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Annicella, Alan

From: Barnes, Jan [jbarnes@transflo.net]
Sent: Friday, April 25, 2003 5:01 PM
To: Annicella, Alan
Subject: Draft Clsoure Plan



JaxClosurePlan-Revision2.doc

Attached is the revised Closure Plan for the TRANSFLO Jacksonville terminal. I thought before we finalized it you could review and provide comments. I believe we've included your suggested changes/improvements. Thanks for your help.

<<JaxClosurePlan-Revision2.doc>>
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**Hazardous Waste Transfer Facility
Closure Plan**

**TRANSFLO Terminal
116 RR Druid Street
Jacksonville, FL 32254**

**Owner:
TRANSFLO Terminal Services, Inc.
6735 Southpoint Drive South; J-975
Jacksonville, FL 32216**

Revised: April 2003

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1 INTRODUCTION

1.1 Purpose

This plan has been prepared in accordance with the requirements of 40-CFR, Part-265 and 62-730.171 Florida Administrative Code (FAC) for closure of RCRA transfer facilities and identifies all steps necessary to close the hazardous waste transfer area at the TRANSFLO terminal in Jacksonville, Florida. This plan provides for the clean closure of this area; therefore, a post-closure plan is not required. The facility is not subject to the post-closure care requirements of disposal facilities.

As required by 40-CFR, Part-265, Subpart G and 62-730.171 FAC (i.e. closure performance standard), the closure procedures described in this plan will minimize the need for further maintenance, and will control, minimize or eliminate, to the extent necessary to protect human health and the environment, escape of hazardous waste, constituents, leachate, contaminated run-off, or waste decomposition products to the ground of surface waters or to the atmosphere.

A copy of this plan will be stored at the facility at all times and will be available for review during normal working hours by representatives of the Florida Department of Environmental Protection (FDEP) and U. S. Environmental Protection Agency, Region IV, until closure of the transfer area is complete.

The following sections of the closure plan provide information concerning the clean closure of the hazardous waste transfer area as required by 62-730.171(2)(b) FAC and 40-CFR 265.111, 265.112(c), 265.114, and 265.115. Section 1 of this plan provides a physical description of the facility and waste management practices. Section 2 provides a description of a field inspection conducted at the site. Section 3 identifies closure objectives. Section 4 presents the procedures necessary for final closure of the hazardous waste transfer area.

1.2 Facility Description

1.2.1 General

The facility and equipment are owned by TRANSFLO Terminal Services, Inc. (TTSI) and are operated by Kinder Morgan Material Services (KMMS). KMMS is responsible for the daily operations and ensuring that all operational requirements are met. The TRANSFLO Terminal is located approximately two miles north of Interstate-10, in Jacksonville, Florida.

The terminal provides "transloading" services for bulk materials, in that bulk material is transloaded between rail cars and highway cargo tanks with no intermediate storage. The overall facility is approximately 4 acres and consists of a truck scale with two ramps, a small office where administrative services for inventory management and document preparation, a 1000 square foot equipment maintenance shop, and portable equipment (e.g. pumps, conveyor systems) that is used to transfer material between

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railcars and highway cargo tanks. Rail cars are placed by the serving railroad (CSXT) on the railroad track spurs inside the facility for loading and unloading of bulk materials.

The hazardous waste fuel to be transferred at this terminal is an industrial furnace fuel brought to the facility in highway cargo tanks. The hazardous waste fuel is then pumped into rail cars for further transportation to a facility for use as a fuel. Only one rail tank car will be loaded at a time. The number of railcars on-site at any given time will range from 1 to 4, depending on the service received from CSXT and other operational factors. Figure 1 shows the TRANSFLO terminal and the designated hazardous waste fuel transfer area.

1.2.2 Waste Transferred

Because of the transfer of this hazardous waste fuel, the TRANSFLO terminal is a hazardous waste "transfer facility". The hazardous waste transferred at the terminal is a synthetic fuel/industrial furnace fuel (D001, D008, D009, D010, D011, D035, F001, F002, F003, F004, and F005). A copy of the Material Safety Data Sheet for the synthetic fuel is provided in Appendix A.

1.2.3 Hazardous Waste Transfer Area

TRANSFLO has designated an area in the northern section of the terminal as the hazardous waste transfer area. This area, as illustrated in Figure 2, is bound by rail line number 2 on the south side and a rail line number 1 on the north side. A 100 foot wide asphalt paved section between the two tracks is wide enough to drive a semi-truck along. The transfer area is approximately 120 feet long. The cars will be loaded on the eastern end of track number 4. This area is long enough to spot two rail tank cars. Drip pans are in place on the designated loading area. A 6 foot wide area directly under the drip pans is constructed of railroad ballast only. Asphalt pavement is located on both sides of the track number 2. Stormwater drains are in between tracks 1 and 2, and stormwater collected is piped to the stormwater outlet structure along the west end of the site.

All truck and rail cars entering and leaving the terminal will be clearly and properly labeled to identify their contents, consistent with applicable regulations for the transportation of hazardous materials and any applicable health and safety requirements.

1.2.4 Maximum Inventory

The approximate maximum quantity of hazardous waste capable of being stored in one rail tank car in the transfer area is approximately 20,000 gallons. It is not anticipated that loaded rail cars will be on-site for more than five days. Typically, the rail tank car switch out schedule is four days per week. Section 62-730.171, F.A.C., however, permits on-site storage of hazardous waste for up to ten (10) days.

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2 FIELD INSPECTION

2.1 Observations

On April 24, 2003, personnel from TRANSFLO Terminal Services performed an inspection of the TRANSFLO hazardous waste transfer area. The purpose of this inspection was to :

- Identify potential signs of spills or leaks (e.g., stained or damaged concrete or asphalt)
- Evaluate the integrity of the staging area, containment devices, and drains.
- Observe a test transfer to confirm the process.

The inspection revealed that the transfer area is in good condition. The asphalt paving has minor cracks near the transfer area, but is otherwise in good repair. The asphalt is approximately 2-inches thick with a 6-inch lime rock base. Stainless steel drip pans are in place between the rails in the transfer area. There is no drain system for the drip pans. At the time of inspection there were no visible cracks in the drip pans. No signs of spills or leaks were identified in the transfer area.

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3 CLOSURE OBJECTIVES

3.1 General

Closure of the hazardous waste transfer area will be conducted in a manner that will meet the closure performance standard of 40-CFR-265.111. The general closure performance standards require that closure activities:

- Minimize the need for further maintenance.
- Control, minimize or eliminate, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground, surface waters, or to the atmosphere.
- Comply with the closure requirements of this subpart, including, but not limited to, the requirements of 40-CFR-265.197, 265.228, 265.258, 265.280, 265.310, 265.351, 265.381, 265.404, and 264.1102 in as much as they apply to this facility.

Implementation of the closure procedures described in Section 4 of this plan will ensure that the above performance standards are met.

In order to determine whether closure activities are complete, “action levels” for those specific hazardous substances associated with the synthetic fuel handled in the transfer area will be used. The action levels used at the TRANSFLO terminal are the Groundwater and Surface Water Clean-up Target Levels and the Soil Cleanup Target Levels specified in F.A.C Section 62.777. Table 1 lists the specific hazardous substances of concern. Those compounds are constituents of the synthetic fuel transferred at the TRANSFLO terminal, and will serve as an indicator for hazardous substances.

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4 CLOSURE PROCEDURES

4.1 General

This section describes the procedures to be followed in the event the hazardous waste transfer area permanently ceases to handle hazardous waste, or an emergency triggering the cleanup procedures of the contingency plan occurs. This closure plan assumes that contingency plan procedures will limit any contamination to the hazardous waste transfer area indicated on Figure 2. In the event that contingency plan procedures are not completely successful, some additional areas may need to be closed and the closure plan will then be expanded to address the other areas.

4.2 Partial Closure - Hazardous Waste Transfer Area

Partial closure of the transfer area prior to final closure is not anticipated.

4.3 Final Closure - Hazardous Waste Transfer Area

The hazardous waste transfer area is located in the north section of the terminal as shown in Figure 2. If the transfer area is closed, and no release has occurred, then a visual inspection of the area will be conducted. Stains, odors, and other signs of spills will be looked for during the inspection. Soil samples will be taken in the ballast area and any other exposed surfaces in the transfer area. The samples will be analyzed for compounds listed in Table 1 to confirm that results are below the action levels.

The following closure activities will be followed for final closure of the transfer area if a spill has occurred. All hazardous wastes will be removed from the transfer area and transported to an appropriate permitted disposal facility. Pads or containment berms will be placed to control movement of liquids on the ground surface and in the drip pans. Free liquids will be pumped into drums or tanks, or adsorbed with pads. Asphalt, drip pans, and rails will be washed with a non-alcohol based detergent and then steam rinsed. Runoff will be controlled by the use of adsorbent pads or containment berms. The ballast will be recovered and washed in an appropriate soil washing system. The detergent wash water and rinse water will be collected and stored in separate, labeled drums for chemical analysis. All liquids, soil and other waste materials will be managed as hazardous waste until such time as analysis proves their non-hazardous nature. Soil samples will be taken in the ballast area between the rail and the asphalt and analyzed for the compounds listed in Table 1. The soils will be excavated if the analytical results indicate that the soils are contaminated above the action levels for the hazardous substances listed in Table 1. Soils will be excavated, horizontally and vertically, until sampling indicates contaminant levels are below the action levels. If a groundwater impact is suspected, groundwater samples will also be taken and analyzed for the compounds listed in Table 1. If the results are above the action levels, then treatment of the groundwater will be necessary. Groundwater will be pumped from open pits or wells into tankers until groundwater sampling indicates that groundwater contamination is below the action limits.

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A sample of the final rinse, soil samples, and groundwater samples, if necessary, will be collected, plus a duplicate for each media. Appropriate QA/QC procedures will be followed for sample collection, analysis, and data verification (see Appendix B). Samples will be analyzed for the compounds listed in Table 1. All sampling and analysis will be conducted by a National Environmental Laboratory Accreditation Program (NELAP)-certified laboratory. Results will be compared to the action levels referenced in Section 3.. If the analysis indicates contamination (i.e., concentrations are above the action levels), then decontamination procedures will be repeated for the contaminated media, or an alternative procedure will be proposed. TRANSFLO reserves the right to propose alternative action levels should the final analyses from a second cleaning exceed the action levels referenced in Section 3.

In accordance with 40-CFR-265.114, during closure activities all contaminated equipment, structures and soil will be properly disposed of, or decontaminated. Collected wash water and rinsate will be characterized per hazardous waste requirements. Hazardous wastes will be shipped to a permitted Treatment, Storage, and Disposal Facility (TSDF) in accordance with 40-CFR, Part 262. Non-hazardous wastes will be containerized and sent to an appropriately permitted waste facility.

4.4 Schedule and Notifications

This closure plan shall be submitted to the FDEP in order to authorize a change to this closure plan. The plan will be amended if:

- Changes in operating plans or facility design affect the closure plan, or
- There is a change in the expected year of closure, if applicable, or
- In concluding final closure activities, unexpected events require a modification of the closure plan, or
- The waste handled changes from that described in this plan

As required by 40-CFR-265.112(c) (2) and (3), TRANSFLO will amend, and submit to FDEP, the modified closure plan at least 60 days prior to the proposed change in facility design, or operation, or no more than 60 days after an unexpected event has occurred which has affected this closure plan. If an unexpected event occurs during the final closure period, TRANSFLO will amend, and submit to FDEP, the modified closure plan no more than 30 days after the unexpected event.

In accordance with 40-CFR-265.112(c)(4), FDEP may request modifications to the closure plan under the conditions described in 40-CFR-265.11(c)(1). TRANSFLO must submit the modified plan within 60 days of the request from FDEP, or within 30 days if the unexpected event occurs during final closure.

4.5 Certification of Closure

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In accordance with 40-CFR-265.115, upon completion of final closure activities, a certification of closure will be prepared and certified by the owner or operator and an independent registered professional engineer indicating that the transfer area has been closed as specified in the approved closure plan. This certification will be transmitted to FDEP via registered mail within 60 days of completion of final closure activities.

4.6 Future Transfer Activities

After closure of the synthetic fuel transfer area is completed and the certification of closure submitted to FDEP is approved, the transfer area may be reopened for transfer of synthetic fuels. The transfer area will be operated in accordance with all applicable requirements for transfer facilities.

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TABLES

Table 1

Hazardous Substances of Concern

Hazardous Substance
Acetone
Acetonitrile
Butyl Acetate
Carbon Tetrachloride
Dimethyl Formamide
Ethyl Acetate
Ethyl Alcohol
Heptane
Hexane
Isopropyl Alcohol
Lead
Mercury
Methanol
Methyl Acetate
Methyl Ethyl Ketone
Methyl Isobutyl Ketone
Methylene Chloride
n-Propyl Acetate
Pyridine
Selenium
Silver
Toluene
1,1,1-Trichloroethane
Xylene (Total)

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FIGURES

(Insert site plan)

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APPENDIX A

Hazardous Waste MSDS

(Insert MSDS information)

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APPENDIX B

SAMPLING AND ANALYSIS PLAN

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SAMPLING AND ANALYSIS PLAN

These sampling and analysis procedures are designed to ensure the integrity of the sampling and testing for the clean closure of the hazardous waste transfer area at the TRANSFLO facility.

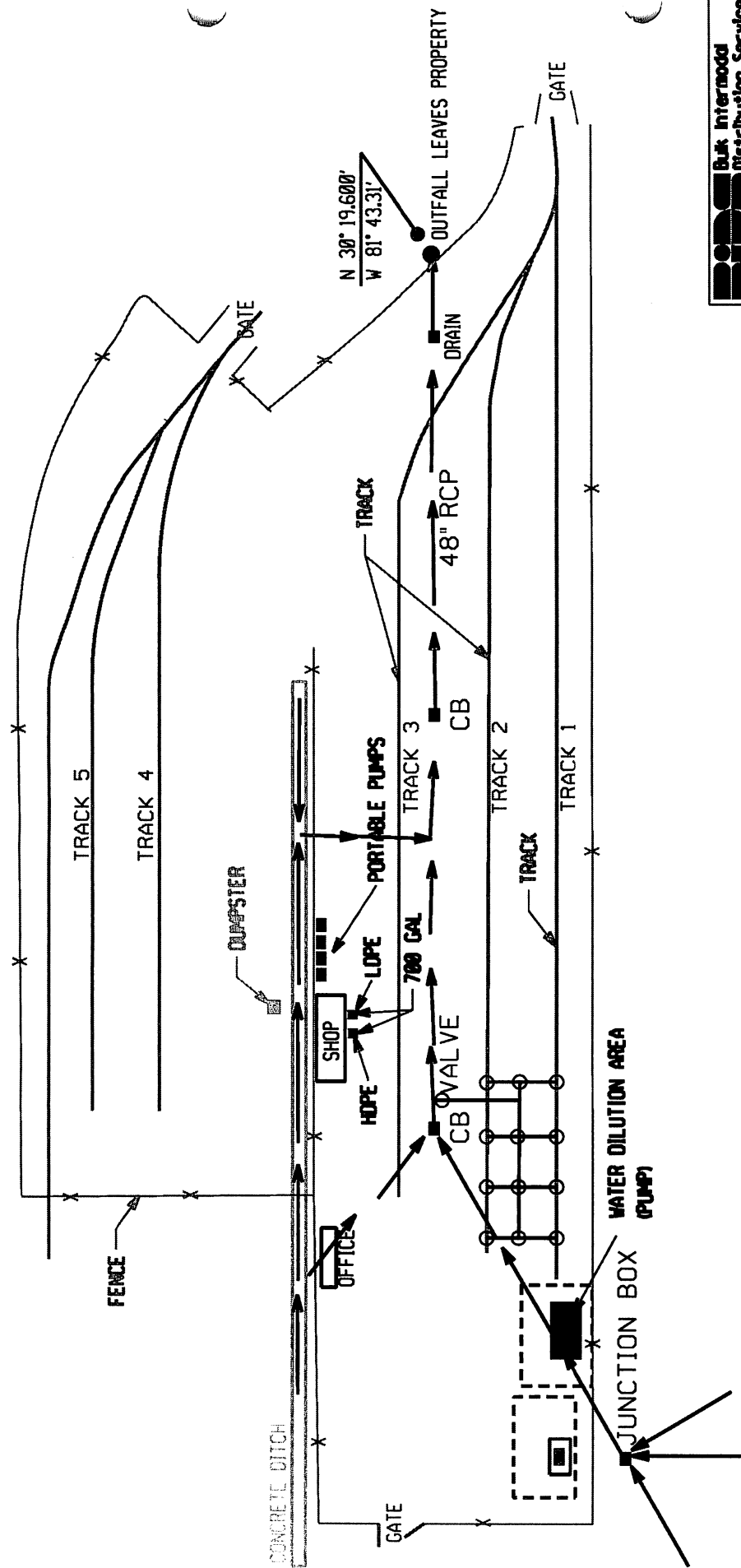
As described in Section 4 of the closure plan, closure will include decontamination of the asphalt, rail, and rail road ballast, if necessary, with a non-alcohol based detergent wash followed by a rinse using hot water or steam. The wash and rinse water will be collected and stored separately.

All sampling will be conducted with an approved CompQAP. During final rinse, grab samples will be collected. Samples will be analyzed for the target parameters, defined by the constituents of any hazardous wastes handled by the transfer facility obtained from sources including MSDSs and hazardous waste materials listed in Table 1. Duplicate samples will also be collected for quality assurance testing. Before sample collection, sample containers will be labeled. Labeling information will include sample number, description of contents, date, sampler's name, and analytical testing requirements. Samples of the rinse water will be collected by submerging a bailer or other appropriate sampling device into the collected rinse water and immediately filling the pre-labeled sampling containers. Samples of the surface water and/or groundwater will be collected by submerging a bailer or other appropriate sampling device into a well or open pit and immediately filling the pre-labeled sampling containers. Soil samples will be collected in a glass jar. Field personnel will note the sample location and description (e.g., rinse water from asphalt), and the associated sample number in the field notebook. All samples will be transported with chain-of-custody documentation to the laboratory in sealed, iced coolers.

Samples will be analyzed at a state certified laboratory with an approved CompQAP, using the following EPA methods:

- Regulated solvent scans - 8015
- Volatile organics - 8260
- Semivolatile organics -8270

All laboratory data will be validated using standard EPA assurance protocols. The validated data will then be compared to action levels listed in Table 1 of the closure plan to determine whether additional decontamination steps need to be taken.



- NOTES:
- 1: SPILL CONTROL MATERIAL
 - 2: REMOVED TANKS, DIKES AND HANDLING AREA'S NOT SHOWN ON MAP FOR CLARITY
 - 3: ALL COMPRESSOR BLOW DOWN TANKS SHOWN IN BLUE

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