

ATTACHMENT III-2

Policy and Procedures for Managing High VOC Wastes under R315-1080 – R315-1090 of the Utah Administrative Code (UAC)

Note that R315-264-1081 UAC incorporates 40 CFR 264 Subpart CC by reference.

The following procedures are required by Permit Condition III.M.2

Clean Harbors Grassy Mountain, LLC

Procedure CC-001 (revision 45)

Purpose: Verify that containers that are not exempt ~~from Subpart CC~~ from R315-264-1080 (40 CFR 264 Subpart CC) meet Level 1 or Level 2 Emission Controls. ~~-(Reference 40 CFR 265.1087)~~

Procedure: Inspect each non-exempt container ~~that, which~~ is not RCRA empty at the time it is received; to determine ~~whether or not whether~~ eConditions 1 and 2 (below) are met. The requirements of the annual inspection are met with the weekly inspection of containers required by the RCRA permit. The inspection must be completed and documented ~~on or before~~ or when the manifest is signed, ~~i.e. the date on item 20 on the manifest.~~

Condition 1: The container meets the applicable U.S. Department of Transportation (DOT) regulations on the packaging of hazardous materials for transportation as specified in 40 ~~CFR~~ 265.1087(f).

- The container meets the applicable requirements specified in 49 CFR Part 178 – Specifications for Packaging or 49 CFR Part 179 – Specifications for Tank Cars (~~i.e.i.e.~~, an approved DOT tank car or container).
- Hazardous waste is managed in the container in accordance with the applicable 49 CFR regulations. ~~except that n~~ No exceptions to the 49 CFR 178 or 179 regulations are allowed except for lab packs ~~and, the exceptions for~~ combination packaging exceptions specified in 49 CFR Part 173.12(b) ~~are allowed~~ (i.e., material is in an approved DOT container for the type of material transferred and is not shipped under an exception).

Condition 2: The container and its cover and closure devices are secured in the closed position.

IF 1 and 2 are TRUE: Document the initial inspection results in WINweb Lab Results by indicating marking a “Pass” for the Subpart CC ~~i~~inspection question by recording on the Waste Receiving Report “~~According to 40 CFR 264.1086: Checked OK~~”. ~~Include the inspector’s signature and date.~~

~~**IF 1 is TRUE and 2 is FALSE:** Correct the defect and record on the Waste Receiving Report the container number, the nature of the defect, and the corrective action taken. Include the inspector’s signature and date.~~

IF 2 is TRUE and 1 is FALSE (~~i.e.i.e.~~, non-DOT container), the following is applicable:

- If the container capacity is 121.5 gallons (0.46 m³) or less, there is no defect. Document the initial inspection results in WINweb Lab Results by indicating a marking “Pass” for the Subpart CC ~~i~~inspection question by recording on the Waste Receiving Report “~~According to 40 CFR 264.1086: Checked OK~~”. ~~Include the inspector’s signature and date.~~ Or,
- If the container is NOT in light material service¹, there is no defect. ~~Document the initial inspection results in WINweb Lab Results by indicating~~ “a Pass” for the Subpart CC ~~i~~inspection question by recording on the Waste Receiving Report “~~According to 40 CFR 264.1086: Checked OK~~”. ~~Include the inspector’s signature and date.~~ Or,
- If the container IS in light material service¹, check the container for detectable organic emissions following Procedure CC-002.

¹ In light material service means the container is used to manage a material for which both of the following conditions apply: The vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20°C; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20 percent by weight.

- a. If the container has NO detectable organic emissions²², there is no deficiency.- Document the initial inspection results in WINweb Lab Results by indicating a “Pass” for the Subpart CC Inspection question. Record by recording on the Waste Receiving Report “**According to 40 CFR 264.1086: Checked OK**”. Include the inspector’s signature and date.
- b. If the container has detectable organic emissions, the container must either be repaired to eliminate the detectable organic emissions or repackaged into either a DOT container or one with no detectable organic emissions. Record on the Waste Receiving Report the container number, the nature of the defect, and the corrective action taken. Include the inspector’s signature and date.

If a defect is found for a container, cover, or closure device, first attempts to repair the defect shall be made immediately and the repair completed as soon as possible (but no later than 24 hours after detection). If the repair cannot be made within 24 hours, the waste will/shall be removed from the container and the container shall not be used to manage hazardous waste until the defect is repaired.

Non-exempt containers are those with volatile organic concentrations >500 ppm or which contain wastes that do not meet all organic LDR treatment standards and are >26.4 gallons (0.1 m³) in volume and are hazardous waste.

~~Footnote 1: In light material services means the container is used to manage a material for which both of the following conditions apply: The vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20°C; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20 percent by weight.~~

~~Footnote 2: No detectable organic emissions means that the concentration of organics at any point along a container’s closure device seams is less than 500 ppmw using the appropriate instrument calibrated and operated according to Method 21 of 40 CFR Part 60. Appendix A.~~

If a defect is found in the container, cover, or closure devices, first attempts to repair the defect shall be made immediately and the repair completed ASAP but no later than 24 hours after detection. If the repair cannot be made within 24 hours, the waste will be removed from the container and the defective container shall not be used to manage hazardous waste until the defect is repaired.

²² No detectable organic emissions means that the concentration of organics at any point along a container’s closure device seams is less than 500 ppmw using the appropriate instrument calibrated and operated according to Method 21 of 40 CFR Part 60. Appendix A.

Clean Harbors Grassy Mountain, LLC

Procedure CC-002 (revision 4)

Purpose: Establish a procedure for evaluation of detectable organic emissions. [Reference: 40 CFR Part 265.1081 & 265.1084(d)(1)(ii)]

Each container with a capacity equal to or greater than 121.5 gallons which is managing hazardous waste in light material service¹ must meet all applicable DOT regulations² or operate with no detectable organic emissions.

Procedure: To determine if a container is operating with no detectable organic emissions (40 CFR Part 265.1081 & 265.1084(d)):

1. The test shall be conducted on each potential leak interface and the cover and closure devices shall be secured and in the closed position;
2. The test shall be performed when the unit contains a hazardous waste having an organic concentration representative of the range of concentrations for the expected hazardous waste;~~It must contain the waste in question;~~
3. The covers and closure devices must be closed and free from visible cracks, holes, gaps or other open spaces into the interior of the container;
4. The organic vapor detection instrument, calibrated on the day it is used must, after subtracting the background reading, read less than 500 ppmv along any accessible potential leak interfaces on the container (i.e., the seams where the cover meets the container or around the perimeter of any closure device, flange, manway, endgate, etc.).
5. The background level shall be determined according to procedures in Method 21 of 40 CFR part 60 Appendix A.
 1. ~~It must contain the waste in question;~~
 2. ~~The covers and closure devices must be closed and free from visible cracks, holes, gaps or other open spaces into the interior of the container;~~
 3. ~~The organic vapor detection instrument, calibrated on the day it is used must, after subtracting the background reading, read less than 500 ppmv along any accessible potential leak interfaces on the container (i.e., the seams where the cover meets the container or around the perimeter of any closure device, flange, manway, endgate, etc.).~~

Footnote 1: In light material services means the container is used to manage a material for which both of the following conditions apply: The vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20°C; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20 percent by weight.

Footnote 2: Applicable U.S. Department of Transportation (DOT) regulations on packaging hazardous material for transportation means:

1. The container meets the applicable requirements specified in 49 CFR Part 178 – Specifications for Packaging or 49 CFR Part 179 – Specifications for Tank Cars.
2. Hazardous waste is managed in the container in accordance with the applicable requirements specified in 49 CFR Part 107, Subpart B – Exemptions; 49 CFR Part 172 – Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements; 49 CFR Part 173 – Shippers – General Requirements for Shipments and Packages; and 49 CFR Part 180 – Continuing Qualification and Maintenance of Packagings.

3. ~~For the purpose of To~~ complying with this stipulation, no exceptions to the 49 CFR Part 178 or 179 regulations are allowed except for as provided in paragraph 4.
4. For a lab pack that is managed in accordance with the requirements of 49 CFR Part 178 for the purpose of complying with this subpart, an owner or operator may comply with the exceptions for combination packagings specified in 49 CFR Part 173.12(b).

If there are any questions as to whether or not a given container meets the above requirements, contact the facility Compliance Manager for a determination.

Clean Harbors Grassy Mountain, LLC

CALIBRATION VERIFICATION

Instrument S/N: _____ Instrument Model: _____

Calibration Gas (type & ppm): _____ Exp Date: _____

Verification reading: _____ ppm

QC limit +/- 20%: Pass Fail
 (circle one)

Calibration Verified by:

Printed Name

Signature

Date

Clean Harbors Grassy Mountain, LLC

Procedure CC-003 (revision 5)

(Reference 40 CFR265.1087(c)(5))

The following procedure and definitions are used to ensure that at ~~the Grassy Mountain Facility~~CHGM:

1. ~~n~~No containers with a capacity of 121.5 gallons or greater are used to manage hazardous waste “in light material service” under Container Level 1 standards unless the containers meet applicable DOT regulations.
2. ~~all~~All wastes managed in the stabilization tanks have VOC concentrations of <500 ppmw at the point of generation, and
3. ~~all~~All non-exempt hazardous wastes entering the facility for transfer or storage are identified.

PROCEDURE

1. During the profile approval / annual update process:
 - a. Waste streams that are not exempt from subpart CC will be identified and the list provided to receiving;
 - b. Non-exempt wastes to be received in bulk (i.e., containers with a design capacity greater than or equal to 121.5 gallons) will be evaluated to determine if the containers would be in light material service;
 - c. If the containers would be in light material service, the generator will be advised that the container must either meet applicable DOT regulations or provide evidence that the container meets one of the other Container Level 2 standards; and
 - d. Waste streams to be treated in the stabilization tanks must be certified by the generator to have VO concentrations of <500 ppmw at the point of generation.
2. During the receiving process CHGM procedure CC-001 will be used to verify the subpart CC standards.

DEFINITIONS

Applicable U.S. Department of Transportation (DOT) regulations mean:

- a. The container meets the applicable requirements specified in 49 CFR Part 178-Specification for Packaging or 49 CFR Part 179-Specification for Tank Cars.
- b. Hazardous waste is managed in the container in accordance with the applicable requirements specified in 49 DFR Part 107, Subpart B-Exemptions: 49 CFR Part 172-Hazardous Materials Table, Special Provisions, Hazardous Materials Communications, Emergency Response Information, and Training Requirements: 49 CFR Part 173-Shippers-General Requirements for Shipments and Packages: and 49 CFR Part 180-Continuing Qualification and Maintenance of Packagings.
- c. No exceptions to the 49 CFR Part 178 or Part 179 regulations are allowed except as provided for in paragraph ‘d’ below.
- d. For a lab pack that is managed in accordance with the requirements of 49 CFR Part 178 for the purpose of complying with this subpart, an owner or operator may comply with the exceptions for combination packagings specified in 49 CFR Part 173.12(b).

In light material services means the container is used to manage a material for which both of the following conditions apply: The vapor pressure of one or more of the organic constituents in the material is greater than 0.3 kilopascals (kPa) at 20°C; and the total concentration of the pure organic constituents having a vapor pressure greater than 0.3 kPa at 20°C is equal to or greater than 20 percent by weight.

Non-exempt containers mean container VO concentrations ≥ 500 ppm **or** which contain wastes that do not meet all organic LDR treatments standards **and** are $>0.1 \text{ m}^3$ (26.4) gallons in volume **and** are a hazardous waste.