

## MODULE III

### STORAGE IN CONTAINERS

#### III.A. APPLICABILITY

- III.A.1. The requirements of this module apply to the operation of the container management areas in the warehouse and the metal storage building. The Permittee shall comply with R315-264-170 through 179, and all applicable requirements established in this permit when managing hazardous waste in the container management areas identified in this module.

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

- III.B.1. The Permittee may store the following hazardous wastes in containers at the facility subject to the terms of this permit:
- III.B.1.a. Parts Washer Waste consisting of the following: petroleum based solvent, tank bottom sludge/sediment, and dumpster/drum washer bottoms sludge;
- III.B.1.b. Immersion Cleaner Waste;
- III.B.1.c. Dry Cleaning Waste consisting of filter cartridges, powder residue, and still by-products;
- III.B.1.d. Paint Wastes consisting of paint, lacquer thinners, and paint/thinner contaminated materials; and
- III.B.1.e. Imaging/Photochemical Waste.
- III.B.2. The Permittee may store the hazardous wastes identified in Condition III.B.1. in containers provided the wastes are identified by one or more of the EPA hazardous waste codes in Condition II.C.1. and are not prohibited by Condition II.C.3.
- III.B.3. The Permittee may store product, non-hazardous waste, universal waste, and 10-day transfer waste in the container storage areas at the facility provided the Permittee complies with applicable DOT and fire code requirements.
- III.B.4. The Permittee shall not store in the container management areas, any waste identified in Condition II.C.3.

#### 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 if it begins to leak, the Permittee 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 R315-264-171. This shall be completed as soon as possible, but no later than two hours from the time the problem was first discovered and noted in the Operating Record.

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

- III.D.1. The Permittee shall assure that wastes in containers are compatible with the containers. Containers must be made of or lined with materials that will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired.

**III.E. MANAGEMENT OF CONTAINERS**

- III.E.1. The Permittee shall keep all containers of hazardous waste closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner that may rupture the container or cause it to leak as specified in R315-264-173.
- III.E.2. Containers of hazardous waste in storage shall not exceed a stacking height of six feet six inches.
- III.E.3. Containers of hazardous waste in the warehouse storage area shall not be stacked more than two pallets high. All containers stored in the warehouse shall be stored on pallets.
- III.E.4. The Permittee shall not store paint wastes in the warehouse storage area.
- III.E.5. The Permittee shall mark or otherwise identify all containers stored in the permitted container storage units in a manner that clearly identifies each container's contents, including, the date placed in storage, the words "hazardous waste" if applicable, and a unique number or identification that can be cross referenced with the manifest or shipping papers accompanying the waste to the facility.
- III.E.6. For purposes of capacity evaluation, all containers stored in the hazardous waste storage areas shall be considered full to their respective capacities with hazardous waste.
- III.E.7. The Permittee shall maintain a minimum of two feet of aisle space in the container storage areas.

**III.F. CONTAINMENT SYSTEMS**

- III.F.1. The secondary containment systems for the container storage areas shall provide a minimum of 10% of the capacity of the container storage area, or 100% of the volume of the largest container stored in the area, whichever is greater.
- III.F.2. The Permittee shall maintain the container storage areas and secondary containment systems in each of the container management areas as constructed and in accordance with ATTACHMENT 7. These systems shall be maintained in such a manner as to ensure that they perform in accordance with R315-264-175.

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

- III.G.1. At capacity, the Permittee shall store no more than the following volumes of hazardous waste:
- III.G.1.a. Warehouse Management Area - 4,500 gallons.
- III.G.1.b. Metal Waste Paint Storage Building - 3,300 gallons.

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

- III.H.1 The Permittee shall locate all containers holding ignitable waste at least 50 feet from the Facility's property line as required by R315-264-176.

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

- III.I.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container as specified in R315-264-177(a).
- III.I.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material as specified in R315-264-177(b).
- III.I.3. A container holding a hazardous waste that is incompatible with any waste or other materials 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 R315-264-177(c).

**III.J. CONTAINER LOCATION/TRACKING**

- III.J.1. The Permittee shall record, in the operating record, the location of each container in the container storage areas. The location records shall be maintained until a container is manifested off-site.

### **III.K. INSPECTION SCHEDULES AND PROCEDURES**

- III.K.1. The Permittee shall conduct inspections of the container storage areas as specified in ATTACHMENT 5.
- III.K.2. The container storage areas shall be inspected daily in accordance with R315-264-15(b) on any day that container loading or unloading activities occur in a respective storage area.
- III.K.3. If a problem is observed during the inspections required under this permit, the Permittee shall correct the problem as specified in R315-264-15(c) and ATTACHMENT 5.
- III.K.4. Container management areas sumps shall be inspected in accordance with ATTACHMENT 5 for the presence of liquids. If liquids are discovered in the sumps, the Permittee shall document the location of the release in the inspection log. Any liquids discovered shall be removed and managed as soon as possible but not later than 24 hours following discovery.

### **III.L. ORGANIC AIR EMISSION STANDARDS**

- III.L.1. The Permittee shall control air emissions from each of the containers of hazardous waste stored in the container storage units in accordance with the applicable provisions of R315-264-1080 through 1090.
- III.L.2. The requirements contained in Condition III.L. do not apply to a container that has a design capacity less than or equal to 0.1 m<sup>3</sup> (about 26 gallons).
- III.L.3. A container is exempt from the standards specified in this condition provided that the container is one of the following:
  - III.L.3.a. A container for which all hazardous waste in the container 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 using the procedures specified in R315-264-1080 through 1090 (specifically R315-264-1083). 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 facility. The reviews and supporting data shall be documented in the Operating Record.
  - III.L.3.b. A container for which the organic content of all hazardous waste in the container has been reduced by an organic destruction method or removal process that achieves any one of the conditions contained in R315-264-1080 through 1090 (specifically 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 R315-264-1080 through 1090 (specifically R315-264-1083(b)).

- III.L.3.c. A container for which all hazardous waste in the container either: meets the numerical concentration limits for organic constituents, applicable to the hazardous waste, as specified in R315-268 (LDR Treatment Standards), or the organic hazardous constituents in the waste have been treated by the treatment technology established by the EPA for the waste in R315-268 (LDR Treatment Technology Standards), or have been removed or destroyed by an equivalent method of treatment approved by the Director pursuant to R315-268.
- III.L.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 the provisions of R315-264-1080 through 1090 (specifically R315-264-1082(d)).
- III.L.5. For containers of hazardous waste in the container storage units having a design capacity greater than 0.1 m<sup>3</sup> (about 26 gallons) and less than or equal to 0.46 m<sup>3</sup> (about 119 gallons), the Permittee shall control air pollutant emissions from the containers in accordance with Level 1 standards.
  - III.L.5.a. Containers using Level 1 controls shall be one of the following:
    - III.L.5.a.i. A container that meets the applicable U.S. DOT regulations on packaging hazardous materials for transportation as specified in R315-264-1086(f).
    - III.L.5.a.ii. A container that is equipped with a cover and closure devices that form a continuous barrier over the container openings such that when the cover and closure devices are secured in the closed position, there are no visible holes, gaps, or other open spaces into the interior of the container. The cover may be a separate cover installed on the container, or may be an integral part of the container structural design.
    - III.L.5.a.iii. An open-top container in which an organic-vapor suppressing barrier is placed on or over the hazardous waste in the container such that no hazardous waste is exposed to the atmosphere.
  - III.L.5.b. A container complying with Level 1 controls shall be equipped with covers and closure devices, as applicable to the container, that are composed of suitable materials to minimize exposure of the hazardous waste to the atmosphere, and to maintain the equipment integrity for as long as the container is in service.
  - III.L.5.c. Whenever a hazardous waste is in a container using Level 1 controls, the Permittee shall install all covers and closure devices for the container, as applicable to the container, and secure and maintain each closure device in the closed position, except as follows:

- III.L.5.c.i. Opening of a closure device or cover is allowed for the purpose of adding hazardous waste or other material as follows:
  - III.L.5.c.i.A. When filling the container to the intended final level in one continuous operation, the Permittee shall promptly secure the closure devices in the closed position and install the covers, as applicable to the container, upon conclusion of the filling operation.
  - III.L.5.c.i.B. When filling the container with discrete quantities or batches of material intermittently over a period of time, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon either the container being filled to the intended final level; the completion of a batch loading after which no additional material will be added to the container within 15 minutes; the person performing the loading operation leaving the immediate vicinity of the container; or the shutdown of the process generating the material being added to the container, whichever condition occurs first.
- III.L.5.c.ii. Opening of a closure device or cover is allowed for the purpose of removing hazardous waste from the container as follows:
  - III.L.5.c.ii.A. Opening of the closure device or cover shall be allowed at any time if the container is empty as defined in R315-261-7.
  - III.L.5.c.ii.B. If discrete quantities or batches of material are removed from the container but the container does not meet the definition of an empty container, the Permittee shall promptly secure the closure devices in the closed position and install covers, as applicable to the container, upon the completion of a batch removal after which no additional material will be removed from the container within 15 minutes, or the person performing the unloading operation leaves the immediate vicinity of the container, whichever condition occurs first.
- III.L.5.c.iii. Opening of a cover or closure device is allowed when access inside the container is needed to perform routine activities other than transfer of hazardous waste. Following completion of the activity, the Permittee shall promptly secure the closure device in the closed position or reinstall the cover, as applicable to the container.
- III.L.5.c.iv. Opening of a spring-loaded pressure-vacuum relief valve, conservation vent, or similar type of pressure relief device that vents to the atmosphere, is allowed during normal operations for the purpose of maintaining the internal pressure of the container in accordance with the design specifications. The device shall be designed to operate with no detectable organic emissions when the device is secured in the closed position.
- III.L.5.c.v. Opening of a safety device, as defined in R315-264-1080 through 1090 (specifically 40 CFR 265.1081 incorporated by reference in R315-265-1), shall be allowed at any time conditions require doing so to avoid an unsafe condition.

- III.L.6. For containers of hazardous waste at the container storage units having a design capacity greater than 0.46 m<sup>3</sup> (about 119 gallons) that are not in light material service (see definition in 40 CFR 265.1081 incorporated by reference in R315-265-1), the Permittee shall control air pollutant emissions from the containers in accordance with Level 1 standards identified in this module.
- III.L.7. For containers of hazardous waste having a design capacity greater than 0.46 m<sup>3</sup> (about 119 gallons) that are in light material service (see definition in 40 CFR 265.1081 incorporated by reference in R315-265-1), the Permittee shall control air pollutant emissions from the containers in accordance with Level 2 standards in R315-264-1080 through 1090 (specifically R315-264-1086(d)).
- III.L.8. The Permittee shall comply with the applicable recordkeeping and reporting requirements contained in R315-264-1080 through 1090 (specifically R315-264-1089 and 1090).

**III.M. CLOSURE**

- III.M.1. At closure of a container management area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in ATTACHMENT 6.