

## **MODULE III - STORAGE IN CONTAINERS**

### **III.A. APPLICABILITY**

- III.A.1. The requirements of this permit module apply to the hazardous waste container storage operations at the Permittees' facility. The Permittees shall comply with R315-170 through 178 of the Utah Admin. Code and all requirements and conditions of this Permit. For the purposes of this permit, the hazardous waste container management areas are designated as: ES-2, ES-3 and the Ash Storage Pad.

### **III.B. WASTE IDENTIFICATION**

- III.B.1 The Permittees shall only store hazardous waste with the following waste codes in containers at the ES-2 explosive storage facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, D001, D003, D005, D008, D038 and K044

- III.B.2 The Permittees shall only store hazardous waste with the following waste codes in containers at the Ash Storage Pad, a chemical storage facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, D005, D008 and D038

- III.B.3 The Permittees shall only store hazardous waste with the following waste codes in containers at the ES-3 explosive storage facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, D001, D003, D005, D008, D038 and K044

### **III.C. CONDITION OF CONTAINERS**

- III.C.1. If a container holding hazardous waste is not in good condition (e.g., severe rusting, bulging, apparent structural defects) or it has begun to leak, the Permittees shall transfer the contents from this container, or the container itself, to a container in good condition or manage the waste in some other way that complies with R315-264-171 of the Utah Admin. Code. This shall be completed as soon as possible, but no later than 24 hours from the time the problem was first discovered and noted in the inspection log.

### **III.D. COMPATIBILITY OF WASTE WITH CONTAINERS**

- III.D.1. The Permittees shall ensure that all wastes are compatible with the storage containers as required by R315-264-172 of the Utah Admin. Code.

### **III.E. MANAGEMENT OF CONTAINERS**

- III.E.1. The Permittees shall manage containers in accordance with R315-264-173 of the Utah Admin. Code. A container holding hazardous waste shall always be closed during storage except when the Permittees are adding or removing waste from the container. The Permittees shall not store containers in a manner which may cause the containers to leak. The Permittees shall manage containers in accordance with this module of the Permit and the procedures identified in Attachment 4.
- III.E.2. The Permittees shall maintain aisle space in each container management area that complies with Condition II.K.6.
- III.E.3. ES-2 is an explosive storage area where the Permittees may store, accumulate and consolidate the wastes identified in Condition III.B.1. The Permittees shall comply with the following conditions for wastes stored in ES-2:
- III.E.3.a. ES-2 has a hazardous waste storage capacity of 4,000 gallons. The Permittees shall not exceed the storage capacity of ES-2.
- III.E.3.b. The Permittees shall maintain an aisle space of at least 30 inches between rows of containers and no rows shall not be more than two containers wide.
- III.E.3.c. The Permittees may store waste in the types of containers identified and described in Section 4.2.1 of Attachment 2 at ES-2, including slum bags, SLIDs (“slum-in-a-drum”), slum pots, fiberboard drums, pizza boxes, “other containers,” as described, and containers specified in Department of Defense (DOD) manual 4145.26-M. The Permittees shall not store waste in tanks at ES-2.
- III.E.3.d. The Permittees shall not stack waste containers at ES-2, except:
- III.E.3.d.i. The 30-gallon fiberboard drums shall not be stacked more than two high;
- III.E.3.d.ii. Slum bags, as defined in Section 4.2.1 of Attachment 4, may be accumulated and stacked inside empty SLIDs;
- III.E.3.d.iii. Pizza boxes may be stacked inside a large cardboard box with no more than 6 pizza boxes per large cardboard box;
- III.E.3.d.iv. The large cardboard boxes containing pizza boxes shall not be stacked more than two high; and
- III.E.3.d.v. Slum bags containing bleed tubes may be stacked inside 75-gallon fiberboard drums.

- III.E.3.e. The Permittees shall label all containers stored in ES-2 in accordance with the waste tracking provisions identified in Section 4.3 of Attachment 4.
- III.E.3.f. Wastes containing free liquids shall not be stored at ES-2.
- III.E.3.g. Nitroglycerine (NG) remover shall not be stored at ES-2.
- III.E.4. The Ash Storage Pad is a chemical storage unit where the Permittees may store and accumulate treatment residues and post burn clean-up wastes identified in Condition III.B.2. The Permittees shall comply with the following conditions for wastes stored on the Ash Storage Pad:
  - III.E.4.a. The Ash Storage Pad has a hazardous waste storage capacity of 50 cubic yards. The Permittees shall not exceed the hazardous waste storage capacity of the Ash Storage Pad.
  - III.E.4.b. The Permittees may store non-hazardous waste on the Ash Storage Pad. All non-hazardous waste stored on the Ash Storage Pad shall count towards the total storage capacity of the Ash Storage Pad.
  - III.E.4.c. All hazardous waste containers on the Ash Storage Pad shall remain closed except when waste is being added or removed;
  - III.E.4.d. The Permittees shall maintain an aisle space of at least 30 inches between containers.
  - III.E.4.e. The Permittees shall not stack containers more than one high on the Ash Storage Pad.
  - III.E.4.f. The Permittees shall label all containers stored on the Ash Storage Pad in accordance with the waste tracking provisions identified in Section 4.3 of Attachment 4.
  - III.E.4.g. The Permittees shall not store incompatible waste on the Ash Storage Pad.
  - III.E.4.h. The Permittees shall immediately clean up all waste spilled during transfer operations to mitigate releases to the environment.
  - III.E.4.i. Wastes containing free liquids shall not be stored on the Ash Storage Pad.
- III.E.5. ES-3 is an explosive storage area where the Permittees may store, accumulate and consolidate the wastes identified in Condition III.B.3. The Permittees shall comply with the following conditions for wastes stored in ES-3:
  - III.E.5.a. ES-3 has a hazardous waste storage capacity of 2,500 gallons. The Permittees shall not exceed the storage capacity of ES-3.

- III.E.5.b. The Permittees shall maintain an aisle space of at least 30 inches between rows of containers and no rows shall not be more than two containers wide.
- III.E.5.c. The Permittees may store waste in the types of containers identified and described in Section 4.2.1 of Attachment 2 at ES-3, including slum bags, SLIDs (“slum-in-a-drum”), slum pots, fiberboard drums, pizza boxes, “other containers,” as described, and containers specified in Department of Defense (DOD) manual 4145.26-M The Permittees shall not store waste in tanks at ES-3.
- III.E.5.d. Unless specified in this condition the Permittees shall not stack waste containers at ES-3, except:
  - III.E.5.d.i. The 30-gallon fiberboard drums shall not be stacked more than two high;
  - III.E.5.d.ii. Slum bags, as defined in Section 4.2.1 of Attachment 4, may be accumulated and stacked inside empty SLIDs;
  - III.E.5.d.iii. Pizza boxes may be stacked inside a large cardboard box with no more than 6 pizza boxes per large cardboard box;
  - III.E.5.d.iv. The large cardboard boxes containing pizza boxes shall not be stacked more than two high; and
  - III.E.5.d.v. Slum bags containing bleed tubes may be stacked inside 75-gallon fiberboard drums.
- III.E.5.e. The Permittees shall label all containers stored in ES-3 in accordance with the waste tracking provisions identified in Section 4.3 of Attachment 4.
- III.E.5.f. Wastes containing free liquids shall not be stored at ES-3.
- III.E.5.g. Nitroglycerine (NG) remover shall not be stored at ES-3.

**III.F. CONTAINMENT UNITS**

- III.F.1. The Permittees shall not store liquid waste at ES-2, ES-3 or the Ash Storage Pad.

**III.G. SPECIAL REQUIREMENTS FOR IGNITABLE AND REACTIVE WASTE**

- III.G.1. The Permittees shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
- III.G.2. For ignitable and reactive wastes stored at ES-2, ES-3 and the Ash Storage Pad, the Permittees shall comply with R315-264-17 of the Utah Admin. Code and the requirements specified in Section 4.4.1 of Attachment 4.

III.G.3. For explosive waste stored at ES-2 and ES-3, the Permittees shall comply with R315-264-17 of the Utah Admin. Code and the quantity distance requirement specified in Section 2.3 of Attachment 2.

**III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE**

III.H.1. The Permittees shall not place incompatible hazardous waste or materials in the same container and shall comply with R315-264-17 of the Utah Admin. Code.

III.H.2. The Permittees shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.

III.H.3. Whenever Class 1.1 and 1.3 waste explosives are stored together at ES-2 or ES-3, the Permittees shall maintain at least a 30-inch aisle space so that there is no interaction between the wastes.

III.H.4. The Permittees shall document compliance with Conditions III.H.1, 2 and 3 as required by R315-264-17(c) of the Utah Admin. Code and place the documentation in the operating record.

**III.I. IDENTIFICATION AND LOCATION OF CONTAINERS IN THE OPERATING RECORD**

III.I.1. The Permittees shall record in the operating record the location of each container of hazardous waste stored at any hazardous waste container storage area identified in Condition III.A. until the container is manifested off site or treated at the NIROP Burning Grounds. The Permittees shall track hazardous waste storage, treatment and off-site management of wastes using the waste tracking systems described in Sections 4.3 of Attachment 4.

**III.J. INSPECTIONS**

III.J.1. The Permittees shall conduct inspections of the storage areas identified in Condition III.A. of this Permit in accordance with the schedule outlined in Section 5.2, Attachment 5 of this Permit.

**III.K. STORAGE OF WASTES FOR LONGER THAN ONE YEAR**

III.K.1. The Permittees may store hazardous waste for more than a year provided that the Permittees submit written notification to the Director prior to exceeding the one year time limit and provide an estimate of the additional storage time needed. This provision applies only to the following hazardous waste:

- III.K.1.a. Waste explosives that are permitted for storage at the NIROP facility and designated for disposal at Utah Test and Training Range (UTTR) where disposal arrangements and/or approvals cannot be completed within one year.
- III.K.1.b. Waste explosives that are permitted for storage at the NIROP facility and lack adequate approvals to ship off-site and/or lack sensitivity data to develop an appropriate disposal plan.
- III.K.2. Whenever the Permittees are storing any of the waste streams identified in Condition III.K.1.a. and III.K.1.b., the Permittees shall submit a written report to the Director on or before January 31<sup>st</sup> of each calendar year. This report shall provide a detailed description of the waste, where it is stored and the Permittees' efforts to arrange treatment and/or disposal.

**III.L. STORAGE OF WASTE ROCKET MOTORS OR MORTOR SECTIONS**

- III.L.1. The Permittees may request emergency storage of waste rocket motors or motor sections in accordance with R315-270-61 of Utah Admin. Code.

**III.M. CLOSURE/POST CLOSURE**

- III.L.1. The Permittees shall close the storage areas in accordance with R315-264-110 through 120 of the Utah Admin. Code, UAC R315-264-178 of the Utah Admin. Code, Condition II.O, and Attachment 8 of this Permit.