	1,632.0	gal
Decontamination fluid container type:	Bulk	
Number of drums required to contain decontamination fluid for removal	0	Drums
Cost of one drum	\$83.85	per Drum
Cost of drums needed to contain decontamination fluid	\$0.00	
TOTAL COST OF DECONTAMINATION OF UNIT BY STEAM CLEANING OR PRESSURE WASHING	\$440.66	

Notes: Work rate for steam cleaning or pressure wash of 0.0041 hour/ft2 is more realistic and was obtained from the previous CostPro version.

Facility: PERMA-FIX of FLORIDA
(RCRA)

Unit: PSB processing tank
system

11/10/2014

Sampling and Analysis Inventory (SA_01-1)

Number of Drilling and Subsurface Soil Samples (2.5-inch boring)	1	Samples
Number of Drilling and Subsurface Soil Samples (4-inch boring)	0	Samples
Number of Concrete Core Samples	0	Samples
Number of Wipe Sample Locations	0	Sample Location
Number of Surface Water and Liquid Sample Locations	1	Sample Location
Number of Soil, Sludge, and Sediment Soil Samples	0	Sample Location
Number of Groundwater Sample Locations	0	Sample Location
Number of Lysimeters to be Sampled	0	Lysimeters

Facility: PERMA-FIX of FLORIDA
(RCRA)

Unit: PSB processing tank
system

11/10/2014

Sampling and Analysis Summary (SA_02-1)

Drilling and Subsurface Soil Sample - 2.5-Inch-Diameter-Holes (SA-03)	\$719.51
Drilling and Subsurface Soil Sample - 4-Inch-Diameter-Holes (SA- 04)	\$0.00
Concrete Core Sample (SA-05)	\$0.00
Wipe Sample (SA-06)	\$0.00
Surface Water and Liquid Sample (SA-07)	\$701.94
Soil, Sludge, and Sediment Sample (SA-08)	\$0.00
Groundwater Sample (SA-09)	\$0.00
Soil-Pore Liquid Sample (SA-10)	\$0.00
Analysis of Subsurface Soil Sample (SA-11)	\$0.00
TOTAL SAMPLING AND ANALYSIS COST	\$1,421.45

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03-1)

DRILLING AND SUBSURFACE SOIL SAMPLE COSTS - 2.5-INCH-DIAMETER-HOLES

Number of borings to be drilled	1	Borings
Enter depth of boreholes (sum of all)	2	ft
Choose the appropriate drilling method	Auger Boring - Level D	
Labor and equipment cost per work hour	\$102.72	per Work Hour
Choose the appropriate drilling method	Hollow-Stem Auger 2.5-Inch	
Work rate to drill 2.5-inch-diameter hole	0.3050	Work hr per Ft
Number of hours required to drill 2.5-inch diameter hole	0.6	Work hrs
Cost of Drilling 2.5-Inch Borings per Sampling Event	\$61.63	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$657.88	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR CLOSURE - 2.5-INCH-DIAMETER-HOLES	\$719.51	
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR POST-CLOSURE CARE PER EVENT - 2.5-INCH-DIAMETER-HOLES	\$719.51	per Event

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	1	\$718.42	0	\$359.21
Metals (SW 6010), per each metal	Both	\$13.73	8	\$27.46	0	\$109.84
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	1	\$377.66	0	\$188.83

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Surface Water and Liquid Samples (SA_07-1)

COLLECTION OF SURFACE WATER AND LIQUID SAMPLES

Number of sampling locations	1	Sample Location
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$91.88	per Work Hour
Work rate required to collect samples from one sampling location	0.5000	Work hrs per Sample
Number of hours required to collect all samples	0.5	Work hrs
Cost of Collection per Sampling Event	\$45.94	per Event

ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES

Cost of Analysis per Sampling Event	\$656.00	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES	\$701.94	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Surface Water and Liquid Samples (SA_07)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Analysis of Lysimeters for soil-pore liquid monitoring	Liquid	\$357.33	1	\$714.66	0	\$357.33
Metals (SW 6010), per each metal	Both	\$13.73	8	\$27.46	0	\$109.84
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	1	\$377.66	0	\$188.83

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Treatment and Disposal Summary (TD_01-1)

Treatment and Disposal of Wastes (TD-02)	\$45,088.50
Treatment and Disposal of Decontamination Fluids (TD-03)	\$2,080.06
Total Cost of Treatment and Disposal	\$47,168.56

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Treatment and Disposal of Waste (TD_02-1)

SOLID WASTE TREATMENT AND DISPOSAL

Solid Waste Type (Optional: Enter Name)	0	
Volume in yd3 of solid waste to be treated and disposed of	0.0	yd3
Treatment and disposal costs per yd3	\$0.00	per yd3
Cost to Treat and Dispose of Solid Waste	\$0.00	

LIQUID WASTE TREATMENT AND DISPOSAL

Liquid Waste Type (Optional: Enter Name)	0	
Volume in gallons of liquid waste to be treated and disposed of	3,005.9	gal
Treatment and disposal costs per gallon	\$15.00	per Gallon
Cost to Treat and Dispose of Liquid Waste	\$45,088.50	

DRUMMED WASTE TREATMENT AND DISPOSAL

Drummed Waste Type (Optional: Enter Name)	0	
Number of drums to be treated and disposed of	0	Drums
Treatment and disposal costs per drum	\$0.00	per Drum
Cost to Treat and Dispose of Drummed Waste	\$0.00	
TOTAL COST FOR TREATMENT AND DISPOSAL OF WASTE	\$45,088.50	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Treatment and Disposal of Decon Fluid (TD_03-1)

Volume of decontamination fluid generated from closure activities

Volume of decontamination fluid from Primary Unit	3,005.9	gal
Volume of decontamination fluid generated by steam cleaning or pressure washing (DC-02)	1,632.0	gal
Volume of decontamination fluid from heavy equipment (DC-04)	0.0	gal
Total Volume of Decontamination Fluid	4,637.9	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$77.41	per Work Hour
Work rate to pump decontamination fluid to a holding tank	0.0001	Work hr per gal
Number of hours required to pump decontamination fluid to a holding tank	0.46379	Work hrs
Subtotal of labor and equipment costs to pump decontamination fluid to a holding tank	\$35.90	
Number of days required to rent a holding tank	1	Days
Holding tank rental fee (10,000 gal tank per day)	\$189.00	per Day
Number of tanks required	1	Tanks
Subtotal of tank rental costs	\$189.00	
Cost for treatment and disposal	\$0.40	per Gallon
Treatment and disposal costs for bulk liquid	\$1,855.16	
TOTAL COST TO TREATMENT AND DISPOSE OF DECONTAMINATION FLUID AS A BULK LIQUID	\$2,080.06	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** PSB processing tank system 11/10/2014

Transportation of Waste (TR_01-1)

TRANSPORTATION OF WASTE IN DRUMS

Number of drums of waste	0	Drums
Number of truckloads needed to transport waste in drums	0	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of 55-gallon drums	\$1,692.00	per Truckload
Cost to transport Waste in Drums	\$0.00	

TRANSPORTATION OF BULK LIQUID

Gallons of liquid waste	4,637.9	gal
Number of truckloads needed to transport bulk free liquid waste	1	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of bulk liquids	\$1,692.00	per Truckload
Cost to Transport Bulk Liquid Wastes	\$1,692.00	

TRANSPORTATION OF BULK WASTE

Number of waste debris boxes	0	Containers
Number of truckloads needed to transport bulk waste	0	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of bulk waste	\$1,692.00	per Truckload
Cost to Transport Bulk Waste	\$0.00	
TOTAL COST OF TRANSPORTATION OF WASTE	\$1,692.00	

Notes: Bulk waste includes 4637.9 gal of decontamination fluids. Transportation cost for waste is included in the Treatment and disposal cost on Form TD_02-1.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Tank Systems Summary (TS_02-1)

Removal of Waste (TS-03)	\$52.78	
Tank System Purging (ignitable waste only) (TS-04)	\$54.08	
Flushing the Tank and Piping (TS-05)	\$105.57	
Excavation, Disassembly, and Loading (TS-06)	\$1,033.83	
Demolition and Removal of Containment System (TS-07)	\$0.00	
Removal of Soil (TS-08)	\$0.00	
Backfill and Grading (BF-01)	\$0.00	
Decontamination (DC-01)	\$388.04	
Sampling and Analysis (SA-02)	\$7,069.58	
Monitoring Well Installation (MW-01)	\$0.00	
Transportation (TR-01)	\$1,692.00	
Treatment and Disposal (TD-01)	\$60,020.19	
User Defined Cost (UD-01)	\$0.00	
Subtotal of Closure Costs	\$70,416.07	
Percentage of Engineering Expenses	10.0	%
Engineering Expenses	\$7,041.61	
Certification of Closure (TS-09)	\$0.00	
Subtotal	\$77,457.68	
Percentage of Contingency Allowance	20.0	%
Contingency Allowance	\$15,491.54	
Landfill Closure (Cover Installation) (CI-02)	\$0.00	
TOTAL COST OF CLOSURE	\$92,949.22	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Tank Systems Inventory (TS_01-1)

UNIT DESCRIPTION AND MAXIMUM PERMITTED CAPACITY

Type of tank system	Aboveground	
Height or length of tank	0.0	ft
Diameter of tank	0.0	ft
Maximum permitted capacity of the tank	1,023.0	gal
Total length of ancillary piping	50.0	ft
Nominal diameter of ancillary piping	2.0	in
Maximum capacity of ancillary piping	8.2	gal
Maximum capacity of tank and ancillary piping	1,031.2	gal

SURFACE AREA OF TANK SYSTEM

Surface area of tank (interior and exterior)	291.0	ft2
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VOLUME OF TANK SYSTEM TO BE REMOVED

Volume of Tank System to be Removed	137.9	ft3
Volume of Tank System to be Removed in yd3	5.1	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM PAD

Length	34.5	ft
Width	24.0	ft
Surface Area of Secondary Containment System Pad	828.0	ft2
Surface Area of Secondary Containment System Pad in yd2	92.0	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM PAD

Thickness	0.5	ft
Volume of Secondary Containment Pad	15.3	yd3

SURFACE AREA OF SECONDARY CONTAINMENT SYSTEM BERM

Total Length	117.0	ft
Height	0.2	ft
Surface Area of Secondary Containment System Berm	23.4	ft2
Surface Area of Secondary Containment System Berm in yd2	2.6	yd2

VOLUME OF SECONDARY CONTAINMENT SYSTEM BERM

Thickness	0.5	ft
Volume of Secondary Containment System Berm	0.4	yd3

SURFACE AREA OF OTHER STRUCTURES IN SECONDARY CONTAINMENT SYSTEM

Surface Area of Other Structures	0.0	ft2
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Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks 11/10/2014

Surface Area of Other Structures in yd2 0.0 yd2

VOLUME OF OTHER STRUCTURES IN SECONDARY CONTAINMENT SYSTEM

Volume of Other Structures 0.0 yd3

VOLUME OF CONTAMINATED SOIL TO BE REMOVED

Length 0.0 ft

Width 0.0 ft

Depth 0.0 ft

Volume of Contaminated Soil to be Removed 0.0 ft3

Volume of Contaminated Soil to be Removed in yd3 0.0 yd3

Notes: This tank system consists of 317-gal reactor vessel 120-gal accumulator tank 30-gal absorber tank 16-gal condenser associated with PF-II treatment 300-gal non-elementary neutralization tank 55-gal deactivation tank 170-gal drum rotator and 15-gal mercury amalgamation unit. Total surface area for tanks= 201 ft2 for PF-II tanks + 60 ft2 for neutralization tank + 30 ft2 for drum rotator deactivation unit and mercury amalgamation unit.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Tank Systems Removal of Waste (TS_03-1)

Maximum volume of waste to be removed from the tank and ancillary piping	1,031.2	gal
Choose the appropriate level of PPE		Protection Level D
Labor and equipment cost per work hour	\$175.95	per Work Hour
Work rate required to remove waste from tank and ancillary piping	0.0003	Work hr per gal
Number of hours required to remove waste from tank and ancillary piping	0.3	Work hrs
TOTAL COST OF REMOVAL OF WASTE FROM TANK AND ANCILLARY PIPING	\$52.78	

Facility: PERMA-FIX of FLORIDA **Unit:** TOB tanks
(RCRA)

11/10/2014

Tank Systems Purging (TS_04-1)

Maximum capacity of the tank system	1,023.0	gal
Amount of solid carbon dioxide (dry ice) needed per gal capacity	1.5	lb per 100 gal
Amount of dry ice needed to purge tank system	15.3	lb
Cost of dry ice	\$2.64	per Pound
Cost of dry ice needed to purge tank system	\$40.39	
Choose the appropriate level of PPE	Protection Level D	
Labor cost per work hour	\$68.45	per Work Hour
Work rate required to purge tank	0.0002	Work hr per gal
Number of hours required to purge tank	0.2	Work hrs
Labor Cost to Purge Tank System	\$13.69	
TOTAL COST OF TANK SYSTEM PURGING	\$54.08	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Flushing the Tank and Piping (TS_05-1)

Maximum capacity of the tank and ancillary piping	1,031.2	gal
Number of times tank and ancillary piping are flushed	1	
Total volume of flushing solution	1,031.2	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$175.95	per Work Hour
Work rate required to flush tank and ancillary piping	0.0006	Work hr per gal
Number of hours required to flush tank and ancillary piping	0.6	Work hrs
Subtotal of labor and equipment cost to flush tank and ancillary piping	\$105.57	
Flushing solution is contained in:		Bulk
Number of drums required to contain flushing solution	0	Drums
Cost of one drum	\$83.85	
Cost of drums needed to contain flushing solution	\$0.00	
TOTAL COST TO FLUSH TANK AND ANCILLARY PIPING	\$105.57	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Tank Systems Excavation, Disassembly, and Loading (TS_06-1)

DISASSEMBLY OF ANCILLARY PIPING

Length of ancillary piping to be disassembled	50.0	ft
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$77.17	per Work Hour
Work rate required to disassemble one foot of pipe	0.1500	Work hr per Ft
Number of hours required to disassemble ancillary piping	7.5	Work hrs
Cost of Disassembly of Ancillary Piping	\$578.78	

EXCAVATION AND LOADING (FOR IN-GROUND AND UNDERGROUND TANKS ONLY)

Capacity of Tank	0.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$541.35	per Work Hour
Work rate required to excavate and load tank per gallon capacity	0.000000	Work hr per gal
Number of hours required to excavate and load tank	0.0	Work hrs
Cost to Excavate and Load Tank	\$0.00	

REMOVE TANK (FOR ON-GROUND AND ABOVEGROUND TANKS ONLY)

Capacity of Tank	1,023.0	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$222.41	per Work Hour
Work rate required to load tank per gallon capacity	0.002000	Work hr per gal
Number of hours required to load tank	2.046	Work hrs
Cost to Load Tank	\$455.05	
TOTAL COST OF EXCAVATION, DISASSEMBLY, AND LOADING	\$1,033.83	

Facility: PERMA-FIX of FLORIDA **Unit:** TOB tanks
(RCRA)

11/10/2014

Decontamination Summary (DC_01-1)

Decontamination of Unit by Steam Cleaning or Pressure Washing (DC-02)	\$388.04
Decontamination of Unit by Sandblasting (DC-03)	\$0.00
Decontamination of Heavy Equipment (DC-04)	\$0.00
TOTAL COST OF DECONTAMINATION	\$388.04

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Decontamination by Steam Cleaning or Pressure Wash (DC_02-1)

Area of unit to be decontaminated	1,433.4	ft2
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$65.77	per Work Hour
Work rate to steam clean or pressure wash one ft2	0.0041	Work hr per ft2
Number of hours required to steam clean or pressure wash the unit	5.9	Work hrs
Subtotal of labor and equipment costs to decontaminate unit by steam cleaning or pressure washing	\$388.04	
Ratio of decontamination fluid to area	1.0	gals per ft2
Volume of decontamination fluid generated	1,433.4	gal
Decontamination fluid container type:		Bulk
Number of drums required to contain decontamination fluid for removal	0	Drums
Cost of one drum	\$83.85	per Drum
Cost of drums needed to contain decontamination fluid	\$0.00	
TOTAL COST OF DECONTAMINATION OF UNIT BY STEAM CLEANING OR PRESSURE WASHING	\$388.04	

Notes: Work rate for steam cleaning or pressure wash of 0.0041 hour/ft2 is more realistic and was obtained from the previous CostPro version.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Sampling and Analysis Inventory (SA_01-1)

Number of Drilling and Subsurface Soil Samples (2.5-inch boring)	2	Samples
Number of Drilling and Subsurface Soil Samples (4-inch boring)	0	Samples
Number of Concrete Core Samples	0	Samples
Number of Wipe Sample Locations	0	Sample Location
Number of Surface Water and Liquid Sample Locations	8	Sample Location
Number of Soil, Sludge, and Sediment Soil Samples	0	Sample Location
Number of Groundwater Sample Locations	0	Sample Location
Number of Lysimeters to be Sampled	0	Lysimeters

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Sampling and Analysis Summary (SA_02-1)

Drilling and Subsurface Soil Sample - 2.5-Inch-Diameter-Holes (SA-03)	\$1,439.02
Drilling and Subsurface Soil Sample - 4-Inch-Diameter-Holes (SA-04)	\$0.00
Concrete Core Sample (SA-05)	\$0.00
Wipe Sample (SA-06)	\$0.00
Surface Water and Liquid Sample (SA-07)	\$5,630.56
Soil, Sludge, and Sediment Sample (SA-08)	\$0.00
Groundwater Sample (SA-09)	\$0.00
Soil-Pore Liquid Sample (SA-10)	\$0.00
Analysis of Subsurface Soil Sample (SA-11)	\$0.00
TOTAL SAMPLING AND ANALYSIS COST	\$7,069.58

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03-1)

DRILLING AND SUBSURFACE SOIL SAMPLE COSTS - 2.5-INCH-DIAMETER-HOLES

Number of borings to be drilled	2	Borings
Enter depth of boreholes (sum of all)	4	ft
Choose the appropriate drilling method	Auger Boring - Level D	
Labor and equipment cost per work hour	\$102.72	per Work Hour
Choose the appropriate drilling method	Hollow-Stem Auger 2.5-Inch	
Work rate to drill 2.5-inch-diameter hole	0.3050	Work hr per Ft
Number of hours required to drill 2.5-inch diameter hole	1.2	Work hrs
Cost of Drilling 2.5-Inch Borings per Sampling Event	\$123.26	per Event

ANALYSIS OF DRILLING SAMPLE

Cost of Analysis per Sampling Event	\$1,315.76	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR CLOSURE - 2.5-INCH-DIAMETER-HOLES	\$1,439.02	
TOTAL COST OF SAMPLING AND ANALYSIS OF DRILLING AND SUBSURFACE SOIL SAMPLES FOR POST-CLOSURE CARE PER EVENT - 2.5-INCH-DIAMETER-HOLES	\$1,439.02	per Event

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Drilling and Subsurface Soil Samples - 2.5-Inch-Diameter-Holes (SA_03)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base/neutral & acid extractable organics (SW 3550/SW 8270)	Solid	\$359.21	2	\$718.42	0	\$718.42
Metals (SW 6010), per each metal	Both	\$13.73	16	\$27.46	0	\$219.68
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	2	\$377.66	0	\$377.66

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Surface Water and Liquid Samples (SA_07-1)

COLLECTION OF SURFACE WATER AND LIQUID SAMPLES

Number of sampling locations	8	Sample Location
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per work hour	\$91.88	per Work Hour
Work rate required to collect samples from one sampling location	0.5000	Work hrs per Sample
Number of hours required to collect all samples	4.0	Work hrs
Cost of Collection per Sampling Event	\$367.52	per Event

ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES

Cost of Analysis per Sampling Event	\$5,263.04	per Event
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SAMPLING EVENTS

Number of sampling events	1	Events
TOTAL COST OF SAMPLING AND ANALYSIS OF SURFACE WATER AND LIQUID SAMPLES	\$5,630.56	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Surface Water and Liquid Samples (SA_07)
Cost of Analysis per Sampling Event

Method		Standard	Qty	Quick	Qty	Total
Base neutral & acid extractable organics (SW 3510/SW 8270)	Liquid	\$359.21	8	\$718.42	0	\$2,873.68
Metals (SW 6010), per each metal	Both	\$13.73	64	\$27.46	0	\$878.72
Volatile organic analysis (SW 5030/SW 8240)	Both	\$188.83	8	\$377.66	0	\$1,510.64

Facility: PERMA-FIX of FLORIDA **Unit:** TOB tanks
(RCRA)

11/10/2014

Treatment and Disposal Summary (TD_01-1)

Treatment and Disposal of Wastes (TD-02)	\$58,826.27
Treatment and Disposal of Decontamination Fluids (TD-03)	\$1,193.92
Total Cost of Treatment and Disposal	\$60,020.19

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Treatment and Disposal of Waste (TD_02-1)

SOLID WASTE TREATMENT AND DISPOSAL

Solid Waste Type (Optional: Enter Name)	HEPA filters & filter bags	
Volume in yd3 of solid waste to be treated and disposed of	3.1	yd3
Treatment and disposal costs per yd3	\$13,986.54	per yd3
Cost to Treat and Dispose of Solid Waste	\$43,358.27	

LIQUID WASTE TREATMENT AND DISPOSAL

Liquid Waste Type (Optional: Enter Name)	0	
Volume in gallons of liquid waste to be treated and disposed of	1,031.2	gal
Treatment and disposal costs per gallon	\$15.00	per Gallon
Cost to Treat and Dispose of Liquid Waste	\$15,468.00	

DRUMMED WASTE TREATMENT AND DISPOSAL

Drummed Waste Type (Optional: Enter Name)	0	
Number of drums to be treated and disposed of	0	Drums
Treatment and disposal costs per drum	\$0.00	per Drum
Cost to Treat and Dispose of Drummed Waste	\$0.00	
TOTAL COST FOR TREATMENT AND DISPOSAL OF WASTE	\$58,826.27	

Notes: Solid waste consists of HEPA filters and filter bags comprising of 83.7 cubic feet.
Transportation and disposal cost is 518.02/cubic foot. Transportation cost is included in the Treatment and Disposal cost for the wastes.

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Treatment and Disposal of Decon Fluid (TD_03-1)

Volume of decontamination fluid generated from closure activities

Volume of decontamination fluid from Primary Unit	1,031.2	gal
Volume of decontamination fluid generated by steam cleaning or pressure washing (DC-02)	1,433.4	gal
Volume of decontamination fluid from heavy equipment (DC-04)	0.0	gal
Total Volume of Decontamination Fluid	2,464.6	gal
Choose the appropriate level of PPE	Protection Level D	
Labor and equipment cost per hour	\$77.41	per Work Hour
Work rate to pump decontamination fluid to a holding tank	0.0001	Work hr per gal
Number of hours required to pump decontamination fluid to a holding tank	0.24646	Work hrs
Subtotal of labor and equipment costs to pump decontamination fluid to a holding tank	\$19.08	
Number of days required to rent a holding tank	1	Days
Holding tank rental fee (10,000 gal tank per day)	\$189.00	per Day
Number of tanks required	1	Tanks
Subtotal of tank rental costs	\$189.00	
Cost for treatment and disposal	\$0.40	per Gallon
Treatment and disposal costs for bulk liquid	\$985.84	
TOTAL COST TO TREATMENT AND DISPOSE OF DECONTAMINATION FLUID AS A BULK LIQUID	\$1,193.92	

Facility: PERMA-FIX of FLORIDA (RCRA) **Unit:** TOB tanks

11/10/2014

Transportation of Waste (TR_01-1)

TRANSPORTATION OF WASTE IN DRUMS

Number of drums of waste	0	Drums
Number of truckloads needed to transport waste in drums	0	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of 55-gallon drums	\$1,692.00	per Truckload
Cost to transport Waste in Drums	\$0.00	

TRANSPORTATION OF BULK LIQUID

Gallons of liquid waste	2,464.6	gal
Number of truckloads needed to transport bulk free liquid waste	1	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of bulk liquids	\$1,692.00	per Truckload
Cost to Transport Bulk Liquid Wastes	\$1,692.00	

TRANSPORATION OF BULK WASTE

Number of waste debris boxes	0	Containers
Number of truckloads needed to transport bulk waste	0	Truckloads
Type of waste		Hazardous
Number of miles	300.0	Mi
Cost per mile	\$5.64	per Mile
Cost to transport one truckload of bulk waste	\$1,692.00	per Truckload
Cost to Transport Bulk Waste	\$0.00	
TOTAL COST OF TRANSPORTATION OF WASTE	\$1,692.00	

Notes: Bulk waste includes 2464.6 gal of decontamination fluids. Transportation cost for wastes are included in the treatment and disposal cost for wastes on Form TD_02-1.

APPENDIX II-P

DEP FORM 62-730.900(2)(C) INFORMATION REGARDING POTENTIAL RELEASES FROM SOLID WASTE MANAGEMENT UNITS

Revision Number	1
Date	3/25/2020
Page	1 of 2

P. Information Regarding Potential Releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs)

Facility Name Perma-Fix of Florida, Inc.

EPA/DEP I.D. No. FLD 980711071

Facility location Gainesville Florida
City State

1. Are any of the following (SWMUs or AOCs), existing or closed at your facility?

A SWMU is a discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include all areas at a facility where solid wastes have been routinely and systematically released, as described in the July 27, 1990 Federal Register (55 FR 30798). The SWMU list in this form does not include all types of SWMUs. These are examples of the more common types of units. If you have a different type of SWMU, mark "yes" under "other".

AOCs are indiscernible units at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Examples of AOCs include areas where loading and unloading of chemicals may have occurred or an area of contamination with no known source.

Do not include hazardous waste units that are currently being permitted in your Part B Application.

Landfill	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Surface impoundment	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Land farm	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste pile	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Incinerator	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Storage tank	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Container storage area	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Injection wells	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Wastewater treatment units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Transfer station	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Waste recycling operations	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Land treatment facility	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Boiler/industrial furnace	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Satellite accumulation areas	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Less than 90-day storage units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Stormwater retention ponds	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Septic tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Used oil/oil filter collection units	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Aerosol can/drum crushers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
On-ground areas, pits, ditches	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Other (units not listed above)	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

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Date	3/25/2020
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2. For each “yes” answer in one (1.) above, on separate sheet(s) of paper:
 - a. Describe the wastes that were stored, treated or disposed of in each unit, and whether the wastes would be considered hazardous wastes or hazardous constituents under RCRA. (Hazardous wastes are those identified in 40 CFR Part 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.) Include any available data on quantities or volumes of wastes disposed of and the dates of disposal.
 - b. Describe each unit, type of unit including construction details, capacity, dimensions (supply any available drawings), and location at the facility on the topographic map provided under 40 CFR 270.14(b)(19). Provide a site plan, if available, and the dates of operation of the unit [40 CFR 270.14(d)(1)]. If the information has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement.
 - c. Include a copy of federal, state and local permits or authorizations for SWMUs that may be permitted under other environmental programs.
See response below
3. For each unit described in two (2.) above, and for each hazardous waste unit in your Part B application [40 CFR 270.14(d)(2)], on separate sheet(s) of paper, provide available data on all prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring. If the data has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement. Provide the following information for each SWMU/AOC:
 - a. Date of release
 - b. Estimated or known quantity or volume of waste released
 - c. Location of the release
 - d. Describe the nature of the release (i.e., spill, overflow, ruptured pipe or tank, etc.).
See response below
4. Provide, for each unit, all available analytical data that describes the nature and extent of the environmental contamination due to the releases described in three (3.) above, on separate sheet(s) of paper. Focus on the concentrations of hazardous wastes or constituents present in contaminated media (e.g., soil, sediment, surface water and groundwater) [40 CFR 270.14(d)(3)]. If the information has previously been submitted formally to the Department, references to the documents and or summary tables may be submitted to meet this requirement.
See response below

2. See RCRA Facility Assessment Report by EPA Contractor A.T. Kearney dated 6/27/90 and attached in permit application Section II.Q

3. See Source Removal Report and No Further Action Request, November 5, 2019 and attached DEP NFA approval letter, December, 2019

4. See Source Removal Report and No Further Action Request, November 5, 2019 and attached DEP NFA approval letter, December, 2019



FLORIDA DEPARTMENT OF Environmental Protection

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

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

December 2, 2019

Mr. Michael Shuler
Perma-Fix of Florida, Inc.
1940 NW 67th Place
Gainesville, FL 32653
mshuler@perma-fix.com

RE: **Source Removal Report and No Further Action (NFA)** dated November 5, 2019;
Perma-Fix of Florida, Inc.; FLD 980 711 071

Dear Mr. Shuler:

The Department has reviewed the above referenced report and concurs with the proposal for No Further Action (NFA) without conditions contained therein. The report provides documentation supporting NFA at solid waste management unit (SWMU) 23. NFA is warranted as all soil contamination has been removed and backfilled with clean fill.

In lieu of a formal Site Rehabilitation Completion Order (SRCO) without conditions to address the updated SWMU status, the Department will make these changes to the permit through the upcoming permit renewal. Perma-Fix must abandon all monitoring wells at this SWMU within 60 days of issuance of the final permit. The wells must be plugged and abandoned in accordance with the requirements of Rule 62-532.500(4), F.A.C.

If you have any questions, please contact Bradley Buselli at (850) 245-8989 or via e-mail at bradley.buselli@floridadep.gov.

Sincerely,

A handwritten signature in blue ink that reads "Michell Mason Smith".

Michell Mason Smith, Environmental Administrator
Hazardous Waste Program and Permitting

cc:

Brian Bastek, EPA Region 4, bastek.brian@epa.gov
Pam Cosgrove, DEP Northeast District, pamela.cosgrove@floridadep.gov
Raymond Whittle, Perma-Fix, rwhittle@perma-fix.net
Bill Kelly, Trihydro, bkelly@trihydro.com

APPENDIX II-Q
ASSESSMENT REPORT

APPENDIX II-Q. ASSESSMENT REPORT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IV

345 COURTLAND STREET, N.E.
ATLANTA, GEORGIA 30365

JUN 27 1990

4WD-RCRAFFB

Mr. Bernhardt C. Warren
Vice President, Regulatory Affairs
Quadrex HPS
1940 North West 67th Place
Gainesville, Florida 32606-1649

RE: Final RFA Report, Quadrex
Gainesville, Florida
EPA I.D. Number FLD 980 711 071.

Dear Mr. Warren:

Enclosed is the final Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) Report which is the result of the Visual Site Inspection (VSI) performed by our contractor, A.T. Kearney on October 3, 1989.

We have determined that no further investigation will be necessary for the solid waste management units (SWMUs) identified at the Quadrex facility. Therefore by copy of this letter, we are recommending to the Florida Department of Environmental Regulation (FDER) to issue the state RCRA permit without the accompanying HSWA permit.

Should you have any further questions, please contact Ron Dobbs of my staff at (404) 347-3433.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Kent Williams".

Kent Williams, Chief
Florida/Georgia Unit
Waste Engineering Section

Enclosure

cc: Mr. Ashwin Patel, FDER, Jacksonville
w/enclosure

Printed on Recycled Paper

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 1

PHOTO NUMBER: 1.1

NAME: North Unloading Area

TYPE OF UNIT: Asphalt pad

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is a section of the asphalt driveway located in the vicinity of the Container Storage Shed (SWMU 4) in the north section of the facility. A portion of this driveway, approximately 75 feet by 75 feet, is used for truck parking during truck unloading operations. Truck trailers containing drums of hazardous waste or mixed wastes are unloaded via forklifts and a portable ramp. The drums are transferred to the Temporary Holding Area (SWMU 3).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives flammable liquids and mixed wastes. The wastes are received in vials or containers that are overpacked into 55-gallon drums. The mixed wastes are liquid scintillation fluids consisting of solvents (toluene and xylene) and trace amounts of radioactive materials. Occasionally, 55-gallon drums containing bulk flammable liquids are also off-loaded at this pad. These flammable liquids include acetone, benzene, methylene chloride and 1,1,1-trichloroethane.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the file review.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 5, 26, 43, 53

COMMENTS:

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 2

PHOTO NUMBER: 2.1

NAME: South Unloading Area

TYPE OF UNIT: Asphalt pad

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is a section of the driveway located immediately south of the North Unloading Area (SWMU 1) in the north section of the facility. A portion of the driveway, approximately 75 feet by 75 feet, is used for truck parking during truck unloading operations. Truck trailers containing drums of hazardous waste or mixed wastes are unloaded via forklifts and a portable ramp. The drums are transferred to the Temporary Holding Area (SWMU 3).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit received flammable liquids and mixed wastes. The wastes are received in vials or containers that are overpacked into 55-gallon drums. The mixed wastes are liquid scintillation fluids consisting of solvents (toluene and xylene) and trace amounts of radioactive materials. Occasionally, 55-gallon drums containing bulk flammable liquids are also off-loaded at this pad. These flammable liquids include acetone, benzene, methylene chloride and 1,1,1- trichloroethane.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the file review.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 5, 26, 43, 53

COMMENTS:

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 3

PHOTO NUMBER: 3.1, 3.2

NAME: Temporary Holding Area

TYPE OF UNIT: Asphalt pad

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The Temporary Holding Area (SWMU 3) is a section of the asphalt lot adjacent to the Container Storage Shed (SWMU 4). The unit consists of five parallel marked rows providing space for rows of pallets stacked two high. Each row is approximately 50 feet long and six feet wide. The rows are spaced approximately two feet apart. Drums containing hazardous and mixed wastes are held at this area until they are labeled. According to a facility representative, this holding period is approximately one day.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives drums filled with vials of liquid scintillation fluids containing solvents (toluene and xylene) and trace amounts of radioactive materials, from either the North or South Unloading Areas (SWMUs 1 and 2). After labeling, the drums are transferred to the Container Storage Shed (SWMU 4). Occasionally, drums containing bulk flammable liquids are held at this unit until they are processed at the Incoming Bulk Waste Transfer Station (SWMU 5) which is housed within the Container Storage Shed (SWMU 4).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 5, 43, 53

COMMENTS:

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 4

PHOTO NUMBER: 3.1, 3.2, 4.1, 4.2, 4.3, 5.1
7.1, 12.3, 14.1, 16.1, 18.1,
20.1, 27.1

NAME: Container Storage Shed

TYPE OF UNIT: RCRA-regulated hazardous waste storage facility currently operated under a temporary operation permit issued by FDER.

PERIOD OF OPERATION: 1983 to present. The unit was expanded in 1987 to comply with RCRA Container Storage Standards.

PHYSICAL DESCRIPTION AND CONDITION:

The present unit is a 50,000-gallon-capacity drum storage shed with a six-inch thick concrete floor. A metal roof covers the unit. There are no walls except at the east and west ends of Zone 3. Secondary containment is provided by concrete curbs and metal-lined concrete sumps. The shed is divided into three zones. Each zone has its own secondary containment. The shed also houses the Incoming Bulk Waste Transfer Station (SWMU 5), 3,000-Gallon Waste Liquid Tank (SWMU 6) and the Tanker/Liquids Loading Station (SWMU 7).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives approximately 90,000 gallons of flammable liquids per year. Included in that waste is approximately 70,000 gallons of liquid scintillation fluids. These fluids consists primarily of toluene or xylene contaminated with trace amounts of radioactive material. Eighty percent of radioactive material contains less than 0.05 microcuries per milliliter of carbon 14 and/or tritium. The remaining 20 percent consists of other isotopes which may require storage at this unit until decay. The scintillation fluids are stored in vials contained in 55-gallon overpack drums. The unit also receives bulk flammable solvents in 55-gallon drums for processing at the Incoming Bulk Waste Transfer Station (SWMU 5).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 5, 23, 43, 53

COMMENTS: For a complete list of wastes managed by this unit, see Waste Management in Chapter II of this report.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 5

PHOTO NUMBER: 5.1, 5.2, 5.3

NAME: Incoming Bulk Waste Transfer Station

TYPE OF UNIT: Drum emptying tank

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is a 500-gallon, open-topped tank elevated above concrete by metal legs. The tank is located in the southeast section of the Container Storage Shed (SWMU 4) adjacent to the 3,000-Gallon Waste Liquids Tank (SWMU 6). Drums containing flammable liquids are emptied into the tank via an overhead hoist. The drums rest on an incline, sloped toward the opening of the tank. A screen covers the tank top to prevent bulk foreign objects from entering the unit. The contents of the tank are pumped into the 3,000-gallon Waste Liquids Tank (SWMU 6) via above-ground metal pipes.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives flammable liquids, contained in 55-gallon drums, from the Temporary Holding Area (SWMU 3). Accordingly to facility representatives, the tank does not receive radioactive materials. Flammable liquids include ethanol, hexane, methyl pyrrole, methylene chloride, acetone and 1,1,1-trichloroethane.

RELEASE PATHWAYS: Air (*) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material. Due to the nature of the operations, vapors and fumes are released to the atmosphere.

RECOMMENDATION: No Further Action (*)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

* Evaluation of the regulatory status of the unit with respect to the air program is suggested.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 6

PHOTO NUMBER: 6.1, 6.2

NAME: 3,000-Gallon Waste Liquids Tank

TYPE OF UNIT: RCRA-regulated waste storage tank currently operated under a temporary operation permit issued by FDER.

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is a closed-topped, above-ground, steel tank located in the central section of the Container Storage Shed (SWMU 4). The tank is supported above the concrete by steel feet. Secondary containment is provided by a concrete-block wall eight feet tall. This tank was previously located outdoors, prior to the construction of the Container Storage Shed (SWMU 4) roof. The contents of the tank are transferred to tanker trucks at the Tanker/Liquids Loading Station (SWMU 7) for off-site incineration.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives flammable liquids from the Indoor Staging and Process Area (SWMU 9) via the LSF Pipes (SWMU 12), the Incoming Bulk Waste Transfer Station (SWMU 5) and the Crushed Vials Final Drainage Station (SWMU 16). Flammable liquids include decayed scintillation fluids containing xylene or toluene; crushed-vial drainage fluids consisting mainly of alcohol and trace amounts of solvents; and bulk flammable liquids such as ethanol, hexane, methyl pyrrole, methylene chloride, acetone and 1,1,1-trichloroethane.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 5, 23, 43, 53

COMMENTS:

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 7

PHOTO NUMBER: 7.1

NAME: Tanker/Liquids Loading Station

TYPE OF UNIT: Tank truck loading pad

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The pad is situated in the east-central section of the Container Storage Shed (SWMU 4). The dimensions of the pad are approximately 50 feet long and 18 feet wide. Secondary containment is provided by two steel trenches at each end of the pad, as well as the secondary containment provided by the Container Storage Shed (SWMU 4). Tank trucks parked at this unit receive flammable liquids, via overhead pipes, from the 3,000-gallon Waste Liquids Tank (SWMU 6) for off-site incineration at a cement kiln.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Trucks parked at the unit receive flammable liquids contained by the 3,000-gallon Waste Liquids Tank (SWMU 6).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI. Some minor spillage (5-10 gallons) of LSF was reported by the facility to FDER on September 28, 1989 (Reference 54); however, no further information was available.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 23, 43, 53, 54

COMMENTS: The unit appeared in good condition.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 8

PHOTO NUMBER: 8.1, 8.2

NAME: Outdoor Staging Area

TYPE OF UNIT: Undiked asphalt pad

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is a section of the asphalt-covered yard located at the entry of the Indoor Staging and Process Area (SWMU 9) in the west section of the facility. The unit receives overpacked drums containing vials of liquid scintillation fluids from the Container Storage Shed (SWMU 4) prior to processing at the Indoor Staging and Process Area (SWMU 9). The entrance to the Indoor Staging and Process Area (SWMU 9) is a concrete pad. Drums are held at this unit for less than eight hours.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Prior to processing, the unit receives vials containing liquid scintillation fluids. The vials are contained in 55-gallon overpack drums. Vermiculite is used as packing material. Scintillation fluids usually contain xylene or toluene and trace amounts of radioactive material. After processing, the unit receives drums containing crushed vials that had been rinsed with alcohol, and drums containing vermiculite. The vermiculite is transferred to the Packing Material Waste Drum Holding Area (SWMU 13). The crushed vials are transferred to the Crushed Glass/Plastic Vials Drum Holding Area (SWMU 15).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

The VSI team observed dark staining on the concrete pad leading to the Indoor Staging and Process Area (SWMU 9). It appeared that runoff from the unit may drain onto grass-covered areas situated on either side of the unit.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 43, 53

COMMENTS: Evidence of staining is shown in Photographs 8.1 and 8.2., however, the staining appears to be insignificant and does not justify a high release potential.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 9

PHOTO NUMBER: 9.1 thru 9.13

NAME: Indoor Staging and Process Area

TYPE OF UNIT: Waste process conveyors, tanks and hoppers

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The area is located inside the Manufacturing Building in the west section of the facility. This unit consists of several component units designed to separate the vials from the packaging materials, separate the liquid from the vials and manage liquids and solids waste streams. These units are the Roller Conveyors (SWMU 9a), the Lift (SWMU 9b), the In-Feed Hopper (SWMU 9c), the Shaker Table (SWMU 9d), the Crusher/Shredder (SWMU 9e), the Rinse Bucket Trough (SWMU 9f), the Three-Chamber Rinse Tank (SWMU 9g), the Drain Table (SWMU 9h) and the LSF Holding Tanks (SWMU 9i). The semi-automated system is manned by five individuals outfitted with respirators and other protective clothing. Jobs include moving drums, inspecting the equipment, moving metal baskets, and vial inspection.

Roller Conveyors (SWMU 9a), Photograph 9.1, 9.2, 9.12

Drums containing vials or carboys of liquid scintillation fluids are transferred between the Outdoor Staging Area (SWMU 8) and the process units via Roller Conveyors (SWMU 9a). The conveyors are also used to transfer drums, containing crushed vials, back to the Outdoor Staging Area (SWMU 8). The metal conveyors are approximately 15 feet long.

Lift (SWMU 9b), Photograph 9.3, 9.5, 9.12

The Lift (SWMU 9b) is a hydraulically-operated conveyor that lifts the drums approximately 10 feet above the ground-floor and dumps the contents of the drums into the In-Feed Hopper (SWMU 9c). The unit is approximately 12 feet tall and 3 feet wide.

In-Feed Hopper (SWMU 9c), Photograph 9.3, 9.4

The contents of the drums are dumped into the In-Feed Hopper (SWMU 9c) by the Lift (SWMU 9b). From the hopper, the vials and packing material discharge into the Shaker Table (SWMU 9d). The metal In-Feed Hopper (SWMU 9c) has a capacity of approximately 50 gallons.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 9

PHOTO NUMBER: 9.1 thru 9.13

NAME: Indoor Staging Area and Process Area

Shaker Table (SWMU 9d), Photograph 9.5, 9.6, 9.7, 9.8

The Shaker Table (SWMU 9d) is a vibrating metal table used for separating the vials from the packaging material. The unit is elevated above the concrete floor by a metal platform. Vermiculite sifts through the screens into cloth socks and discharges into 55-gallon drums. The vials remain above the screens and empty into the Crusher/Shredder (SWMU 9e).

Crusher/Shredder (SWMU 9e), Photograph 9.5, 9.7, 9.9

The Crusher/Shredder (SWMU 9e) is housed by a metal frame approximately four feet long, three feet high and two feet wide. Within the unit are 33 cutting discs which crush/shred the vials and liberate the fluids. The vials are again trapped above screens and discharged into metal baskets at the Rinse Basket Trough (SWMU 9f). The liquid drains to the bottom of the unit and is collected by the LSF Holding Tanks (SWMU 9i).

Rinse Basket Trough (SWMU 9f), Photograph 9.9

The Rinse Basket Trough (SWMU 9f) is located at ground-level and holds metal baskets containing the crushed vials. The unit consists of a metal trough approximately six feet long, 1.5 feet wide, and two feet deep. Two metal lips, situated along the top length of the trough, hold the baskets above the bottom of the trough. At this unit, liquids drain from the vials prior to vial rinsing. The contents of the trough are pumped to the LSF Holding Tanks (SWMU 9i) via a small pump.

Three-Chamber Rinse Tank (SWMU 9g), Photograph 9.10, 9.11

After the scintillation fluids have drained from the vials, the baskets are carried to the Three-Chamber Rinse Tank (SWMU 9g). The rinse tank consists of three metal chambers approximately two feet square and three feet deep. The vials are triple-rinsed in alcohol and transferred to the Drain Table (SWMU 9h) immediately adjacent to the unit.

Drain Table (SWMU 9h), Photograph 9.12

The Drain Table (SWMU 9h) is a metal sink and inspection table approximately six feet long, three feet wide and six inches deep. The contents of the baskets are inspected to ensure that all vials are broken. The crushed vials are pushed along the table and into a 55-gallon drum equipped with a plastic pipe. The pipe is inserted through the vial's to touch the bottom of the drum. This pipe provides access to the bottom of the drum for alcohol-draining at the Crushed Vials Final Drainage Station (SWMU 16).

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SWMU NUMBER: 9

PHOTO NUMBER: 9.1 thru 9.13

NAME: Indoor Staging Area and Process Area

LSF Holding Tanks (SWMU 9i), Photograph 9.13

The LSF Holding Tanks (SWMU 9i) receive liquids from the Crusher/Shredder (SWMU 9e) via pipes; from carboys via hand-pumps; from the Drain Table (SWMU 9h); and from the Three-Chamber Rinse Tank (SWMU 9g). The two closed-top stainless steel tanks have a combined capacity of 80 gallons. Liquids are held at this unit and tested for radioactivity levels prior to discharge to the 3,000-Gallon Waste Liquids Tank (SWMU 6) via the LSF Pipe (SWMU 12).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

Approximately 6,000 gallons of liquid scintillation fluids are processed by this unit per month. Fumes and vapors are vented, via the Process Area Ventilation System (SWMU 10), to the Carbon Adsorption System (SWMU 11).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (*)
Groundwater (*) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material. However, operations conducted at this unit generated alcohol and solvent fumes.

RECOMMENDATION: No Further Action (*)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS: The Crusher/Shredder (SWMU 9e) replaced the Former Glass/Plastic Shredder (SWMU 25) unit during 1988.

* Routine inspection of the integrity of the walls and floor of this unit is suggested.

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SWMU NUMBER: 10

PHOTO NUMBER: 10.1

NAME: Processing Area Ventilation System

TYPE OF UNIT: Air purifying system

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The system consists of flexible plastic hoses and various-shaped metal ducts and hoods designed to collect fumes and vapors generated in the Indoor Staging and Process Area (SWMU 9). The hoses are used to trap vapors and fumes from the individual processing components. Air from the room is drawn through filter-covered ducts by a fan. The air is discharged to the atmosphere via the Carbon Adsorption System (SWMU 11). The system is active; however, it was not observed in operation because it was shut down at the time of the VSI.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The system receives air contaminated with solvent and alcohol fumes, generated at the Indoor Staging and Process Area (SWMU 9). The vapors and fumes may contain alcohol, toluene and xylene.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

The unit was inactive during the VSI. No evidence of release was identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 11

PHOTO NUMBER: 11.1, 11.2

NAME: Carbon Adsorption System

TYPE OF UNIT: Air purifying system

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit consists of two metal tanks filled with activated charcoal. The tanks are closed-topped, and are approximately four feet tall and two feet in diameter. The unit is connected to the Process Area Ventilation System (SWMU 10) via metal pipes which are connected to the bottom of the tank. The air rises through the charcoal and is released to the atmosphere. The two tanks are housed in a separate room outside the Process Area.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives air containing organic vapors from the Process Area Ventilation System (SWMU 10). The unit is designed to release to the atmosphere.

RELEASE PATHWAYS: Air (*) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

The unit is designed to release to the atmosphere.

RECOMMENDATION: No Further Action (*)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: * This unit does not have an air permit, although the unit is inspected by the Department of Environmental Safety, Alachua County. Evaluation of the regulatory status of the unit with respect to the air program is suggested.

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SWMU NUMBER: 12

PHOTO NUMBER: 12.1, 12.2, 12.3

NAME: LSF Pipe

TYPE OF UNIT: Waste solvent transfer pipe

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The LSF Pipe (SWMU 12) transfers waste solvent from the Indoor Staging and Process Area (SWMU 9) to the 3,000-Gallon Waste Liquids Tank (SWMU 6) located at the Container Storage Shed (SWMU 4). The above-ground pipe is made of 1.5-inch diameter steel pipe encased in a three-inch-diameter Polyvinylchloride (PVC) pipe. The pipes are encased in a concrete trough. The pipe originates in the west-central section and discharges at the tank in the northwest section of the facility via pumps. The unit is approximately 300 linear feet.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit transfers flammable liquids consisting primarily of xylene, toluene and alcohol.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (*)
Groundwater (*) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: * White stains along the pipe connections were noted in the vicinity of the Indoor Staging and Process Area (SWMU 9) in the west section of the facility. See Photograph 12.1. Routine inspection of the integrity of the pipes and trough is suggested.

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SWMU NUMBER: 13

PHOTO NUMBER: 13.1

NAME: Packing Material Wastes Drum Holding Area

TYPE OF UNIT: Staging area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

This staging area is located on asphalt between the main facility building and the Container Storage Shed (SWMU 4) in the north section of the facility. The asphalt area is approximately 30 feet long and 15 feet wide. Runoff from the unit appears to drain toward a grass strip between the asphalt pad and the facility building.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives drums containing packing material (vermiculite) used to cushion the vials containing liquid scintillation fluid. The contents of the drums are poured into the Dumping Trailers (SWMU 19), transferred off-site to a cement manufacturer and processed into a cement aggregate. Approximately 250 drums, stacked on pallets two high, were observed at this unit during the VSI. The process generates approximately 250 drums per month. It takes approximately 250 drums to fill a Dumping Trailer (SWMU 19).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 14

PHOTO NUMBER: 14.1

NAME: Empty Drums Holding Area

TYPE OF UNIT: Staging area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is located on the west side of the Packing Material Wastes Drum Holding Area (SWMU 13) in the north section of the facility. The asphalt area is approximately 25 feet by 25 feet. The drums are stored directly on the asphalt.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives empty drums that may contain small amounts of residual liquid from the Packing Material Wastes Drum Holding Area (SWMU 13), the Drained Crushed Vials Drum Holding Area (SWMU 17) and the Indoor Staging and Process Area (SWMU 9). The drums are loaded onto a van-type trailer and transferred off-site to the Drum Service of Florida for reconditioning.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 15

PHOTO NUMBER: 15.1

NAME: Crushed Glass/Plastic Vials Drum Holding Area

TYPE OF UNIT: Staging area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is a section of the asphalt located in the northwest corner of the facility in the vicinity of the Container Storage Shed (SWMU 4) and the North Drainage Ditch (SWMU 23). The asphalt area is approximately 40 feet long and 20 feet wide. A drop inlet situated in the vicinity of the unit discharges runoff from the unit to the North Drainage Ditch (SWMU 23). The drop inlet is approximately four feet long by two feet wide, and is made of metal.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives 55-gallon drums containing crushed glass or plastic vials from the Indoor Staging and Process Area (SWMU 9) via forklift. The vials had been rinsed with alcohol and are held at this unit to drain the fluids to the bottom of the drum. According to facility representatives, very small volumes of alcohol are contained by the drum. Approximately 170 drums, stacked on pallets two high, were observed at this unit during the VSI.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

Runoff and pad washings in the vicinity of the units discharge to the North Drainage Ditch (SWMU 23) via a drop inlet. However, since the unit receives drums containing small volumes of alcohol, the likelihood of a release to surface water from this unit is judged to be low.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 16

PHOTO NUMBER: 16.1, 16.2

NAME: Crushed Vials Final Drainage Station

TYPE OF UNIT: Staging area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is an asphalt area situated on the south side of the Container Storage Shed (SWMU 4) in the vicinity of the 3,000-Gallon Waste Liquids Tank (SWMU 6). The asphalt pad is approximately 25 feet long and four feet wide. Alcohol that has drained to the bottom of the drum is transferred to the 3,000-Gallon Waste Liquids Tanks (SWMU 6) via a small pump and hose. Each drum has a vertically-placed pipe providing access to the drum bottom. The pump hose is inserted into the pipe for removal of any alcohol that may remain on the bottom of the drum. The drums are stored on pallets at this unit.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives drums containing plastic vials which have been rinsed in alcohol and allowed to drain. Any drained liquids are removed from the bottom of the drum via a small portable pump and hose. The contents of the drum are pumped to the 3,000-Gallon Waste Liquid Tank (SWMU 6).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS: The unit is underlain by asphalt that appeared to be in good condition.

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SWMU NUMBER: 17

PHOTO NUMBER: 17.1

NAME: Drained Crushed Vials Drum Holding Area

TYPE OF UNIT: Staging area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

This unit is located south of the Crushed Glass/Plastic Vials Drum Holding Area (SWMU 15) in the northwest section of the facility. The asphalt area is approximately 40 feet long and 15 feet wide. The VSI team observed approximately 100 drums stacked on pallets at this unit. The drums are held at this unit until they are loaded into the Dumping Trailers (SWMU 19) via the Gondolas (SWMU 18).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives drums containing crushed vials after the remaining alcohol has been pumped out at the Crushed Vials Final Drainage Station (SWMU 16).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 18

PHOTO NUMBER: 18.1, 19.2

NAME: Gondolas

TYPE OF UNIT: Dumpster

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

Ten gondolas are situated along the west side of the Container Storage Shed (SWMU 4) located in the northwest section of the facility. These units are used to transfer the crushed vials from the drums to the Dumping Trailers (SWMU 19). Each unit has an approximate capacity of one cubic yard. The units are made of steel and are elevated above the asphalt by four wheels. Each Gondola (SWMU 18) has a metal cover.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The units receive crushed vials from the drums stored at the Drained Crushed Vials Drum Holding Area (SWMU 17). When the gondolas are full, they are transferred to the Dumping Trailers (SWMU 19) via forklift.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was identified during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 19

PHOTO NUMBER: 19.1, 19.2, 20.1

NAME: Dumping Trailers

TYPE OF UNIT: Leased trailers for off-site material transfer

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The units are commercial truck trailers. The trailers are approximately 20 feet long, six feet wide and five feet deep. The aluminum-bodied, open-topped trailers are parked in the west section of the facility. The trailer tops are covered with a rubber tarp.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The units receive crushed plastic, glass vials, or packing materials. Approximately four to five trailers of glass and one trailer of vermiculite are transferred off-site per month. The vials are disposed of off-site at the Clifton Landfill, Garden City, GA. The packing material is transferred off-site to a cement manufacturer.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 20

PHOTO NUMBER: 18.1, 19.1, 19.2, 20.1

NAME: Waste Handling Routes

TYPE OF UNIT: Asphalt lot and driveways

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

This unit represents the various paths traveled by forklifts transferring drums of hazardous wastes, crushed vials and packing materials throughout the facility. These operations are limited to areas west and north of the facility building.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit may receive drippage or spillage containing hazardous constituents. Runoff from these routes may drain onto grass areas surrounding the operations yard. Additionally, runoff and asphalt washings are discharged to the North Drainage Ditch (SWMU 23) via the drop inlet at the Crushed Glass/Plastic Vials Drum Holding Area (SWMU 15).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

As observed during the VSI, water accumulating on this unit is routinely pushed by broom into a drop inlet that discharges to the North Drainage Ditch (SWMU 23). However, since the unit potentially receives only small volumes of volatile constituents, the release potential to surface water is low.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 21

PHOTO NUMBER: 21.1

NAME: North Retention Pond

TYPE OF UNIT: Percolation/evaporation impoundment

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The pond is located in the northeast section of the facility in the vicinity of the South Unloading Area (SWMU 2) and the Field Trailers Service Area (SWMU 26). The pond is made of soil and is approximately 70 feet long, 25 feet wide and three feet deep. The unit is maintained in grass and was empty during the VSI.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives runoff via direct surface flow from the northeast parking lot, the South Unloading Area (SWMU 2), the Field Trailers Service Area (SWMU 26) and the Spray Paint Booth Area (AOC A). The runoff may contain trace amounts of hazardous constituents.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material. However, the unit is unlined and designed to percolate runoff into the soil.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 22

PHOTO NUMBER: 22.1

NAME: East Retention Pond

TYPE OF UNIT: Percolation/evaporation impoundment

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The pond is located in the southeast section of the facility. The pond is made of soil and is approximately 20 feet long and 10 feet wide. A concrete swale discharges runoff from the south parking lot into the pond. This pond is partially-overgrown with cattails. During the VSI, the unit was filled with water approximately four inches deep. Overflow from this unit discharges to the East Drainage Ditch (SWMU 24) via an underground PVC pipe.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives runoff via direct surface flow from the south parking lot.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material. However, the unit is unlined and designed to percolate runoff into the soil.

RECOMMENDATION: No Further Action (*)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: *No further action is suggested at this time because no evidence that gasoline, oil, or other foreign contaminants were entering the unit was noted.

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SWMU NUMBER: 23

PHOTO NUMBER: 23.1, 24.1

NAME: North Drainage Ditch

TYPE OF UNIT: Surface drainage

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The ditch bounds the facility to the north and discharges to the East Drainage Ditch (SWMU 24) bounding the facility to the east. The ditch is approximately eight feet wide and three to four feet deep. The ditch is unlined except in the area where the two ditches meet. This portion of the ditch is lined with concrete. The ditch banks are overgrown with shrubs and small trees.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives runoff from the drop inlet at the Crushed Glass/Plastic Vials Drum Holding Area (SWMU 15), the Waste Handling Routes (SWMU 20), the northeast parking lot and the North Unloading Area (SWMU 1), and the PCB Drummed Waste Storage Area (SWMU 27). The runoff may contain hazardous constituents.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 24

PHOTO NUMBER: 24.1

NAME: East Drainage Ditch

TYPE OF UNIT: Surface drainage

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The ditch bounds the facility to the east and flows north. The ditch is approximately eight feet wide and three feet deep. The ditch is unlined except in the area where it meets the North Drainage Ditch (SWMU 23). This portion of the ditch is lined with concrete. The ditch banks are overgrown with shrubs and small trees.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives runoff from the driveway along the east side of the facility.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 25

PHOTO NUMBER: 25.1

NAME: Former Glass/Plastic Shredder Unit

TYPE OF UNIT: Former waste process unit

PERIOD OF OPERATION: 1983 to 1988

PHYSICAL DESCRIPTION AND CONDITION:

The former unit was a wood shredder utilized to shred plastic and glass vials during its period of operation. While active, it was situated in the Indoor Staging and Process Area (SWMU 9). During the VSI, the former unit was located in the north section of the facility. The unit consists of an approximately 40-gallon hopper connected to the shredder. The unit is supported by a metal platform four feet tall.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit received plastic and glass vials containing decayed liquid scintillation fluids. The fluids consisted of xylene or toluene and low-level radioactive wastes.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI. The facility had difficulty ensuring all vials were crushed with this unit.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

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SWMU NUMBER: 26

PHOTO NUMBER: 26.1, 26.2

NAME: Field Trailers Service Area

TYPE OF UNIT: Asphalt lot

PERIOD OF OPERATION: 1982 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is an asphalt lot approximately 200 feet long and 50 feet wide situated on the east side of the facility building. Field trailers are parked at this unit after completion of off-site hazardous waste remediation activities. Service includes outfitting the trailers for upcoming jobs. According to facility representatives, the trailers are decontaminated at the remediation sites prior to returning to the facility.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

If trailers undergo incomplete decontamination procedures, then runoff in the area may become contaminated with hazardous constituents. Remediation sites where these trailers may have been used include radioactive and PCB-contaminated sites. However, no evidence of incomplete decontamination procedures was observed or reported.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: It is suggested that the facility provide documentation to demonstrate the effectiveness of the decontamination procedures.

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SWMU NUMBER: 27

PHOTO NUMBER: 27.1, 27.2, 27.3

NAME: PCB Drummed Waste Storage Area

TYPE OF UNIT: Self-contained cargo container

PERIOD OF OPERATION: 1985 to present

PHYSICAL DESCRIPTION AND CONDITION:

The self-contained metal cargo container is 20 feet long, 10 feet wide and seven feet high. The container is located at the northeast parking lot in the northeast section of the facility. The unit has the capacity to hold 24 55-gallon drums. Within the metal container is a metal secondary containment system with metal curbs approximately four inches high. Most of the drums are elevated above the metal floor by small drum dollies.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit stores oils and other wastes containing PCBs from the PCB Decontamination Test Site (SWMU 32) located at the Annex. Approximately 15 drums were observed at this unit during the VSI.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: The self-contained unit appeared to be in good condition.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 28

PHOTO NUMBER: 28.1

NAME: Freon Distillation Waste Collection Unit

TYPE OF UNIT: Still bottoms collection unit

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit consists of a one-gallon plastic container utilized to collect still bottoms from the protective clothing washing machine. This unit is located in the vicinity of the Indoor Staging and Process Area (SWMU 9). The bucket is underlain by a plastic-lined wooden tray.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives still bottoms from the freon clothes washer. The still bottoms may contain xylene and toluene from protective clothing worn by employees in the Indoor Staging and Process Area (SWMU 9).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: The unit is located indoors and is underlain by concrete that appeared to be in good condition.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 29

PHOTO NUMBER: 29.1

NAME: Sand and Grit Drum Storage Area

TYPE OF UNIT: Drummed waste and product storage area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

An asphalt area measuring approximately 200 square feet is utilized to store drums containing sand and grit. The unit is located outside the northeast corner of the Container Storage Shed (SWMU 4).

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

This unit is a one-time temporary storage area for drums containing sand and grit. According to facility representatives, this material does not contain any hazardous constituents. During September 1989, one of the facility's clients shipped LSF vials in overpack drums utilizing sand and grit as packing material. The facility accepted the shipment, processed the vials, and has stored the drums containing sand and grit at this area since that time. This area is normally used for storing drums of alcohol.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53, 59

COMMENTS: It is suggested that the facility provide documentation indicating the non-hazardous nature of the sand and grit.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 30

PHOTO NUMBER: 30.1, 30.2

NAME: Laboratory Wastes Accumulation Area

TYPE OF UNIT: Satellite accumulation area

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit consists of a small surface area at a lab table for storage of small lab-specimen wastes and a drum for collecting other lab wastes. The unit is located indoors in the Annex.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives waste specimens containing solvents, mixed wastes and PCBs. The specimen bottles are hand-carried to the Laboratory Specimens Storage Building (SWMU 31) located outdoors and west of the Annex. PCB wastes are transferred to the PCB Drummed Waste Storage Area (SWMU 27).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
RFA Phase II Sampling ()
RFI Necessary ()

REFERENCES: 53

COMMENTS:

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 31

PHOTO NUMBER: 31.1, 31.2

NAME: Laboratory Specimens Storage Building

TYPE OF UNIT: Less-than-90-day storage

PERIOD OF OPERATION: 1983 to present

PHYSICAL DESCRIPTION AND CONDITION:

The unit is a corrugated-metal building approximately ten feet long, ten feet wide and eight feet tall. The floor is constructed of wood and the shed is elevated above a concrete slab by metal skids. The shed is located outdoors approximately 200 feet west of the Annex. Small bottles of waste specimens are stored on metal shelves. Within 90 days, the wastes are hand-carried to the Container Storage Shed (SWMU 4) for disposal.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit receives laboratory specimens containing solvents, mixed wastes and PCBs. There were over 200 specimen bottles at this unit during the VSI. Facility representatives did not provide detailed information pertaining to the operation of the unit.

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material. The lab is expected to be moved to the main facility building during December 1989.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 53

COMMENTS: It is suggested that the facility provide details pertaining to wastes and waste management at this unit.

APPENDIX II-Q. ASSESSMENT REPORT

SWMU DATA SHEET

SWMU

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September 11, 1997

SWMU NUMBER: 32

PHOTO NUMBER: None

NAME: PCB Decontamination Test Site

TYPE OF UNIT: Demonstration room

PERIOD OF OPERATION: 1985 to present

PHYSICAL DESCRIPTION AND CONDITION:

A room adjoining the laboratory measuring approximately 200 square feet, located at the Annex, was periodically used to demonstrate a PCB treatment system under a permit issued by EPA. The last period of use was indicated to have been May-July 1988 (Reference 9). At the time of the VSI, the room was used for office furniture storage.

WASTES AND/OR HAZARDOUS CONSTITUENTS MANAGED:

The unit received PCB wastes. The demonstration was viewed by EPA representatives. Facility representatives did not provide detailed information pertaining to the activities at this unit. However, the wastes generated at the unit were transferred to the PCB Drummed Waste Storage Area (SWMU 27).

RELEASE PATHWAYS: Air (L) Surface Water (L) Soil (L)
Groundwater (L) Subsurface Gas (L)

HISTORY AND/OR EVIDENCE OF RELEASE(s):

No evidence of release was observed during the VSI or identified in the available file material.

RECOMMENDATION: No Further Action (X)
 RFA Phase II Sampling ()
 RFI Necessary ()

REFERENCES: 9, 18, 19, 48, 53

COMMENTS: It is suggested that the facility provide documentation pertaining to the activities and disposal of wastes.

APPENDIX II-Q. ASSESSMENT REPORT

AOC DATA SHEET

SWMU

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September 11, 1997

AOC NUMBER: A

PHOTO NUMBER: A.1, A.2

NAME: Spray Paint Booth Area

PHYSICAL DESCRIPTION AND CONDITION:

A Paint Booth 12 feet long, 12 feet wide and 16 feet high, and a metal tray ten feet long, ten feet wide and six inches deep, were identified in the central section of the facility during the VSI. The tray is used for paint stripping and the booth is active. According to facility representatives, a water-based sulfuric or phosphoric acid is used for stripping and an epoxy paint is utilized at the spray booth. Paint wastes are transferred to the Container Storage Shed (SWMU 4). It is suggested that the facility and FDER determine if an air permit is required for the booth.

APPENDIX II-Q. ASSESSMENT REPORT

Number:	SWMU-33
Name:	Laboratory
Type of Unit:	Laboratory Satellite Accumulation
Period of Operation:	1991 to present
Physical Description and Condition:	This unit consists of an area within the laboratory where 3 five gallon pails are located for the accumulation of glass, hazardous solids (plastic/glass), and crimp-top vials. These wastes are accumulated as a result of laboratory operations. The unit is provided with a base composed of interior service tile and is approximately 5 feet by 2 feet in size.
Wastes and/or Hazardous Constituents Managed:	The unit receives glass, hazardous solids (plastic/glass), and crimp-top vials which are accumulated in 3, five gallon pails prior to management (as appropriate) in the non-hazardous, or RCRA areas on-site.
Release Pathways:	Air (L) Surface Water (L) Soil (L) Subsurface Gas (L) Groundwater (L)
Release History:	The unit has been operational for laboratory activities which are monitored by facility personnel. No reportable release of hazardous constituents has occurred from the unit.
Recommendation:	No further Action (X) RFA Phase II Sampling () RFI Necessary ()
Comments:	The unit is part of laboratory operations and is maintained in good condition.

APPENDIX II-Q. ASSESSMENT REPORT

Number:	SWMU-34		
Name:	West Warehouse		
Type of Unit:	90-Day generator storage area, satellite accumulation area and 10 day transfer area		
Period of Operation:	1991 to present; 10 day transfer area operational since 1995		
Physical Description and Condition:	This unit consists of three general areas utilized as identified above for the temporary storage or transfer of drummed waste.		
Wastes and/or Hazardous Constituents Managed:	The unit receives site generated hazardous wastes including hazardous solids (plastic/debris); organic solvents/flammable materials, crimp-top vials, and metal/corrosive wastes.		
Release Pathways:	Air (L)	Surface Water (L)	Soil (L)
	Subsurface Gas (L)	Groundwater (L)	
Release History:	The unit has been operational for site activities which are monitored by facility personnel. No reportable release of hazardous constituents has occurred from the unit.		
Recommendation:	No further Action (X) RFA Phase II Sampling () RFI Necessary ()		
Comments:	The unit provides temporary storage and transfer of segregated hazardous waste storage for site generated incompatible wastes. The transfer facility has operated since 1995 and is maintained in good condition.		

APPENDIX II-Q. ASSESSMENT REPORT

Number:	SWMU-35
Name:	East Warehouse
Type of Unit:	Non hazardous tank and container storage area
Period of Operation:	1991 to present
Physical Description and Condition:	This unit consists of an area within the warehouse where containerized non-hazardous wastes are stored on a concrete base. The area also contains one 8,000 gallon storage tank, with secondary containment for oily water
Wastes and/or Hazardous Constituents Managed:	Non hazardous wastes including (but not limited to) waste oils, waste waters, oily waste and types and forms or non-hazardous waste.
Release Pathways::	Air (L) Surface Water (L) Soil (L) Subsurface Gas (L) Groundwater (L)
Release History:	The unit has been operational for facility activities which are monitored by facility personnel. No reportable release has occurred from the unit.
Recommendation:	No further Action (X) RFA Phase II Sampling () RFI Necessary ()
Comments:	The unit will be maintained be in good condition.

APPENDIX II-Q. ASSESSMENT REPORT

Number:	SWMU-36		
Name:	East Loading Area		
Type of Unit:	Loading Dock		
Period of Operation:	1991 to present		
Physical Description and Condition:	The unit is a concrete loading dock approximately 35 X 25 feet in size. The dock is approximately 3 1/2 feet above the parking area elevation.		
Wastes and/or Hazardous Constituents Managed:	The unit is utilized for the loading and off-loading of drums from transport vehicles. The unit receives non-hazardous or hazardous waste in accordance with the PFF RCRA permit.		
Release Pathways:	Air (L)	Surface Water (L)	Soil (L)
	Subsurface Gas (L)	Groundwater (L)	
Release History:	To date, the unit has not been used for waste management activities. No reportable release of hazardous constituents has occurred from the unit.		
Recommendation:	No further Action (X) RFA Phase II Sampling () RFI Necessary ()		
Comments:	The unit will be maintained in good condition.		

APPENDIX II-S-1

SAMPLE FORMS

APPENDIX II-S-1. SAMPLE FORMS
SVOC Analyzer Response Time Log
VOC Analyzer Calibration Precision Log
VOC Analyzer Calibration Log

METHOD 21 LEAK DETECTION MONITORING

VOC ANALYZER RESPONSE TIME LOG

THIS TEST MUST BE CONDUCTED BEFORE FIRST USE OF VOC ANALYZER AND AT SUBSEQUENT 3 MONTH (QUARTERLY) INTERVALS

- | Initial Testing | Subsequent Quarterly Testing | After modification to VOC Analyzer Set Up |
|-----------------|--|---|
| (1) | Introduce "zero gas" into VOC Analyzer sample probe until the instrument readings have stabilized. | |
| (2) | Switch to the "test gas" (concentration = 10,000 ppmv). Take stable instrument reading. | |
| (3) | Repeat steps (1) and (2) for 3 cycles. | |

Time to Reach a Reading of 10,000 ppmv (seconds)			Average Response Time (seconds)
(1)	(2)	(3)	$\frac{(1) + (2) + (3)}{3}$
			=

Is Average Response Time > 30 seconds?

- YES - Do not use VOC Analyzer for further testing.
NO - Proceed with monitoring.

Name (Print)

Signature

Test Date

Time

APPENDIX II-S-1. SAMPLE FORMS
SVOC Analyzer Response Time Log
VOC Analyzer Calibration Precision Log
VOC Analyzer Calibration Log

METHOD 21 LEAK DETECTION MONITORING

VOC ANALYZER QUARTERLY CALIBRATION PRECISION LOG

THIS TEST MUST BE CONDUCTED BEFORE FIRST USE OF VOC ANALYZER AND AT SUBSEQUENT THREE MONTH INTERVALS.

Initial Testing

Subsequent Quarterly Testing

- (1) Introduce "zero gas" into VOC Analyzer sample probe until the instrument readings have stabilized.
- (2) Switch to the "test gas" (concentration = 10,000 ppmv). Take stable instrument reading.
- (3) Repeat steps (1) and (2) for 3 cycles.

Analyzer Reading (ppmv)	Difference from Actual (ppmv)
(1)	[10,000 - Reading (1)] =
(2)	[10,000 - Reading (2)] =
(3)	[10,000 - Reading (3)] =
Total	
Average Difference (= Total/3)	
Calibration Precision (%) (= Average Difference X 100) 10,000	

Is Calibration Precision 90% or Better?

- YES - Proceed with monitoring.
NO - Do not use VOC Analyzer for further testing.

Name (Print)

Signature

Test Date

Time

APPENDIX II-S-1. SAMPLE FORMS
SVOC Analyzer Response Time Log
VOC Analyzer Calibration Precision Log
VOC Analyzer Calibration Log

METHOD 21 LEAK DETECTION MONITORING

VOC ANALYZER CALIBRATION LOG

CALIBRATION TEST MUST BE PERFORMED PRIOR TO EACH USE OF THE VOC ANALYZER.

- (1) Switch on the VOC Analyzer. Allow instrument to "warm up". Introduce "zero gas" into VOC Analyzer sample probe until the instrument readings have stabilized.
- (2) Introduce "test gas" (concentration = 10,000 ppmv) and adjust meter until it corresponds to 10,000 ppmv.

VOC Analyzer adjusted to 10,000 ppmv?

YES - Proceed with monitoring

NO - Do not use VOC Analyzer for further testing until repaired.

Name (Print)

Signature

Calibration Date

Time

APPENDIX II-S-2

REFERENCE METHOD 21

APPENDIX II-S-2. REFERENCE METHOD 21

Method 21—Determination of Volatile Organic Compound Leaks

1.0 SCOPE AND APPLICATION

1.1 ANALYTES

TABLE 1. ANALYTES

Analyte	CAS No.
Volatile Organic Compounds (VOC)	No CAS number assigned

1.2 SCOPE

This method is applicable for the determination of VOC leaks from process equipment. These sources include, but are not limited to, valves, flanges and other connections, pumps and compressors, pressure relief devices, process drains, open-ended valves, pump and compressor seal system degassing vents, accumulator vessel vents, agitator seals, and access door seals.

1.3 DATA QUALITY OBJECTIVES

Adherence to the requirements of this method will enhance the quality of the data obtained from air pollutant sampling methods.

2.0 SUMMARY OF METHOD

A portable instrument is used to detect VOC leaks from individual sources. The instrument detector type is not specified, but it must meet the specifications and performance criteria contained in Section 6.0. A leak definition concentration based on a reference compound is specified in each applicable regulation. This method is intended to locate and classify leaks only and is not to be used as a direct measure of mass emission rate from individual sources.

3.0 DEFINITIONS

3.1 CALIBRATION GAS

The VOC compound used to adjust the instrument meter reading to a known value. The calibration gas is usually the reference compound at a known concentration approximately equal to the leak definition concentration.

3.2 CALIBRATION PRECISION

The degree of agreement between measurements of the same known value, expressed as the relative percentage of the average difference between the meter readings and the known concentration to the known concentration.

3.3 LEAK DEFINITION CONCENTRATION

The local VOC concentration at the surface of a leak source that indicates that a VOC emission (leak) is present. The leak definition is an instrument meter reading based on a reference compound.

APPENDIX II-S-2. REFERENCE METHOD 21

3.4 NO DETECTABLE EMISSION

A local VOC concentration at the surface of a leak source, adjusted for local VOC ambient concentration, that is less than 2.5 percent of the specified leak definition concentration. that indicates that a VOC emission (leak) is not present.

3.5 REFERENCE COMPOUND

The VOC species selected as the instrument calibration basis for specification of the leak definition concentration. (For example, if a leak definition concentration is 10,000 ppm as methane, then any source emission that results in a local concentration that yields a meter reading of 10,000 on an instrument meter calibrated with methane would be classified as a leak. In this example, the leak definition concentration is 10,000 ppm and the reference compound is methane.)

3.6 RESPONSE FACTOR

The ratio of the known concentration of a VOC compound to the observed meter reading when measured using an instrument calibrated with the reference compound specified in the applicable regulation.

3.7 RESPONSE TIME

The time interval from a step change in VOC concentration at the input of the sampling system to the time at which 90 percent of the corresponding final value is reached as displayed on the instrument readout meter.

4.0 INTERFERENCES [RESERVED]

5.0 SAFETY

5.1 DISCLAIMER

This method may involve hazardous materials, operations, and equipment. This test method may not address all of the safety problems associated with its use. It is the responsibility of the user of this test method to establish appropriate safety and health practices and determine the applicability of regulatory limitations prior to performing this test method.

5.2 HAZARDOUS POLLUTANTS

Several of the compounds, leaks of which may be determined by this method, may be irritating or corrosive to tissues (e.g., heptane) or may be toxic (e.g., benzene, methyl alcohol). Nearly all are fire hazards. Compounds in emissions should be determined through familiarity with the source. Appropriate precautions can be found in reference documents, such as reference No. 4 in Section 16.0.

6.0 EQUIPMENT AND SUPPLIES

A VOC monitoring instrument meeting the following specifications is required:

APPENDIX II-S-2. REFERENCE METHOD 21

6.1 VOC INSTRUMENT DETECTOR

The VOC instrument detector shall respond to the compounds being processed. Detector types that may meet this requirement include, but are not limited to, catalytic oxidation, flame ionization, infrared absorption, and photoionization.

6.2 INSTRUMENT

The instrument shall be capable of measuring the leak definition concentration specified in the regulation.

6.3 SCALE

The scale of the instrument meter shall be readable to ± 2.5 percent of the specified leak definition concentration.

6.4 ELECTRONICALLY DRIVEN PUMP

The instrument shall be equipped with an electrically driven pump to ensure that a sample is provided to the detector at a constant flow rate. The nominal sample flow rate, as measured at the sample probe tip, shall be 0.10 to 3.0 l/min (0.004 to 0.1 ft³ /min) when the probe is fitted with a glass wool plug or filter that may be used to prevent plugging of the instrument.

6.5 PROBE

The instrument shall be equipped with a probe or probe extension or sampling not to exceed 6.4 mm (1/4in) in outside diameter, with a single end opening for admission of sample.

6.6 INTRINSICALLY SAFE

The instrument shall be intrinsically safe for operation in explosive atmospheres as defined by the National Electrical Code by the National Fire Prevention Association or other applicable regulatory code for operation in any explosive atmospheres that may be encountered in its use. The instrument shall, at a minimum, be intrinsically safe for Class 1, Division 1 conditions, and/or Class 2, Division 1 conditions, as appropriate, as defined by the example code. The instrument shall not be operated with any safety device, such as an exhaust flame arrestor, removed.

7.0 REAGENTS AND STANDARDS

7.1 TWO GASES

Two gas mixtures are required for instrument calibration and performance evaluation:

7.1.1 ZERO GAS.

Air, less than 10 parts per million by volume (ppmv) VOC.

7.1.2 CALIBRATION GAS.

For each organic species that is to be measured during individual source surveys, obtain or prepare a known standard in air at a concentration approximately equal to the applicable leak definition specified in the regulation.

APPENDIX II-S-2. REFERENCE METHOD 21

7.2 CYLINDER GASES

If cylinder calibration gas mixtures are used, they must be analyzed and certified by the manufacturer to be within 2 percent accuracy, and a shelf life must be specified. Cylinder standards must be either reanalyzed or replaced at the end of the specified shelf life.

7.3 PREPARED GASES

Calibration gases may be prepared by the user according to any accepted gaseous preparation procedure that will yield a mixture accurate to within 2 percent. Prepared standards must be replaced each day of use unless it is demonstrated that degradation does not occur during storage.

7.4 MIXTURES WITH NON-REFERENCE COMPOUND GASES

Calibrations may be performed using a compound other than the reference compound. In this case, a conversion factor must be determined for the alternative compound such that the resulting meter readings during source surveys can be converted to reference compound results.

8.0 SAMPLE COLLECTION, PRESERVATION, STORAGE, AND TRANSPORT

8.1 INSTRUMENT PERFORMANCE EVALUATION

Assemble and start up the instrument according to the manufacturer's instructions for recommended warmup period and preliminary adjustments.

8.1.1 RESPONSE FACTOR

A response factor must be determined for each compound that is to be measured, either by testing or from reference sources. The response factor tests are required before placing the analyzer into service, but do not have to be repeated at subsequent intervals.

8.1.1.1 CALIBRATION

Calibrate the instrument with the reference compound as specified in the applicable regulation. Introduce the calibration gas mixture to the analyzer and record the observed meter reading. Introduce zero gas until a stable reading is obtained. Make a total of three measurements by alternating between the calibration gas and zero gas. Calculate the response factor for each repetition and the average response factor.

8.1.1.2 RESPONSE FACTORS

The instrument response factors for each of the individual VOC to be measured shall be less than 10 unless otherwise specified in the applicable regulation. When no instrument is available that meets this specification when calibrated with the reference VOC specified in the applicable regulation, the available instrument may be calibrated with one of the VOC to be measured, or any other VOC, so long as the instrument then has a response factor of less than 10 for each of the individual VOC to be measured.

8.1.1.3 UNPUBLISHED RESPONSE FACTORS

Alternatively, if response factors have been published for the compounds of interest for the instrument or detector type, the response factor determination is not required, and existing results may be referenced. Examples of

APPENDIX II-S-2. REFERENCE METHOD 21

published response factors for flame ionization and catalytic oxidation detectors are included in References 1–3 of Section 17.0.

8.1.2 CALIBRATION PRECISION

The calibration precision test must be completed prior to placing the analyzer into service and at subsequent 3-month intervals or at the next use, whichever is later.

8.1.2.1 AVERAGE PERCENT

Make a total of three measurements by alternately using zero gas and the specified calibration gas. Record the meter readings. Calculate the average algebraic difference between the meter readings and the known value. Divide this average difference by the known calibration value and multiply by 100 to express the resulting calibration precision as a percentage.

8.1.2.2 PRECISION

The calibration precision shall be equal to or less than 10 percent of the calibration gas value.

8.1.3 RESPONSE TIME

The response time test is required before placing the instrument into service. If a modification to the sample pumping system or flow configuration is made that would change the response time, a new test is required before further use.

8.1.3.1 RESPONSE TIME CALCULATION

Introduce zero gas into the instrument sample probe. When the meter reading has stabilized, switch quickly to the specified calibration gas. After switching, measure the time required to attain 90 percent of the final stable reading. Perform this test sequence three times and record the results. Calculate the average response time.

8.1.3.2 MAXIMUM RESPONSE TIME

The instrument response time shall be equal to or less than 30 seconds. The instrument pump, dilution probe (if any), sample probe, and probe filter that will be used during testing shall all be in place during the response time determination.

8.2 INSTRUMENT CALIBRATION

Calibrate the VOC monitoring instrument according to Section 10.0.

8.3 INDIVIDUAL SOURCE SURVEYS

8.3.1 TYPE I—LEAK DEFINITION BASED ON CONCENTRATION

Place the probe inlet at the surface of the component interface where leakage could occur. Move the probe along the interface periphery while observing the instrument readout. If an increased meter reading is observed, slowly sample the interface where leakage is indicated until the maximum meter reading is obtained. Leave the probe inlet at this maximum reading location for approximately two times the instrument response time. If the maximum observed meter reading is greater than the leak definition in the applicable regulation, record and report the results

APPENDIX II-S-2. REFERENCE METHOD 21

as specified in the regulation reporting requirements. Examples of the application of this general technique to specific equipment types are:

8.3.1.1 VALVES

The most common source of leaks from valves is the seal between the stem and housing. Place the probe at the interface where the stem exits the packing gland and sample the stem circumference. Also, place the probe at the interface of the packing gland take-up flange seat and sample the periphery. In addition, survey valve housings of multipart assembly at the surface of all interfaces where a leak could occur.

8.3.1.2 FLANGES AND OTHER CONNECTIONS

For welded flanges, place the probe at the outer edge of the flange-gasket interface and sample the circumference of the flange. Sample other types of nonpermanent joints (such as threaded connections) with a similar traverse.

8.3.1.3 PUMPS AND COMPRESSORS

Conduct a circumferential traverse at the outer surface of the pump or compressor shaft and seal interface. If the source is a rotating shaft, position the probe inlet within 1 cm of the shaft- seal interface for the survey. If the housing configuration prevents a complete traverse of the shaft periphery, sample all accessible portions. Sample all other joints on the pump or compressor housing where leakage could occur.

8.3.1.4 PRESSURE RELIEF DEVICES

The configuration of most pressure relief devices prevents sampling at the sealing seat interface. For those devices equipped with an enclosed extension, or horn, place the probe inlet at approximately the center of the exhaust area to the atmosphere.

8.3.1.5 PROCESS DRAINS

For open drains, place the probe inlet at approximately the center of the area open to the atmosphere. For covered drains, place the probe at the surface of the cover interface and conduct a peripheral traverse.

8.3.1.6 OPEN-ENDED LINES OR VALVES

Place the probe inlet at approximately the center of the opening to the atmosphere.

8.3.1.7 SEAL SYSTEM DEGASSING VENTS AND ACCUMULATOR VENTS

Place the probe inlet at approximately the center of the opening to the atmosphere.

8.3.1.8 ACCESS DOOR SEALS

Place the probe inlet at the surface of the door seal interface and conduct a peripheral traverse.

8.3.2 TYPE II— “NO DETECTABLE EMISSION”

Determine the local ambient VOC concentration around the source by moving the probe randomly upwind and downwind at a distance of one to two meters from the source. If an interference exists with this determination due

APPENDIX II-S-2. REFERENCE METHOD 21

to a nearby emission or leak, the local ambient concentration may be determined at distances closer to the source, but in no case shall the distance be less than 25 centimeters. Then move the probe inlet to the surface of the source and determine the concentration as outlined in Section 8.3.1. The difference between these concentrations determines whether there are no detectable emissions. Record and report the results as specified by the regulation. For those cases where the regulation requires a specific device installation, or that specified vents be ducted or piped to a control device, the existence of these conditions shall be visually confirmed. When the regulation also requires that no detectable emissions exist, visual observations and sampling surveys are required. Examples of this technique are:

8.3.2.1 PUMP OR COMPRESSOR SEALS

If applicable, determine the type of shaft seal. Perform a survey of the local area ambient VOC concentration and determine if detectable emissions exist as described in Section 8.3.2.

8.3.2.2 SEAL SYSTEM DEGASSING VENTS, ACCUMULATOR VESSEL VENTS, PRESSURE RELIEF DEVICES

If applicable, observe whether or not the applicable ducting or piping exists. Also, determine if any sources exist in the ducting or piping where emissions could occur upstream of the control device. If the required ducting or piping exists and there are no sources where the emissions could be vented to the atmosphere upstream of the control device, then it is presumed that no detectable emissions are present. If there are sources in the ducting or piping where emissions could be vented or sources where leaks could occur, the sampling surveys described in Section 8.3.2 shall be used to determine if detectable emissions exist.

8.3.3 ALTERNATIVE SCREENING PROCEDURE.

8.3.3.1 BUBBLE SOAP SOLUTION

A screening procedure based on the formation of bubbles in a soap solution that is sprayed on a potential leak source may be used for those sources that do not have continuously moving parts, that do not have surface temperatures greater than the boiling point or less than the freezing point of the soap solution, that do not have open areas to the atmosphere that the soap solution cannot bridge, or that do not exhibit evidence of liquid leakage. Sources that have these conditions present must be surveyed using the instrument technique of Section 8.3.1 or 8.3.2.

8.3.3.2 SOAP SOLUTION METHOD

Spray a soap solution over all potential leak sources. The soap solution may be a commercially available leak detection solution or may be prepared using concentrated detergent and water. A pressure sprayer or squeeze bottle may be used to dispense the solution. Observe the potential leak sites to determine if any bubbles are formed. If no bubbles are observed, the source is presumed to have no detectable emissions or leaks as applicable. If any bubbles are observed, the instrument techniques of Section 8.3.1 or 8.3.2 shall be used to determine if a leak exists, or if the source has detectable emissions, as applicable.

APPENDIX II-S-2. REFERENCE METHOD 21

9.0 QUALITY CONTROL

TABLE 2. ANALYTES

Section	Quality Control Measure	Effect
8.1.2	Instrument calibration precision check	Ensure precision and accuracy, respectively, of instrument response to standard
10.0	Instrument calibration	

10.0 CALIBRATION AND STANDARDIZATION

10.1 CALIBRATION

Calibrate the VOC monitoring instrument as follows. After the appropriate warmup period and zero internal calibration procedure, introduce the calibration gas into the instrument sample probe. Adjust the instrument meter readout to correspond to the calibration gas value.

Note: If the meter readout cannot be adjusted to the proper value, a malfunction of the analyzer is indicated and corrective actions are necessary before use.

11.0 ANALYTICAL PROCEDURES [RESERVED]

12.0 DATA ANALYSES AND CALCULATIONS [RESERVED]

13.0 METHOD PERFORMANCE [RESERVED]

14.0 POLLUTION PREVENTION [RESERVED]

15.0 WASTE MANAGEMENT [RESERVED]

16.0 REFERENCES

1. Dubose, D.A., and G.E. Harris. Response Factors of VOC Analyzers at a Meter Reading of 10,000 ppmv for Selected Organic Compounds. U.S. Environmental Protection Agency, Research Triangle Park, NC. Publication No. EPA 600/2-81051. September 1981.
2. Brown, G.E., et al. Response Factors of VOC Analyzers Calibrated with Methane for Selected Organic Compounds. U.S. Environmental Protection Agency, Research Triangle Park, NC. Publication No. EPA 600/2-81-022. May 1981.
3. DuBose, D.A. et al. Response of Portable VOC Analyzers to Chemical Mixtures. U.S. Environmental Protection Agency, Research Triangle Park, NC. Publication No. EPA 600/2-81-110. September 1981.
4. Handbook of Hazardous Materials: Fire, Safety, Health. Alliance of American Insurers. Schaumburg, IL. 1983.

17.0 TABLES, DIAGRAMS, FLOWCHARTS, AND VALIDATION DATA [RESERVED]

APPENDIX II-T

DEP FORM 62-730.900(2)(D) CERTIFICATION

Revision Number	1
Date	3/25/2020
Page	1 of 3

**APPLICATION FOR A HAZARDOUS WASTE FACILITY PERMIT
CERTIFICATION
TO BE COMPLETED BY ALL APPLICANTS**

Signature and Certification

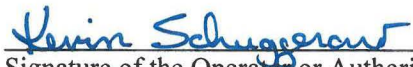
Facility Name Perma-Fix of Florida, Inc.

EPA/DEP I.D. No. FLD 980711071

The following certifications must be included with the submittal of an application for a hazardous waste authorization. The certifications must be signed by the owner of a sole proprietorship; or by a general partner of a partnership; or by a principal executive officer of at least the level of vice president of a corporation or business association, or by a duly authorized representative of that person. If the same person is a facility operator, facility owner, and real property owner, that person can cross out and initial the signature blocks under "1. Facility Operator" and "2. Facility Owner," and add the words "Facility Owner and Operator" at the line "Signature of the Land Owner or Authorized Representative."

1. Facility 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 of the Department of Environmental Protection. It is understood that the permit is only transferable in accordance with Chapter 62-730, Florida Administrative Code (F.A.C.), and, if granted a permit, the Department of Environmental Protection will be notified prior to the sale or legal transfer of the permitted facility.



Signature of the Operator or Authorized Representative*

Kevin Schmuengerow, V.P. Southeast Operations
Name and Title (Please type or print)

Date 3/25/2020 E-mail address kschmuengerow@perma-fix.com

Telephone (404) 989-1665

*** Attach a letter of authorization**

Revision Number	1
Date	3/25/2020
Page	2 of 3

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 conduct remedial activities at 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 of the Department of Environmental Protection.



Signature of the Facility Owner or Authorized Representative*

Kevin Schmuggerow, V.P. Southeast Operations
Name and Title (Please type or print)

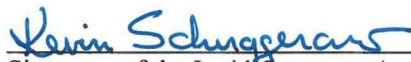
Date 3/25/2020 E-mail address kschmuggerow@perma-fix.com

Telephone (404) 989-1665

*** 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 for the construction, operation, postclosure or corrective actions of a hazardous waste management facility on the property as described. For hazardous waste facilities that close with waste in place, 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 62-730, F.A.C.



Signature of the Land Owner or Authorized Representative*

Kevin Schmuggerow, V.P. Southeast Operations
Name and Title (Please type or print)

Date 3/25/2020 E-mail address kschmuggerow@perma-fix.com

Telephone (404) 989-1665

*** Attach a letter of authorization**

Revision Number	2
Date	March 4, 2022
Page	3 of 3

4. Professional Engineer Registered in Florida

Complete this certification when required to do so by Chapter 471, F.S., or when not exempted by Rule 62-730.220(9), F.A.C.

This is to certify that the engineering features of this hazardous waste management facility have been designed or examined by me and found to conform to engineering principles applicable to such facilities. In my professional judgement, 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 Protection.

Signature

Brad Pekas

Name (please type)

Florida Registration Number 46867

Mailing Address 3740 St. Johns Bluff Rd. S., Suite 14

Street or P.O. Box

Jacksonville

FL

32224

City

State

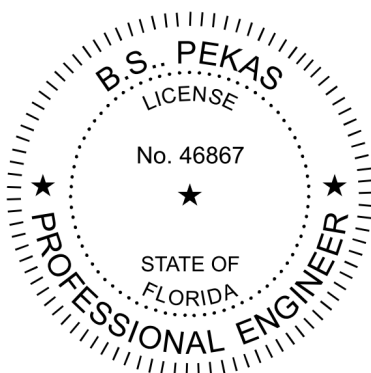
Zip

Date 3/4/2022

E-mail address bpekas@trihydro.com

Telephone (904) 513-9748

(PLEASE AFFIX SEAL)



PART I AND II
CHECKLISTS

PART I GENERAL PERMIT APPLICATION REVIEW CHECKLIST

PAGE 1 OF 3

FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

SUBMITTAL DATE		REVIEWER		
1. <u>12/11/2019</u>		<u>Brad Buselli</u>		
2. _____		_____		
3. _____		_____		
PAGE / P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
	General.			
	a. Required no. of copies, with original signatures and seal.	62-730.220(3)		
	b. Standard 3-ring or D-ring binder.	62-730.220(11)		
	c. Headers with revision number, page number and date on each page of the application.	62-730.220(11)		
	d. Formatted same as application instructions.			
	e. Index page for certifications	62-730.220(11)		
	f. Notice to local governments.	62-730.220(11)		
	Part I- General.			
3 / 1	A-1 Type Of Facility.	270.13(A)	Y	DEP Form 62-730.900(2)(a)
3 / 2	A-2 Type Of Application.	270.13(G)	Y	DEP Form 62-730.900(2)(a)
3 / 3	A-3 Revision Number.		Y	DEP Form 62-730.900(2)(a)
3 / 4	A-4 Date Operation Began.	270.13(G)	Y	DEP Form 62-730.900(2)(a)
3 / 5	A-5 Facility Name.	270.13(B)	Y	DEP Form 62-730.900(2)(a)
3 / 6	A-6 ID Number.	264.11	Y	DEP Form 62-730.900(2)(a)
3 / 7	A-7 Facility Location.	270.13(B)	Y	DEP Form 62-730.900(2)(a)
4 / 1	A-8 Facility Mailing Address.	270.13(B)	Y	DEP Form 62-730.900(2)(a)
4 / 2	A-9 Facility Contact.		Y	DEP Form 62-730.900(2)(a)
	• Name			
	• Address			
	• Title			
	• Phone			
4 / 3	A-10 Operator(s).	270.13(d)	Y	DEP Form 62-730.900(2)(a)
	• Name			
	• Phone			
4 / 3	A-11 Operator(s) Address.	270.13(d)	Y	DEP Form 62-730.900(2)(a)

PART I GENERAL PERMIT APPLICATION REVIEW CHECKLIST

PAGE 2 OF 3

FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE / P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
4 / 4	A-12 Facility Owner's. • Name • Phone	270.13(e)	Y	DEP Form 62-730.900(2)(a)
4 / 4	A-13 Facility Owner's Address.	270.13(e)	Y	DEP Form 62-730.900(2)(a)
4 / 5	A-14 Legal Structure.	270.13(d)	Y	DEP Form 62-730.900(2)(a)
	A-15 County-State Registration.	270.13(d)	N/A	
4 / 7	A-16 State of Incorporation.	270.13(d)	Y	DEP Form 62-730.900(2)(a)
	A-17 Partners/Owners. • Name • Address	270.13(d)	N/A	
5 / 1	A-18 Site Ownership Status. • Land Owner's Name • Land Owner's Address	270.13(e)	Y	DEP Form 62-730.900(2)(a)
5 / 2	A-19 Engineer. • Name • Registration Number • Address • Association	62-730.220(9)	Y	DEP Form 62-730.900(2)(a)
	A-20 Geologist. • Name • Registration Number • Address • Association	62-730.220(10)	N/A	
5 / 3	A-21 Indian Lands.	270.13(f)	Y	DEP Form 62-730.900(2)(a)
30	A-22 Existing Environmental Permits. • NPDES • UIC • RCRA • PSD • Others	270.13(k)	Y	Table I-1

PART I GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE / P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
5 / 5	B-1 Facility Location. <ul style="list-style-type: none"> • County • Nearest Community • Latitude/Longitude • Section/Township/Range • UTM Number 	270.13(b)	Y	DEP Form 62-730.900(2)(a)
5 / 6	B-2 Area of Facility Site.		Y	
37	B-3 Scale Drawing. <ul style="list-style-type: none"> • Photographs 	270.13(h)	Y	Figure I-1
39	B-4 Map. <ul style="list-style-type: none"> • One mile beyond property line • Outline of facility • Location of existing and proposed intake and discharge structures • Hazardous waste treatment, storage, and disposal facilities • Underground injection wells • Springs, rivers, and other surface water bodies • Drinking water wells 	270.13(i)	Y	Figure I-3
38	B-5 Flood Plain.		Y	Figure I-2
40	C-1 Zoning.		Y	Figure I-4
	C-2 Zoning Changes.		N/A	
41	C-3 Present Land.		Y	Figure I-5
6 / 7	D-1 Waste Generated On-Site. <ul style="list-style-type: none"> • SIC Codes 	270.13(c)	Y	DEP Form 62-730.900(2)(a)
15 / 4	D-2 Description of Operation. <ul style="list-style-type: none"> • A general description of the facility. Include the nature of the business. Off-site facilities should identify the types of industry served. On-site facilities should briefly describe the process(es) involved in the generation of hazardous waste. 	270.13(i)&(m) 270.14(b)(1)	Y	
33	D-3 Process - Codes and Design Capacities. <ul style="list-style-type: none"> • Process Codes • Process Capacity • Waste Code • Unit of measure • Annual Amount 	270.13(i) & (j)	Y	Table I-4

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

PAGE 1 of 33

FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

SUBMITTAL DATE

REVIEWER

1. 12/11/2019

Brad Buselli

2. _____

3. _____

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
------------------	-------------	-----------	-------------------------	----------

Part II-A. General 62-730

39	A-1. TOPOGRAPHIC MAP. A topographic map showing the facility and a distance of 1000 feet around it. The following information is required:	270.14(b)(19)	Y	Figure I-3
----	--	---------------	---	------------

- Scale 1 in. - 200 ft.

226	• Contours sufficient to show surface water flow		Y	Figure II-A-1
-----	--	--	---	---------------

39	• Extend 1000 ft. beyond property • Map scale • Map date		Y	Figure I-3
----	--	--	---	------------

38	• 100 Yr. floodplain		Y	Figure I-2
----	----------------------	--	---	------------

230	• Surface waters		Y	Figure II-A-5
-----	------------------	--	---	---------------

40	• Surrounding land use		Y	Figure I-4
----	------------------------	--	---	------------

39	• Map orientation • Legal boundaries		Y	Figure I-3
----	---	--	---	------------

227	• Location of access control		Y	Figure II-A-2
-----	------------------------------	--	---	---------------

- Injection and withdrawal wells
 - on-site
 - off-site

N/A

228	• Building • Structures		Y	Figure II-A-3
-----	----------------------------	--	---	---------------

229	• Sewers		Y	Figure II-A-4
-----	----------	--	---	---------------

228	• Loading and unloading areas		Y	Figure II-A-3
-----	-------------------------------	--	---	---------------

- Fire control facilities

N/A

232	• Flood control or drainage barriers		Y	Figure II-A-7
-----	--------------------------------------	--	---	---------------

- Run-off control systems

231	• Location of hazardous waste units		Y	Figure II-A-6
-----	-------------------------------------	--	---	---------------

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

PAGE 2 of 33

FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
231	<ul style="list-style-type: none"> Location of solid waste management units 		Y	Figure II-A-6
227	<ul style="list-style-type: none"> Access and internal roads. <p>For large facilities, the use of other scales may be acceptable on a case-by-case basis.</p>		Y	Figure II-A-2
	A-1a. ADDITIONAL TOPOGRAPHIC REQUIREMENTS FOR LAND STORAGE, TREATMENT, AND DISPOSAL FACILITIES. (See Section Topographic Map Requirements.)	270.14(c)(3) & (4), 264.95 and 264.97	N/A	
126 / 3 233	A-1b. WIND ROSE. <ul style="list-style-type: none"> Wind speed Direction Legend Date. 	270.14(b)(19)	Y	Part II.A.1 Figure II-A-8
126 / 4 234	A-1c. TRAFFIC INFORMATION. A description of the means of transporting hazardous wastes. All facilities should describe movement of waste on the facility. Description must include: <ul style="list-style-type: none"> Estimated volume Traffic pattern Traffic control Access road(s) surfacing and load-bearing capacity. Off-site facilities (only) should also describe movement of waste to the facility from the point where it leaves nearest major highway.	270.14(b)(10)	Y	Part II.A.1 Figure II-A-9
127 / 1 166 / 2 470 126	A-2. FINANCIAL RESPONSIBILITY. A-2a. CLOSURE COST ESTIMATES. <ul style="list-style-type: none"> Copy of Financial Mechanism Financial Assurance DEP Form 62-730.900(2) Part II 2. Contact Financial Assurance Section in Tallahassee.	264.142, 264.143 and 270.14(b)(15)	Y	Part II.A.2 Part II.K.1 Appendix II-K-2 Appendix II-A-1
179 / 1 470 126	A-2b. POST-CLOSURE CARE COST ESTIMATE. <ul style="list-style-type: none"> Copy of Financial Mechanism Financial Assurance DEP Form 62-730.900(2) Part II 2. Contact Financial Assurance Section in Tallahassee.	264.144, 264.145, 264.146 and 270.14(b)(16)	Y	Part II.K.9 Appendix II-K-2 Appendix II-A-1

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
	A-2c. CORRECTIVE ACTION COST ESTIMATES. • Copy of Financial Mechanism Financial Assurance DEP Form 62-730.900(2) Part II 2. Contact Financial Assurance Section in Tallahassee.	264.100, 264.101 and 62-730.180(6)	N / A	
256	A-2d. LIABILITY COVERAGE. • Copy of Policy	264.147 and 270.14(b)(17)	Y	Appendix II-A-1
127/3	A-3. FLOODPLAIN STANDARD. Documentation of whether or not the facility is located within a 100-yr. floodplain including the source of data (Federal Insurance Administration Map or other maps and calculations). If map other than FIA map is used, demonstration of equivalent mapping technique should be provided. If located in 100-yr. floodplain include: • 100-yr. floodplain level • Other special flooding factors (e.g., wave action) that must be considered to prevent washout.	270.14(b)(11)(iii) and 264.18(b)	Y	Part II.A.3
	A-3b(l). DEMONSTRATION OF COMPLIANCE. For facilities located within the 100-yr. floodplain, a description of how the facility is designed, constructed, operated, and maintained to prevent washout of any hazardous waste during a flood. Either of the following may be used:	270.14(b)(11)(iv) and 264.18(b)	N / A	
	A-3b(l)(a). FLOOD PROOFING AND FLOOD PROTECTION. A structural or other engineering study showing how design of the tanks, containers, or waste piles and the flood proofing and protection devices at the facility will prevent washout including: • Engineering analysis of hydrodynamic and hydrostatic forces • Structural or other engineering studies of hazardous waste units and flood protection devices.	270.14(b)(11)(iv)(A) & (B)	N / A	

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
	<p>A-3b(1)(b). FLOOD PLAN. Description of the procedures to be followed to remove hazardous waste to safety before the facility is flooded. The plan must address the following:</p> <ul style="list-style-type: none"> • Timing related to flood levels. • Estimated time to move the waste. • Description of the location to which the waste will be moved and proof of the receiving facility's eligibility to receive hazardous waste. • Procedures, equipment, and personnel to be used and the means to ensure that these resources will be available. • Potential for accidental discharge of the waste. 	<p>270.14(b)(11) (iv)(C) and 264.18(b)(1)(i)</p>	N / A	
	<p>A-3b(2). PLAN FOR FUTURE COMPLIANCE WITH FLOODPLAIN STANDARD. For facilities located within the 100-yr. floodplain that do not comply with the floodplain standard, a plan showing how and when the facility will be brought into compliance. A compliance schedule must be included.</p>	270.14(b)(11)(v)	N / A	
	<p>A-3b(3). WAIVER FOR LAND STORAGE AND DISPOSAL FACILITIES (EXISTING FACILITIES ONLY). If a waiver from the Floodplain Standard is requested, the owner or operator must demonstrate that there will be no adverse effects on human health or the environment if washout occurs. The following factors must be considered in this demonstration:</p> <ul style="list-style-type: none"> • Volume and physical and chemical characteristics of the waste. • Concentration of hazardous constituents that would potentially affect surface waters. • Impact of such concentration on the current or potential uses of and water quality standards established for the affected surface waters. 	264.18(b)(1)(ii)	N / A	

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
	<ul style="list-style-type: none"> Impact of hazardous constituents on the sediments of affected surface waters or the soils of the 100-yr. floodplain. 			
127/4	A-4. FACILITY INFORMATION. A-4a. SECURITY. Security Procedures and Equipment. Unless a waiver is granted, the application must include a description of the security procedures and equipment required by 264.14:	264.14 and 270.14(b)(4)	Y	
	24-Hour Surveillance System. A 24-hour surveillance system (e.g., television monitoring or surveillance by guards or facility personnel) that continuously monitors and controls entry onto the active portion of the facility: <ul style="list-style-type: none"> Procedures and personnel to be used Location and description of equipment. 	264.14(b)(1)	N/A	
127/4	Barrier and Means to Control Entry. (In lieu of a 24-hour surveillance system, the applicant may elect to use a barrier and other means to control entry.)	264.14(b)(2)(i)	Y	
127/4	Barrier. An artificial or natural barrier (e.g., a fence in good repair or a fence combined with a cliff) that completely surrounds the active portion of the facility: <ul style="list-style-type: none"> Height Material of construction 	264.14(b)(2)(i)	Y	
127/4	Means to Control Entry. A means to control entry, at all times, through the gates or other entrances to the active portion of the facility (e.g., an attendant, television monitors, locked entrance, or controlled roadway access to the facility): <ul style="list-style-type: none"> Procedure and personnel to be used. Location and description of equipment. 	264.14(b)(2)(ii)	Y	

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
127/6	Warning Sign. The facility must have a sign with the legend, "Danger - Unauthorized Personnel Keep Out," which must: <ul style="list-style-type: none"> • Be posted at each entrance to the active portion of the facility. • Be in sufficient numbers to be seen from any approach to the active portion of the facility. • Legend must be in English and any other language predominated in the area. • Be legible from a distance of at least 25 feet. Existing signs with a legend other than "Danger - Unauthorized Personnel Keep Out" may be used if the legend on the sign indicates that only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.	264.14(c)	Y	
	Waiver. If a waiver of these requirements is requested, the owner or operator must demonstrate the following:	264.14(a)	N / A	
	Injury to Intruder. Physical contact with the waste, structure, or equipment within the active portion of the facility will not injure unknowing or unauthorized persons or livestock that may enter the active portion of a facility; and	264.14(a)(1)	N / A	
	Violation Caused by Intruder. Disturbance of the waste or equipment by the unknowing or unauthorized entry of persons or livestock onto the active portion of a facility will not cause a violation of the requirements of 264.	264.14(a)(2)	N / A	
	NOTE: To address the above, the application should include: <ul style="list-style-type: none"> • Nature and duration of hazard potential from waste. • Equipment and structures to minimum potential for an intruder to: 1) cause a spill; 2) mix incompatible wastes; 3) ignite ignitable or 		N / A	

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

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PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
	reactive wastes; 4)damage containment or monitoring systems. • Feature that prevent contact with waste.			
263	A-4b. CONTINGENCY PLAN. A copy of the contingency plan required in Part 264, Subpart D. Include, where applicable, specific requirements in 264.227.	270.14(b)(7) (264.50 through 264.56)	Y	Appendix II-A-2
390	An existing spill prevention control plan can be amended to incorporate hazardous waste management provisions sufficient to comply with 264, Subpart D requirements. General Information. • Facility name and location and owner or operator name. • Site plan. • Description of facility operations.	264.52(b)	Y	Appendix II-C-5
296	Emergency Coordinators. • Names, addresses, office and home phone numbers, and duties of primary and alternate coordinators in sequences as alternates.	264.52(d) and 264.55	Y	Contingency Plan Table 1
272/1	• A statement authorizing designated coordinators to commit the necessary resources to implement the contingency plan. • Can reach facility in short period of time.			Contingency Plan Section 3.0
273/1	Implementation. Criteria for implementation of contingency plan for any potential emergency:	264.52(a) and 264.56(d)	Y	Contingency Plan Section 4.0
312	• Fires/explosions. • Unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.			Contingency Plan Attachment A. Emergency Coordination and Reporting Information
288/1	Emergency Response Procedures. Notification.	264.56(a)	Y	Contingency Plan Section 13.0
289	• Methodology for immediate notification of facility personnel and necessary state or local agencies.			Contingency Plan Table 2. Emergency Notifications
312				Contingency Plan Attachment A. Emergency Coordination and Reporting Information

PART II GENERAL PERMIT APPLICATION REVIEW CHECKLIST

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FACILITY Perma-Fix of Florida, Inc.

EPA ID NUMBER FLD 980711071

PATS NUMBER _____

TYPE OF APPLICATION RCRA Hazardous Waste Facility Permit Renewal

PAGE/ P'GRAPH	REVIEW ITEM	REFERENCE	COMPLETE? Y/N OR N/A	COMMENTS
274/5	Identification of Hazardous Materials. Available data and/or procedures for identification of hazardous materials involved in the emergency and quantity and areal extent of release. Include information on: <ul style="list-style-type: none"> • Characteristics of waste. • Exact source. • Amount. • Aerial extent of release. 	264.56(b)	Y	Contingency Plan Section 4.5.2
275/2	Hazard Assessment. <ul style="list-style-type: none"> • Procedure for assessment of possible hazards to the environment and human health. • Procedures for determining the need for evacuation and notification of authorities. The authorities to be notified must include the on-scene-coordinator for that area or the National Response Center. 	264.56(c) and 264.56(d)	Y	Contingency Plan Section 4.5.2
276/2	Control Procedures. <ul style="list-style-type: none"> • Specific responses and control procedures to be taken in the event of a fire, explosion, or release of hazardous waste to air, land, or water. 	264.52(a)	Y	Contingency Plan Section 4.5.2
280/1	Prevention of Recurrence or Spread of Fires, Explosions or Releases: <ul style="list-style-type: none"> • During an emergency situation, a description of the necessary steps to be taken to ensure that fires, explosions, or releases do not occur, reoccur, or spread to other hazardous waste at the facility. Steps must include, where applicable: <ul style="list-style-type: none"> - Shut-down of processes and continued monitoring of them - Collecting, containing, and treating released wastes - Removing and isolating containers - Proper use of fire control structures (e.g., fire doors), systems (e.g., sprinkler systems), and equipment (e.g., extinguishers). 	264.56(e)	Y	Contingency Plan Section 5.0
297				Contingency Plan Table 2. Emergency Procedures for Fire
299				Contingency Plan Table 3. Emergency Procedures for Explosions
300				Contingency Plan Table 4. Emergency Procedures for Spills

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281/1	Storage and Treatment of Released Material <ul style="list-style-type: none"> Provisions to monitor for leaks, pressure buildup, gas generation, or ruptures, as appropriate, if operations at the facility are stopped in response to a release, fire or explosion. Provisions for treatment, storage, or disposal of any hazardous waste resulting from a release, fire, or explosion at the facility. Equipment available. Procedures for deployment of these resources. Methods to contain, treat, and clean up a hazardous release and decontaminate the affected area. 	264.56(f) and 264.56(g)	Y	Contingency Plan Section 6.0
283/1	Incompatible Waste. Provisions for preventing waste which is incompatible with the released material from being treated, stored, or located in the affected areas until cleanup procedures are completed.	264.56(h)(1)	Y	Contingency Plan Section 8.0
284/1	Post-Emergency Equipment Maintenance. Procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed. (This includes advising authorities.)	264.56(h)(2) and 264.56(i)	Y	Contingency Plan Section 9.0
285/1	Container Spills and Leakage. Procedures for responding to container spills or leakage including removal of spilled waste and repair or replacement of containers.	264.171	Y	Contingency Plan Section 10.0
286/1	Tank Spills and Leakage. <ul style="list-style-type: none"> Procedures for responding to tank spills or leakage, including removal of spilled waste and repair of tank. Procedures for responding to leaks or spills from tanks containing hazardous wastes F020, F021, F022, F023, F026, and F027; and 	264.194(c) and 264.200	Y	Contingency Plan Section 11.0

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	procedures for immediate removal of these wastes from the containment system and replacement or repair of the leaking tank.			
	Surface Impoundment Spills, Leakage, and Sudden Drops.	270.14(b)(7), 264.227,	N/A	
	<ul style="list-style-type: none"> Procedures for stopping waste additions. Procedures for containing any leakage. Procedures for stopping leaks and preventing sudden drops and preventing catastrophic failure. Procedures and criteria for emptying impoundment. Procedures for installing a liner in existing portions of the impoundment or procedures for certification of the liner in other than existing portions when the impoundment is removed from service as the result of a sudden drop in liquid level. Obtain qualified engineers certification of repairs and probability of leakage or failure. 	264.227(b)(1), 264.227(b)(2), 264.227(b)(3) and 264.227(b)(4)		
		264.227(b)(5)		
		264.227(d)(2)		
282/1	Emergency Equipment. Location, description, and capabilities of emergency equipment. This should include: <ul style="list-style-type: none"> Spill control equipment. Fire control equipment. Personnel protective items such as respirators and protective clothing. First aid and medical supplies. Emergency decontamination equipment. Emergency communication and alarm systems. 	264.52(e)	Y	Contingency Plan Section 7.0
288/1	Coordination Agreements.		Y	Contingency Plan Section 13.0
289	<ul style="list-style-type: none"> A description of coordination agreement existing police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency. 	264.37 and 264.52(c)		Contingency Plan Table 2. Emergency Notifications
312				Contingency Plan Attachment A. Emergency Coordination and Reporting Information

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315	<ul style="list-style-type: none"> A statement indicating that a copy of the contingency plan has been submitted to these organizations. If applicable, document of refusal to enter into a coordination agreement. 	264.53(b) 264.37(b)	Y	Contingency Plan Attachment B. Coordination Agreement/Receipt Documentation
290 / 1	Evacuation Plan. The plan must include:	264.52(f)	Y	Contingency Plan Section 14.0
305-310	<ul style="list-style-type: none"> Criteria for evacuation. A description of signal(s) to be used to begin evacuation. Primary and alternate evacuation routes. 			Contingency Plan Figures 3-8
293 / 1	Required Reports. <ul style="list-style-type: none"> Provisions for submission of reports of emergency incidents within 15 days of occurrence. Notation of such incidents in the operating record identifying the time, date, and details of these emergency incidents. 	264.56(i)	Y	Contingency Plan Section 15.0
	D-4c. PREVENTIVE PROCEDURES, STRUCTURES, AND EQUIPMENT. A description of procedures, structures, or equipment used at the facility for the following must be included:	270.14(b)(8)		
128 / 2	Unloading Operations. Prevention of hazards in unloading operations (e.g., use of ramps or special forklifts).	270.14(b)(8)(i)	Y	
128 / 4	Run-Off. Prevention of runoff from hazardous waste handling areas to other areas of the facility or environment, or prevention of flooding, (e.g., berms, dikes, trenches).	270.14(b)(8)(ii)	Y	
128 / 5	Water Supplies. Prevention of contamination of water supplies.	270.14(b)(8)(iii)	Y	
278 / 3	Equipment and Power Failure. Mitigation of effects of equipment failure and power outages.	270.14(b)(8)(iv)	Y	Contingency Plan Section 4.5.4.6

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128 / 3	Personal Protection Equipment. Prevention of undue exposure of personnel to hazardous waste (e.g., protective clothing).	270.14(b)(8)(v)	Y	
346 / 1	Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes A description of the precautions taken by a facility that handles ignitable, reactive or incompatible waste to demonstrate compliance with 264.17 including documentation demonstrating compliance with 264.17(c). Precautions to prevent actual ignition, including separation from sources of ignition such as: <ul style="list-style-type: none"> • Open flames. • Smoking. • Cutting and welding. • Hot surfaces. • Frictional heat. • Spark (static, electrical, or mechanical). • Spontaneous, ignition (heat producing chemical reactions). • Radiant heat. Demonstration that when ignitable or reactive waste is being handled, the owner or operator confines smoking and open flames to specially designated locations. "No Smoking" signs must be conspicuously placed wherever a hazard exists for ignitable or reactive waste.	270.14(b)(9) and 264.17(a) and (c)	Y	Waste Analysis Plan Section 2.7
346 / 1	General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste A description of the precautions taken by a facility that treats, stores, or disposes of ignitable or reactive waste, or accidentally mixes incompatible waste or incompatible wastes or other materials, to prevent reactions which:	270.14(b)(9) and 264.17(b) and (c)	Y	Waste Analysis Plan Section 2.7

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	(1) generate extreme heat or pressure, fire or explosions or violent reactions; (2) produce uncontrolled flammable fumes, dusts, or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; (5) by similar means threaten human health or the environment.			
345 / 2	Documentation to meet requirements of 264.17(c)	264.17(c)	Y	Waste Analysis Plan Section 2.5
346 / 1	or (b) may be based on references to published scientific or engineering literature, data from trial tests, waste analyses, or results of treatment of similar wastes by similar treatment processes and under similar operating conditions.			Waste Analysis Plan Section 2.7
130 / 4	Management of Ignitable or Reactive Waste in Containers. Sketches, drawings, or data demonstrating that containers of ignitable or reactive waste are located at least 15 meters (50 feet) from the facility's property line.	270.15(c) and 264.176	Y	
130 / 5	Management of Incompatible Wastes in Containers	270.15(d) and 264.177	Y	
131 / 1	A description of procedures to demonstrate compliance with 264.177(a) and (b), and 264.17(b) and (c): <ul style="list-style-type: none"> The procedures used to ensure that incompatible wastes and materials are not placed in the same container (unless 264.17(b) is complied with) or in an unwashed container that previously held compatible waste. Dikes, berms, walls or other devices used to separate containers, holding wastes which are incompatible with wastes or materials stored nearby. 	264.177(a) and 264.177(b) 264.177(c)		

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	Management of Ignitable or Reactive Wastes in Tanks. A description of the operational procedures for handling incompatible, ignitable, or reactive wastes, including the use of buffer zones. Requirements of 264 include: <ul style="list-style-type: none"> Waste must be treated, rendered, or mixed before or immediately after placement in the tank so that it is no longer considered ignitable and complies with 264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; or the tank is used solely for emergencies. Facilities that treat or store ignitable or reactive waste in covered tanks must comply with the National Fire Protection Association's buffer zone requirements for tanks. 	270.16(f) and 264.198		
147/4	Incompatible Wastes in Tanks. A statement that incompatible wastes and materials are not stored in the same tank or in an unwashed tank that previously held an incompatible waste or material (unless 264.17(b) is complied with).	270.16(f) and 264.199	Y	
	Ignitable or Reactive Wastes in Waste Piles. The application must include a description of the procedures for handling ignitable, or reactive wastes, including the use of buffer zones. Waste must be treated, rendered, or mixed before or immediately after placement in the waste pile so that it is no longer considered ignitable and complies with 264.17(b); or the waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite.	270.18(f) and 264.256	N/A	
	Incompatible Wastes in Waste Piles. The applicant must include:	270.18(g) and 264.257	N/A	

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	<ul style="list-style-type: none"> • A statement that incompatible wastes and materials are not stored in the same waste pile or on the same base that previously held an incompatible waste or material unless 264.17(b) is complied with. • A description of the procedures (dikes, beams, walls, distances) utilized to separate a waste pile of hazardous waste that is incompatible with any waste or other material stored nearby. 			
	Ignitable or Reactive Wastes in Surface Impoundment. <ul style="list-style-type: none"> • A description of the procedures for handling ignitable, or reactive wastes, including the use of buffer zones. Waste must be treated, rendered, or mixed before or immediately after placement in the surface impoundment so that it is no longer considered ignitable and complies with 264.17(b); or • The waste is stored or treated in such a way that it is protected from any material or conditions that may cause the waste to react or ignite; • The impoundment is used only for emergencies. 	270.17(g) and 264.229	N / A	
	Incompatible Waste in Surface Impoundment. The application must include: <ul style="list-style-type: none"> • A statement that incompatible wastes and materials are not stored in the same surface impoundment or in the impoundment that previously held an incompatible waste or material unless 264.17(b) is complied with. 	270.17(h) and 264.230	N / A	
	Ignitable or Reactive Wastes in Landfills. Documentation of procedures for: <ul style="list-style-type: none"> • Rendering wastes non reactive prior to or immediately after placement in the landfill. • Preventing reactions. • Protecting ignitable wastes in containers from materials or conditions that may cause them to ignite. 	270.21(f) and 264.312	N / A	

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	Incompatible Wastes in Landfills. Applicant must provide procedures for ensuring that incompatible wastes will not be disposed of in the same landfill cell, unless 264.17(b) is complied with.	270.21(g) and 264.313	N / A	
	Ignitable or Reactive Wastes in Land Treatment. A description of the management of ignitable or reactive wastes which will be placed in or on the treatment zone, if applicable, and an explanation of how the following requirements will be complied with: <ul style="list-style-type: none"> • The waste is immediately incorporated into the soil so that the resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste and the requirements of 264.17(b) are complied with; or • The waste is managed in such a way that it is protected from any material or conditions which may cause it to ignite or react. 	270.20(g) and 264.281	N / A	
	Incompatible Wastes in Land Treatment. A description of the management of incompatible wastes must be submitted if incompatible wastes, or incompatible wastes and materials, will be placed in or on the same treatment zone, including an explanation of how the requirements of 264.17(b) are complied with.	270.20(h) and 264.282	N / A	
	A-4d. PREPAREDNESS AND PREVENTION REQUIREMENTS. A justification of any request for a waiver of preparedness and prevention requirements of Part 264, Subpart C.	270.14(b)(6)	N / A	
131 / 2	Equipment Requirements. Unless it can be demonstrated that none of the hazards posed by waste handled at the facility would require a particular kind of equipment specified below, the facility must have the following equipment: (These requirements are not specifically listed in 270.14-270.29 for inclusion in a Part B).	264.32	Y	

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131 / 4	Internal Communications. An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.	264.32(a)	Y	
131 / 4 132 / 1	External Communications. A device such as telephone (immediately available at the scene of operations) or a handheld two-way radio, for summoning emergency assistance from local police departments, or state or local emergency response teams.	264.32(b)	Y	
131 / 3 188	Emergency Equipment. <ul style="list-style-type: none"> • Fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals and portable fire extinguishers). • Spill control equipment. • Decontamination equipment. 	264.32(c)	Y	Table 11-1 Emergency Equipment List
131 / 3	Water for Fire Control. One of the following: <ul style="list-style-type: none"> • Water at adequate volume and pressure to supply water hose streams; or • Foam-producing equipment; or • Automatic sprinklers or water spray systems. 	264.32(d)	Y	
132 / 3	Aisle Space Requirement. Requests for a waiver of the aisle space requirement must be accompanied by a demonstration that aisle space is not needed to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency.	264.35	Y	
319 / 1	A-4e. PERSONNEL TRAINING. Outline of Training Program. An outline of both the introductory and continuing training programs by owners or operators to prepare the personnel to operate	270.14(b)(12) and 264.16	Y	

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	and maintain the facility in a safe manner as required to demonstrate compliance with 264.16. Include a brief description of how training will be designed to meet actual job tasks in accordance with requirements in 264.16(a)(3). (Note: On-the-job training may be used to comply with these requirements.)			
320/1	Job Titles and Duties. For each employee whose position at the facility is related to hazardous waste management, the following must be maintained at the facility: <ul style="list-style-type: none"> • Job title. • Job duties. • Job description. 	264.16(d)(1) and 264.16(d)(2)	Y	
320/2 334	Training Content, Frequency, and Techniques. In both introductory and continuing training (including an annual review of the initial training) for each employee describe: <ul style="list-style-type: none"> • Training content. • Frequency of training. • Technique(s) used in training. 	264.16(a)(3), 264.16(c) and 264.16(d)(3)	Y	Personnel Training Plan
322/1 336/9	Training Director. Demonstration that the program is directed by a person trained in hazardous waste management: <ul style="list-style-type: none"> • Credentials of training director. 	264.16(a)(2)	Y	Personnel Training Program Section 1.4 Personnel Training Plan Section 5.0
322/2 336/9	Relevance of Training to Job Position. A brief description of how instructions of facility personnel in hazardous waste management procedures (including contingency plan implementation) is relevant to their positions. [To demonstrate compliance with 264.16(a)(2).]	264.16(a)(2)	Y	Personnel Training Program Section 1.5 Personnel Training Plan Section 8.0
322/4	Training for Emergency Response. Documentation that the training program trains facility personnel to respond effectively to emergencies and trains them to be familiar with	264.16(a)(3)	Y	Personnel Training Program Section 1.6

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	<p>emergency procedures, emergency equipment, and emergency systems, include where applicable:</p> <ul style="list-style-type: none"> • Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment. • Key parameters for automatic waste feed cut-off system. • Communications or alarm systems. • Response to fires or explosions. • Response to groundwater contamination incidents. • Shutdown of operations. 	<p>264.16(a)(3)(i)</p> <p>264.16(a)(3)(ii)</p> <p>264.16(a)(3)(iii)</p> <p>264.16(a)(3)(iv)</p> <p>264.16(a)(3)(v)</p> <p>264.16(a)(3)(vi)</p>		
322/5	<p>Implementation of Training Program.</p> <ul style="list-style-type: none"> • Indication that training has been and will be successfully completed by facility personnel within 6 months of their employment or assignment to a facility, or transfer to a new position at a facility, whichever is later. <p>(NOTE: Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements).</p> <ul style="list-style-type: none"> • Records documenting that the required training has been given to and completed by facility personnel must be maintained. 	<p>264.16(d)(4)</p> <p>264.16(b)</p>	Y	Personnel Training Program Section 2.0
133/2	<p>A-5. CHEMICAL AND PHYSICAL ANALYSIS.</p> <p>For each hazardous waste treated, stored or disposed at the facility, the following information should be provided:</p> <ul style="list-style-type: none"> • General description of the waste. • Hazardous characteristics. • Basis for hazard designation. • Laboratory report on analyses results. • Existing published or documented data on hazardous waste or hazardous waste from a similar process (new facilities only). <p>At a minimum, the analyses should include all the information which must be known to treat,</p>	<p>270.14(b)(2)</p> <p>264.13(a)</p>	Y	

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	store, or dispose of the waste in accordance with Part 264 and 268 requirements or conditions of a permit issued under Part 270.			
137 / 5	Containers. <ul style="list-style-type: none"> • Compatibility of waste with container. • For containers of wastes without a secondary containment system test procedures and results or other documentation or information which show that wastes do not contain free liquids. A suggested test for free liquids is the Paint Filter Liquids (Test Method 9095 in SW-846). • Waste specific parameters based on hazardous designation. • Other information required for safe operation. 	264.172, 270.15(d), 264.177 and 270.15(b)(1)	Y	
143 / 2	Tanks. <ul style="list-style-type: none"> • Specific gravity. • Waste specific parameters based on hazardous designation. • Other information required for safe operation. 	264.191(a)	Y	
	Waste Piles. <ul style="list-style-type: none"> • For waste piles that are inside or under a structure when an exemption from 264.251 is requested, test procedures and results, or other documentation or information which show that the wastes do not contain free liquids when placed on the pile. A suggested test for free liquids is the Paint Filter Liquids Test (Method 9095 in SW-846). • Demonstration that the wastes will not generate leachate through decomposition or other reactions while being stored. 	264.250(c)(1) 264.250(c)(4)	N / A	
	Incinerators. Trial Burn. If a trial burn is proposed (or has been conducted already), an analysis of each waste or waste mixture to be burned during the trial burn (or burned during	270.62(b)(2)(i)	N / A	

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the previous trial burn) and after the trial burn is complete, which includes:

- Heat value.
- Viscosity (liquids).
- Physical form (non-liquids).
- Identification of hazardous organic constituents listed in Appendix VIII: [Note: The applicant need not analyze for Appendix VIII constituents which would reasonably not be expected to be found in the waste. The constituents excluded from analysis must be identified, and the basis for exclusion stated.]
 - Approximate quantification of hazardous constituents
 - Chlorine content
 - Ash content.

Data in Lieu of Trial Burn.

270.19(c)(i)

N / A

Data may be supplied in lieu of the results of a trial burn. The data must include an analysis of each waste or waste mixture to be burned, including:

- Heat value.
- Viscosity (if applicable) or description of physical form of the waste.
- Identification of hazardous organic constituents listed in Appendix VIII: [Note: The applicant need not analyze for Appendix VIII constituents which would reasonably not be expected to be found in the waste. The constituents excluded from analysis must be identified, and the basis for exclusion stated.]
 - Approximate quantification of hazardous constituents
 - Quantification of hazardous constituents which may be designated as POHC's based on data submitted from other trial or operational burns which demonstrate compliance with the performance standard in 264.343.
 - Comparison of waste for which permit data submitted in lieu of a trial burn, including identified POHC'S.

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	Landfills. • Results of the Paint Filter Liquids Test (Method 9095 in SW-846) showing that containerized or bulk wastes do not contain free liquids.	264.314	N / A	
	Land Treatment. • Demonstrate that waste can be completely degraded, transformed, or immobilized in treatment zone: - Percent moisture - Specific gravity or bulk density - Conductivity - Acidity or Alkalinity - TOC - Appendix VIII constituents - Concentration and identification or volition hazardous constituents - Cadmium concentration (when foodchain crops are grown in the treatment zone).	264.272(a) 264.276(b)	N / A	
339 / 1	A-6. WASTE ANALYSIS PLAN. A copy of the waste analysis plan required by 264.13(b) and, if applicable, 264.13(c). The Waste Analysis Plan should describe the procedures used to obtain chemical and physical information and data on the wastes to ensure proper storage, treatment, and disposal and compliance with the land disposal restriction program. Minimum requirements include:	270.14(b)(3), 264.13(b) & (c) and 268.7	Y	
350	Parameters and Rationale. A list of parameters chosen for analysis and an explanation of the rationale for their selection.	264.13(b)(1)	Y	Waste Analysis Plan Table 2
350	Test Methods. A description of the best methods used to test for parameters chosen.	264.13(b)(2)	Y	Waste Analysis Plan Table 2
345 / 4	Sampling Methods. A list of the sampling methods used to obtain a representative sample of each waste to be analyzed.	264.13(b)(3) Part 261, Appendix I	Y	

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340/3	Frequency of Analysis. A description of the frequency at which the analyses will be repeated. The frequency must be sufficient to ensure that the analysis is accurate and up-to-date. (For an on-site facility, this will be whenever there is a process change. For an incinerator, this will be as often as required to verify consistency of the waste feed.)	264.13(b)(4)	Y	Waste Analysis Plan Section 2.0
340/5	Additional Requirements for Wastes Generated Off-Site. A description of the procedures used to inspect and/or analyze waste generated off-site that includes: <ul style="list-style-type: none"> • Procedures to determine waste identity. • Sampling frequency. • Sampling methods. • Waste analysis information supplied by generator. 	264.73(a) & (b), 264.13(b)(5) and 264.13(c)	Y	Waste Analysis Plan Section 2.1
346/1	Additional Requirements for Facilities Handling Ignitable, Reactive, or Incompatible Waste. If the facility stores or treats ignitable, reactive, or incompatible waste, a description of methods which will be used to meet the additional waste analysis requirements necessary for complying with the regulatory requirement specified in Section F-5.	264.13(b)(6) 264.17	Y	Waste Analysis Plan Section 2.7
343/5	Additional Waste Analysis Requirements Pertaining to Land Disposal Restrictions.	270.14(b)(3), 264.13(a)(1), 264.13(b)(6) and 268.7	Y	Waste Analysis Plan Section 2.3
340/5	Waste Characteristics. Analytical data must be submitted by the generator to the owner/operator for each waste stored, treated, or disposed at the facility, or information from knowledge of the waste can be used, to determine if the waste is restricted under 268. If generator knowledge is used, all supporting data must be maintained in the operating record.	264.13(a)(1) and 268.7	Y	Waste Analysis Plan Section 2.1.1

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	<p>Waste Characteristics: Solvent Wastes and Dioxin-Containing Wastes.</p> <p>F001-F005 spent solvent wastes are restricted from land disposal under 268.30 and F020-F023 and F026-F028 dioxin-containing wastes are prohibited under 268.31 unless:</p> <ul style="list-style-type: none"> • Wastes meet applicable standards in Subpart D, or • An exemption has been granted pursuant to 268.6, or • An exemption has been granted pursuant to 268.5. <p>To determine if a waste is restricted, you must:</p> <ul style="list-style-type: none"> • Test waste, or an extract developed using the Toxicity Characteristic Leaching Procedure (TCLP), or • Use information from knowledge of chemical and physical characteristics. 	<p>264.13(a)(1) and 268.7(a)</p> <p>268.30, 268.31 and Part 268, Appendix I</p>	N / A	
	<p>Waste Characteristics: California List Wastes. The following wastes are prohibited from land disposal under 268.32:</p> <ul style="list-style-type: none"> • Liquid hazardous wastes with a pH less than or equal to 2.0. • Liquid wastes containing PCB's at concentrations greater than or equal to 50 ppm • Liquid hazardous wastes that are primarily water and contain HOCs in total concentration greater than or equal to 1,000 mg/l. • Non-liquid hazardous wastes containing HOCs in total concentrations greater than or equal to 1,000 mg/kg. <p>Unless:</p> <ul style="list-style-type: none"> • An exemption has been granted pursuant to 268.6, or • A case-by-case extension of the effective date has been granted pursuant to 268.5, or 	<p>264.13(a)(1), 268.7(a) and 268.32</p>	N / A	

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	<ul style="list-style-type: none"> Wastes meet applicable standards in Subpart D or, Where treatment standards are not specified, wastes are in compliance with applicable prohibitions in 268 or RCRA Section 3004(d). <p>To make the determinations:</p> <ul style="list-style-type: none"> Use Method 9095 (Paint Filter Liquids Test) in SW-846 to determine if waste is a liquid. Initial generator must test waste (not extract or filtrate) in accordance with 261.22(a)(1), or use knowledge of the waste to determine if pH is less than or equal to 2.0. Initial generator of liquid hazardous waste containing PCBs or a liquid or non-liquid hazardous waste containing HOCs must test waste (not extract or filtrate), or use knowledge of waste, to determine if concentration levels meet the prohibitions above. 			
	<p>Waste Characteristics: First Third.</p> <p>Initial generator must test a representative sample of the waste extract or the entire waste, depending on whether the treatment standards are expressed as concentrations in the waste extract or the waste, to determine whether a waste listed in 266.10 meets treatment standards set in 268.41 and 268.43, respectively. If the waste contains constituents exceeding applicable Subpart D levels, waste is prohibited from land disposal unless:</p> <ul style="list-style-type: none"> An exemption has been granted pursuant to 268.6, or A case-by-case extension has been granted pursuant to 268.5. 	264.13(a)(1), 268.7(a) and 268.33	N / A	
344 / 6	<p>Additional Requirements for Treatment Facilities.</p> <p>Treatment facilities must conduct the following testing:</p>	264.13(a)(1) and 268.7(b)	Y	Waste Analysis Plan Section 2.3

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	<ul style="list-style-type: none"> For wastes with treatment standards expressed as concentrations of waste extract (268.41), test treatment residues, or an extract of such residues developed using the TCLP, to assure treatment standards are met. For wastes with treatment standards expressed as concentrations in the waste (268.43), test treatment residues, not an extract of such residues, to assure residues meet applicable standards. For California List Wastes (268.32) not subject to Subtitle D treatment standards, test treatment residues according to procedures in C-3(a)(2) to assure residues comply with applicable prohibitions. 			
341 / 8	Not applicable to wastes for which treatment technologies have been specified. If wastes received from an off-site generator, need procedures to assure that treatment is not conducted until required data is provide by the generator.		Y	Waste Analysis Plan Section 2.2
	Additional Requirements for Disposal Facilities. If wastes or treatment residues are received from an off-site generator or treatment facility, assure wastes will not be disposed without receipt of proper notice and certification as specified in 268.7(a) & (b). Owner/operator of land disposal facility must: <ul style="list-style-type: none"> Test waste, or an extract of the waste or treatment residue developed using TCLP, or Use methods required by generators under 268.32 [C-3a(2)] to assure waste or treatment residues comply with applicable Subpart D treatment standards and all applicable prohibitions in 268.32. 	264.13(a)(1) and 268.7(c)	N / A	
	Additional Requirements for Surface Impoundments Exempted from Land Disposal Restrictions. For surface impoundments exempted from land disposal restrictions under 268.4(a), address the following: Sampling and Analysis of Impoundment Contents. <ul style="list-style-type: none"> Procedures and schedule to be followed to sample 	264.13(b)(7) and 268.4(a) 264.13(b)(7)(i) and (ii),	N / A	

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	and test treatment residues to demonstrate compliance with treatment standards or prohibitions. Note that representative samples of the sludge and the supernatant must be tested separately rather than mixed to form homogeneous samples.	and 268.4(a)(2)		
343/5	Annual Removal of Residues. Procedures and schedule for removing residues which do not meet applicable treatment standards or prohibitions, do not exhibit a characteristic of hazardous waste, and are not delisted under Part 260.22. These residues must be removed at least annually. Note that residues may not be placed in any other surface impoundment for subsequent management.	264.13(b)(7)(iii), and 268.4(a)(2)	Y	Waste Analysis Plan Section 2.3
	Requirements for Land Disposal Facilities With An Approved Exemption or Extension. If a case-by-case extension has been approved under 268.5 or a petition has been approved under 268.6, provide a copy of the Notice of Approval.	270.14(b)(21)	N/A	
134/6	A-7. MANIFEST SYSTEM, RECORD KEEPING, AND REPORTING. <ul style="list-style-type: none"> • Required Notices. • Manifest System. • Operating Records. • Biannual Reports. • Unmanifested Waste Reports. • Waste Minimization. • Addition Reports. 	264.12 264.71 264.72 264.73 264.74 264.75 264.76 264.77	Y	Section II.A.7 Manifest System, Recordkeeping, and Reporting
212	Inspection Schedule. A copy of the general inspection schedule required by 264.15(b) including, where applicable, specific requirements of 264.174, 264.194, 264.226, 264.254, 264.273, 264.303, and 264.347.	270.14(b)(5) and 264.15	Y	Table II-6. Inspection Schedule

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212	<p>General Inspection Requirements. A description of the facility inspection schedule (schedule must be kept at the facility) for the following equipment:</p> <ul style="list-style-type: none"> • Monitoring equipment. • Emergency and safety equipment. • Security devices. • Operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards. • Testing as necessary of communications or alarm systems, fire protection equipment and decontamination equipment. 	<p>270.14(b)(5) and 264.15(a) & (b)</p> <p>264.15(a) & (b)</p> <p>264.32-34</p>	Y	Table II-6. Inspection Schedule
212	<p>Examples of Monitoring Equipment That Should be Inspected at Treatment, Storage, and Disposal Facilities Are:</p> <ul style="list-style-type: none"> • Scales. • Flow and liquid level monitors. • Hazardous gas detectors. • pH monitors. • Leachate monitors. • Pressure sensors. • Temperature gauges. 	264.33	Y	Table II-6. Inspection Schedule
	<p>Examples of Monitoring Equipment That Should Be Inspected at Facilities With Incinerators Are:</p> <ul style="list-style-type: none"> • Waste flow monitors and recorders. • Auxiliary air flow monitors. • Combustion air flow monitors. • Temperature monitors. • Flame sensors. • CO monitors and recorders. • Pressure differential indicators. • Pressure sensors. • pH monitors. • Ammeters for measuring blower current draw. 		N/A	

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212	Examples of Safety and Emergency Equipment to Be Inspected at TSD Facilities are: <ul style="list-style-type: none"> • Respirators. • Communication systems. • Alarm System. • Emergency lighting and power systems. • Smoke detectors. • Fire protection equipment. • First aid equipment and supplies. • Decontamination equipment. • Protective clothing. 		Y	Table II-6. Inspection Schedule
212	Examples of Security Devices to Be Inspected at TSD Facilities Are: <ul style="list-style-type: none"> • Surveillance system. • Barrier surrounding facility. • Locking devices. 		Y	Table II-6. Inspection Schedule
212	Examples of Operating and Structural Equipment at TSD Facilities Are: <ul style="list-style-type: none"> • Spill detection devices. • Spill control and collection equipment. • Fire and explosion barriers. • Ventilation equipment. • Sump pumps. • Dikes, bases, and foundations. 		Y	Table II-6. Inspection Schedule
212	In addition; areas such as waste storage, mixing, loading, and unloading areas which are subject to spills; must be inspected.		Y	Table II-6. Inspection Schedule
212	Types of Problems. The schedule must identify the types of problems to look for during the inspection (e.g., leaks, deterioration, readings out of specified range, missing items or materials, inoperative equipment, etc.).	264.15(b)(3)	Y	Table II-6. Inspection Schedule
212	Frequency of Inspection. A description of the inspection frequency must be provided for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the	264.15(b)(4)	Y	Table II-6. Inspection Schedule

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	probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.			
	All emergency waste feed cut-off valves must be inspected at least weekly to verify proper operation. All system alarms must also be tested weekly.	264.347(c) (Incinerators only)	N / A	
212	Specific Process Inspection Requirements. At a minimum, the inspection schedule must include the terms and frequencies called for in 264.174, 264.195, 264.226, 264.254, 264.303, and 264.347, where applicable.	270.14(b)(5) and 264.15(b)(4)	Y	Table II-6. Inspection Schedule
210	Container Inspection. A description of the weekly inspection of containers and container storage areas for leaks in containers or deterioration of containers and the containment system caused by corrosion or other factors.	264. 174	Y	Table II-4. Inspection Log - Container Storage Areas
211	Tank System Inspection. <ul style="list-style-type: none"> • A description of the inspection each operating day of overfilling control equipment, monitoring equipment, and levels of waste in uncovered tanks. • A description of the daily inspection of tank construction materials and the area surrounding the tank, including secondary containment system (e.g., dike). • A schedule describing the monitoring of each operating day of monitoring equipment (e.g., pressure and temperature gauges), where present, to ensure that the tank is operated according to design specifications. • A schedule showing the level of waste in uncovered tanks that is inspected each operating day. 	264.195	Y	Table II-5. Inspection Log - Bulk Tank

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	<ul style="list-style-type: none"> • A schedule and procedure for assessing the condition of the tank, including detection of leaks, cracks, or wall thinning to less than minimal thickness. • A procedure for emptying a tank to allow entry and inspection when necessary to detect corrosion or erosion of the tank sides and bottom. • Confirm proper operation of cathodic protection system (if present) within six months after installation and at least annually thereafter. • Schedule showing all sources of impressed current are inspected and/or tested at least bimonthly. 			
	<p>Waste Pile Inspection. The application must provide a description of the procedures to:</p> <ul style="list-style-type: none"> • Inspect liners and covers during construction and immediately after installation for: <ul style="list-style-type: none"> - uniformity, damage and imperfections, holes, cracks, thin spots, bulges, root holes, tight seams and joints, permeability and compaction • Remove the waste pile and periodically inspect liners for deterioration, cracks and other imperfections. • Perform weekly inspections and, after storms, to detect: <ul style="list-style-type: none"> - deterioration, malfunctions, or improper operation of run-on and run-off control systems, - the presence of liquids in leak detection systems, where installed, - proper functioning of wind dispersal control systems, where present, - the presence of leachate in and proper functioning of leachate collection and removal systems, where present. 	270.14(b)(5), 270.18(d) and 264.254	N / A	
	<p>Surface Impoundment Inspection. The application must provide a description of how each surface impoundment, including the liner and cover systems and appurtenances for control of over-topping, will be inspected weekly and after storms to detect evidence of any of the following:</p>	270.14(b)(5), 264.226(b) and 270.17(c)	N / A	

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	<ul style="list-style-type: none"> • Deterioration, malfunctions, or improper operation of overtopping control systems. • Sudden drops in the level of the impoundments contents. • The presence of liquids in leak detection systems, where installed. • Severe erosion or other sign of deterioration in dikes or other containment devices. 			
	For new facilities, a description of how the liners will be inspected during construction and immediately after installation to detect non-uniformity, damages and imperfections (holes, cracks, thin seams, bulges, root holes, tight seams and joints, permeability, and compaction). See Item D-4b(2) concerning inspection of dikes for structural integrity.	264.226(a)	N / A	
	Incinerator Inspection. <ul style="list-style-type: none"> • Incinerator and associated equipment must be inspected visually at least daily for leaks, spills, fugitive emissions, and signs of tampering. • Emergency waste feed cut-off system and associated alarms must be tested weekly unless the applicant demonstrates that weekly frequency is unduly restrictive and that less frequent inspection will be adequate. At a minimum, operational testing must be conducted monthly. 	264.347(b) & (c)	N / A	
	Landfill Inspection. Landfill owners or operators must provide a description of procedures for: <ul style="list-style-type: none"> • For new facilities, inspection of liners/covers during and immediately after installation. • Inspections weekly and after storms for: <ul style="list-style-type: none"> - operation of run-on/run-off controls, - liquids in leak detection systems, - proper functioning of wind dispersal controls, - leachate in and proper operation of leachate collection/removal systems. 	270.21(d), 264.15(a) and 264.303(b)	N / A	

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	Land Treatment Inspection. A description of the inspection procedures. Specifically the unit must be inspected weekly and after storms for: <ul style="list-style-type: none"> • Deterioration, malfunctions, or improper operation of run-on and run-off control systems. • Improper functioning of wind dispersal control measures. • The presence of liquids in leak detection systems, where installed. • Proper functioning of wind dispersal control systems, where present. • The presence of leachate in and proper functioning of leachate collection and removal systems, where present. 	270.20(c)(5) and 264.273(g)	N / A	
160 / 2 212	Miscellaneous Unit Inspections. Provide an inspection program which ensures compliance with the standards specified in other units, where applicable.	270.14(b)(5) and 264.602	Y	Table II-6. Inspection Schedule
147 / 7	Remedial Action. A description of procedures for taking remedial actions when inspections reveal problems or when problems are imminent. These may alternately be described in the contingency plan [See 264.194(c), 264.227, 264.171].	264.15(c)	Y	Section II.C.12 Response to Leaks or Spills
210 211	Inspection Log. A copy or description of the inspection log or summary form including the following: <ul style="list-style-type: none"> • Dates and times of inspections. • Name(s) and inspector(s). • Observations made. • Date and nature of repairs or remedial actions taken. 	264.73(b)(5) and 264.15(d)	Y	Table II-4 Table II-5

Updated 4/13/10