

Memorandum

Florida Department of Environmental Protection

FLD 980-559-728

To: Chemical Conservation (Chemcon) File
(HC02-279948 & HC02-279952)

Through: Bob Snyder
John White

From: Mary McGehee

Date: April 14, 1997

Subject: April 8, 1997 Meeting

Attendees: Armando Gonzalez, Pat Sullivan, Bill Labadie, Bob Snyder, John White, and Mary McGehee

8 April 1997 10:15

Chemical Conservation Corporation meeting to discuss warning letter and N.O.D.

Permit Issues

General: Bob began with discussion of status of off-site consequences initiative. Apparently this has been put somewhat on hold. It is something Chemcon should be considering.

Chemcon
~~They~~ received the Department's letter dated 3/7/97. Bob indicated we checked into the Georgia facility and the tank farm is not regulated by a permit, but a corrective action order. We have a copy of the Georgia corrective action order for our files.

Armando wants to address concerns with the permit application. He needs to know specifically which parts of the permit application we are concerned with in order to address them.

Items in 3/7/97 letter:

Bob indicated: DOT compatibility classes are not as good as compatibility of chemicals considering the number of waste codes they will accept. Separate the codes/chemical constituents for the WWT process from fuel blending, from transfer waste and from storage. Mentioned VOC's and equipment required for the wastewater treatment unit. Armando stated they will be treating waste codes that are just characteristic in the WWT unit. Bob said he had no problem with phasing the WWT unit and modifying the permit later when they are ready for advanced treatments. Armando stated when they have more experience and new regulations to delist are available they may amend the WWT unit.

Pat Sullivan mentioned outside disposal sites control what codes they accept.

Fuel blending, Bob indicated he was quite comfortable with.

Summary of WWT:

Only characteristic wastes will be addressed in WWT. When regulations come out delisting wastes, Chemcon will modify permit.

Pat asked if it would be okay to use DOT codes for storage, rather than compatibility classes. There isn't a problem with this because they are not mixing - DOT storage classes, okay.

Armando discussed a table he has put together which explains the materials they will not take.

Tank Discussion:

Mary asked about fuel blending and waste codes.

Armando indicated they can handle many waste codes, he mentioned acutely toxic chemicals with levels below 1000 ppm.

Mary asked about FIFO System used at the ^{Valdosta} Georgia facility, ~~Valdosta~~.

Bob indicated we are wrestling with the mixture rule.

Armando indicated that they are using FIFO in Chemcon, Valdosta.

Armando indicated they empty the tanks very seldom.

Bob indicated the problem with one year storage under Land Ban.

Bob indicated Region VII has a policy that the waste codes stay until the tank is emptied. He did not think the land disposal rules were intended to mean this, however, this is what Laidlaw Bartow facility has interpreted LDR to mean.

Pat asked about our intention to contact Georgia, EPD. Mary indicated we did and when she explained what she understood to be happening she was told by the Georgia EPD they (Chemcon, Valdosta) can't do that.

Bob indicated he does not believe the LDR requirement should apply to fuel blending, however, that is what has happened.

Armando indicated they would follow the guideline.

Bob indicated they could control what is going in the tank in order to prevent a problem.

Pat indicated that, by his discussion, he understood the process by which the mixture rule applies. He indicated they could send the waste to Georgia, ~~where they do FIFO~~.

It was discussed how they could deal with the problem; not mix the waste in, or ship the waste directly for incineration.

Chemcon will propose the waste codes used by the two major cement kilns that uses the fuel. This will help us isolate the exotic chemicals (codes) which may create a problem.

Bob indicated that, whatever we do, we must be consistent with the rest of the state.

they would be blending.

Armando reiterated WWT will just be characteristic waste codes.

Transfer Waste:

Transfer waste is ~~just~~ temporarily stored 10 days or less. Bob indicated that anything that takes place in a permitted area must be explained as part of the permit application. Bob wants there to be a distinction between transfer waste and storage waste. Mary indicated we had discussed movable signs, if the waste was going to be stored inside, ~~this may have been resolved~~. We would like something simple to identify transfer waste from permitted waste (storage). *CFDEP*

Transfer facility waste
Chemcon presently use white labels to identify wastes accepted into storage. It was agreed upon that drums without a white label will be considered transfer waste (10 days or less).

The tracking label has drum I.D.# and date it arrived. Chemcon has also started marking the drums with paint directly because sometimes solvents on the outside have caused the label to fall off.

Discussed ways in which different sources are managed. Bulk waste, storage, lab packs, and transfer wastes. All ~~but~~ transfer facility waste (~~permitted~~) will have white sticker *label*.

Off-site Consequences:

drums but those identified as
Off-site consequences analysis will be addressed in legislation in the future, however, Chemcon could start working on it now. Bob indicated they need to control off-site releases. He asked if they had obtained hospital records related to the Bromine release. Pat/Armando indicated the hospital will not release records without the patients consent.

Some discussion of AES-Jacksonville facility-which has initiated the off-site consequences issue, originally in the air program.

Bob does not want them to do off-site consequence analysis. He wants them to address day-to-day problems and releases. Respirators for workers appear to be fine.

Armando stated he wrote to the Department with info about what he will include in contingency plan and has already implemented. Bob indicated he witnessed some of the changes during a recent site visit. (Ex: When consolidating waste an indicator light lets others know that activity is underway.)

Mary asked if they plan on treating the characteristic listed wastewater, and if listed continue to send off as listed then.

Leave it like it was
WWT Facility They will not treat characteristic wastes that carry listed waste codes.

They want to dedicate one of the four fuel blending tanks to listed hazardous waste wastewater. This will include water removed from hazardous waste fuels and regular listed hazardous waste wastewater. The water will go for incineration. If separation occurs, they will pump fuel to fuel tanks.

Waste analysis. Some analytical capability is required to ensure profiles are correct. They are in the process of getting a lab. Bob indicated when they begin fuel blending, we will expect some analytical capability.

Mary indicated we need to itemize the N.O.D.

Armando indicated he would appreciate that.

Bob indicated she should continue with the N.O.D. Comments she had - corrected for changes made since she wrote them.

Bob indicated we would clean up the comments and get them out this afternoon.

Armando asked about a time frame?

Mary indicated the other permit expired in March.

We will get the info to them A.S.A.P. We will send them something Monday.

How long before Chemcon responds? We will talk when they get the comments.

Wastewater - proposed general concepts. What level of detail is in application. Armando indicated info is in application.

C/E Issues

At the time of the inspection, Armando does not recall us discussing the violations. John explained that we did discuss these issues, however, he doesn't recall the detail with which we discussed them.

Chemcon does not recall drums being stored outside.

They indicated that the drums were "in process".

John indicated that the bulking area was full and the 24 drums were outside on the asphalt

Bill Labadie indicated that they needed to make room for new drums and moved those drums outside to await bulking.

It was indicated that any "process areas" should be identified in the permit.

Used oil notification is done. Used oil is shipped out as hazardous waste - mixed with listed wastes and shipped as fuel. Will go to fuel blending.

Labeling problem. Waste was being bulked into new containers. The new containers were not labeled. Bob will look into details.

MM/la

cc: Compliance file

Part I - General Facility Information

- ① Pg. 8 Identify how an inspector can distinguish transfer waste from permitted waste while stored in the container storage unit.
- ② Pg. 8 Identify the only wastewater to be treated is wastewater containing ~~characteristic~~ characteristic waste codes. ~~(6)(1)(2)(3)(4)(5)~~
Please identify here the characteristic waste codes Chemcon plans to treat in the wastewater treatment system.
- ③ Pg. 10 Same comment as #1
- ④ Pg. 10 Instead of the term "short" please replace with "10 days or less."
- ⑤ Pg. 10 ~~Replace with~~
Same as #1
- ⑥ Pg. 10b ~~Identify~~ What type of bench-test methods do you mean?
- ⑦ Pg. 10b Remove entire ^{section} paragraph discussing the waste fuel shipment "volume meter" and replace with agreed method we discussed in the April 8th meeting. Codes leaving the tank will contain everything that was stored in the tank until the tank is emptied + cleaned. Once emptied + cleaned the slate will be cleared and codes will start accumulating as waste is placed in the tank again.

John question 10c

- ⑧ Pg. 10f Clarify this paragraph to identify Chemcon will treat hazardous wastewater identified by the characteristic codes only. A statement may be included to say Chemcon may modify this permit at a later date to treat "low-risk" listed hazardous waste but will ^{at together a separate permit modification package w/ appropriate fee.}

⑨ pg. 108

~~Where are the tote tanks to be kept?~~
~~while processing is under operation?~~

Will the tote tanks be inside the consolidation bermed pad / the waste removal process area or outside in the concrete pavement area while in process?

⑩ pg. 108

WWT process equipment: reactors, filter press, particulate filter, ion exchange units, and organic removal system. Provide detailed design specification for the equipment necessary to treat hazardous characteristic wastewater. Identify equipment units will require other ~~(an)~~ permits.

⑪ pg. 25-32a

Breakdown Table 1.1.3 by processes, ex: which waste codes will go for fuel blending, wastewater treatment, permitted storage, or transfer waste.

Part II A General

⑫ Facility Information

pg. 33

Since Chemcon has recently acquired the property on the eastern border, this portion of the application will need to be addressed and updated when the facility is prepared to start expansion process.

Contingency Plan

⑬ pg. 67

Indicate the WWT system will treat only hazardous wastewater ~~contaminated~~ ^{identified} by characteristic codes.

⑭ pg. 69

If characteristic wastewater is treated will it need to ~~be~~ be shipped to a hazardous treatment facility?

(15) pg. 70

Include the FDEP ^{Haz. Waste 407 893 3323} ~~Emergency Response~~ phone number (904) 4139911 as well as the State Warning Point phone number

(16) pg. 72

Mail Contingency plans to the department heads, ex: ^{Station} Captain or whatever is appropriate instead of individuals who may no longer be stationed there.

(17) pg. 72

Replace the word "shortly" with "within 30 days".

(18) pg. 94

WWT system plan view needs to be redone to indicate only characteristic wastewater will be treated.

(19) pg. 97

All spills must be documented in the inspection records.

(20) pg. 97

Include FDEP as being notified when Chemcon has a release of hazardous waste.

(21) pg. 102

How will this be corrected when Chemcon removes the stormwater retention ponds? Will the slope cause the released waste to impact the environment?

(22) pg. 106

Will the fire department approve the proposed evacuation route. Realizing it will be updated to take the future growth into account, however the people who must exit the offices through the eastern door must circle around the entire facility to get out. Is there another route?

Mitigation Procedures

(23) pg. 110

How will Chemcon monitor the air contaminant exposure levels?

(24) pg. 110

What type of air control system will Chemcon install to prevent this from occurring? Using a fan to exhaust fumes to the outside will not be appropriate.

(25) pg. 111

Preparedness and Prevention

(26) pg. 117

How will Chemcon propose to capture emissions?

Will the fans vent the flammable gas vapors outside the facility or capture them in some sort of filtering system?

(27) pg. 124

Same as #18

(28) pg. 125

Does the air exhaust system inside the booths have any filtering mechanisms or does it vent directly to outside. Has Chemcon investigated to see if an air permit was necessary for this unit?

Waste Analysis Plan

(29) pg. 171

Where will the spray cans be processed? How will Chemcon capture emissions?

(30) pg. 186

mgmt of non ~~conforming~~ ~~waste streams~~ ~~of~~ ~~conforming~~ ~~waste streams~~

(30a) pg. 188

~~How long~~ What is the general timeframe ~~of~~ ~~conducting the test~~ Chemcon uses to determine a reaction between two samples during the compatibility test?

(31) pg. 188

~~From the date they originally received the waste.~~ Has Chemcon investigated the need for an air permit to operate the air stripper? ~~and~~ If necessary, it will be required to be permitted before operations may begin.

(32) pg. 89

Codes placed into any tank will remain on all ~~waste pumped material~~ ~~structures~~ ~~shipment~~ wastes that are pumped out of the tank until the tank is emptied and cleaned. At that point ~~is waste~~ the tank will have no codes associated with it. As waste ~~is added in new series~~ codes will start

(33) pg. 190

266 rejected
Should testing for PCB's be appropriate here?

(34) pg. 191

~~A sample from the treated effluent must be~~
Won't the WWT system proper render the WW treated by Chemcon to be totally non-hazardous?

Recordkeeping + Reporting

(35) pg. 226

Repeat #7

(35a) pg. 232

Segregation + Separation

Unauthorized Waste Shipping

See Same as (28)

(36) pg. 263

~~Full Maintenance~~

Tanks Information

(37) pg. 284

Wastewater Tanks - will they have access manways or is this not necessary?
Removal of sludge

(38) pg. 286

Chemcon will not be able to use the tanks until the ^{Class I} modification has been ~~processed~~ issued by DEP.

(39) pg. 288

What do R1, R2 + R3 represent?
Recirculation lines
Recovery lines

Process Description

(40) pg. 297

Can Chemcon provide a tentative schedule for the installation of the components identified in this section.

(41) pg. 297

~~This is~~ The Waste Fuel Blending System describes waste with a heating value which comes into the Chemcon facility in drums. Please identify the procedures in place if Chemcon intends on receiving tanker trucks with a high BTU value waste. (i.e. Blending necessary or direct loading to waste fuel tank?)

(42) pg. 297

~~Will this~~ Will this operation be conducted from the ~~out~~ consolidation pad adjacent to the WWT tanks? ~~should we assume during the rainy season this process will not be operating?~~

(43) pg. 297

Lockout
i.e.
Label
Valves?

Since Chemcon will be alternating the ~~receiving~~ loading tank and effluent tank, how will ~~workers~~ the Chemcon employees be able to identify ~~which tank is~~ the process purpose of the tanks. ~~Will both tanks be emptied simultaneously and switched or is there a chance we intended to as the "feed tank" gets mixed with~~

(43a) pg. 298

Clarify ~~there is a~~ the secondary containment berm surrounding the reactor tanks.

Figure 11.C.3/4-4 does not match Figure 1.D.2-1 (Facility Equipment Layout).

#44 ps. 300

Will the Consolidation Pad be used for waste in process or does Chemcon intend to leave drums in this area as storage until they can be processed?

#45 ps. 300

See #9

Explain why a number of corrosive wastewater types will be segregated in tote tanks. And explain why Chemcon will place some of the corrosive waste ~~is~~ directly into the corrosive liquid tanks (Tanks #7 + #8) and why some corrosive waste will be stored in the tote tanks and placed in the container storage unit for later treatment at the facility.

#46 ps. 300

Chemcon may apply for a permit modification in the future to treat listed hazardous waste.

#47 ps. 300

Will Chemcon be sampling for the underlying HW constituents as well?

#48 ps. 301
My Mistake

Exhibit IIC.3/4-1 refers to the Plan View of the Waste Fuel Blending System. Difficult to see how the Automatic Dosification system is provided in this ~~system~~ exhibit.

#49 ps. 301

What temperature will correspond to the pre-set maximum level?

#50 ps. 301

What is the pre-set pH value (neutral / pH of 7)?

51. PS. 301 Where ~~is~~^{in general is} Chemcon proposing to install the cooling tower? ~~and~~
~~This~~ This may be a unit requiring a permit from the Industrial Waste section ~~of~~ of F&EP prior to using it in the treatment process.

52 PS. 302 Describe in greater detail the "specific signs" which are manifested by the treatment process. Specifically, how will Chemcon know when the metals have been ~~of~~ adequately precipitated?

53 PS. 302 Same as # 47

" "

54 PS. 302

55 PS. 302 ~~If necessary, Chemcon must have~~
31

56 PS. 302 Describe the sampling process Chemcon will utilize to determine whether hazardous wastewater contaminated with organic constituents has been adequately treated by the air stripper or carbon absorption unit or whether it must recirculate through the treatment system.

Spill Prevention

57. PS. 313

HERE

Figure 11.C. 7/9-2 Indicates the Existing Storage tank area (~~is~~
~~Fuel Blending~~ (Waste Fuel Tank) measures 42' x 32' which conflicts w/ several other figures. Verify the storage tank area is actually 32 x 32

Legnatables and Incompatibles
#58 ps 319 Same as #30

pro 35 28 29 25
1997
(63) (28)

Tank Releases

#59 ps. 326 since the tanks at Chemcon will be containing volatile haz. waste constituents, ~~a release to the environment~~ ^{the release of} ~~constituents~~ airborne ~~release~~ would be constitute "a release to the environment".

Verification of Decontamination

#60 ps. 343 Will Chemcon be sampling in the areas waste was consolidated.
DEP's concern that actual ~~chance~~ probability of a release is greater in this scenario than storage area.
Consolidation pad also houses the air stripper / filter press + ion exchange units. Consolidation Area had booths which we believed vented directly to the outside - no sampling proposed for these areas.

55
30
30

Closure Case Estimate Comments

Tanks and Container Emissions

(#61) ps. 410 How will Chemcon maintain the Carbon Absorption Systems - ^{How will they} ~~when will they~~ change the carbon (testing efficiency / preventative maintenance schedule / processing volume)?

Closing Comments -

Prior to ~~the~~ Chemcon beginning the expansion of the facility, please submit updated figures and photographs identifying new boundaries, evacuation plans, traffic control patterns, etc.

Preventative Maintenance on eqp.

Ex: When will you change out the activated carbon filters - testing or schedule
What about filterpack in air stripping tower?