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5/3/1989

DEPARTMENT OF ECOLOGY
INSPECTION REPORT

TO: Dan Cargill
DATE OF VISIT: 4/25/89
NEW INDUSTRY:

INSPECTOR Barbara Trejo
PERMIT NO.: WA-000309-3
PERMIT EXPIRES: 6/29/86

TYPE OF INSPECTION:

___ PERMIT APPLICATION _X_ PERMIT RENEWAL ___ COMPLAINT
___ PERMIT COMPLIANCE ___ ENFORCEMENT ___ DROP-IN
___ PERMIT CANCELLATION

FACILITY: Rhone Poulenc Inc. T R
ADDRESS : 9229 East Marginal Way South MAP: QUAD:
CITY: Seattle ZIP: 98108 COUNTY: King TEL: 764-4450

PERSON CONTACTED: Sue Hays
TYPE OF FACILITY: Vanillin Manufacturing
RECEIVING WATER: Duwamish River
TYPE OF TREATMENT SYSTEM: N/A

OPERATION Satis ____ Fair _X_ Unsat ___
COMPLIES WITH PERMIT CONDITIONS:

DESCRIPTION: Dan Cargill and I (Barbara Trejo) arrived at Rhone-Poulenc Inc. on April 25, 1989, at 0946 hours, to conduct a facility inspection as part of the NPDES permit renewal process. Rhone-Poulenc is one of two facilities in the U.S. that currently produce vanillin.

Upon entering the facility on April 25, 1989, Dan advised Ms. Hays, Governmental Affairs Superintendent for Rhone-Poulenc, that while we would "log-in", the disclaimer of liability and the confidentiality statement are not binding in that all inspection findings are a matter of public record. Also, except for negligence on our part, they would be liable for injury or damage. We were granted entry and provide a second form which contained a similar statement as the enclosed visitor log. Dan advised her that we could not sign the form.

Dan provided Ms. Hays with a copy of Chapter 42.17 RCW, Chapter 173-03 WAC (Public Records) and Chapter 173-220 WAC. He explained that absent a request approved under WAC 173-220-080(2), all information pertaining to the facility in our files, including inspection reports, were public records. He also explained that confidentiality could only be granted by the Director or designee. He also advised her that we would not surrender our film because we have the authority to inspect and document our findings. He advised her that duplicate photographs could be provided to the

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company if they wanted them. After Ms. Hays consulted with a corporation attorney, we were granted access. Ms. Hays stated that a confidentiality request would be forthcoming. Ms. Hays also stated that in the past, Ecology and EPA inspectors had signed the forms and surrendered their film for the company to process and screen.

Ms. Hays briefly discussed the vanillin production process and generated waste streams. Vanillin black liquor (VBL), vanillin black liquor solids (VBLS), and vanillin still bottoms (VSB) appear to be the major wastes generated at the facility. These wastes are removed from the Rhone-Poulenc site and recycled for use at paper or cement industries except for the filtrate from the VBLS which is shipped to Arlington, Oregon for disposal.

I briefly discussed with Ms. Hays the drainage lines for two outfalls to the Duwamish River and five outfalls to Slip 6. The locations of the outfalls along with a post-inspection assigned outfall number are referenced to the grid system shown on the Mosanto Company Plot Plan, Zones 1 through 3, Storm Drainage Piping, drawn March 1983 and the Plot Plan, Zone 4, Process Piping Drainage, drawn January 1, 1983 as follows:

001	W6340,S5328	NPDES permitted outfall to the Duwamish River.
002	W6300,S5552	Unpermitted discharge to the Duwamish River.
003	-- --	Outfall location not identified on Monsanto drawing. Two 10-inch lines terminated at approximately W5925,S5805. Unpermitted discharge point.
004	W5775,S5810	Unpermitted discharge point to Slip 6.
005	W5674,S5755	Unpermitted discharge to Slip 6.
006	W5642,S5740	Unpermitted discharge to Slip 6.
007	W5570,S5710	36-inch diameter county drainage line.

Drainage plans for the facility have been revised and Ms. Hays will provide Ecology with revised copies of the storm drainage, sanitary sewer, and process drainage plans.

The following text describes conditions and concerns identified during our facility inspection regarding the drainage lines and basins associated with each outfall to the Duwamish River and Slip 6.

Outfall 001

The discharge to outfall 001 consits of stormwater and city supplied non-contact cooling water. Stormwater generally originates from the area between the tank farm and existing maintenance building, the area between the distribution center/warehouse and the processing area, and from the northern half of the storage building and distribution center/warehouse; non-contact cooling water originates from the process area. A by-pass exists to the drain line from the tank farm but is generally not used according to Ms. Hays except in cases where large quantities of stormwater are tested prior to discharge.

Stormwater and any spillage in the tank farm would generally be directed to the mersize sump off the southeast corner of the tank farm. The mersize sump contains a sump pump with overhead lines to the containment reservoir.

The tank farm is generally used to store products associated with vanillin processing except for four tanks which contain di-octylphthalate. Rhone-Poulenc serves as a di-octylphthalate distributor but does not use this product in their process.

The VBLS filter building is located north of the tank farm. Ms. Hays did not know which drain line the building was plumbed into but will provide us with the information.

Ms. Hays indicated that storm drain #3, located approximately 15 feet east of the outfall, is the sampling point for the current NPDES monitoring. Storm drain #1, located approximately 290 feet east of storm drain #3, contains a pH meter and overflow weir to calculate flow volume to the outfall. Ms. Hays indicated that when the effluent pH exceeds the pH range stated in the NPDES permit, the system shuts down and prevents effluent from being discharged to the Duwamish River. I requested operating information about the flow monitor and pH meter, including calibration frequency.

Ms. Hays did not know details of the weir operation but will provide us with the plans. The weir is connected to a charting device in the distribution center/warehouse but is disconnected when no discharge is planned at the facility.

Ms. Hays indicated that blowdown from the cooling tower may no longer be connected to outfall 001 although city supplied water used as non-contact cooling water is still discharged to the outfall. City water is reported to be treated with catalyzed sodium sulfite to reduce the chlorine content.

Outfall 002

The discharge lines to outfall 002 originate from a storage building (old meal bin) and distribution center/warehouse building located in the northwest quadrant of the facility. Based on the storm drainage plans and inspection, the lines appear to collect storm water from the southern portion of these buildings then converge into a 10-inch line which appears to flow to outfall 002 on the Duwamish River.

A floor drain located in the distribution center/warehouse building and a sump along the west side of the building were inspected to assess potential pollutant sources to the outfall. Neither appears to be connected to the outfall. The sump does not contain a pump and the drain is a remnant of an abandoned dry glue operation.

A question exists whether the storm drain line is capped east of storm drain #6, off of the southeast corner of the distribution center/warehouse, or if the line is used as an overflow. Ms. Hays indicated that she will check into this.

Outfall 003

The 1983 Monsanto Company storm drainage piping plans show two 10-inch diameter lines which terminate north of the railroad track, off the southwest corner of the maintenance building. A question about abandonment of these lines to Slip 6 is indicated on the plan. According to the plans, drainage lines from and adjacent to the maintenance building are tied into the two 10-inch diameter lines. According to our files, the outfall associated with these discharge lines was reported by Monsanto as being abandoned and rerouted to outfall 001 in the 1970's.

Ms. Hays indicated that she would check old plans and drawings for information about abandonment to outfall 003. I also asked Ms. Hays to provide us with information about the existing drainage system from and adjacent to the maintenance building.

Outfall 004

Outfall 004 is associated with underground piping which appears to originate at the southeast corner of the existing maintenance building according to Monsanto drainage plans. We were unable to find any evidence of this piping during our inspection and Ms. Hays was unaware of it's location. Based on Monsanto storm drainage plans, a blank flange has been placed at the outfall. Dan suggested to Ms. Hays that the condition of the flange should be checked and appropriate repairs or replacement be completed to prevent drainage from this line to Slip 6.

Outfall 005

The discharge line to outfall 005 originates at a storm drain east of the control building and at the breathing air and electrical piping trench. The two lines converge at storm drain #9. According to Ms. Hays, the company plans to discontinue the discharge to outfall 005 and reroute it to the process drainage line.

The breathing air and electrical piping trench has metal grating at the surface and it crosses a roadway within the facility. Consequently, the area should be kept clear of any potential pollutants since it would eventually be discharged to outfall 005 in Slip 6.

Outfall 006

The discharge line to outfall 006 originates northwest of the VBLS containment reservoir. Currently, the identified drains to this line are a catch basin located approximately 20 feet east of two VBLS holding tanks and a small diameter surface drain located approximately 10 feet west of the API separator. The two VBLS holding tanks are not contained and consequently a potential source of pollutants to Slip 6 through spillage to the identified storm drains.

According to Ms. Hays, plans to terminate discharge to the outfall are scheduled for late 1989 along with plans to build containment around the two VBLS holding tanks.

The containment reservoir, built in 1976, is a concrete lined holding area for VBLS. The fluid portion of the VBLS is pumped to the two holding tanks described above; the sediment portion is collected in the bottom of the tank. Sediment is removed periodically with vacuum trucks. Dan suggested to Ms. Hays that the structural integrity of the reservoir be evaluated periodically.

A concrete lined sump is located immediately north of the two holding tanks described above. Ms. Hays reported that the sump holds a copper solution used at the facility.

Outfall 007

The drainage line to outfall 007 is a 36-inch diameter county line which originates east of the existing facility laboratory and cuts across the southeast end of the Rhone-Poulenc site. At least one storm drain has been identified as being plumbed into this line.

Three additional catch basins were noted in the vicinity of the county drainage line based on Monsanto drainage plans. According to Ms. Hays, they are located in the vicinity of the former maintenance building. The southern catch basin was covered with a steel plate; the other two catch basins were open. A vertical pipe was noted in each open catch basin.

Ms. Hays was uncertain whether the catch basins were plumbed into the county line. She suggested covering the open catch basins with plates.

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