

## Russell, Merlin

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**From:** Morgan, Steve  
**Sent:** Tuesday, November 06, 2012 7:44 AM  
**To:** 'Riffel, Bruce'  
**Cc:** Russell, Merlin; Tripp, Anthony  
**Subject:** FW: Solid waste permit to review  
**Attachments:** 62-701.900(4).pdf; Attachment A - Non-RCRA Solidification SOP.doc; Attachment B - AppxH WAP Nov 2011 Rev 1.doc; Attachment C - Chap1-AppxC Nov 2011 Rev 1.doc; Attachment G - Closure Plan Nov 2011 Rev 1.doc

Bruce:

Below are my and Merlin's comments regarding the attached draft documents. Please revise the documents submitted with your application, as appropriate, to address these comments.

Please feel free to e-mail or call me if you have any further questions.

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**From:** Russell, Merlin  
**Sent:** Monday, November 05, 2012 11:10 AM  
**To:** Morgan, Steve  
**Cc:** Tripp, Anthony; Knauss, Elizabeth  
**Subject:** RE: Solid waste permit to review

Steve, without doing a word for word comparison (which I don't intend to do), I it's hard to find changes made to the WAP or Closure Plan or changes to the file on facility operations. As I said in my earlier e-mail, if Bruce would highlight changes/additions somehow, it would make it much easier to review. I think he sent the plans that had been approved for the RCRA permit for you to look over. For example, as you note on the closure plan, there are no details for closure of the solidification unit so I am guessing he has proposed no changes to the closure plan.

merlin

**From:** Morgan, Steve  
**Sent:** Monday, November 05, 2012 9:43 AM  
**To:** Russell, Merlin  
**Subject:** FW: Solid waste permit to review

Below are my comments regarding the attached documents:

- Form 62-701.900(4)
  - Part A.3 – Check “New” box
  - Pat A.5. – For purposes of the solid waste application, the DEP ID # is WACS ID #50782

- Attachment A
  - Section 5 – Procedures – Solidification Procedures
    - Item #6 – This Item or another appropriate part of Attachment A or attachment to the application should include a description of how the records are kept of which incoming waste containers/loads are included in each solidification batch.
    - Item #8 – This item should describe if/how the wash water is collected and disposed.
    - Item #11 – Please provide MSDS for the “oil dry” and “Swell-jell” and verify that only physical solidification (not-chemical) results from the use of these products.
    - The *Solidification Procedures* section should be revised to include a description of the following procedures:
      - procedures for mixing waste and solidification media in solidification tub
      - procedures for removal and loading of solidified waste into outbound containers
  - Attachment A should include a description of routine cleaning procedure for the solidification tub and concrete solidification area
  - Attachment A or Attachment H – Contingency Plan should include a description of the facility’s “Response to Releases” from the solidification operation.
- Attachment B – No comments at this time
- Attachment C – No comments at this time other those provided for Attachment G associated with Attachment C
- Attachment G
  - Attachment G should include the “Closure Methods” for the solidification area, including the solidification tub.
  - Section 9.3
    - The maximum waste inventory should include waste in the solidification area (i.e. a full solidification tub) and the maximum quantity of solidification material (sawdust, oil-dry, etc.) that will be stored at the facility. Figure 9.1 and the facility’s closure cost estimate & and proof of financial assurance for closure (Attachment I) should be revised accordingly. Section I-C-1.1.1 of Attachment C may also need to be revised.

Please feel free to e-mail or call me if you have any further questions.

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*Please take a few minutes to share your comments on the service you received from the department by clicking on this link [DEP Customer Survey](#).*

**From:** Riffel, Bruce [mailto:riffel.bruce@cleanharbors.com]  
**Sent:** Friday, October 12, 2012 1:04 PM  
**To:** Morgan, Steve  
**Subject:** Solid waste permit to review

Steve,

Here is the major part of our upcoming permit submission. Will you please review and make any suggestions so it will go better when we do the submission. We are working on our drawings .

Thanks

Bruce Riffel  
Senior Compliance Manager

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