

MODULE III

STORAGE AND TREATMENT IN CONTAINERS

TABLE OF CONTENTS

III.A. APPLICABILITY1
III.B. WASTE IDENTIFICATION1
III.C. CONDITION OF CONTAINERS.....2
III.D. COMPATIBILITY OF WASTE WITH CONTAINERS.....2
III.E. MANAGEMENT OF CONTAINERS2
III.F. CONTAINER MANAGEMENT BUILDING - CONTAINMENT UNITS AND CAPACITIES.....3
III.G. DRAIN AND FLUSH BUILDING WAREHOUSE ONE (DFBWO).....4
III.H. BULK SOLID STORAGE AREA (BSSA)4
III.I. LEACHATE BUILDING5
III.J. SPECIAL REQUIREMENTS, IGNITABLE OR REACTIVE WASTES.....5
III.K. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE.....5
III.L. IDENTIFICATION OF LOCATION OF CONTAINERS IN OPERATING RECORD .6
III.M. INSPECTIONS.....6
III.N. CONSTRUCTION OF NEW UNITS.....6
III.O. CLOSURE/POST CLOSURE.....6

ATTACHMENTS

ATTACHMENT III-1: Container Management Building and Drain and Flush Building Warehouse One (DFBWO) Storage Area Drawings

ATTACHMENT III-2: Policy and Procedures for Managing High Volatile Organic Compounds (VOC) Wastes under Subpart CC

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 and management units at the Clean Harbors Grassy Mountain Facility (CHGM). 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 and management units.
2. CHGM shall manage all containers of hazardous waste in accordance with this module.
3. CHGM shall manage Polychlorinated Biphenyls (PCBs) in containers in accordance with Module X, the Waste Management Plan for PCBs.
4. The conditions of this module are applicable when PCB wastes are stored in the Container Management Building.
5. Containers of RCRA/TSCA waste may be stored in the permitted storage units. Such containers are subject to the conditions of this module.
6. CHGM shall not profile containers with the EPA waste code D001 (for ignitability).
7. CHGM shall manage and process containers of mercury waste into larger containers in the DFBWO - Mercury Processing and Storage Unit A3.

III.B. WASTE IDENTIFICATION

1. CHGM 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 waste or material identified in Condition II.D.1 in containers at CHGM.

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, 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 R315-264-171. CHGM shall complete 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 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.
3. Contents of leaking or damaged containers may be emptied directly into treatment processes providing all appropriate fingerprint analyses, and any necessary additional analyses have been performed.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

CHGM shall assure that the waste is compatible with the containers as required by UAC R315-264-172.

III.E. MANAGEMENT OF CONTAINERS

1. Containers shall always remain closed except when CHGM is adding or removing material from containers as allowed by UAC R315-264-173. CHGM shall not store or move containers in a way that may cause the containers to leak.
2. CHGM shall place the hazardous waste from the transport vehicle into storage or onto another transport vehicle for shipment to another facility within ten days of receipt at the site. Receipt, for purposes of this permit, will be the day the transport vehicle comes through the gate of CHGM.
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 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 R315-268-50 and a letter with the justification provided to the Director of the Division Waste Management and Radiation Control (Director).

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 into the Operating Record.
6. Should a container test positive for ignitability (D001) upon arrival, CHGM shall reject the container or obtain a new profile for continued management of the container, including shipment to another facility. CHGM shall segregate containers that have the EPA waste code D001 for ignitability on Top Dock 1. Containers shall not exceed 50 in number and shall not remain at CHGM for longer than 30 days.

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

1. CHGM shall manage the container storage units in accordance with the UAC R315-264-175. For purposes of this section, a container storage unit shall be considered full when calculating the number of gallons stored. 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 unit 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 unit is subdivided into two container management sub-units 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 unit 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 unit 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 units.
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 unit sumps in accordance with Attachment II-3 for the presence of liquids. If liquids are discovered in the sump, CHGM shall determine the source and note this in the inspection log. CHGM shall remove any liquids discovered in the sump 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 all run-off from container storage and management units identified in Condition III.F.1. for hazardous waste characteristics and constituents, then dispose of it according to the applicable portions of the permit.
6. Any time CHGM plans to increase storage capacities, CHGM shall submit calculations to demonstrate compliance with the secondary containment requirements specified in UAC R315-264-175. Any changes to storage capacities shall be subject to the permit modification requirements specified in UAC 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 Unit A1 – maximum capacity of 17,600 gallons of waste in containers. This unit has sufficient containment capacity to store the maximum capacity permitted.
2. Mercury Staging and Storage Unit A2 – maximum capacity of 7,040 gallons of waste in containers. This area has sufficient containment capacity to store the maximum capacity permitted. (A2 and A4 are listed as contiguous).
3. Mercury Processing and Storage Unit A3 – maximum capacity of 3,080 gallons of waste in containers. This unit has sufficient containment capacity to store the maximum capacity permitted.
4. Mercury Storage Outdoor Unit A4 – maximum capacity of 5,720 gallons of waste in containers. This unit has sufficient containment capacity to store the maximum capacity permitted. (A2 and A4 are listed as contiguous).
5. CHGM shall manage containment units as identified in Conditions 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 heat tent (HT-L), as indicated in the facility plan view in Attachment II-1. Information concerning the configuration of the BSSA is shown in Attachment III-1.
 - a. To determine compliance with storage capacities, all containers shall be considered full of hazardous waste.

2. CHGM shall not store non-liquid waste received in bulk transport containers for longer than one year.
3. CHGM shall manage containers located in the BSSA in accordance with UAC R315-264-173 and inspect all containers located in the BSSA daily in accordance with UAC R315-264-174.
4. Each of the three 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 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 Leachate Building. 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 location of waste stored in the Leachate Building in the Operating Record, as described in Section III.K. below.

III.J. SPECIAL REQUIREMENTS, IGNITABLE OR REACTIVE WASTES

1. CHGM shall not locate containers holding ignitable or reactive waste within 50 feet of the CHGM property line. CHGM shall comply with UAC R315-264-176.
2. CHGM shall electrically ground all containers holding ignitable liquid wastes whenever wastes are added to or removed from those containers.

III.K. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

1. CHGM shall not place incompatible wastes in the same container. CHGM shall comply with UAC R315-264-177(a).
2. CHGM 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 incompatible containerized waste with a berm, 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 barcode label 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 shall record and maintain the location of all hazardous waste containers when they are placed in storage, 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 location records each day the storage area is operational. CHGM shall maintain records 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 shall conduct daily inspections of the container storage 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 as specified in Condition II.G and UAC R315-264-174.
2. Special inspections of containers of high Volatile Organic Compounds (VOC) wastes. Within 24 hours of receipt, CHGM shall inspect containers of high VOC wastes 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. This does not apply if the containers are emptied within 24 hours of receipt.

III.N. CONSTRUCTION OF NEW UNITS

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

III.O. CLOSURE/POST CLOSURE

CHGM shall close the container storage units in accordance with UAC R315-264-110 through R315-264-114, UAC R315-264-178, and Module II Condition II.O.