

MODULE III

STORAGE AND TREATMENT IN CONTAINERS

TABLE OF CONTENTS

	Page
MODULE III - STORAGE AND TREATMENT IN CONTAINERS	
III.A. APPLICABILITY.....	1
III.B. WASTE IDENTIFICATION.....	1
III.C. CONDITION OF CONTAINERS.....	1
III.D. COMPATIBILITY OF WASTE WITH CONTAINERS.....	2
III.E. MANAGEMENT OF CONTAINERS.....	2
III.F. CONTAINER MANAGEMENT BUILDING CONTAINMENT AREAS AND CAPACITIES.....	3
III.G. DRAIN AND FLUSH BUILDING WAREHOUSE ONE (DFBWO).....	4
III.H. BULK SOLID STORAGE AREA.....	4
III.I. LEACHATE BUILDING.....	5
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.N. CONSTRUCTION OF NEW UNITS.....	6
III.O. CLOSURE/POST CLOSURE.....	6
 ATTACHMENT III-1: CONTAINER MANAGEMENT BUILDING AND STORAGE AREA DRAWINGS	
 ATTACHMENT III-2: POLICY AND PROCEDURES FOR MANAGING HIGH VOC WASTES UNDER SUBPART CC	
 ATTACHMENT III-3: DRAIN & FLUSH BUILDING WAREHOUSE ONE AREA DRAWINGS	

MODULE III - STORAGE AND TREATMENT IN 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 Grassy Mountain facility. The Permittee shall comply with Utah Admin. Code R315-264-170 and all conditions of this permit. For the purposes of this permit, the Container Management Building, the Drain and Flush Building Warehouse One (DFBWO) the Bulk Solid Storage Areas (BSSA), and the Leachate Building are designated hazardous waste storage areas.
- III.A.2. All containers of hazardous waste shall be managed in accordance with this module.
- III.A.3. PCBs in containers shall be managed in accordance with Module X, the Waste Management Plan for Polychlorinated Biphenyls.
- III.A.4. When PCB wastes are stored in the Container Management Building, the conditions of this module are applicable.
- III.A.5. Containers of RCRA/TSCA waste may be stored in the permitted storage areas. Such containers are subject to the conditions of this module.
- III.A.6. Containers with the EPA waste code D001 (for ignitability) shall not be profiled to the Grassy Mountain Facility.
- III.A.7. Containers of Mercury waste shall be managed and processed into larger containers in the DFBWO - Mercury Processing and Storage Area A3.

III.B. WASTE IDENTIFICATION

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

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 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 Utah Admin. Code R315-264-171. This shall be completed as soon as possible, but no later than 24 hours from the time the problem was first discovered and noted in the Operating Record.

- III.C.2. Facility personnel shall ensure that the replacement containers referenced in Condition III.C.1. are sufficiently labeled to allow identification and tracking of the waste while it is managed at the facility.
- III.C.3. Contents of leaking or damaged containers may be emptied directly into treatment processes providing all appropriate fingerprint analyses, and additional analysis (if necessary) have been performed.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

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

III.E. MANAGEMENT OF CONTAINERS

- III.E.1. Containers shall always remain closed except when the Permittee is adding or removing material from containers as allowed by Utah Admin. Code R315-264-173. The Permittee shall not store or move containers in a way that may cause the containers to leak.
- III.E.2. The Permittee shall place the hazardous waste from the transport vehicle into storage or onto another transport vehicle for shipment to another facility within ten days from arrival at the site. Arrival, for purposes of this permit, will be the day the transport vehicle comes through the gate of the Grassy Mountain Facility.
- III.E.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.
- III.E.4. The Permittee may store 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 Utah Admin. Code R315-268-50 and a letter with the justification provided to the Director of the Division of Solid and Hazardous Waste.
- III.E.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. This certification statement shall be incorporated into the operating record.
- III.E.6. Should, upon arrival, a container tests positive for ignitability (D001), the Grassy Mountain Facility shall reject the container or obtain a new profile for continued management of the container, including shipment to another facility. Containers that have the EPA waste code D001 for ignitability shall be segregated on Top

Dock 1, not exceed 50 in number, and not remain at the Grassy Mountain Facility for longer than 30 days.

III.F. CONTAINER MANAGEMENT BUILDING CONTAINMENT AREAS AND CAPACITIES

- III.F.1. The Permittee shall manage the container management facilities in accordance with the Utah Admin. Code R315-264-175. For purposes of this section, a container shall be considered full when calculating the number of gallons stored. The Permittee may store the following quantities of hazardous wastes and/or RCRA/TSCA wastes:
- III.F.1.a. Dock 1 has a maximum capacity 18,850 gallons of liquid waste in containers. This area is also named as "Top Dock 1" or "TD01" in facility records.
- III.F.1.b. Pad 2 has a maximum capacity 66,000 gallons of waste in containers. This area is subdivided into two container management sub-areas 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.
- III.F.1.c. Pad 3A has a maximum capacity 20,900 gallons of waste in containers. This area is also referred to as "Top Dock 2" or "TD02" in facility records.
- III.F.1.d. Pad 3B has a maximum capacity 20,900 gallons of waste in containers. This area is also referred to as the "Sample Pad" or "SPAD" in facility records.
- III.F.1.e. Dock 1, Pad 2 and Pads 3A and 3B shall not be for 90-day storage or satellite storage areas.
- III.F.2. The minimum allowable aisle space shall be two feet six inches except along building walls that may be one foot six inches.
- III.F.2.a. Containers may not be stored more than eight feet high as measured from the floor to the top of the uppermost container.
- III.F.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.
- III.F.4. Container management area sumps shall be inspected in accordance with, Attachment II-3 for presence of liquids. If liquids are discovered in the sump, the Permittee shall determine the source and note this in the inspection log. Any liquids discovered in the sump shall be removed within 24 hours and managed as hazardous waste in accordance with all applicable requirements of this permit.

- III.F.5. All run-off from container storage and management areas identified in Condition III.F.1. shall be collected, analyzed for hazardous wastes characteristics and constituents, and disposed of according to the applicable portions of the permit.
- III.F.6. Any time the facility plans to increase storage capacities, the Permittee shall submit secondary containment calculations to demonstrate compliance with the secondary containment requirements specified in Utah Admin. Code R315-264-175. Any changes to storage capacities shall be subject to the permit modification requirements specified in Utah Admin. Code R315-270-42. and Section I.D of Module I of this permit.

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

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

III.H. BULK SOLID STORAGE AREA

- III.H.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 both heat tents (HT-L and HT-S), as indicated in the facility plan view located in Attachment II-1. Information concerning the configuration of the BSSA is shown in Attachment III-1.
- III.H.1.a. For purposes of determining compliance with storage capacities, all containers shall be considered full of hazardous waste.
- III.H.2. Non-liquid waste received in bulk transport containers shall not be stored for a period that exceeds one year.

- III.H.3. All containers located in the BSSA shall be inspected daily in accordance with Utah Admin. Code R315-264-174 and managed in accordance with Utah Admin. Code R315-264-173.
- III.H.4. Each of the four storage areas that make up the BSSA may store up to the following quantities:
 - III.H.4.a. Bulk Solid Storage Area - East (BSSA-E) may store up to 600 cubic yards.
 - III.H.4.b. Bulk Solid Storage Area - West (BSSA-W) may store up to 1,600 cubic yards.
 - III.H.4.c. Heat Tent - Large (HT-L) may store up to 280 cubic yards.
 - III.H.4.e. Total bulk solid storage shall not exceed 2, 640 cubic yards, including the volume of waste identified in Condition III.E.3.

III.I. LEACHATE BUILDING

- III.I.1. The Leachate Building is the location where leachate is transferred to and from the Leachate Tanks. The leachate collected is accumulated in the tanks, until it is shipped off site for disposal.
- III.I.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 yard in capacity.
- III.I.3. Location of waste stored in the Leachate Building shall be documented in the operating record, as described in Section III.K. below.

III.J. SPECIAL REQUIREMENTS, IGNITABLE OR REACTIVE WASTES

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

III.K. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

- III.K.1. The Permittee shall not place incompatible wastes in the same container. The Permittee shall comply with Utah Admin. Code R315-264-177(a).

III.K.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material in accordance with R315-264-177(b) nor store incompatible waste in containers separated from each other with a berm, wall or other means in accordance with R315-264-177(c).

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

During the receiving process, and prior to placement into storage, a Grassy Mountain Facility barcode label is affixed to each container. Each label has a unique number used for tracking the container from receipt to disposal. The Permittee shall record and maintain the location of all hazardous waste containers when they are placed in storage or relocated in the container management building or relocated elsewhere at the facility. The location record of all containers shall show the specific location with coordinates showing pad area and row for each container in the management area. Location records shall be updated each day the storage area is operational. Records shall be maintained for all containers removed from storage showing the status of the container regarding treatment, disposal or disposition. For bulk transport containers the inventory record shall show the area in which each is stored (i.e. BSSA-E, BSSA-W, HT-L, or Leachate Building).

III.M. INSPECTIONS

III.M.1 The Permittee shall conduct daily inspections (when storage areas are staffed) of the container storage areas identified in Condition III.A. of this permit in accordance with the schedule outlined in Attachment II-3. Inspection requirements, as specified in Condition II.G and Utah Admin. Code R315-264-174, shall be followed.

III.M.2 Special Inspections of Containers of High VOC Wastes; Containers of high VOC wastes shall be inspected in accordance with Attachment III-2, “Policy and Procedures for Managing High VOC Wastes under R315-264-1080 through R315-264-1091”, for proper fit and tightness of covers unless it is emptied within 24 hours of receipt and if not, no later than the day the manifest is signed.

III.N. CONSTRUCTION OF NEW UNITS

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

III.O. CLOSURE/POST CLOSURE

The Permittee shall close the container storage areas in accordance with Utah Admin. Code R315-264-110 through R315-264-114 and Utah Admin Code R315-264-178 and Condition II.O.