

**MODULE 3**  
**STORAGE AND TREATMENT IN CONTAINERS**

3.A. APPLICABILITY

3.A.1. The requirements of this module pertain to the operation of hazardous waste container storage and processing areas (also referred to as container management areas) at the facility. The Permittee shall comply with all requirements established in this permit when storing or treating any wastes or other materials in the container management areas, including those which do not carry an EPA waste code (e.g., industrial waste, exempt hazardous waste, site generated waste, non-hazardous waste, etc.).

3.A.2. The Permittee may store wastes, as outlined in this module, in the container storage and processing areas specified below, up to the capacities listed. Storage of wastes in containers in any other areas is prohibited. For purposes of determining compliance with the capacity limitations, all containers shall be considered to be full to their respective capacities.

- a. Receiving and holding floor area in building E-1 -- 1,048 55-gallon containers or 57,640 gallons. Unless a row, or part of a row, is clearly marked differently by a prominent display (i.e., storage, transship, OFFC, reject) in Building E-1, it will be considered to be in receiving mode.
- b. Receiving and holding floor area in building E-5 -- 1,160 55-gallon containers or 63,800 gallons. Unless a row, or part of a row, is clearly marked differently by a prominent display (i.e., storage, transship, OFFC, reject) in Building E-5, it will be considered to be in receiving mode.
- c. Receiving and holding floor area in building E-8 -- 2,304 55-gallon containers or 126,720 gallons. Unless a row, or part of a row, in Building E-8 is clearly marked differently by a prominent display (i.e., storage, transship, OFFC, reject), it will be considered to be in receiving mode.
- d. Building E-2 -- 1,524 55-gallon containers or 83,820 gallons (exclusive of the workstations).
- e. Workstations WS1, WS2, and WS3 in building E-2 -- four 55-gallon containers each or 220 gallons each.
- f. Building E-3 -- 2,930 55-gallon containers or 161,150 gallons (includes two safes in row F each with a capacity of 55 gallons).
- g. Building E-6 -- 2,096 55-gallon containers or 115,280 gallons.
- h. Building E-7 -- 2,792 55-gallon containers or 153,560 gallons.

- i. Building E-4 -- 1,644 55-gallon containers or 90,420 gallons (exclusive of the repack area and decant area).
- j. Repack area in building E-4 -- four 55-gallon containers or 220 gallons.
- k. Decant area in building E-4 -- four 55-gallon containers or 220 gallons.
- l. Breezeway -- 256 55-gallon containers or 14,080 gallons (176 55-gallon containers or 9,680 gallons on the breezeway and 80 55-gallon containers or 4,400 gallons on the conveyors).
- m. Drive through direct burn station -- one direct burn tanker in the eastern half of the drive through area, designated as T-411 and up to 12 55-gallon containers, designated as T-411D1, T-411D2, or T-411D3, staged for transfer to a tanker (7,500 gallons total). This area may also be used to store a trailer or large bulk container as long as the total volume does not exceed this capacity.
- n. Drive through corrosive direct burn station -- one direct burn tanker or 16 bulk liquid totes / pallets of smaller containers in the western half of the drive through area, designated as T-415 (up to a total of 7,500 gallons). This area may also be used to store a trailer or large bulk container as long as the total volume does not exceed 7,500 gallons.
- o. Truck unloading direct burn station (east, center, and west bays of truck unloading) as follows:
  - EAST BAY -- one direct burn tanker designated as T-413 (7,500 gallons) OR 144 55-gallon containers on pallets (7,920 gallons),
  - CENTER BAY -- one direct burn tanker designated as T-414 (7,500 gallons) OR 72 55-gallon containers on pallets (3,960 gallons), and
  - WEST BAY -- one direct burn tanker designated as T-416 (7,500 gallons) OR 72 55-gallon containers on pallets (3,960 gallons).

These areas may also be used to store a trailer or large bulk container as long as the total volume does not exceed 7,500 gallons in any of the three bays.

- p. E-1 and E-5 receiving docks -- 140 55-gallon containers or 7,700 gallons on pallets on each dock. Three refrigerated trailers may be parked per dock and each refrigerated trailer may store 84 55-gallon containers or 4,620 gallons (252 55-gallon containers or 13,860 gallons combined). The largest bulk container that may be stored in the E-1 or E-5 receiving docks is 4,888 gallons. For determining remaining dock capacity, the capacity of any bulk containers and containers in a refrigerated trailer is subtracted from the total dock capacity (13,860 gallons).

- q. E-8 receiving docks -- 200 55-gallon containers or 11,000 gallons on pallets. Refrigerated trailers may be parked at each dock and each refrigerated trailer may store 84 55-gallon containers or 4,620 gallons (420 55-gallon containers or 23,100 gallons combined). The largest bulk container that may be stored in the E-8 receiving docks is 4,888 gallons. For determining the remaining dock capacity, the capacity of any bulk containers and containers in a refrigerated trailer is subtracted from the total dock capacity (23,100 gallons).
- r. Cylinder storage area and cylinder feed station combined -- 800 9" diameter by 52" high, compressed gas cylinders or equivalent.
- s. Cylinder feed station -- 20 9" diameter by 52" high, compressed gas cylinders or equivalent, or up to 6000 gallons in one compressed gas container, such as a tanker. This capacity does not include a cylinder or cylinders in the glove box. The glove box at the cylinder feed station will only be used in emergency situations (i.e., leaking cylinders). The glove box will remain empty at all other times.
- t. Slag pad east of the bulk solids maintenance bay --12 55-gallon containers or 660 gallons; equipped with portable secondary containment.
- u. Drum pumping station -- 4 55-gallon containers or 220 gallons.
- v. Bulk solids/sludge pad/sludge pad direct burn station with the direct burn tanker designated as T-412 -- 144 55-gallon containers or 7,920 gallons in containers on pallets; 23,760 gallons in large or bulk containers, including bulk liquid totes.
- w. Laboratory Cooler -- 2 55-gallon containers or 110 gallons equipped with portable secondary containment.
- x. Building 68 -- 56 55-gallon containers or 3,080 gallons.
- y. Building 69 -- 56 55-gallon containers or 3,080 gallons.
- z. Building 70-East -- 32 55-gallon containers or 1,760 gallons.
- aa. Building 70-West -- 32 55-gallon containers or 1,760 gallons.
- bb. Building 71-East -- 32 55-gallon containers or 1,760 gallons.
- cc. Building 71-West -- 32 55-gallon containers or 1,760 gallons.
- dd. Shred tower storage racks -- 120 55-gallon containers or 6,600 gallons.
- ee. Shred tower conveyor -- 24 55-gallon containers or 1,320 gallons.

ff. ATF magazines -- three storage magazines, 30,000 pounds each for a total of 90,000 pounds.

gg. Drum pump storage -- 12 55-gallon containers or 660 gallons; equipped with portable secondary containment.

3.A.3. The Permittee may perform only the following treatment or processing operations to wastes in containers, and only in the container management areas listed below. Any other treatment or processing of waste in containers in the container management areas, or any treatment or processing of waste in containers in any other areas is prohibited.

- a. Repack area in building E-4 (decanting, repacking, liquid bulk-up, and absorption/solidification, as described in Attachment 8).
- b. Decant room in building E-4 (decanting only, as described in Attachment 8).
- c. Workstations WS1, WS2, and WS3 in building E-2 (decanting, repacking, lab pack inspection, lab pack repacking, lab pack solidification, liquid bulk-up, compatibility testing, and debris processing, as described in Attachment 8).
- d. Tipper and Decanter in building E-2 (repackage sharps and/or infectious waste, as described in Attachment 8).
- e. E-1, E-5, and E-8 (consolidation or repacking of containers that doesn't involve exposing waste to the atmosphere, as described in Attachment 8).
- f. Drive through direct burn station (decanting only, as described in Attachment 8).
- g. Bulk solids building shredder (shredding only, as described in Attachment 8).
- h. The Permittee may transfer wastes from one tanker to another within secondary containment.
- i. Feed wastes to the kiln from the drive through direct burn station, the truck unloading direct burn station, the sludge pad direct burn station, the drum pumping (educt) station, and to the afterburner from the corrosive drive through direct burn station and the compressed gas cylinder feed station, as described in Attachment 8.
- j. Shred tower (shred containers and pallets and feed them to the incinerator, as described in Attachment 8).

3.B. OPERATION AND MAINTENANCE

- 3.B.1. The Permittee shall maintain the container management areas and secondary containment systems as constructed and in accordance with the drawings contained in Attachment 10.
- 3.B.2. Modifications to the drawings for the container management areas and secondary containment systems shall be allowed only in accordance with the permit modification requirements in Condition 1.D.
- 3.B.3. The Permittee shall not proceed with construction or installation of a new or modified container management area or secondary containment system without the approval of the Director of the Division of Waste Management and Radiation Control (Director) unless construction is allowed as outlined in Condition 1.D.
- 3.B.4. The Permittee shall maintain the container storage and processing areas and any ancillary equipment and secondary containment systems in good repair. The Permittee shall perform routine maintenance at sufficient frequency to ensure that the container storage and processing areas and any ancillary equipment and secondary containment systems remain in good repair. The Permittee shall correct malfunctions and deterioration as expeditiously as possible.
- 3.B.5. The Permittee shall design, construct, maintain, and operate the container management areas and secondary containment systems to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden discharge of hazardous waste or hazardous waste constituents to the air, soil, groundwater, surface water or any other location which could threaten human health or the environment.
- 3.B.6. The Permittee shall comply with the provisions specified in Attachment 8 -- Waste Storage, Processing, and Tracking.

3.C. PERMITTED AND PROHIBITED WASTES

- 3.C.1. The Permittee may store, treat, or both in the container storage and processing areas the wastes identified in Condition 2.C.1. unless prohibited in Condition 3.C.2. through 3.C.10. subject to the requirements of this permit.
- 3.C.2. The Permittee shall not store or treat any waste or material identified in Condition 2.C.2 in any of the container storage and processing areas at any time.
- 3.C.3. The Permittee shall not store liquids with a flash point less than or equal to 140 °F in any of the container management areas except buildings E-6, E-7, and E-8. However, these may be located in the following locations for a period of up to ten days as part of the process for staging feed to the incinerator or other processing operations:

- a. The receiving and holding floor areas of buildings E-1 and E-5,
- b. Building E-4,
- c. The repack room or decant room in building E-4,
- d. The breezeway,
- e. Building E-2 F row (limited to those in inner containers that will not be opened in the repacking process),
- f. Building E-2 G row (limited to those in inner containers that will not be opened in the repacking process),
- g. Drive through direct burn station,
- h. Drive through corrosive direct burn station,
- i. Truck unloading direct burn station,
- j. Bulk solids/sludge pad,
- k. Buildings E-1, E-5, and E-8 receiving docks,
- l. Slag pad east of the bulk solids maintenance bay,
- m. Drum pumping storage area,
- n. Drum pumping (educt) station,
- o. Shred tower storage racks,
- p. Shred tower conveyor.

The Permittee may only process liquids with a flash point less than or equal to 140 °F in the repack area or decant room in building E-4 as described in Condition 3.A.3.

The Permittee may store controlled substances (as characterized by Category Code 6 in Table 2 of Attachment 1, the Waste Analysis Plan), that also contain liquids with a flash point less than or equal to 140 °F in the building E-3 safes.

The Permittee may store infectious wastes (as characterized by Category Code 7a or 7b in Table 2 of Attachment 1, the Waste Analysis Plan), that also contain liquids with a flash point less than or equal to 140 °F in a refrigerated trailer in one of the container building docks.

If the Permittee anticipates periods where the capacity in buildings E-6, E-7, and E-8 may not be adequate, such as during turn around periods where waste is not being incinerated, or other non-planned events that may result in higher volumes of these materials on site, the Permittee may use locations in the breezeway, E-4, and shred tower storage racks which will be designated by a prominent display, on a temporary basis, only after providing oral notification to the Director followed by written notification within seven days and only when buildings E-6, E-7, and E-8 are at capacity. The Permittee shall prioritize the processing of these materials stored in the breezeway, E-4 and the shred tower storage racks in order to minimize the time these materials are stored in areas other than E-6, E-7, and E-8. The Permittee shall notify the Director in writing within 72 hours of these materials stored in the breezeway, E-4, and shred tower storage racks being

processed and indicate in the notice that all further storage of these materials is reverting solely back to buildings E-6, E-7, and E-8.

3.C.4. The Permittee shall not store cyanide or sulfide bearing waste as described in Utah Administrative Code (UAC) R315-261-23(a)(5) in any of the container management areas except buildings 70-East, 70-West, 71-East, and 71-West, with the exception outlined below. However, the Permittee may store these wastes in the following locations for a period of up to ten days as part of the process for staging feed to the incinerator or other processing operations:

- a. The receiving and holding floor areas of buildings E-1, E-5, and E-8,
- b. Building E-4,
- c. The repack room or decant room in building E-4,
- d. The workstations in building E-2,
- e. The breezeway,
- f. Drive through direct burn station,
- g. Drive through corrosive direct burn station,
- h. Truck unloading direct burn station,
- i. Bulk solids/sludge pad,
- j. Sludge pad direct burn station,
- k. Buildings E-1, E-5, and E-8 receiving docks,
- l. Slag pad east of the bulk solids maintenance bay,
- m. Drum pumping storage area,
- n. Drum pumping (educt) station,
- o. Shred tower storage racks,
- p. Shred tower conveyor.

The Permittee shall not store other materials which are potentially incompatible with these materials in the same area as these materials.

If the Permittee anticipates periods where the capacity in buildings 70-East, 70-West, 71-East, and 71-West may not be adequate, such as during turn around periods where waste is not being incinerated, or other non-planned events that may result in higher volumes of these materials on site, the Permittee may use locations in the breezeway and in buildings E-2, E-3, and E-4 which will be designated by a prominent display, on a temporary basis, only after providing oral notification to the Director followed by written notification within seven days and only when buildings 70-East, 70-West, 71-East, and 71-West are at capacity. The Permittee must keep these containers on containment pallets while stored in buildings E-2 and E-3. Additionally, the whole rack segment must only contain that material. A rack segment is defined as the two adjacent pallet spaces on all three levels. The Permittee shall prioritize the processing of these materials stored in the breezeway and in buildings E-2, E-3, and E-4 in order to minimize the time these materials are stored in areas other than buildings 70-East, 70-West, 71-East, and 71-West. The Permittee shall notify the Director in writing within 72 hours of these materials stored in the breezeway and in buildings E-2, E-3, and

E-4 being processed and indicate in the notice that all further storage of these materials is reverting solely back to buildings 70-East, 70-West, 71-East, and 71-West.

3.C.5. The Permittee shall not store oxidizers as described in UAC R315-261-21(a)(4) in any of the container management areas except buildings 68 and 69, with the exception outlined below. However, the Permittee may store these wastes in the following locations for a period of up to ten days as part of the process for staging feed to the incinerator or other processing operations:

- a. The receiving and holding floor areas of buildings E-1, E-5, and E-8,
- b. Building E-4,
- c. The repack room or decant room in building E-4,
- d. The workstations in building E-2,
- e. The breezeway,
- f. Drive through direct burn station,
- g. Drive through corrosive direct burn station,
- h. Truck unloading direct burn station,
- i. Bulk solids/sludge pad,
- j. Sludge pad direct burn station,
- k. Slag pad east of the bulk solids maintenance bay,
- l. Buildings E-1, E-5, and E-8 receiving docks,
- m. Drum pumping storage area,
- n. Drum pumping (educt) station.

The Permittee shall not store other materials which are potentially incompatible with these materials in the same area as these materials.

If the Permittee anticipates periods where the capacity in buildings 68 and 69 may not be adequate, such as during turn around periods where waste is not being incinerated, or other non-planned events that may result in higher volumes of these materials on site, the Permittee may use locations in the breezeway and in buildings E-2, E-3, and E-4, which will be designated by a prominent display, on a temporary basis, only after providing oral notification to the Director followed by written notification within seven days and only when buildings 68 and 69 is at capacity. The Permittee must keep these containers on containment pallets while stored in the breezeway and in buildings E-2, E-3, and E-4. Additionally, the whole rack segment must only contain that material. A rack segment is defined as the two adjacent pallet spaces on all three levels. The Permittee shall prioritize the processing of these materials stored in the breezeway and in buildings E-2, E-3, and E-4 in order to minimize the time these materials are stored in areas other than buildings 68 and 69. The Permittee shall notify the Director in writing within 72 hours of these materials stored in the breezeway and in buildings E-2, E-3, and E-4 being processed and indicate in the notice that all further storage of these materials is reverting solely back to buildings 68 and 69.



- 3.C.6. The Permittee shall not store compressed gas cylinders in any of the container management areas except the compressed gas cylinder storage area and the cylinder feed station. However, the Permittee may off-load compressed gas cylinders into buildings E-1, E-5, or E-8 and place them into racks while in E-1, E-5, or E-8. Compressed gas cylinders shall not remain in buildings E-1, E-5, or E-8 more than 24 hours from the time the cylinders are off-loaded before being transferred to the cylinder storage area.
- 3.C.7. The Permittee shall not store water reactive wastes in the drum pumping storage area or the drum pumping station at any time.
- 3.C.8. The Permittee shall limit wastes or materials stored or processed through the drive through corrosive direct burn system to corrosives, Class IB and IC flammable liquids, combustible liquids, highly toxic and toxic material, where these are defined in the International Fire Code.
- 3.C.9. The Permittee shall limit waste or materials processed through the sludge pad direct burn system to those with a flash point above 140 °F.
- 3.C.10. The Permittee shall not process in the shred tower, oxidizers, infectious waste, explosives, water reactives, and compressed gas cylinders.

3.D. OPERATING REQUIREMENTS

- 3.D.1. If a non-cylinder container holding hazardous waste, except for waste carrying the P999 waste code, is not in good condition (e.g., severe rusting, bulging, apparent structural defects) or it begins to leak, the Permittee shall transfer the hazardous waste from such container, or the container of hazardous waste itself, to a DOT acceptable container in accordance with Attachment 8, as soon as possible, but no later than two hours from the time the problem was first discovered. If a compressed gas cylinder is determined to be leaking, the Permittee shall transfer the leaking gas cylinder to the glove box at the cylinder feed station where it will be allowed to leak into the glove box while the glove box is exhausted to the incinerator. If the incinerator is down when a cylinder is leaking, the Permittee shall transfer the cylinder to an isolated portion of the property and allow it to leak until empty. If a container holding waste carrying the P999 waste code is not in good condition or begins to leak, the Permittee shall follow Condition 3.D.25.
- 3.D.2. The Permittee shall assure that wastes or other materials in containers are compatible with the containers. Containers must be made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste stored in them, so that the ability of the containers to contain the waste is not impaired.
- 3.D.3. The Permittee shall not place incompatible waste or materials in the same container.

- 3.D.4. The Permittee shall not place hazardous waste or materials in an unwashed container that previously held an incompatible waste or material.
- 3.D.5. The Permittee shall separate a container holding a waste that is incompatible with any waste or other material from the other waste or material by placing it in building 68, 69, 70-East, 70-West, 71-East, or 71-West as appropriate. The Permittee shall not store incompatible wastes in the container management areas identified in Condition 3.A.2.a. through q., t. through w., and dd. through gg. except under the limited circumstances outlined in Condition 3.C.4. The Permittee shall store compressed gas cylinders in racks in the cylinder storage area with compatible materials in each rack. Cylinder compatibility and rack separation shall be in accordance with the International Fire Code.
- 3.D.6. The Permittee shall ensure all containers are closed except when adding or removing wastes or treatment reagents, as allowed by this permit, to or from the containers. Containers of waste identified by the P999 waste code must remain closed at all times while at the facility but may have the retaining ring or other device securing the lid or cover to the container, loosened for safety reasons, as necessary, immediately prior to being fed to the incinerator. For overpacks identified by the P999 waste code, both the inner lid and outer lid may be loosened immediately prior to being fed to the incinerator.
- 3.D.7. The Permittee shall conduct ventilation of open containers in accordance with Attachment 14.
- 3.D.8. The Permittee shall not open, handle, store, or manage containers in a manner which may rupture the containers or cause them to leak.
- 3.D.9. The Permittee shall unload any transport vehicle carrying containers within ten days of being received at the facility. In the event the Permittee cannot unload a received vehicle within the ten days, the Permittee may request oral approval from the Director to extend the timeframe on a temporary basis. This approval shall be followed by written notification to the Director within seven days of the oral approval. The Permittee shall place small containers in the receiving and holding floor areas of buildings E-1, E-5, or E-8 when the row is in receiving mode, or in the temporary extensions of the receiving areas outlined in Attachment 8 until the material has been accepted. The Permittee may place bulk containers in the drive through direct burn station (tankers only), the drive through corrosive direct burn station (a tanker or a bulk liquid tote only), the truck unloading direct burn station (tankers only), the bulk solids/sludge pad, the sludge pad direct burn station (a tanker or a bulk liquid tote only), or the E-1, E-5, and E-8 receiving docks prior to acceptance. The Permittee may place compressed gas cylinders and tankers into the cylinder storage area prior to acceptance. The Permittee shall clearly identify those cylinders and tankers in the cylinder storage

area that are not yet accepted in a unique manner from those cylinders and tankers that have been accepted.

- 3.D.10. The Permittee shall maintain sufficient aisle space in the container management areas to allow the unobstructed movement of personnel, fire protection equipment, discharge control equipment, and decontamination equipment to all areas of the container management areas. The Permittee shall maintain sufficient aisle space such that access can be made to each container to check for leaks, container damage or deterioration, and to view the barcode label. The Permittee shall place containers and maintain aisle space, as shown on drawings D-034-M-401, D-800-M-402, D-800-M-502, and D-800-M-403 in Attachment 10. For larger bulk containers (such as tankers or rolloffs) being stored on the bulk solids/sludge pad, one bulk container occupies the same space as one row of six pallets shown on drawing D-800-M-403. For bulk containers with a similar footprint as a pallet (such as a bulk liquid tote or Flo-bin), the bulk container occupies the same space as one pallet of drums. The Permittee shall store bulk containers in the same locations as the pallets or rows of pallets indicated on drawing D-800-M-403. For larger bulk containers (such as tankers or rolloffs) being stored in the E-1, E-5, and E-8 receiving docks, one bulk container occupies the same space as two rows of five pallet locations shown on drawing D-800-M-402. For bulk containers with a similar footprint as a pallet (such as a bulk liquid tote or Flo-bin), the bulk container occupies the same space as one pallet of drums. For the truck unloading direct burn station, the Permittee shall not store any containers on pallets in a bay at the same time as a bulk container is being stored in the bay.
- 3.D.11. The Permittee shall not locate containers holding ignitable or reactive waste, including those which have not yet been accepted, within 50 feet of the facility's property line.
- 3.D.12. No smoking shall be allowed within 50 feet of any of the container management areas. The Permittee shall take precautions to prevent accidental ignition or reaction of waste. The Permittee shall separate and protect waste from sources of ignition or reaction including, but not limited to: open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., from heat-producing chemical reactions), and radiant heat. Such sources of ignition shall be allowed only after adequate additional precautions have been taken to prevent ignition of wastes or other materials and a hot work permit has been issued. Notwithstanding this condition, a hot work permit is not required for performing storage and acceptance (fingerprint) analyses within the hoods of the E-5 and E-8 fingerprint areas.
- 3.D.13. The Permittee shall maintain a record of the location of each container in the container storage areas. The Permittee shall maintain a history of the movement of each container of waste from the time it is placed into one of the container management areas until it is either incinerated or manifested off-site. The

Permittee shall comply with the waste tracking provisions in Attachment 8. The Permittee shall provide access to the electronic waste tracking system portion of the operating record for the Director to review. The Permittee shall make available a remote link to the computer system and the appropriate query system for accessing the required data. Data to be accessible include manifest information, profile information, processing waste class code, final code dates for wastes that have been accepted or rejected, load sample analyses, weights, current locations, movement histories, and the dates/times incinerated or transferred off-site. The Permittee shall provide queries to access the information for individual drums, manifests, EPA ID numbers, lot numbers, and profiles. The Permittee shall also provide the information for containers based on location at the facility, status (rejects, infectious wastes, etc.), and characteristics (ignitables, cyanides, sulfides, oxidizers, corrosives, reactives, etc.).

- 3.D.14. The Permittee may accept and manage several small containers which have been shrink-wrapped or otherwise bound together and attached to a pallet and shipped as a single container at the facility as one container. If the containers on a pallet are not bound as described above, the Permittee shall manage them as individual containers.
- 3.D.15. The Permittee shall store containers, not including gas cylinders and bulk containers, on pallets. The Permittee will store compressed gas cylinders in racks as outlined below. Containers on pallets shall be stored on racks where available and as outlined below. Where racks are not available, containers may be stacked on pallets as outlined below. The Permittee shall neatly stack and/or wrap containers to provide stability and in a manner that will not cause them to fall or leak.
- a. For large containers ( $\geq$  50-gallon capacity) the maximum stacking height per pallet is one container. For small containers (<50-gallon capacity), the maximum stacking height per pallet is 48 inches.
  - b. Containers shall not be stacked more than:
    - three pallets high in buildings E-2 (exclusive of the workstations and spaces 1 through 12 in row G), E-3 (exclusive of safes in spaces 4 and 5 in row F), E-4 (exclusive of the decant area and repack area), E-7 (exclusive of row F, space 19), E-6 (exclusive of space 24 in D and F rows, and spaces 1 through 4 in row H), and the shred tower storage racks;
    - two pallets high in storage and transship rows of buildings E-1, E-5, and E-8, space 24 in D and F rows of building E-6, truck unloading direct burn, the refrigerated trailers parked in E-1, E-5, or E-8 receiving docks, the breezeway, spaces 1 through 12 in row G of building E-2, space 19 in row F of building E-7, and buildings 68, 69, 70-East, 70-West, 71-East, and 71-West;
    - one pallet high in the rows of buildings E-1, E-5, and E-8 that are not designated as storage or transship, E-1, E-5, and E-8 receiving docks, bulk solids/sludge pad, laboratory cooler, WS1-WS3, the decant area and repack

area in building E-4, the safes in spaces 4 and 5 in row F of building E-3, spaces 1 through 4 in row H of building E-6, slag pad east of the bulk solids maintenance bay, the drum pumping storage area, the drum pumping station, the drive through direct burn station, and the drive through corrosive direct burn station;  
any closer than eight inches of the ceiling in the ATF explosives magazines.

- c. Containers placed or stacked on the feed conveyors need not be on pallets. If they are stacked, they must be stacked in such a way that they will not fall as they move on the conveyor. Stacking height is limited to 48 inches on the conveyors.
- d. Containers that have been legally shipped but do not meet the height limitations specified in Condition 3.D.15.a. may be off-loaded and held in the receiving and holding floor areas of buildings E-1, E-5, or E-8 when the row is in receiving mode. However, they must be reconfigured to meet the size requirements prior to placement in any of the other container management areas.
- e. The Permittee shall store compressed gas cylinders in racks containing compatible gases, with different types of gases separated in accordance with the International Fire Code. The Permittee shall secure the cylinders to prevent falling as described in the International Fire Code. The Permittee may also store compressed gas in bulk containers, such as a tanker.

- 3.D.16. The Permittee shall prepare and maintain on site an infectious waste management plan that addresses the applicable requirements of UAC R315-316-2.
- 3.D.17. Except for sharps, the Permittee shall contain infectious waste in plastic bags or inside rigid containers. The bags shall be securely tied, and the containers shall be securely sealed to prevent leakage or expulsion of solid or liquid wastes during storage and handling.
- 3.D.18. The Permittee shall contain infectious waste sharps for storage, handling, and treatment in leak-proof, rigid, puncture-resistant containers which are taped closed or tightly lidded to preclude loss of contents.
- 3.D.19. All containers for containment of any infectious waste shall be red or orange, or if containers are not red or orange, shall be clearly identified with the international biohazard sign and one of the following labels: "INFECTIOUS WASTE," "BIOMEDICAL WASTE," or "BIOHAZARD."
- 3.D.20. The Permittee may reuse a rigid infectious waste container for infectious or non-infectious waste if it is thoroughly washed and decontaminated each time it is emptied or if the surfaces of the container have been completely protected from contamination by disposable, unpunctured, or undamaged liners, bags or other

devices that are removed with the infectious waste, and the surface of the liner has not been damaged or punctured.

- 3.D.21. The Permittee must protect infectious waste in storage and containment areas from the elements; ventilate to the outside; only allow access to authorized persons; and mark with prominent warning signs on, or adjacent to, the exterior doors or gates. The warning signs shall contain the international biohazard sign and shall state: "CAUTION - INFECTIOUS WASTE STORAGE AREA - UNAUTHORIZED PERSONS KEEP OUT" and must be easily read during daylight from a distance of 25 feet.
- 3.D.22. If infectious waste is on site longer than seven days, the Permittee shall store it at or below 40 degrees Fahrenheit.
- 3.D.23. The Permittee shall incinerate infectious waste as soon as possible, but not to exceed 60 days after collection from the generator.
- 3.D.24. The Permittee shall maintain the foam-water fire protection system to each of the E-6, E-7, and E-8 container storage buildings.
- 3.D.25. If a container holding waste identified by the P999 waste code is not in good condition (e.g., it exhibits severe rusting, bulging, apparent structural defects) or it begins to leak, the Permittee shall immediately secure the area around the container and prohibit access to the area. The Permittee shall immediately notify the generator of the waste and request the generator's assistance in responding to the situation. The Permittee shall prohibit access to the container in question until the generator advises the Permittee on proper management of the situation. The Permittee may approach the container and conduct the necessary response/cleanup activities only after the generator has advised the Permittee and recommended that the Permittee respond. The Permittee shall comply with Condition 3.D.1., using the generator, if necessary, to contain, collect and repackage the waste. The Permittee shall also orally notify the Director within 24 hours of discovering the problem/leak. The Permittee shall document these notifications, the generator's advice, and all cleanup and response activities in the facility operating record.
- 3.D.26. When the bulk solids/sludge pad or slag pad east of the bulk solids maintenance bay is being used to store waste, the Permittee shall protect it with physical barriers sufficient to prevent vehicular damage to containers in the storage areas. The Permittee shall also operate the bulk solids/sludge pad/sludge pad direct burn station in a manner that permits access to, and the movement of personnel, fire protection equipment, discharge control equipment, and decontamination equipment to all areas of the container storage pad while also allowing the necessary access to adjacent waste management units.

3.D.27. The Permittee shall use the three ATF magazines to store 1.3G explosive materials. The ATF magazines may also be used to store 1.4 explosive materials. The Permittee may use the magazines to store unaccepted explosive materials as the facility works to resolve a discrepancy or is in the process of rejecting the waste back to the generator or alternate facility.

3.D.28. The Permittee will place Division 1.3G explosive wastes onto a burn plan as soon as practical and feed directly to the incinerator. The Permittee will offload, evaluate for acceptance, accept, break pallets down if accepted, and stage for incineration, with incineration commencing within 48 hours of receiving a shipment of 1.3G explosives. If this process is interrupted and delayed for more than 24 hours, the Permittee will store wastes in one or more of the on-site ATF storage magazines and waste feed rescheduled.

3.E. CONTAINMENT

3.E.1. The Permittee shall operate and maintain the secondary containment systems so that they are free of both cracks and gaps and are sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

3.E.2. The Permittee shall empty all liquid and remove accumulated waste from a sump or secondary containment area no later than 24 hours after discovering the contents. The Permittee shall consider all liquids and other materials collected from a sump or secondary containment area a hazardous waste and manage appropriately.

3.E.3. The Permittee shall maintain containment for 10% of the maximum capacity volume of containers or the volume of the largest container, whichever is greater, for each container management area identified in Condition 3.A.2., except for the cylinder storage area and cylinder feed station, which require no secondary containment.

3.F. DIRECT BURN TANKERS (DRIVE THROUGH DIRECT BURN STATION AND TRUCK UNLOADING DIRECT BURN STATION)

3.F.1. The Permittee shall park or place tankers of waste to be fed through the drive through direct burn system and containers to be decanted to a tanker within the drive through direct burn station secondary containment (eastern half of the former loadout area south of the slag pad). The Permittee shall park tankers of waste to be fed from the truck unloading direct burn system in the east, center, or west bays of the truck unloading building. See drawing D-034-M-002.

3.F.2. The Permittee shall track wastes stored in either direct burn tanker station (drive through or truck unloading) or fed from either tanker to the kiln in accordance with Attachment 8.

- 3.F.3 The Permittee shall maintain and operate the drive through and truck unloading direct burn tanker systems in accordance with Attachments 8 and 10.
- 3.F.4 The Permittee shall make modifications to the operation of the drive through and truck unloading direct burn tanker systems in accordance with Condition 1.D.
- 3.F.5 The Permittee shall nitrogen blanket the drive through and truck unloading direct burn tankers.
- 3.F.6 The Permittee shall ground the drive through and truck unloading direct burn tankers prior to and during feeding, filling, or both.
- 3.F.7 The Permittee shall comply with UAC R315-266-111(d)(2). The Permittee shall obtain certification by the local Fire Marshall prior to the Permittee placing the drive through and truck unloading direct burn tanker systems into operation.
- 3.F.8 As viewed from an area between the afterburner and front wall of the kiln, the Permittee shall always maintain clear visibility of the direct burn tanker and the manifold/pump area of the drive through direct burn station when waste is present in the unit. Any time waste is present in the unit, the Permittee shall maintain a view of the direct burn tanker and the manifold/pump area of the truck unloading direct burn station through a video camera connected to a monitor in the control room. The Permittee shall ensure an operator is present at the decant area whenever decant operations are occurring in the drive through direct burn station.
- 3.F.9 The Permittee may feed wastes from either the drive through direct burn system or the truck unloading direct burn system to either the sludge lance (A-103) or to the direct burn lance (A-101). While feeding wastes from either the drive through direct burn system or the truck unloading direct burn system to the sludge lance (A-103), the Permittee shall isolate the lines from the sludge recirculation line to prevent ignitable or incompatible wastes from entering either of the sludge storage tanks (T-401 or T-406). Following the feeding of wastes from either the drive through direct burn system or the truck unloading direct burn system to the sludge lance (A-103), the Permittee shall adequately flush the lines with an appropriate solvent to prevent ignitable or incompatible wastes from entering either of the sludge storage tanks (T-401 or T-406).
- 3.F.10 When using the vacuum pump to decant from a container to a direct burn tanker, the vacuum pump shall automatically shut down and decant operations shall cease when the LEL measurement of the combined dilution air and vacuum pump vent reach 60% LEL.
- 3.F.11 When the backup carbon adsorption system is being used, no vacuum pump transfer of waste from a container to a tanker is allowed.



3.G. DIRECT BURN FROM A CONTAINER

- 3.G.1. The Permittee shall place containers of waste to be fed through the drum pumping station inside the glove box at the drum pumping station. See drawing D-034-M-002. The Permittee shall seal and vent the glove box prior to opening the drums or feeding to the kiln when processing flammable liquids, oxidizers, toxic and highly toxic materials.
- 3.G.2. The Permittee shall track wastes processed through the drum pumping station in accordance with Attachment 8.
- 3.G.3. The Permittee shall maintain and operate the drum pumping station in accordance with Attachments 8 and 10.
- 3.G.4. The Permittee shall modify the operation of the drum pumping station in accordance with Condition 1.D.
- 3.G.5. The Permittee shall ground all containers holding flammable liquids at the drum pumping station prior to and while the waste is being fed to the kiln from the drum pumping station. The Permittee shall ground the glove box and feed system according to supplier recommended practice.
- 3.G.6. The Permittee shall comply with UAC R315-266-111(d)(2). The Permittee shall obtain certification by the local Fire Marshall prior to placing the drum pumping station into operation.
- 3.G.7. The Permittee shall flush the drum pumping feed station feed system with an appropriate fluid prior to feeding an incompatible waste so that reactions will not occur in the feed system.
- 3.G.8. The Permittee shall use nitrogen blanketing as needed to prevent explosive atmospheres from developing in the glove box and piping system.
- 3.G.9. The Permittee shall vent the glove box to the afterburner. In the event that air to the eductor fails, air supply shall automatically switch to nitrogen to continue venting the glove box.
- 3.G.10. The Permittee shall equip the glove box with a fire detection system and a CO<sub>2</sub> fire suppression system. The Permittee shall maintain this system to immediately extinguish any fire in the glove box.
- 3.G.11. The Permittee shall equip the glove box with an LEL sensor and alarms to provide warnings prior to the development of potentially explosive situations. The Permittee shall use these alarms and take appropriate corrective actions to prevent fires and explosions.

- 3.G.12. The Permittee shall equip the glove box with explosion panels designed to protect workers in the area.
- 3.G.13 When the drum pumping station storage area is in use, the Permittee shall protect it with physical barriers sufficient to prevent vehicular damage to containers in the area. The Permittee shall maintain the drum pumping station storage area is clear of equipment, containers, debris, or other objects such that access to, and the movement of personnel, fire protection equipment, discharge control equipment, and decontamination equipment to all areas of the container storage area will not be impeded.
- 3.H. CORROSIVE DIRECT BURN TANKERS AND TOTES (DRIVE THROUGH CORROSIVE DIRECT BURN STATION)
- 3.H.1. The Permittee shall park or place tankers or bulk liquid totes of waste to be fed through the drive through corrosive direct burn system within the drive through corrosive direct burn station secondary containment (western half of the former loadout area south of the slag pad). See drawing D-034-M-002.
- 3.H.2. The Permittee shall track wastes stored in or fed from the drive through corrosive direct burn station in accordance with Attachment 8.
- 3.H.3. The Permittee shall maintain and operate the drive through corrosive direct burn station in accordance with Attachments 8 and 10.
- 3.H.4. The Permittee shall modify the operation of the drive through corrosive direct burn station in accordance with Condition 1.D.
- 3.H.5 The Permittee shall nitrogen blanket all tankers and bulk liquid totes in the drive through corrosive direct burn station.
- 3.H.6. The Permittee shall ground all tankers and bulk liquid totes in the drive through corrosive direct burn station while being fed to the incinerator.
- 3.H.7. The Permittee shall comply with UAC R315-266-111(d)(2). The Permittee shall obtain certification by the local Fire Marshall prior to placing the drive through corrosive direct burn station into operation.
- 3.H.8. Any time waste is present in the unit, the Permittee shall maintain a view of the corrosive direct burn tanker or tote and the manifold/pump area of the drive through corrosive direct burn station through a video camera connected to a monitor in the control room.
- 3.H.9. The Permittee may only feed wastes from the drive through corrosive direct burn station to the south afterburner burner location A-106B-5.

- 3.I. SLUDGE DIRECT BURN TANKERS AND TOTES (SLUDGE PAD DIRECT BURN STATION)
- 3.I.1. The Permittee shall place tankers or bulk liquid totes of waste to be fed through the sludge pad direct burn station within the sludge pad direct burn station secondary containment (northeast of the bulk solids tower and directly east of T-406 (see drawing D-034-M-002)).
- 3.I.2. The Permittee shall track wastes stored in the sludge pad direct burn station or fed from a tanker or bulk liquid tote to the kiln in accordance with Attachment 8.
- 3.I.3. The Permittee shall maintain and operate the sludge pad direct burn station in accordance with Attachments 8 and 10.
- 3.I.4. The Permittee shall modify the operation of the sludge pad direct burn station in accordance with Condition 1.D.
- 3.I.5. The Permittee shall nitrogen blanket the sludge pad direct burn tankers or bulk liquid totes.
- 3.I.6. The Permittee shall ground the sludge pad direct burn tankers or bulk liquid totes prior to and while being fed.
- 3.I.7. The Permittee shall comply with UAC R315-266-111(d)(2). The Permittee shall obtain certification by the local Fire Marshall prior to placing the sludge pad direct burn station into operation.
- 3.I.8. Any time waste is present in the unit, the Permittee shall maintain a view of the sludge pad direct burn tanker or bulk liquid tote and the manifold/pump area of the sludge pad direct burn station through a video camera connected to a monitor in the control room.
- 3.I.9. The Permittee may feed wastes from the sludge pad direct burn station to either the sludge lance (A-103) or to the direct burn lance (A-101). While feeding wastes from the sludge pad direct burn station to the sludge lance (A-103), the Permittee shall isolate the lines from the sludge recirculation line to prevent ignitable or incompatible wastes from entering either of the sludge storage tanks (T-401 or T-406).
- 3.I.10. Following the feeding of wastes from the sludge pad direct burn station to the sludge lance (A-103), the Permittee shall adequately flush lines with an appropriate solvent to prevent ignitable or incompatible wastes from entering either of the sludge storage tanks (T-401 or T-406).

3.J. SHRED TOWER

- 3.J.1. The Permittee shall maintain and operate the shred tower system in accordance with the drawings and specifications contained in Attachment 10.
- 3.J.2. The Permittee shall maintain the shred tower and ancillary equipment in good repair. The Permittee shall perform routine maintenance at sufficient frequency to ensure that the shred tower remains in good repair. The Permittee shall correct malfunctions and deterioration as expeditiously as possible as outlined in Attachment 3.
- 3.J.3. The Permittee may feed hazardous wastes to the shred tower only when all instruments required by this condition are on-line and operating properly.
- 3.J.4. The Permittee shall maintain and operate the monitoring and recording equipment specified in Attachment 16 while shredding and feeding hazardous waste. The Permittee shall monitor and record the data in accordance with Attachment 16. The Permittee shall provide accurate data using the monitoring equipment specified in Attachment 16.
- 3.J.5. The Permittee shall calibrate the shred tower instruments in accordance with Attachment 13.
- 3.J.6. The Permittee shall operate the shred tower in such a way as to minimize the opening of the emergency relief vent(s).
- 3.J.7. The Permittee shall record all instances where the emergency relief vent(s) is/are opened in the operating record. The Permittee shall include a description of the cause of the opening and corrective actions implemented to prevent future occurrences in the operating record.
- 3.J.8. The Permittee shall record all instances where the CO<sub>2</sub> system and/or deluge system are activated in the operating record. The Permittee shall include a description of the cause of the activation and corrective actions implemented to prevent future occurrences in the operating record.
- 3.J.9. The Permittee shall operate and maintain a video recording system to record the containers fed to the shred tower. The system shall be capable of recording a legible picture of the tracking numbers of the containers fed.
- 3.J.10. The Permittee shall only operate the shred/feed system when the oxygen concentration in the shred chamber is less than 5%. If any shred chamber has greater than 5% oxygen, the Permittee shall stop the shredders, close the isolation valve between the kiln and shred system, and close the airlock exit door until the oxygen concentration drops below 4.5%.

- 3.J.11. The Permittee shall not feed containers to the shredders if the oxygen concentration in the airlock is greater than 5%. If the oxygen concentration in the airlock is greater than 5%, the Permittee shall close the airlock exit door until the oxygen concentration in the airlock has dropped below 4.5%.
- 3.J.12. The Permittee shall only operate the shred/feed system when the shred tower external LEL monitors read less than 10%. If any of the monitors reads greater than 10% LEL, the Permittee shall stop the shredders, close the isolation valve between the kiln and shred system, and close the airlock exit door until the LEL drops below 5%.
- 3.J.13. The Permittee shall vent the excess gases from the airlock and shred chambers, via a pressure blower, through a flame arrestor and discharge the excess gases directly into the afterburner. If the afterburner temperature drops below 1400 °F, the Permittee shall shut down the shred tower systems (except for the external conveyor systems).
- 3.J.14. The Permittee shall automatically shut down the shred auger feed system for all waste feed cutoffs identified as types 1 through 4 in Condition 5.F. When a waste feed cutoff identified as types 1 through 4 in Condition 5.F. occur, the Permittee will start a timer, and if it exceeds one minute, the Permittee shall automatically close the isolation valve. The Permittee shall reset the timer after each cutoff.
- 3.J.15. The Permittee shall inspect the shredding system in accordance with Attachment 3.