

MODULE III

STORAGE AND TREATMENT IN CONTAINERS

DRAFT

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MODULE III - STORAGE AND TREATMENT IN CONTAINERS

III.A. APPLICABILITY

1. The requirements of this permit module pertain to the operation of hazardous waste container ~~storage areas~~storage and management units at the Clean Harbors Grassy Mountain Facility (CHGM). ~~The Permittee~~CHGM shall comply with the Utah Administrative Code (UAC) R315-264-170 and all conditions of this permit. For the purposes of this permit, the Container Management Building, the Drain and Flush Building Warehouse One (DFBWO) the Bulk Solid Storage Areas (BSSA), and the Leachate Building are designated hazardous waste ~~storage areas~~storage and management units.
2. CHGM shall manage aAll containers of hazardous waste ~~shall be managed~~ in accordance with this module.
3. CHGM shall manage Polychlorinated Biphenyls (PCBs) in containers ~~shall be managed~~ in accordance with Module X, the Waste Management Plan for PCBs. Polychlorinated Biphenyls.
4. When PCB wastes are stored in the Container Management Building, the conditions of this module are applicable.
5. Containers of RCRA/TSCA waste may be stored in the permitted storage ~~areas~~units. Such containers are subject to the conditions of this module.
6. CHGM shall not profile cContainers with the EPA waste code D001 (for ignitability) ~~shall not be profiled at the~~to the CHGM Grassy Mountain Facility.
7. CHGM shall manage and process cContainers of ~~M~~mercury waste ~~shall be managed and processed~~ into larger containers in the DFBWO - Mercury Processing and Storage ~~Area-Unit~~ A3.

III.B. WASTE IDENTIFICATION

1. The PermitteeCHGM may store the wastes listed in Attachment II-RCRA-TSCA WAP Appendix 3 column 2, "containers," subject to the terms of this permit.
2. CHGM may store and/or treat wWaste or material identified in Condition II.D.1 ~~may be stored and/or treated~~ in containers at CHGMthe Grassy Mountain Facility.

III.C. CONDITION OF CONTAINERS

1. If a container holding hazardous waste is not in good condition (e.g., severe rusting, bulging, apparent structural defects) or it begins to leak, ~~the Permittee~~ CHGM shall transfer the hazardous waste from such container, or the container of hazardous waste itself, into a container that is in good condition or manage the waste in some other way that complies with the requirements of ~~UAC Utah Admin. Code~~ R315-264-171. This CHGM shall ~~be completed~~ this as soon as possible, but no later than 24 hours from the time the problem was first discovered, and note ~~it~~ in the Operating Record.
2. ~~CHGM Facility~~ personnel shall ensure that the replacement containers referenced in Condition III.C.1. are sufficiently labeled to allow identification and tracking of the waste while it is managed at ~~CHGM the facility~~.
3. Contents of leaking or damaged containers may be emptied directly into treatment processes providing all appropriate fingerprint analyses, and any necessary additional ~~analysis analyses (if necessary)~~ have been performed.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

~~CHGM The Permittee~~ shall assure that the waste is compatible with the containers as required by ~~UAC Utah Admin. Code~~ R315-264-172.

III.E. MANAGEMENT OF CONTAINERS

1. Containers shall always remain closed except when ~~CHGM the Permittee~~ is adding or removing material from containers as allowed by ~~UAC Utah Admin. Code~~ R315-264-173. ~~CHGM The Permittee~~ shall not store or move containers in a way that may cause the containers to leak.
2. ~~CHGM The Permittee~~ shall place the hazardous waste from the transport vehicle into storage or onto another transport vehicle for shipment to another facility within ten days ~~off from arrival receipt~~ at the site. ~~Arrival Receipt~~, for purposes of this permit, will be the day the transport vehicle comes through the gate of ~~the CHGM Grassy Mountain Facility~~.
3. Containers may be off-loaded directly into treatment or disposal processes without first being placed in storage providing all inspection, analytical, and treatment requirements of this permit have been satisfied.
4. ~~CHGM The Permittee~~ may store Land Disposal Restricted (LDR) wastes for a period of one year for the purpose of accumulation to facilitate proper treatment or disposal. Justification for storage of these prohibited wastes beyond one year shall be included in the Operating Record as required by ~~UAC Utah Admin. Code~~ R315-268-50 and a letter with the justification provided to the Director of the Division Waste Management and Radiation Control (the Director). ~~of Solid and Hazardous Waste~~.

5. Containers with waste codes F999 or F999/P999 are not required to be opened for a visual inspection and sampling provided the generator certifies that the container is at least 90% full, contains no free liquids, and requires no treatment. CHGM shall incorporate ~~this certification statement shall be incorporated~~ into the Operating Record ~~operating record~~.
6. Should ~~, upon arrival,~~ a container tests positive for ignitability (D001) upon arrival, CHGM the Grassy Mountain Facility shall reject the container or obtain a new profile for continued management of the container, including shipment to another facility. CHGM shall segregate ~~c~~Containers that have the EPA waste code D001 for ignitability ~~shall be segregated~~ on Top Dock 1. Containers shall, not exceed 50 in number; and shall not remain at ~~the CHGM Grassy Mountain Facility~~ for longer than 30 days.

III.F. CONTAINER MANAGEMENT BUILDING - CONTAINMENT AREAS UNITS AND CAPACITIES

1. ~~The Permittee~~CHGM shall manage the container ~~management facilities~~storage units in accordance with the UAC~~Utah Admin. Code~~ R315-264-175. For purposes of this section, a container ~~management facility storage unit~~ shall be considered full when calculating the number of gallons stored. ~~The Permittee~~CHGM may store the following quantities of hazardous wastes and/or RCRA/TSCA wastes:
 - a. Dock 1 has a maximum capacity of 18,850 gallons of liquid waste in containers. This areaunit is also named as “Top Dock 1” or “TD01” in facility records.
 - b. Pad 2 has a maximum capacity of 66,000 gallons of waste in containers. This areaunit is subdivided into two container management sub-areaunits known as the “North Pad” or “NP01” and the “South Pad” or “SP01” in facility records. Each “Pad” has sufficient containment capacity to store the maximum capacity permitted.
 - c. Pad 3A has a maximum capacity of 20,900 gallons of waste in containers. This areaunit is also referred to as “Top Dock 2” or “TD02” in facility records.
 - d. Pad 3B has a maximum capacity of 20,900 gallons of waste in containers. This areaunit is also referred to as the “Sample Pad” or “SPAD” in facility records.
 - e. Dock 1, Pad 2, and Pads 3A and 3B shall not be for 90-day storage or satellite storage areaunits.
2. The minimum allowable aisle space shall be two feet six inches except along building walls that may be one foot six inches.
 - a. Containers may not be stored more than eight feet high as measured from the floor to the top of the uppermost container.

3. All containers of non-hazardous waste stored on Dock 1, Pad 2 or Pad 3 will be considered full of liquid hazardous waste for the purposes of determining compliance with containment standards.
4. CHGM shall inspect container management ~~areaunit~~ sumps ~~shall be inspected~~ in accordance with Attachment II-3 for the presence of liquids. If liquids are discovered in the sump, ~~CHGM~~the Permittee shall determine the source and note this in the inspection log. ~~CHGM shall remove a~~Any liquids discovered in the sump ~~shall be removed~~ within 24 hours and manage ~~the liquids~~ as hazardous waste in accordance with all applicable requirements of this permit.
5. ~~CHGM shall collect and analyze a~~All run-off from container storage and management ~~areaunits~~ identified in Condition III.F.1. ~~shall be collected, analyzed~~ for hazardous ~~wastewastes~~ characteristics, and constituents, ~~then, and disposed of it~~ according to the applicable portions of the permit.
6. Any time ~~CHGM~~the facility plans to increase storage capacities, ~~CHGM~~the Permittee shall submit ~~secondary containment~~ calculations to demonstrate compliance with the secondary containment requirements specified in ~~UAC~~Utah Admin. Code R315-264-175. Any changes to storage capacities shall be subject to the permit modification requirements specified in ~~UAC~~Utah Admin. Code R315-270-42, and Section I.D of Module I of this permit.

III.G. DRAIN AND FLUSH BUILDING WAREHOUSE ONE (DFBWO)

1. Mercury Storage ~~Area-Unit~~ A1 – maximum capacity of 17,600 gallons of waste in containers. This ~~areaunit~~ has the sufficient containment capacity to store the maximum capacity permitted.
2. Mercury Staging and Storage ~~Area-Unit~~ A2 – maximum capacity of 7,040 gallons of waste in containers. This area has the sufficient containment capacity to store the maximum capacity permitted. (A2 & A4 are listed as contiguous).
3. Mercury Processing and Storage ~~Area-Unit~~ A3 – maximum capacity of 3,080 gallons of waste in containers. This ~~areaunit~~ has the sufficient containment capacity to store the maximum capacity permitted.
4. Mercury Storage Outdoor ~~Area-Unit~~ A4 – maximum capacity of 5,720 gallons of waste in containers. This ~~areaunit~~ has the sufficient containment capacity to store the maximum capacity permitted. (A2 & A4 are listed as contiguous).
5. ~~CHGM shall manage~~ ~~—c~~Containment units ~~ment management will be managed the same~~ as identified in III.F.4 – III.F.6.

III.H. BULK SOLID STORAGE AREA (BSSA)

1. The Bulk Solid Storage Area (BSSA) is permitted to store only non-liquid waste in bulk transport containers, such as gondolas, end dumps, and roll-off containers. The BSSA consists of the east (BSSA-E) and west (BSSA-W) areas and ~~the both~~ heat tents (HT-L ~~and HT-S~~), as indicated in the facility plan view ~~located~~ in Attachment II-1. Information concerning the configuration of the BSSA is shown in Attachment III-1.
 - a. ~~For purposes of To determining~~ determine compliance with storage capacities, all containers shall be considered full of hazardous waste.
2. ~~CHGM shall not store n~~Non-liquid waste received in bulk transport containers ~~shall not be stored~~ for ~~a period that exceeds~~ longer than one year.
3. ~~CHGM shall manage~~ All containers located in the BSSA ~~shall be inspected daily~~ in accordance with UAC R315-264-173 and inspect all containers located in the BSSA daily in accordance with UAC ~~Utah Admin. Code R315-264-174.4 and managed in accordance with UAC~~ Utah Admin. Code R315-264-173.
4. Each of the ~~three~~ four storage areas that make up the BSSA may store up to the following quantities:
 - a. Bulk Solid Storage Area - East (BSSA-E) may store up to 600 cubic yards.
 - b. Bulk Solid Storage Area - West (BSSA-W) may store up to 1,600 cubic yards.
 - c. Heat Tent - Large (HT-L) may store up to 280 cubic yards.
 - d. Total bulk solid storage shall not exceed 2, ~~480~~ 640 cubic yards, including the volume of waste identified in Condition III.E.3.

III.I. LEACHATE BUILDING

1. ~~Leachate is transferred to and from the leachate tanks in the The~~ Leachate Building ~~is the location where leachate is transferred to and from the Leachate Tanks~~. The leachate collected is accumulated in the tanks; until it is shipped off site for disposal.
2. In addition to providing containment for leachate transfers, the Leachate Building is permitted to store hazardous and PCB waste. The building is approved to store one road tanker, not to exceed 6,000 gallons, or one roll-off box ~~(or gondola)~~ not to exceed 30 cubic yards in capacity.
3. ~~CHGM shall document the l~~ocation of waste stored in the Leachate Building ~~shall be documented~~ in the ~~operating record~~ Operating Record, as described in Section III.K. below.

III.J. SPECIAL REQUIREMENTS, IGNITABLE OR REACTIVE WASTES

1. ~~CHGM~~~~The Permittee~~ shall not locate containers holding ignitable or reactive waste within 50 feet of the ~~CHGM~~~~facility's~~ property line. ~~CHGM~~~~The Permittee~~ shall comply with ~~UAC~~~~Utah Admin. Code~~ R315-264-176.
2. ~~CHGM~~~~The Permittee~~ shall electrically ground all containers holding ignitable liquid wastes whenever wastes are added to or removed from those containers ~~(except for sampling)~~.

III.K. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. ~~CHGM~~~~The Permittee~~ shall not place incompatible wastes in the same container. ~~CHGM~~~~The Permittee~~ shall comply with ~~UAC~~~~Utah Admin. Code~~ R315-264-177(a).
2. ~~CHGM~~~~The Permittee~~ shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material in accordance with ~~UAC~~ R315-264-177(b).
3. ~~CHGM shall separate~~ ~~nor store~~ incompatible containerized waste ~~in containers separated from each other~~ with a berm, wall/wall, or other means in accordance with ~~UAC~~ R315-264-177(c).

III.L. IDENTIFICATION OF LOCATION OF CONTAINERS IN OPERATING RECORD

During the receiving process, and prior to placement into storage, CHGM shall affix a Grassy Mountain Facility barcode label ~~is not already affixed~~ to each container ~~if one is not already applied~~. Each label has a unique number used for tracking the container from receipt to disposal. ~~CHGM~~~~The Permittee~~ shall record and maintain the location of all hazardous waste containers when they are placed in storage, ~~or~~ relocated in the container management building, or relocated elsewhere at the facility. The location record of all containers shall show the specific location with coordinates showing pad area and row for each container in the management area. CHGM shall update ~~l~~ocation records ~~shall be updated~~ each day the storage area is operational. CHGM shall maintain records ~~shall be maintained~~ for all containers removed from storage showing the status of the container regarding treatment, disposal, or disposition. For bulk transport containers, the inventory record shall show the area in which each is stored (i.e., BSSA-E, BSSA-W, HT-L, or Leachate Building).

III.M. INSPECTIONS

1. ~~CHGM~~The Permittee shall conduct daily inspections ~~(when storage areas are staffed)~~ of the container storage ~~area~~units identified in Condition III.A. of this permit ~~(when the container storage units are staffed)~~ in accordance with the schedule outlined in Attachment II-3. ~~CHGM shall follow~~ inspection requirements ~~shall be followed~~, as specified in Condition II.G and ~~UAC~~Utah Admin. Code R315-264-174, ~~shall be followed~~.
2. Special inspections of containers of high VOC wastes. Within 24 hours of receipt, ~~CHGM shall inspect~~ containers of high VOC wastes ~~shall be inspected~~ in accordance with Attachment III-2, "Policy and Procedures for Managing High VOC Wastes under UAC R315-264-1080 through R315-264-1091,"; for proper fit and tightness of covers. ~~unless it is~~ This does not apply if the containers are emptied within 24 hours of receipt, ~~and if not, no later than the day the manifest is signed~~.

III.N. CONSTRUCTION OF NEW UNITS

~~CHGM~~The Permittee shall comply with Module I Conditions I.O, covering planned changes, and Condition I.P, certification of new construction and modifications ~~from~~ Module I. All new container management systems and modifications to existing systems shall also meet containment and leak detection requirements specified in UACUtah Admin. Code R315-264-175.

III.O. CLOSURE/POST CLOSURE

~~CHGM~~The Permittee shall close the container storage ~~area~~units in accordance with UACUtah Admin. Code R315-264-110 through R315-264-114, ~~and~~ UACUtah Admin Code R315-264-178, and Module II Condition II.O.