

Memorandum

Florida Department of Environmental Protection

FLD 980559-728

TO: CHEMICAL CONSERVATION CORPORATION (Chemcon) FILE

THROUGH: BOB SNYDER, FDEP ORLANDO

FROM: MARY McGEHEE, FDEP ORLANDO *MM*

DATE: MARCH 3, 1997

RE: LAVERN AJANAKU - GEORGIA DEPARTMENT OF NATURAL RESOURCES
(404) 656-2833

The purpose of this memo is to record a telephone conversation I had with Lavern Ajanaku (pronounced Ajauniko). LaVern is with the Georgia Department of Natural Resources, Hazardous Waste Management Protection Section. She is very familiar with Chemcon having reviewed their hazardous waste permit application for the Valdosta, GA. facility. Although it is my understanding LaVern no longer regulates hazardous waste facilities, she authored their permit (issued July 26, 1995 and expiring July 26, 2005). As noted, the permit issue to Chemcon - Valdosta is a 10 year permit.

In our conversation, LaVern said it took several years to for her to be able to declare the application complete. There were changes proposed by the facility which altered the application which would then restart the review process. At one point, Chemcon was asked to revoke and reissue their application.

I explained the application we have been trying to process. Originally, Chemcon proposed to manage the waste codes removed from their storage tanks on a first in first out (FIFO) basis. In a meeting at the facility when we discussed this point and Chemcon stated their Valdosta facility was allowed to do that and proceeded to get confirmation through a phone conversation with Michael Downey, Chemcon Valdosta Facility Manager. Chemcon has since proposed putting a counter on the waste codes which would remain on the waste until a full tank volume was removed. For example, if D018 was added to a waste fuel blending tank the D018 waste code would remain associated with tank drawdown for a full 20,000 gallons. After Chemcon has removed 20,000, they proposed that D018 code would then be allowed to be removed from waste drawdown. LaVern and I discussed the site visit to the Chemcon Valdosta facility which occurred on December 16, 1996 and included the following participants: Michael Downey & Armando Gonzalez, both of Chemcon, and Bob Snyder & Mary McGehee both of FDEP.

LaVern explained the Storage tanks are not covered under the permit but are instead a part of the Corrective Action Order (EPD-HW-1150) between the Georgia Environmental Protection Division and Chemical Conservation of Georgia, Inc. LaVern faxed a copy of the Order to the Central District office for our files. The cover page notes the Order provides conditions for operation of the tank farm and a schedule for investigation of releases from solid waste management units at the facility.

In summary, the hazardous waste storage tank operating portion states:

- Chemcon is authorized to store a total of 140,000 gallons of the hazardous waste identified (D001, D004-D011, D018-D043, F001-F003, F005, U002, U031, U112, U140, U154, U159, U161, U220, U226, U228, U239) in tanks.
- Upon written approval from EPD, Chemcon may be allowed to store additional, expressly identified, waste codes in tanks authorized for hazardous waste storage.
- Chemcon shall not place hazardous waste in any tank system if the waste could cause the tank, it's ancillary equipment, or the containment system to rupture, leak, corrode or otherwise fail. Storage of incompatible wastes in any tank authorized for storage is prohibited.
- No less than 60 days prior to the installation or relocation of any tank within the tank farm, Chemcon must submit to EPD a tank management plan which includes at a minimum the following:
 - (a) Tank configuration diagram identifying the proposed location of all tanks within the tank far and the status of those tanks (ie., storage tank, generator tank, product tank);
 - (b) Dimension and capacity of each tank;
 - (c) Description of feed systems, safety cutoff, bypass systems and pressure controls (vents) for each tank that will hold hazardous waste;
 - (d) Diagram of piping, instrumentation and process flow for each tank that will hold hazardous waste;
 - (e) Description of how the tank system will be installed in compliance with §264.192 (b) through (e) for each tank that will hold hazardous waste;
 - (f) Description of controls and practices to prevent spills and overflows from the tank system, as required under §264.194(b) for each tank that will hold hazardous waste.
 - (g) Description of how operating procedures and tank system and facility design will achieve compliance with the requirements of §§ 264.198 and 264.199 for each tank that will hold hazardous waste;
 - (h) Schedule and description of the procedures, as well as a sample inspection log for the following:
 - inspecting overfill controls;
 - inspecting aboveground portions of the tank system to detect corrosion or release of waste;
 - gathering data from monitoring and leak detection equipment to ensure that the tank system is being operated according to its design;

- inspecting the construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system to detect erosion or signs of releases of hazardous waste (wet spots, dead vegetation); and
 - cathodic protection systems, if present.
- (i) A demonstration, (survey by a Georgia Registered Surveyor) of compliance with the requirements for the maintenance of protective distances between the tank and any public ways, streets, alleys, or an adjoining property line that can be built upon, as required in Tables 2-1 through 2-6 of the NFPA's "Flammable and Combustible Liquids Code" for each tank that will hold hazardous waste.
- (j) Closure cost estimate for closing the tank systems, pursuant to the procedures set forth in the Partial closure Plan dated April 12, 1993. If said plan is superseded, Chemcon shall base the cost estimates on the approved, revised closure plan.
- Chemcon shall comply with § 264.192, which sets minimum standards for the design and installation of new tank systems or components, whenever installing new tank systems or relocating existing tank systems or components; except that, all reports, certifications and statements required by those sections in addition to being kept on file at the facility shall be submitted in accordance with the following schedule:
 - (a) Chemcon shall submit the written assessment required by § 264.192(a) no later than 60 days prior to the installation or relocation of the tank, tank system or component.
 - (b) No less than 15 days prior to storage of any hazardous waste in any newly installed or relocated tank system within the tank farm, Chemcon must submit written statements and certifications by those persons required to supervise the installation of the tank system in accordance with §§ 264.192(b) through (f) that attest that the tank system was properly installed and that repairs required pursuant to §§ 264.192 (b) and (d) were performed. Those statements and certifications must also be kept at the facility in accordance with § 264.192(g).
- Chemcon shall design, construct, operate and maintain the tank systems including the secondary containment system in accordance with the approved detailed procedures, plan, specifications and schedules required by the conditions above and in accordance with §§ 264.191.
- Within 90 days of written notification by EPD, based on EPD's determination that the tanks in the tank farm no longer require relocation to accommodate contamination investigations and/or remediation, Chemcon shall submit for EPD approval a Secondary Containment Assessment, reviewed by an independent, qualified, registered professional engineer and certified in accordance with § 270.11(d) that attests to the secondary containment's compliance with §§ 264.193 (b) through (f). This assessment must describe how the containment system complies with §§ 264.193 (b) through (f),

addressing each section individually. The Secondary containment Assessment must be kept on file at the facility. The period of time between the execution of this Order and EPD approval of a Secondary Containment Assessment is hereby designated the "Secondary Containment Compliance Period".

- Within 30 days of the date of this executed Order, Chemcon shall submit for approval the following, which, upon approval will apply to all tank systems in which Chemcon is authorized to store hazardous waste pursuant to this Order and all generator tank systems for the duration of the Secondary Containment Compliance Period defined in the above condition:
 - (a) A schedule and procedures to provide an assessment of the overall condition of all tank systems, other than non-enterable underground tanks, by an independent, qualified registered professional engineer, or a statement indicating that a leak test that meets the requirements of § 264.191(b)(5) will be performed.
 - (b) Procedures to provide a leak test or other integrity assessment for ancillary equipment.
- The assessment of the systems' integrity and leak tests shall reflect the following:
 - (a) Schedule and procedures for integrity assessments shall be adequate to detect obvious cracks, leaks, and corrosion or erosion that may lead to cracks and leaks.
 - (b) Frequency of integrity assessments must be based on the following:
 - Construction material of the tank & ancillary equipment;
 - Age of the system;
 - Type of corrosion or erosion protection used;
 - Rate of Corrosion or erosion observed during the previous inspection; and
 - The characteristics of the waste being stored or treated.
 - (c) Chemcon shall remove the stored waste from the tanks, if necessary, to allow the condition of all internal tank surfaces to be assessed.
 - (d) The procedures and tests required by the integrity assessment shall be conducted no less than annually, with the first being conducted within 30 days of approval by EPD of the procedures and/or statements required by the assessment.
- Chemcon shall comply with the following for the duration of the Secondary Containment Compliance Period:
 - (a) All tanks systems, in which Chemcon is authorized to store hazardous waste pursuant to this Order, and all generator tank systems shall be provided with temporary secondary containment that is:

- Capable of detecting and collecting releases and accumulated liquids until the collected material is removed.
 - Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills, or precipitation. Spilled or leaked waste and accumulated precipitation must be removed from the secondary containment system within 24 hours and in as timely a manner as necessary to protect human health and the environment.
 - Provided with leak detection. All tanks and tank systems must be raised to allow for visual leak detection or must be provided with an alternate leak detection system approved by EPD that is capable of detecting releases within 24 hours.
- (b) § 264.193(i)(4) regarding recordkeeping of assessments and tests conducted,
- (c) § 264.193(I)(5) regarding leaking or unfit-for-use tank systems and components.
- Upon conclusion of the Secondary Containment Compliance Period, Chemcon shall comply with §§ 264.193(a) through (f) which pertains to containment and detection of releases to ensure that all tanks containing hazardous waste have adequate secondary containment and release detection.
 - Chemcon shall comply with the following:
 - (a) §§ 264.194, 264.195, 264.196, 264.198 and 264.199 regarding operating and inspection requirements and special requirements for ignitable, reactive and incompatible wastes. Additionally, upon approval by EPD, Chemcon must operate the tank systems and conduct inspections in accordance with the practices, procedures and schedules required above.
 - (b) § 264.196(e)(2) and (3) regarding repair of the tank system after a leak or spill from a tank or secondary containment system. Additionally, Chemcon shall submit to the Director all certification of major repairs to correct leaks within seven days of returning the tank system to use.

The purpose of maintaining the tank operating conditions as part of the Corrective Action Order was to eliminate the modifications which would be required every time they relocated/installed a tank or well as part of the on-going clean-up. This facility had contamination identified when Chemcon purchased it.

LaVern did explain one release which occurred since Chemcon has been managing it. Chemcon blows air into the tanks in order to mix them. On one occasion they blew too much air into the tank and it released from the top, or as LaVern describes "burped". This was the only accidental release we discussed.

Conversation w/ LaVern Ajanaku
Georgia Dept. of Natural Resources
March 3, 1997
Page 6

In closing, we discussed whether or not they could put the FIFO codes or the waste code counter on the tank system. For informational purposes, I faxed LaVern (fax# 404 651-9425) a copy of EPA Region VII's Memo dated January 3, 1992 regarding: Regional Policy to Remove Waste Codes from the Contents of Working Tanks. It appears LaVern and I agree that the tanks would need to meet the definition of empty before removing waste codes from waste put into the tank. Inspectors have scheduled the Chemcon GA inspection, LaVern was planning to ask them to check the waste codes associated with the tank drawdown on their site visit.