MODULE III - CONTAINERS

III.A. <u>APPLICABILITY</u>

- III.A.1. The conditions of this Module specify the storage requirements that apply to all containers of hazardous waste at the container storage unit (CSU) located at the Univar Solutions USA Inc. Clearfield Facility. The Permittee shall comply with R315-264-170 and all the conditions of this Module. The CSU regulated under this Permit includes four storage areas/bays that are permitted for storage of hazardous waste.
- III.A.2. The CSU is constructed and shall be maintained in accordance with Condition I.O. and Attachments 9 and 11 of this Permit.

III.B. <u>PERMITTED AND PROHIBITED WASTE IDENTIFICATION</u>

III.B.1. The Permittee may store in containers at the CSU the hazardous wastes identified below by the following EPA hazardous waste codes:

D001	D007	D012	D017	D022	D027	D032
D001 D002	D007 D008	D012 D013	D017 D018	D022 D023	D027 D028	D032 D033
D004	D009	D014	D019	D024	D029	D034
D005	D010	D015	D020	D025	D030	D035
D006	D011	D016	D021	D026	D031	D036
D037	F008	P029	U043	U076	U112	U188
D038	F009	U001	U044	U077	U117	U190
D039	F019	U002	U051	U078	U121	U194
D040	F034	U003	U052	U079	U122	U196
D041	F035	U004	U053	U080	U123	U210
D042	F037	U008	U055	U083	U125	U213
D043	F038	U012	U056	U088	U140	U219
F001	K001	U019	U057	U090	U147	U220
F002	K048	U023	U069	U092	U154	U223
F003	K049	U028	U070	U103	U159	U226
F004	K050	U031	U071	U107	U161	U228
F005	K051	U032	U072	U108	U165	U239
F006	K052	U039	U075	U110	U171	U359
F007	K086					

III.B.2. The Permittee may add hazardous waste codes to those specified by Condition III.B.1. through permit modification in accordance with R315-270-42. Any addition of hazardous waste codes to Condition III.B.1. requires a modification to the Permit in accordance with Condition I.D.3.

- III.B.3. The Permittee is prohibited from storing hazardous waste not identified by Condition III.B.1. and the following: III.B.3.a. Water Reactive Materials that exhibit the characteristics in R315-261-23(a)(2)-(4): III.B.3.b. Pyrophoric Materials (defined as DOT Division 4.2(1)); III.B.3.c. Division 1.1 and 1.2 Explosives; Shock Sensitive Materials; III.B.3.d. III.B.3.e. Radioactive Materials that do not meet one or more of the exemptions listed in R313-19-13: III.B.3.f. Compressed gas cylinders or aerosol cans which do not meet the definition of an empty container, with the exception of flammable aerosols up to one liter capacity packaged in drums, pails, or boxes; III.B.3.g. F020, F021, F022, F023, F026, F027, and F028, and D003 Reactive Waste. III.B.3.h. III.B.3.i. Infectious Waste
- III.B.3.j Liquid PCB-containing Wastes

III.C. <u>CONDITION OF CONTAINERS</u>

- III.C.1. If a container holding hazardous waste is not in good condition (e.g., severe rusting, bulging, structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such a container, or the container of hazardous waste itself, to a Department of Transportation (DOT) approved container in good condition. This shall be completed immediately upon discovery and noted in the inspection log.
- III.C.2. The Permittee shall document such incidents in detail as follows: date of the incident, the number of containers involved, contents of the container (waste code or hazardous waste constituents), manifest number, estimated quantity of leakage, if any, equipment and materials utilized for leakage and/or transferring.

III.D. <u>COMPATIBILITY OF WASTE WITH CONTAINERS</u>

III.D.1. The Permittee shall use only DOT approved containers and shall ensure that the

waste is compatible with the containers as required by R315-264-172. Containers for wastes must be made of or lined with materials that will not react with and are otherwise compatible with, the waste to be stored. The container types that may be received at the Facility and their materials of construction are identified in Attachment 9. Compatibility of container construction material and wastes to be stored in the container are verified prior to storage by comparing information collected during waste characterization with manufacturer's specifications and container usage data. The waste generators are responsible for proper packaging of wastes prior to transportation to the Facility. The Facility will not accept for transport any wastes not packaged in a chemically compatible container in good condition.

III.E. <u>MANAGEMENT OF CONTAINERS</u>

- III.E.1. The Permittee shall keep all containers closed, except when it is necessary to add or remove waste. The Permittee shall not open, handle, or store containers in a manner which may rupture or cause the containers to leak as specified in R315-264-173.
- III.E.2. The Permittee shall manage containers in accordance with the Container Management Plan in Attachment 10 and maintain aisle space as specified in Condition II.I.6.
- III.E.3. The Permittee shall store the containers on pallets or container legs. The containers shall not be stacked more than two levels high.
- III.E.4. The Permittee shall unload, and place into storage, any manifested containers of hazardous waste designated for storage at the Permittee's facility within two working days following arrival at the Facility. Arrival for purposes of this Permit shall be the day the transport vehicle arrived at the Univar Solutions USA Inc. facility. Containers shall be placed on the loading dock after unloading where inspections shall be completed as specified in Attachment 1. Containers shall be placed in the CSU only after completion of inspection procedures and associated documentation.
- III.E.5. The Permittee shall provide storage for and maintain on-site, 85 gallon (or other applicable size) overpack drums.

III.F. <u>CONTAINMENT SYSTEMS</u>

III.F.1 The Permittee has constructed and shall maintain the containment system in accordance with the attached plans and specifications, contained in Attachments 9 and 11 and as specified in R315-264-175.

- III.F.2. The Permittee shall maintain an impervious coating on the floor of the CSU.
- III.F.3. At maximum capacity, the Permittee may store the following volumes of material in the four storage areas within the CSU:
- III.F.3.a. Storage Area 1 1,760 gallons (equivalent to 32, 55-gallon containers);
- III.F.3.b. Storage Area 2 -- 12,320 gallons (equivalent to 224, 55-gallon containers); and
- III.F.3.c. Storage Area 3 9,240 gallons (equivalent to 168, 55-gallon containers).
- III.F.3.d. Storage Area 4 9,240 gallons (equivalent to 168, 55-gallon containers).

III.G. <u>SPECIAL REQUIREMENTS FOR IGNITABLE WASTE</u>

- III.G.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the Facility boundary in accordance with R315-264-176.
- III.G.2. The Permittee shall take precautions to prevent accidental ignition of ignitable waste and follow the procedures specified in Attachment 10 and in accordance with R315-264-17(a).
- III.G.3. The Permittee shall not allow open flames or smoking within 50 feet of the container storage areas.
- III.G.4. No reactive waste (D003) shall be stored in the CSU.

III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

- III.H.1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials in the same container in accordance with R315-264-177(a).
- III.H.2. The Permittee shall not place hazardous waste or materials in an unwashed container that previously held an incompatible waste or material in accordance with R315-264-177(b).
- III.H.3. The Permittee shall ensure a container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers is separated from the other materials, as required by R315-264-177(c). Facility employees shall be trained in waste segregation when placing wastes within a specific storage area.

III.I. IDENTIFICATION OF LOCATION OF CONTAINERS IN THE OPERATING RECORD

III.I.1. The Permittee shall record the location of each container in the CSU. The location records shall be accurate and up to date and maintained in the operating records at the Facility. The Permittee shall use the container management system for tracking containers and their locations, which is presented in Attachment 10.

III.J. INSPECTION SCHEDULES AND PROCEDURES

- III.J.1. The Permittee shall inspect loading and unloading areas, and container storage cells, for leaks, spills, and releases each day that containers are moved within these areas.
- III.J.2. The Permittee shall conduct inspections of the storage areas identified in Condition III.A of this Permit in accordance with the schedule and the inspection log in Attachment 3.
- III.J.3. The Permittee shall remedy any deterioration or malfunction discovered during the inspections, described in Condition III.J., in a timely manner and as specified in Attachments 3 and 10 and Conditions II.F.1.a. and II.F.1.b.
- III.J.4. The CSU shall be inspected weekly for the presence of free liquids, in accordance with Attachment 3. Container integrity shall be inspected immediately whenever free liquids are discovered. If liquids are discovered, the Permittee shall document the location, source and estimated quantity of free liquids in the inspection log. Any liquids discovered shall be removed immediately upon discovery. The collected standing water or free liquid shall be managed as hazardous waste unless determined not to be hazardous waste. The Permittee shall document any event associated with leaking or deterioration of containers, and cracking or deterioration of the secondary containment or floor, on the inspection log.
- III.J.5. The Permittee shall inspect weekly the integrity of the secondary containment and floor of the CSU for cracking, uneven settlement, and deteriorations, and shall inspect the concrete storage pad surface coatings for erosion, chipping, and scratching. If deteriorations are discovered in container management areas, the Permittee shall document the location, nature and extent of the deteriorations in the inspection log and repair these areas within 72 hours of discovery.
- III.J.6.For purposes of capacity as outlined in III.F.4, all containers located on the CSU
shall be considered full to their respective capacities with hazardous waste.

III.K. <u>RECORD KEEPING</u>

III.K.1. The Permittee shall place the results of all waste analyses and any other documentation required for compliance with the requirements of Condition III.H. and R315-264-177 and R315-264-17(b) in the Facility operating record as specified in R315-264-73.

III.L. <u>CLOSURE</u>

III.L.1. The Permittee shall remove all hazardous waste and hazardous waste residues from the containment system and close the CSU in accordance with the procedures in the Attachment 8, and as required in R315-264-110 through 115 and R315-264-178.

III.M. <u>UNIVERSAL WASTES</u>

III.M.1. The Permittee shall comply with the requirements of R315-273 for Universal Wastes.

III.N. <u>SUBPART CC</u>

III.N.1. The Permittee shall comply with applicable air emission standards of R315-264-179, R315-264-1080 through 1090, and as described in Attachment 9.