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## **MODULE III - MANAGEMENT OF CONTAINERS**

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

- III.A.1. The requirements of this Permit module pertain to the operation of hazardous waste container storage areas at the Hill AFB Hazardous Waste Storage Facility (HWSF). The Permittee shall comply with UAC R315-264-170 and all the Conditions of this Module. For the purposes of this Permit, the HWSF consists of Building 898, Building 888, and the outside fenced area immediately surrounding the two buildings located at Hill AFB.

### **III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION**

- III.B.1. The Permittee may store, in containers only, the hazardous wastes identified by EPA hazardous waste codes in Attachment 2 (Waste Analysis Plan) of this Permit, and the non-hazardous wastes listed in Conditions II.D.1.b. through e., subject to the terms of this Permit.
- III.B.2. The Permittee is prohibited from storing hazardous waste not identified in Condition III.B.1 and those hazardous wastes identified in Condition II.D.2 of this Permit. Any addition of hazardous waste to Condition III.B.1 requires a modification to the Permit in accordance with Condition I.D.
- III.B.3. The Permittee may store, in containers only, materials in the HWSF. Materials may be a substance or mixture of substances that are not solid or hazardous waste. Materials may include, but are not limited to, recyclable materials and commercial chemical products. Materials stored in the HWSF will be subject to the HWSF container management requirements as specified in the following conditions.

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

- III.C.1. If a container that is used for storage of hazardous or non-hazardous waste or materials is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the contents, or the container itself, to 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. This shall be completed as soon as possible, but not later than 24 hours from the time the problem was discovered and noted in the Operating Record. Containers of hazardous waste shall be labeled in accordance with UAC R315-262-17.
- III.C.2. The Permittee 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 the facility.

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

- III.D. 1. The Permittee shall use only containers that are in good condition and comply with the requirements of this Permit and shall assure that the ability of the container to contain the waste or material is not impaired.
- III.D.2. The Permittee shall assure that any waste or material is compatible with the container in which the waste or material is stored as required by UAC R315-264-172.

**III.E. MANAGEMENT OF CONTAINERS**

- III.E.1 The Permittee shall keep all containers closed, except when it is necessary to add, remove, or sample waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak as required by UAC R315-264-173.
- III.E.2. The Permittee shall manage containers in accordance with the Container Management Plan in Attachment 9 of this Permit.
- III.E.3. The Permittee shall ensure that the following conditions are met for all containers stored in Buildings 888 and 898:
- III.E.3.a. All containers of materials and hazardous and non-hazardous waste shall be maintained within adequate secondary containment as described in Condition III.F with the exception of containers with volumes greater than 2 cubic yards that do not contain free liquids.
- III.E.3.b. All containers of hazardous waste and other materials shall be placed on pallets or shelves.
- III.E.4. The Permittee shall comply with Condition II.J.6 of this Permit regarding maintaining required aisle space for storage of hazardous waste and other materials.
- III.E.5. The Permittee may store containers of hazardous waste and other materials in the flammable cabinets located in Building 888.
- III.E.6. The Permittee shall maintain on-site, 85-gallon (or other applicable size) overpack drums at the HWSF.
- III.E.7. The Permittee shall comply with UAC R315-268 for all hazardous waste and other materials in Buildings 888 and 898.
- III.E.8. The Permittee shall unload any transport vehicle hauling containers of hazardous waste for storage within 24 hours following arrival of the vehicle carrying the waste at the HWSF. The day of arrival shall be recorded in the Operating Record.
- III.E.9. The Permittee shall verify and document in the Operating Record that waste from each container consolidated into outside bulk waste storage does not contain free liquids.

**III.F. CONTAINMENT SYSTEMS**

- III.F.1. The Permittee shall construct, maintain, and operate the containment systems in accordance with Attachment 9 (Container Management Plan). The secondary containment systems shall be operated and maintained according to the requirements of UAC R315-264-175.
- III.F.2. Container management areas shall be inspected for the presence of free liquids in accordance with Attachment 4 (General Inspection Requirements) of this Permit. If liquids are discovered, the Permittee shall record the location and estimated volume of the liquids in the inspection log.

**III.G. CONTAINER STORAGE AREA CAPACITY**

- III.G.1. The combined permitted storage capacity of Building 898 for waste and materials is 16,830 gallons (306 55-gallon drums) as described in Attachment 9 (Container Management Plan) of this Permit.
- III.G.2. The combined permitted storage capacity Building 888 for waste and materials is 128,040 gallons (2,328 55-gallon drums) as described in Attachment 9 (Container Management Plan) of this Permit.
- III.G.3. Materials and hazardous waste shall be stored in separate clearly marked areas based on compatibility. The labels or equivalent marking on all containers of materials and hazardous waste alcoves shall be clearly visible without moving containers.
- III.G.4. For purposes of this Permit, all containers stored within buildings 888 and 898 shall be considered full to their respective capacities with liquid hazardous waste.

**III.H. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE**

- III.H. 1. The Permittee shall not store containers holding ignitable or reactive waste within 15 meters (50 feet) of the Facility property line in accordance with UAC R315-264-176.
- III.H.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures required in Attachments 7 (Contingency Plan and Emergency Procedures) and 9 (Container Management Plan) of this Permit in accordance with UAC R315-264-17 and UAC R315-264-176.

**III. I. SPECIAL LOCATION REQUIREMENTS FOR IGNITABLE MATERIALS AND WASTE**

- III.I.1. The Permittee shall store ignitable materials and waste only in Bays Z11, Z13, Z14 and Z16 and in alcoves Z12 and Z15 (See Figure 9-1 of Attachment 9 (Container Management Plan) of this Permit). These bays are designed as "hazardous storage bays" to accommodate the hazards associated with highly flammable and combustible materials. For the purposes of this Condition,

ignitable materials shall be defined as any material with a flash point less than 140 °F.

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

III.J.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container, in accordance with UAC R315- 264-177(a).

III.J.2. The Permittee shall not place waste in an unwashed container that previously held an incompatible waste or material, in accordance with UAC R315-264-177(b), unless the container has been triple rinsed, or the container is empty and fitted with a compatible disposable liner. The Permittee shall follow the plan for cleaning of containers in Attachment 9 (Container Management Plan) of this Permit.

III.J.3. A container holding a waste that is incompatible with any waste or other materials stored nearby, shall be separated from the other materials or protected from them by means of a dike, berm, wall, or other device in accordance with UAC R315- 264-177(c).

**III.K. CONTAINER LOCATION/TRACKING**

III.K.1. The Permittee shall record in the Operating Record the location of each container accepted into Buildings 898 and 888 in accordance with Attachment 9 (Container Management Plan) of this Permit.

**III.L. INSPECTION SCHEDULES AND PROCEDURES**

III.L.1. The Permittee shall inspect the container storage area weekly, in accordance with the Inspection Schedule in Attachment 4 (General Inspection Requirements) of this Permit and UAC R315-264-174 to detect leaking containers and deterioration of containers and the secondary containment system caused by corrosion and other factors.

III.L.2. The Permittee shall inspect the container storage area on each day when loading and unloading activities are occurring in accordance with UAC R315-264-15(b)(4).

III.L.3. If problems are observed during the inspections, the Permittee shall correct the problem in accordance with UAC R315-264-15(c) and Condition II.G and record the remedial action taken in the Operating Record in accordance with UAC R315-264-15(d) and Attachment 4 (General Inspection Requirements) of this Permit.

**III.M. ORGANIC AIR EMISSION STANDARDS**

III.M.1. The Permittee shall control air emissions from each container of hazardous waste stored in the HWSF in accordance with the applicable provisions of UAC R315-264-179.

III.M.2. The requirements of Condition III.M.1 do not apply to a container that has a design capacity less than or equal to 0.1 m<sup>3</sup> (26.4 gallons).

- III.M.3. The following containers are also exempt from Condition III.M.1:
- III.M.3.a. A container in which the hazardous waste has an average volatile organic (VO) concentration at the point of waste origination of less than 500 parts per million by weight (ppmw). The average VO concentration shall be determined in accordance with UAC R315-264-1083(a). The Permittee shall review and update, as necessary, this VO determination at least once every 12 months following the date of the initial determination for each type of waste managed in containers at the HWSF. The initial review shall be conducted within 30 days of the effective date of this Permit. The Permittee shall conduct a new waste determination whenever changes to the process generating or treating the waste stream are reasonably likely to cause the average VO concentrations to increase to a level such that that applicable treatment conditions specified in UAC R315-264-1082(c)(2) are not achieved. The reviews shall be documented in the Operating Record.
- III.M.3.b. A container in which the organic content of the hazardous waste has been reduced by an organic destruction method or removal process that achieves any one of the conditions in UAC R315-264-1082(c)(2). For these wastes, the necessary determinations to demonstrate organic destruction or removal shall be made using the applicable procedures specified in UAC R315-264-1083(b).
- III.M.3.c. A container in which the hazardous waste: (a) meets the numerical concentration limits for organic constituents applicable to the hazardous waste as specified in UAC R315-268, or (b) the organic hazardous constituents in the waste have been treated by the treatment technology established by the EPA for the waste in UAC R315-268 or an equivalent method of treatment approved by the Director pursuant to UAC R315-268.
- III.M.4. The Director may at any time perform or request that the Permittee perform an average VO concentration determination of a hazardous waste managed in a container exempted from using air emission controls under Conditions III.M.2. and III.M.3 (UAC R315-264-1082(d)).
- III.M.5. For containers of hazardous waste in the HWSF having a design capacity greater than 0.1 m<sup>3</sup> (26.4 gallons) and less than or equal to 0.46 m<sup>3</sup> (121.5 gallons), the Permittee shall control air pollutant emissions from the containers in accordance with UAC R315-264-1086, (level 1 standards).
- III.M.6. The Permittee shall comply with the applicable recordkeeping and reporting requirements contained in this Permit as part of the Operating Record.

### **III.N. CLOSURE**

The Permittee shall close the HWSF in accordance with UAC R315-264-110, UAC R315-264-178, Condition II.N., and the procedures in Attachment 8, Closure Plan, of this Permit.