US EPA RECORDS CENTER REGION 5
1002640

MEMO

From: Wen C. Huang WCH
Through: Greg Czajkowski, Acting Section Chief/TSP Section GRC.
Jose Cisneros, Chief/WMB
To: Margaret M. Guerriero, Director
Director, WPTD
Subject: Class 2 Permit Modification
GE Plastics Mt. Vernon, Inc. (Operator)
Mt. Vernon Phenol Plant Partnership (Owner)
Date: September 14, 2004

On January 21, 2004, the Federal RCRA permit was issued to GE Plastics Mt. Vernon, Inc. (Operator) and Mt. Vernon Phenol Plant Partnership (Owner). The final permit was appealed by GE. Following extensive discussions and negotiations between the U.S. EPA and the Permittees, a final settlement was reached. This permit modification is the result of the permit appeal settlement.

Since the effective date of the permit was changed from April 21, 2004 to May 30, 2004, the signature page has to be signed by the Director. This change was part of the settlement (See Item G of Attachment A, Class 2 modification request dated July 29, 2004).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

(6F)

REPLY TO THE ATTENTION OF:
DW-8J

January 21, 2004

RE: GE Plastics Mt. Vernon, Inc. and
Mt. Vernon Phenol Plant Partnership
IND 006 376 362

Dear Sir/Madam:

On January 21, 2004, the United States Environmental Protection Agency (U.S. EPA), Region 5, issued the Federal portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste Permit for the above-referenced facility. When both Federal portion of the permit and the State of Indiana's portion of the permit are effective, GE Plastics Mt. Vernon, Inc. (Operator) and Mt. Vernon Phenol Plant Partnership (Owner), will have an effective RCRA permit.

This letter supplements the enclosed Response to Comments generated as a result of the public notice for the draft permit. This Response to Comments was prepared by the U.S. EPA and sent to interested parties.

I have made the final decision to issue the Federal portion of the RCRA Hazardous Waste Permit for the facility in Mt. Vernon, Indiana. Unless review is requested under Title 40 of the Code of Federal Regulations (40 CFR) Section § 124.19, the Federal portion of the RCRA permit becomes effective on April 21, 2004.

Eligibility to appeal this permit is discussed further in 40 CFR 124.19. The original and one copy of the petition must be received by the U.S. EPA in Washington, D.C. at the address indicated below within 33 days of the date of this letter.

United States Environmental Protection Agency
Environmental Appeals Board (MC-1103H)
Ariel Rios Building
Washington, D.C. 20460

A copy of the petition should also be sent to:

Waste Management Branch (DW-8J)
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

January 21, 2004

REPLY TO THE ATTENTION OF:

DW-8J

CERTIFIED MAIL: 7000 0520 0020 5098 7957
RETURN RECEIPT REQUESTED

Mr. David K. Perkins
Principal, Water and Waste Programs Leader
GE Plastics Mt. Vernon, Inc. and
Mt. Vernon Phenol Plant Partnership
One Lexan Lane
Mt. Vernon, IN 47620-9364

RE: Final Federal RCRA Permit
IND 006 376 362

Dear Mr. Perkins:

Enclosed is a copy of the Federal portion of a Resource Conservation and Recovery Act (RCRA) Hazardous Waste permit for the above-referenced facility. The Hazardous Waste permit contains both Federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Indiana RCRA program authorized under Title 40 of the Code of Federal Regulations (40 CFR) Part 271. When both this portion and the State permit are effective, the GE Plastics Mt. Vernon, Inc. and Mt. Vernon Phenol Plant Partnership have an effective RCRA Hazardous Waste permit. Any hazardous waste activity not included in the RCRA permit is prohibited when such activity requires a RCRA Hazardous Waste permit.

This Federal permit is effective on the date indicated on the signature page of the Federal permit. Eligibility to appeal the Federal permit is discussed further in 40 CFR §124.19. The original and one copy of the petition must be received by U.S. EPA in Washington, D.C., at the address indicated below within 30 days after service of notice of the final permit decision.

United States Environmental Protection Agency
Environmental Appeals Board (MC-1103H)
Ariel Rios Building
Washington, D.C. 20460

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Response to Comments
RCRA Part B Permit Application, Revision 1
Boilers H-530A and H-530B
GE Plastics, Mt. Vernon, Inc.
Mt. Vernon, Posey County
IND 006 376 362

SECTION C - WASTE CHARACTERISTICS
C-1 - Chemical and Physical Analyses

1. *Provide more detail regarding the production of the hazardous wastestreams.*

GEPMTV will add additional detail to this section.

2. *Provide a laboratory report detailing the chemical and physical analyses of representative samples of each wastestream. Section C is an independent section and should not reference other sections*

GEPMTV will amend this section to include TCLP and metals results for each waste stream. We will also include Table 4.1 from the trial burn plan as a new table in this section.

C-1b - Waste in Tank Systems

3. *Identify the tank construction materials (for example, fiber glass, polyethylene, steel, or etc.) and demonstrate the compatibility of the waste with the tank construction materials.*

The waste tanks (V-525 A/B) are constructed of carbon steel. V-525 A/B were inspected by IDEM in 2000. It should be noted that V-525 A/B are "less than 90 day" tanks and not part of the Part B permit.

Table C-1 - Analytical Parameters

4. *In table C-1, provide the year with ASTM test methods. ASTM method A-251 has been deleted; an alternate method should be provided.*

Table C-1 will be updated to reflect the appropriate method. For the Chlorine analysis, we will use ASTM D 2428-88.

5. *In table C-1, the analytical methods should be updated to the revised methods.*

Table C-1 will be updated to reflect the appropriate methods.

C-2b - Test Methods

6. *List all the analytical methods to be used. Once the permit has been issued, a permit modification would be necessary in order to utilize alternate methods.*

Section C-2b will updated as required. If EPA changes or updates SW-846, GEPMTV will use the updated methods.

7. *Provide a complete Quality Assurance Project Plan (QAPP) for the waste analysis plan. Guidelines for developing the QAPP and its essential elements are found in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), chapter one. The quality assurance/quality control (QA/QC) in section C-2i is deficient. The QA/QC should include, for example, formulas for accuracy and precision and their quality control criteria.*

A complete QAPP will be added to this section.

C-2d - Frequency of Analysis

8. *Provide more detail regarding the frequency at which the wastestream will be characterized. Wastestreams should be characterized annually, at a minimum.*

The wastestream is sampled and analyzed on a batch or "per tank" basis. In addition, the Phenol plant has administrative controls in place to assure that process changes that could impact wastestream composition are reviewed prior implementation.

9. *In Section C - Waste Characteristics, standard analytical methods may be included by reference; for example, methods from Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846), Methods for Chemical Analysis of Water and Wastes (EPA -600/4-79-020), and American Society for Testing and Materials (ASTM).*

We understand and agree with this comment.

SECTION I - CLOSURE PLANS, POST-CLOSURE PLANS, AND FINANCIAL REQUIREMENTS

10. *Within Section I, indicate the containers, preservatives, and preservation procedures for samples.*

Section I will be upgraded to indicate appropriate containers, preservatives and preservation procedures for samples.

I-1 - Closure Plan

11. Maps of the facility and each unit to be closed must be included in Section I-1.

Figure A-2 will be reproduced and included in this section.

I-1e(2) - Disposal or Decontamination of Equipment, Structures, and Soils

12. Indicate that the rinsates will be analyzed for all hazardous wastes, hazardous waste constituents, and their breakdown products. The toxicity characteristic leaching procedure (TCLP) is used to determine if a material is hazardous as per 40 CFR 261.24. The TCLP is not used for cleanup levels.

GEPMTV will comply with 329 IAC 3.1-6-4 (b) that applies to scrap metal contaminated with hazardous waste.

13. For inorganic and certain organic parameters, the cleanup levels of the rinsate will be based on the Maximum Contaminant Levels (MCLs) of the National Primary Drinking Water Regulations (40 CFR 141). For the organic parameters without MCLs, the cleanup levels of the rinsate will be based on the analytical method's estimated quantitation limits (EQLs), as defined in SW-846.

GEPMTV will comply with 329 IAC 3.1-6-4 (b) that applies to scrap metal contaminated with hazardous waste.

14. Wastes for disposal must be analyzed for total hazardous waste constituents and their breakdown products for which the waste is listed. The wastes are listed for K022. If the analytes are detected, the waste remains a hazardous waste.

GEPMTV will comply with 329 IAC 3.1-6-4 (b) that applies to scrap metal contaminated with hazardous waste

15. If release from the containment pad is probable, soil sampling must be performed. Revise the Decontamination of Boiler Containment Pad section accordingly.

The closure plan will be revised as needed to contain this comment.

Table I-3 - Cleanup Levels

16. *Revise the cleanup levels in Table I-3. Also, the current terminology for practical quantitation limits (PQLs) is estimated quantitation limits (EQLs).*

Table I-3 will be revised for the EQL terminalogy.

Appendix I-1 - Quality Assurance Project Plan

17. *Provide a complete Quality Assurance Project Plan (QAPP) for closure activities. The QAPP that was provided is deficient. The QAPP should include, for example, formulas for accuracy and precision and their quality control criteria.*

A complete QAPP for the anticipated laboratory will be added to section I-1

Table I-1a - Parameters and Analytical Methods for Soil and Rinsate Water Analyses

18. *The analytical method for metals, except mercury, should be updated to the revised SW-846 method 6010B.*

The method will be revised as noted.

19. *In Table I-1a, provide the analytical methods estimated quantitation limits (EQLs). The analytical methods should meet the project objectives. One of the project objectives for rinsates is that the EQLs of the analytical methods should be less than (when possible) the Maximum Contaminant Levels (MCLs) of the National Primary Drinking Water Regulations (40 CFR 141) or when EQLs less than the MCLs cannot be obtained, the EQLs should be as low as possible. EQLs should be based on "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846).*

EQLs will be added as appropriate and available to table I-1a.

TRIAL BURN PLAN
Section 6.1.1 - Permit-Required Testing

20. *Comment 4. from IDEM's previous review comments has not been adequately addressed. It stated that "the product of a boiler is steam. The trial burn plan should be revised to set minimum and maximum production rates as required by the regulation", i.e. 40 CFR 266.102(e)(2)(B). The facility appears to have identified production rate as total thermal input. The thermal input corresponds to the requirement in 40 CFR 266.102(e)(2)(A), the feed rate of hazardous waste and other fuels. The production rate is specifically listed, as an additional requirement required to have permitted limits based on the trial burn.*

Steam Production will be monitored and recorded during the Trial Burn test. It has been added as a parameter as discussed on Section 6.8, Pg. 6-20 of the revised Trial Burn Plan.

Appendix A - Quality Assurance Project Plan

21. *For Table 6-1, the accuracy and precision will be determined on the process samples. Quality control criteria of a laboratory control sample (LCS) does not provide quality control information of the sample matrix. Typical quality control for semivolatile organic compounds (SVOCs) analysis is listed below.*

Matrix Spike Recoveries

SVOC	*Water % Rec*	*Other Matrices % Rec*
Acenaphthene	*46-120*	*31-137*
4-Chloro-3-Methylphenol	*23-100*	*26-103*
2-Chlorophenol	*27-123*	*25-102*
1,4-Dichlorophenol	*36-100*	*28-104*
2,4-Dinitrotoluene	*24-100*	*28-100*
4-Nitrophenol	*10-100*	*11-114*
Nitroso-dipropyl amine	*41-120*	*41-126*
Phenol	*12-100*	*26-100*
Pentachlorophenol	*9-103*	*50-109*
Pyrene	*26-127*	*35-142*
1,2,4-Trichlorobenzene	*39-100*	*38-107*

Precision of matrix spikes

SVOC	*Water* <u>*RPD*</u>	*Other Matrices* <u>*RPD*</u>
Acenaphthene	*31*	*20*
4-Chloro-3-Methylphenol	*42*	*35*
2-Chlorophenol	*40*	*50*
1,4-Dichlorophenol	*28*	*27*
2,4-Dinitrotoluene	*38*	*47*
4-Nitrophenol	*50*	*50*
Nitroso-dipropyl amine	*38*	*38*
Phenol	*42*	*35*
Pentachlorophenol	*50*	*47*
Pyrene	*31*	*36*
1,2,4-Trichlorobenzene	*28*	*23*

This comment is addressed in the QAPP response document.

22. *For Table 6-1, provide a rationale for not analyzing the process samples for volatile organic compounds (VOCs). VOCs are analytes that were detected in the wastestream. They are listed in Table 8-3.*

This comment is addressed in the QAPP response document.

<u>*Section 8.2 - Process Sampling*</u>

23. *Indicate the frequency of sample duplicates. They should be performed at a rate of one per twenty samples.*

This comment is addressed in the QAPP response document.

Section 11.0 - Analytical Procedures

24. *Indicate the frequency of process samples' matrix spike/matrix spike duplicates. They should be performed at a rate of one per twenty samples or each batch, whichever is least. Tables 12-3 and 12-4 may be referenced.*

This comment is addressed in the QAPP response document.

25. *For Tables 12-3 and 12-4, clarify the acceptance criteria "Laboratory derived tolerances." Specific quality control criteria should be used.*

This comment is addressed in the QAPP response document.

Section 12.3 - Analytical Documentation

26. *Indicate that the analytical results will also include, at a minimum, sampling dates, analysis dates, analytical methods used, estimated quanitation limits (EQLs), and quality control (QC) results. The quality assurance / quality control (QA/QC) results will include, at a minimum, method of standard addition (ICP) or serial dilution analysis (ICP) (as applicable), tuning results (GC-MS), method blank results, internal standard areas, matrix duplicate results (as applicable), matrix spike/matrix spike duplicate results, laboratory control samples, and surrogate recoveries.*

This comment is addressed in the QAPP response document.

Section 15.5 - Quality Assurance Reporting

27. *Within Section 15.5, indicate that the quality assurance/quality control information listed in Section 12.3 will also be reported.*

This comment is addressed in the QAPP response document.

28. *The Central States Analytical Laboratories Support of the Trial Burn should indicate that the quality control procedures in the permit's trial burn section would be followed.*

This comment is addressed in the QAPP response document.

PHENOL PLANT BOILER ENGINEERING ASSESSMENT

29. *The facility provided a separate volume describing boiler controls and operating procedures. The facility stated that this should not be incorporated into the permit. It is not clear that the permit will meet the requirements of 40 CFR 266.102(e)(2)(C) and (D) without this document. Boiler controls and operating procedures need to be part of the permit to ensure that the DRE will continue to be met after the trial burn.*

The boiler assessment document was prepared solely as a tool to allow for the review of the Trial Burn plan and associated documents. Thus, it would be inappropriate to incorporate this document wholesale into the permit. For example, if the phenol plant were to change the brand of their distributed control system (DCS) computer from Bailey to Honeywell, inclusion of the engineering assessment in the permit would require that this change have a corresponding permit modification. Regardless of which DCS computer that is used, GEPMTV is responsible for operating, monitoring and documenting that the operation of the boilers is within the specified permit limits.

We believe that any information from the boiler assessment that is desired to be incorporated into the permit should specifically justified.

RESPONSE TO COMMENTS
REGARDING
THE FEDERAL RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) PERMIT
TO BE ISSUED TO GE PLASTICS MT. VERNON, INC. (GE)
AND
MT. VERNON PHENOL PLANT PARTNERSHIP
MT. VERNON, INDIANA

INTRODUCTION

This response is issued pursuant to Title 40 of the Code of Federal Regulations (40 CFR) Section 124.17, which requires that any changes of draft permit conditions be specified along with the reason for the change; that all significant comments be described and responded to; and that any documents cited in the response be included in the administrative record. Comments were requested regarding the United States Environmental Protection Agency's (U.S. EPA) tentative determination to reissue a RCRA permit to the Permittees.

The 45-day public comment period commenced on August 8, 2003, with a public notice in *The Mount Vernon Democrat* and a radio announcement on a local radio station, WYFM. The termination date of this comment period was September 25, 2003. Written comments on the draft Federal permit were received from GE.

Additionally, pertinent information and materials were available at the Alexandria Public Library, located at 115 W. 5th Street, Mt. Vernon, Indiana.

RESPONSE TO COMMENTS

U.S. EPA's Responses to GE's Comments on Signature Pages and Section I General Conditions

1. **Comment #1 (Page i)**: GE requests that the effective date be the date at least 3 months after the permit is issued. This will allow GE sufficient time to install and test both equipment and the computer control software needed to conduct newly required monitoring and automatic waste feed cutoffs (AWFCOs).

   U.S. EPA's Response:

   In its comments and its supplemental submission, GE has provided sufficient rationale to support an effective date of 3 months after issuance of the permit. The requested change has been made.

2. **Comment # 2 (Page ii):** The third paragraph under the heading "Permit Approval" states that one basis for the permit is "the approved trial burn report." GE believes it would clarify the permit to reference the report with more specificity to avoid potential confusion in the future regarding exactly which trial burn report is intended. Accordingly, GE requests that this paragraph be revised by inserting the following parenthetical after the phrase "approved trial

burn report": "(the RCRA Trial Burn Report Revision 1 dated July 2003, and approved July 30, 2003, is the current trial burn report)".

U.S. EPA's Response:

U.S. EPA agrees that the current approved trial burn report is the one referenced in the comment, as is clear in the administrative record. U.S. EPA does not see the need to provide that level of detail in the text of the permit. The provision will not be changed.

3. **Comment # 3 (Page 1 of 15)**: In the second paragraph of section I.A, the word "generally" should be deleted. This provision is based upon 40 CFR § 270.4(a), which does not employ this word.

U.S. EPA's Response:

"Generally" reflects the fact that 40 CFR § 270.4(a) contains exceptions to the general principle stated in the sentence. This qualifier provides fair notice to the Permittees that the protections provided are only as broad as the permit on which they are based. The provision will not be changed.

4. **Comment # 4 (Page 1 of 15)**: In the third paragraph of section I.A, the draft permit's references to sections 3008(a) and 3008(h), both of which are part of Subtitle C of RCRA, conflict with 40 CFR§ 270.4(a), which provides that compliance with the permit constitutes compliance, for purpose of enforcement, with Subtitle C of RCRA.

U.S. EPA's Response:

The reference to sections 3008(a) and 3008(h) will be removed.

5. **Comment # 5 (Page 1 of 15):** The second paragraph of section I.B.1 is an incomplete, and therefore potentially misleading, statement of the legal requirements pertaining to permit modification. Region V has used an approach in another RCRA draft permit (issued to General Electric Company, WID 086 686 003 (the "General Electric Company(Wisconsin) permit"; at page 1 of 10) that GE believes is more complete and, therefore, accurate. GE requests that the second paragraph of section I.B.1 be revised by adding language from the General Electric Company (Wisconsin) permit.

U.S. EPA's Response:

While U.S. EPA does not agree that the draft permit language was incomplete or misleading, the additional language is an accurate reflection of the regulatory requirements. Because this additional detail may help ensure that the Permittees will be aware of, and comply with, those requirements, U.S. EPA will revise the language to add the additional details requested by the Permittees.

6. **Comment # 6 (Page 4 of 15)**: Condition I.E.9.a refers to a "state-approved waste analysis

plan". While GE has a waste analysis plan, it has never been submitted to, or approved by, the State of Indiana. To our knowledge, there is no requirement that it be submitted to, or approved by, the State. We did submit a waste analysis plan as part of our Part B application, which application EPA approved on July 30, 2003. Thus, we request that the words "state-approved" be changed to "EPA-approved".

U.S. EPA's Response:

The waste analysis plan (WAP) is part of the base RCRA program which the State has the authority to review and approve. The WAP that U.S. EPA approved incorporated comments from the State, and is also considered part of the WAP the State approved prior to issuing the State portion of the facility's permit. Since GE is closing the storage facility that is the primary subject of the State permit, the state-approved WAP may be terminated. It is therefore appropriate to change the reference to the WAP for boiler operations from "state-approved" to "U.S. EPA-approved." The final permit reflects this change.

7. **Comments # 7 (Page 5 of 15)**: (A) We have two comments regarding Condition I.E.11. First, the second sentence of this Condition ("Advance notice will not constitute a defense for any noncompliance.") constitutes a legal determination without any statutory or regulatory basis. In addition, if GE provided advance notice for a planned change and EPA instituted an enforcement action concerning that change, the issue of whether the notice provided any type of defense would be dealt with in the course of that action. The specific facts and circumstances of the notice and change will be fundamental to a decision on the legal effect of the notice. To leave the second sentence in the permit would be to make a legal determination without benefit of the facts of the specific case. Thus, there is no legal or factual basis for this provision. Accordingly, GE requests that the second sentence be deleted.

(B) Second, EPA has appropriately cited to 40 CFR § 270.30(l)(2) as the source of the requirement in the first sentence. However, the balance of 40 CFR § 270.30(l)(2) was not included in the draft permit's text. GE requests that the remaining portion of § 270.30(l)(2) that is relevant be added for completeness, accuracy, and clarity.

U.S. EPA's Response:

(A) The language at issue provides the Permittees with fair notice that the mere act of providing advance notice will not by itself constitute a legal defense for noncompliance with the permit. As GE notes, the issue of whether the Permittees may have a defense for noncompliance with the permit is a matter that will be decided on the specific facts and circumstances of the planned changes and their potential impacts. The permit statement is therefore accurate, and does not limit the Permittees' ability to raise potential defenses. The provision will not be changed.

(B) Although the remaining portion of § 270.30(l)(2) addresses new facilities and may therefore be of limited relevance, the additional language will be added as requested in the interest of thoroughness.

8. **Comment # 8 (Page 5 of 15)**: (A) Condition I.E.12 should be deleted. First, GE sees no purpose in addressing a hypothetical future installation of RCRA air emission control devices; it is not relevant. To the extent that GE wants to install RCRA air emission control devices after the permit is issued, GE will do so in accordance with applicable rules, which already require GE to notify EPA (e.g., 40 CFR § 270.30(l)(1)).

(B) Second, the latter half of this condition is based upon §270.30(l)(2), which is addressed in condition I.E.11 (and to which we have requested that the entire relevant portion of §270.30(l)(2) be added). Thus, putting the provisions of §270.30(l)(2) in Condition I.E.12 is redundant. Furthermore, the provisions of §270.32(l)(2) are only triggered in the event of an anticipated noncompliance. GE does not see how installation of air emission control devices would constitute an anticipated noncompliance. Thus, none of the language of §270.30(l)(2) should be used here. GE is providing a comment upon the inspection period set forth in Condition I.E.12b. This provision contains a 30-day inspection requirement. However, the underlying rule (§270.32(l)(2)) provides for a 15-day period, not a 30-day period. Thus, if EPA does not remove the language of §270.30(l)(2) from Condition I.E.12, the timing in Condition I.E.12b should be corrected to match the regulation - 15 days.

U.S. EPA's Response:

This provision has been removed as requested. To avoid re-numbering of sections and cross-references, Condition I.E.12 will be intentionally left blank.

9. **Comment # 9 (Page 6 of 15)**: The final sentence of Condition I.E.13 is based upon the language of 40 CFR 264.12(c), which provides:

Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, the owner or operator must notify the new owner or operator in writing of the requirements of this part and part 270 of this chapter.

However, the draft permit adds a reference to Part 268 that is not found in the cited regulation. Thus, EPA lacks the authority to include the reference to Part 268 in the draft permit. Accordingly, the reference should be deleted.

U.S. EPA's Response:

U.S. EPA disagrees with the assertion that it lacks authority to include the reference to Part 268 in this permit language under appropriate circumstances. In this case, however, the reference will be removed as requested. This change in no way excuses the Permittees or transferees from their obligations to comply with Part 268.

10. **Comment # 10 (Page 6 of 15)**: Condition I.E.14 Twenty-Four Hour Reporting. The text of Condition I.E.14.a adds a requirement not found in the underlying rule. The Condition requires reporting "promptly, but no later than 24 hours after you become aware of the non-compliance." The rule upon which this provision is based simply requires reporting within 24 hours. See 40

CFR § 270.30(l)(6)(i) ("The Permittee shall report any non-compliance which may endanger health or the environment orally within 24 hours from the time the permittee becomes aware of the circumstances....."). Thus, the provision substantively changes the legal requirement.

U.S. EPA's Response:

The adverb "promptly" merely reinforces the purpose of the cited regulation and emphasizes the need to report non-compliance within 24 hours. It is still clear that providing notice within 24 hours is the standard for judging compliance, so there is no substantive change and no inconsistency with the regulation. The provision will not be changed.

11. **Comments # 11 (Page 6 of 15):** The first sentence of Condition I.E.14.b cites to two regulatory provisions - 40 CFR § 270.30(l)(6) and 40 CFR § 270.33. The latter provision does not address any of the content of this portion of the draft permit. Thus, the citation does not appear necessary, and we request that it be deleted.

In addition, the grammar and punctuation used in the text of Condition I.E.14.b before the 10 listed items differ from the rule, thereby creating confusion.

In paragraph (6)(i)(B) of the rule, the reporting requirement addresses two types of events (a release or discharge of hazardous waste, and a fire or explosion). Both events are modified by the two clauses that follow - "from a HWM facility, which could threaten the environment or human health outside the facility". The draft permit does not reflect this. While the fire/explosion event is modified by the two clauses, the release/discharge event is not. GE requests that this omission be corrected. We have provided revised text at the end of this comment.

Last, the proposed permit separates into two separate conditions (I.E.14.a and I.E.14.b) a concept that the rule treats as a single concept. The result is confusing and changes the meaning of the underlying rule. The rule (40 CFR §270.30(l)(6)(i)) requires the permittee to report certain events of noncompliance, then lists three as examples - a release of hazardous waste that may endanger a public drinking water supply; a release or discharge of hazardous waste from the HWM facility; and, a fire or explosion at the HWM facility.

However, the proposed permit separates the examples (set forth in I.E.14.b) from the reporting requirement (at I.E.14.a). The confusion is evident in the text of I.E.14.b. There, the first sentence states that the report must include certain information. The following sentence (immediately before the list of 10 items) states the same thing. The translation of the rule into permit text has resulted in a confusing outcome.

We believe the second sentence of I.E.14.b correctly points to the types of information that should be included. The first sentence is mistakenly described as contents of the report. Instead, we believe the role of the first portion of I.E.14.b is to provide examples of noncompliance events that trigger the reporting requirement in I.E.14.a.

U.S. EPA's Response:

The reference to 40 CFR §270.33 will be removed and the grammar of the paragraph will be revised as suggested to more closely parallel the regulatory language. To avoid any confusion, the final sentence before the list of 10 items will be revised to read: "The oral report describing the occurrence and its cause must include the following details:" U.S. EPA does not believe that the structure and organization of Conditions I.E.14.a and I.E.14.b otherwise create any confusion and these provisions will otherwise not be changed.

12. **Comment # 12 (Page 7 of 15)**: Condition I.E.14.c sets forth the elements of a written follow-up report. However, the Condition differs from the underlying rule in two ways, and each inappropriately changes the meaning of the rule's requirement.

First, two elements (items (2) and (3) in the draft permit text) incorrectly expand the scope of the report. Each element refers to the underlying incident that triggers the report as "noncompliance and/or release or discharge of hazardous waste". This expands the scope of the reporting requirement beyond the rule. The rule clearly states that the reports, oral and written, are triggered only by a certain type of noncompliance event, i.e., one that may endanger health or the environment. The draft permit goes beyond this by referring to a release or discharge or hazardous waste in the disjunctive with a noncompliance. GE requests that the references in items (2) and (3) to "... and/or release or discharge of hazardous waste" be deleted.

Second, most of the elements do not reflect the language of the underlying rule (40 CFR §270.30(l)(6)(iii)). The permit text inappropriately expands the regulatory requirements. We have revised the proposed rule text of these elements to faithfully translate the rule's requirements.

Last, we revised the last paragraph to make consistent the reference in the last paragraph ("written notice") to the initial language in the first paragraph ("written report"), and added "such" to clarify the reference back.

U.S. EPA's Response:

The first part of the comment is based on a strained interpretation of the language and does not require any change to the provision. The written report requirement is clearly linked to the need to provide an oral report under Condition I.E.14.a. There is no expansion of the scope of the report; information on any relevant noncompliance, release and discharge is required by the regulation. The additional information requirements cited in the second part of the comment are logical outgrowths of the elements specifically cited in the regulation and are necessary to place the information in context. They are narrowly crafted and closely linked to the specific elements listed in the regulation and are consistent with those specific elements. The reference to "notice" will be changed to "report" as requested, but the provision will otherwise not be changed.

13. **Comment # 13 (Page 8 of 15)**: Condition I.E.16.a inappropriately expands the requirements

imposed upon GE beyond those in the underlying rule, in several ways. First, the draft permit proposes to expand the rule's reporting requirement from one regarding the failure to submit relevant facts in the permit application to one that covers the permit application "or other submittal". There is no basis in the rule to expand the scope of this requirement to some "other submittal".

Second, the draft permit proposes to expand the rule's reporting requirement from one regarding the submission of incorrect information in the permit application or in any "report to the Director" to one that covers the permit application and other "submittals". The term "submittals" has a broader meaning than "reports to the Director". The latter refers to items the rule or permit specifically directs be sent to the Director, while the former is not so limited. Thus, both proposed requirements substantively change the scope of the underlying rule.

Third, EPA added the phrase "or otherwise omitted" in the first sentence, a phrase not found in the rule. GE does not understand what the added language is supposed to mean. We are unable to conceive of a situation where a permittee would omit a relevant fact, where that omission would not also constitute a failure to submit the relevant fact. The phrase "or otherwise omitted" is, therefore, redundant and should be deleted. On the other hand, if it has a meaning beyond the regulatory requirement, GE requests that this phrase be deleted as an improper expansion of the underlying regulatory requirement.

Last, EPA added a requirement at the end of this Condition that goes beyond the regulatory requirement to submit the correct facts or information. The draft permit requires GE to explain in writing the circumstances of the incomplete or inaccurate submittal. This requirement is not part of the rule, and should be deleted.

U.S. EPA's Response:

The provision is consistent with 40 CFR §270.30(l)(11) and will not be changed. To the extent the provision expands on the specific language of the regulation, it merely reinforces the importance of full and accurate disclosure of information to the U.S. EPA. The language puts the Permittees on fair notice that submissions can be inaccurate due to omissions as well as due to incomplete or inaccurate statements. Finally, the requirement that the Permittees explain in writing the circumstances of the incomplete or inaccurate submittal is essential to the U.S. EPA's understanding of the nature and extent of possible noncompliance and offers the Permittees an opportunity to outline any defenses and/or mitigating circumstances they may wish to assert.

14. **Comment # 14 (Page 9 of 15)**: Condition I.I.2 applies to hazardous waste facilities that accept waste from off-site generators. GE is not such a hazardous waste facility. GE requests that EPA delete this condition.

U.S. EPA's Response: Even if the Permittees do not currently accept waste from off-site generators, it is possible that the facility could elect to do so during the term of the permit. This provision will not be removed.

15. **Comments # 15 (Page 10 of 15):** The first sentence of Condition I.J.3 ("Any inconsistency or deviation from the approved designs, plans and schedules is a permit noncompliance.") should be deleted, for two reasons. First, the concept is adequately addressed in Condition I.J.1 ("Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject you to enforcement action under Section 3008 of RCRA."). Second, the sentence states a legal conclusion without taking into account the facts and circumstances surrounding an inconsistency or deviation from an approved design, plan or schedule. It is inappropriate to draw such a legal conclusion without providing GE the opportunity to demonstrate that no deviation occurred because the facts and circumstance surrounding the alleged deviation are being ignored.

U.S. EPA's Response:

Condition I.J.3 does not duplicate Condition I.J.1. Condition I.J.3 clarifies and refines the consequences of a failure to meet approved designs, plans and schedules as described in Condition I.J.1 and elsewhere. The language at issue provides the permittees with fair notice that such a failure constitutes noncompliance with the permit. As GE notes, the issue of the enforcement consequences of the noncompliance will be decided on the specific facts and circumstances surrounding an inconsistency or deviation from an approved design, plan or schedule. The statement is therefore accurate, and does not limit the permittees' ability to raise potential defenses. The provision will not be changed.

U.S. EPA's General Response to GEs' Comments on Boilers

GE makes several general comments concerning the technical conditions described in Section II pertaining to the operations of hazardous waste burning boilers. These general comments can be divided into several main categories:

(1) The Number of Parameters to Be Included in the Permit

GE asserts that monitoring only the combustion chamber temperature and CO (carbon monoxide) concentration is sufficient to meet the regulatory requirements and to ensure that the boilers would be in compliance with the Boilers and Industrial Furnaces (BIF) Rule -- in 40 CFR Part 266. GE claims that U.S. EPA has not shown that monitoring other parameters is necessary to meet the regulatory requirements.

Many other operating parameters, however, may affect the emissions of particulates and Volatile Organic Compounds (VOCs) and the safety of the boiler operations. Because the boilers at this facility are more than 20 years old and because the scope of the trial burn at the facility was limited, it is essential that good operating practices are followed and verified, and that boiler operations are closely and thoroughly monitored. Standards for combustion chamber temperature and CO concentration alone will not prevent unacceptable emissions from the boilers.

While CO is a good indication of combustion, it is not a direct indicator of what pollutants are formed at what levels, because different constituents have different combustion kinetics. For this facility the trial burn demonstrated compliance with the BIF rule only under conditions when the CO

concentration in the flue gas was very low (i.e. less than 6 parts per million by volume (ppmv) corrected to 7 % oxygen (O_2)). The BIF Rule (and the permit), however, allows operations at levels up to100 ppm of CO corrected to 7 % O_2 in the flue gas. Because the boilers were not tested under high CO concentration, the Permittees have not demonstrated that these boilers could still comply with the BIF Rule when the CO concentration is at an order of magnitude higher than what was demonstrated during the trial burn. Therefore, proper operation of the boilers is essential to assure that they will satisfy BIF emissions standards and meet the purposes of the BIF rule. As a result, permit conditions for additional operating parameters were deemed necessary to ensure the proper operation of these boilers. They are included under U.S. EPA's authority under 40 CFR §270.32(b)(2) and 40 CFR §266.102(e).

(2) Use of Trial Burn Information

GE asserts that it is not fair to include permit requirements for several parameters for which GE did not propose to monitor over a range of values in the trial burn plan. GE states that if U.S. EPA believed that limits on these parameters were necessary, it should have said so during its review of the trial burn plan. GE also states that although some data for these parameters have been provided to U.S. EPA, either in the trial burn report or in subsequent correspondence, the trial burn plan was not designed to evaluate these parameters as possible limits or conditions. As such, GE asserts these data lack sufficient sample size or quality, or both, to use as the basis of establishing permit conditions.

GE misstates the nature and purpose of the trial burn process. The purpose of a trial burn is: (1) to demonstrate compliance with the BIF Rule, (2) to establish boiler operating conditions, and (3) to identify additional conditions which may be necessary to protection of human health and the environment based on conditions observed during the trial burn. See 40 CFR §266.102(e)(2).

U.S. EPA must look to the information in the trial burn report and must also evaluate the areas not sufficiently addressed by the trial burn report in developing permit conditions. Although the U.S. EPA approves the trial burn plan, that approval is not a guarantee that the trial burn will resolve all regulatory issues and is not a limit on U.S. EPA's obligation to develop appropriate permit conditions. The original trial burn report was incomplete, which necessitated the required revisions to include other parameters and operating conditions. U.S. EPA must determine whether (and which) additional requirements must be imposed in order to assure that the control systems associated with the boiler and auxiliary equipment consistently meets the design conditions and the monitoring/recording equipment is reliable. As discussed in more detail in the responses to specific comments, sufficient information is available to establish these permit conditions.

(3) Conditions Concerning Safety and Efficiency of Boiler Operations

GE asserts that U.S. EPA has not shown the necessity for certain conditions addressing boiler operation and safety practices.

Boilers 530A and 530B were installed in 1980 and 1982, respectively. U.S. EPA is especially concerned that these hazardous waste burning boilers will approach the end of their useful lives during the life of this permit. As boilers age they typically become less reliable and more prone to malfunctions and upsets. (This concern is one of the reasons why boilers must be recertified every

three years under the interim status regulations.) Because of the expectation that performance of these boilers will decline, U.S. EPA has incorporated certain critical industrial standards into this permit that are essential to the safety and efficiency of boiler operations in accordance with 40 CFR §270.32(b)(2).

These industrial standards represent good operating practices. As such, the Permittees are likely in compliance as a matter of course. Including those standards as part of this permit ensures the safety and effectiveness of boiler operations.

As noted above, the permit regulations require U.S. EPA to set standards across a range of operating parameters in accordance with 40 CFR § 266.102(e)(2)(i) so that "for each hazardous waste, the permit will specify acceptable operating limits including, but not limited to, the following conditions as appropriate.

> (A) Feed rate of hazardous waste and other fuels measured.....
> (B) Minimum and maximum device production rate .....
> (C) Appropriate controls on the hazardous waste firing system.....
> (D) Allowable variation in boiler and industrial furnace system design or operating procedures.....
> (E) Minimum combustion gas temperature measured at a location indicative of combustion chamber temperature.....
> (F) An appropriate indicator of combustion gas velocity.....
> (G) Such other operating requirement as are necessary to ensure that the DRE performance standard of 40 CFR § 266.104(a) is met.

Two additional facts further support the need to make sure the boilers operate under carefully controlled parameters. First, the hazardous waste boilers were cleaned 3 months prior to the trial burn. Therefore the trial burn was not conducted under worst case conditions. Accumulation of flyash in the boilers over a long period of time can have significant impacts on the particulate, VOCs and metal emissions due to re-entrainment of flyash into the flue gas. Because the permit allows the boilers to operate for more than a year without cleaning, actual operating conditions may be worse than those tested in the trial burn.

Second, GE has informed U.S. EPA that the thermocouple used for the boiler combustion chamber has to be replaced every 3 months. This is significantly shorter than the expected life of a thermocouple, which calls into question how effectively combustion chamber temperature is monitored. The thermocouple monitors the temperature of the boiler combustion chamber, providing the data used to determine compliance with regulatory requirements and to trigger safety mechanisms. The frequency and extent of thermocouple drift or failure cannot be measured. Inaccurate temperature readings resulting from deterioration of the thermocouple may cause inappropriate fluctuations in the combustion chamber temperature. There is no redundant or backup system. This concern further emphasizes the need for additional conditions to ensure that the combustion chamber temperature can be accurately monitored.

(4) <u>Engineering Units</u>

GE has asked that the standards for several parameters be clarified to state that they are measured in

rolling hourly averages. That is and was the intent of the draft permit where specified below. When expressed in engineering units (e.g., #/hour or #/minute), the units are the average value within the expressed interval. Therefore, #/hour is the average flow per hour, provided such flow is regulated. Units expressed in psig should be within the accepted engineering range of the gauge.

U.S. EPA's Responses to GE Plastics' Comments on Section II - Boilers

16. **Comment # 16 (Page 10 of 15)**: GE requests that the word "applicable" be inserted before "requirements" in the first sentence of Condition II.A to clarify the permit, because not all of the requirements of 40 CFR Part 266, Subpart H apply to GE.

    U.S. EPA's Response:

    U.S. EPA agrees to make the requested change and has inserted the word "applicable" in the final permit.

17. **Comment # 17 (Page 11 of 15):** GE states that the last paragraph of Condition II.A has already been addressed in Condition I.B.1. Thus, this condition is redundant and, for the sake of clarity, should be deleted.

    U.S. EPA's Response:

    Because there is no conflict between Condition II.A and Condition I.B.1, and because the purpose of Condition II.A is to re-emphasize the importance of the permit modification process under the BIF Rule, no change was made to the draft permit.

18. **Comment # 18 (Page 11 of 15):** GE requests that Condition II.B.2 be revised to make it clear that natural gas must be fired whenever hazardous waste fuel is fired, but not vice versa.

    U.S. EPA's Response:

    The suggested change was made to avoid any potential confusion, with the exception that the term "hazardous waste fuel" was substituted for "hazardous fuel" in the last sentence to provide further clarification. Condition II.B.2 therefore reads:

    " In each boiler (H-530A and H-530B), natural gas must be fired whenever hazardous waste fuel is fired. The minimum heat input from the natural gas in each boiler when hazardous waste fuel is burned shall be 1.10 million BTU per hour (hourly rolling average)."

19, **Comments # 19 (Page 11 of 15):** The first sentence of Condition II.B.3.b is unclear. First, there are no "metal emissions" being established in the permit. Instead, the permit establishes feed rate limits on metals (and other constituents) in order to comply with the regulatory emissions standards. Second, the reference to "Adjusted Tier I" is incomplete. The regulation refers to "Adjusted Tier I feed rate screening limits". *See, e.g.*, 40 CFR §§ 266.102(e)(2)(iii), 266.102(e)(4)(i), and 266.103(b)(2)(ii). GE requested revisions to the Condition.

U.S. EPA's Response:

The suggested change to Condition II.B.3.b was made because it adds clarification without changing the substance of the Condition.

20. **Comment # 20 (Page 12 of 15)**: GE requested that Condition II.B.4 be deleted in its entirety, asserting that the BIF Rule does not require limits on hazardous waste fuel temperature or on hazardous waste line pressure. GE also requested that if the Condition was not deleted: (1) the minimum temperature be reduced to 140° F; (2) steam tracing not be required to maintain the temperature over the piping system; and (3) failure to meet the parameter can result in waste feed cutoff rather than tripping the boiler.

U.S. EPA's Response:

The hazardous waste fuel burned in GE's boilers is a very high viscosity material. Maintaining an acceptable temperature and pressure at the burner is essential to ensuring good combustion efficiency and burner safety. Temperature and pressure of the fuel affect atomization and are important to the creation of optimum fuel particle distribution, fuel air mixing, and flame pattern.

The Permittees only demonstrated that these boilers could comply with the BIF Rule with the hazardous waste fuel maintained at an elevated temperature. As a result, it is necessary to ensure proper combustion and safety under all operational conditions allowed by the permit. This is done by assuring that the Permittees will follow good engineering practices adopted by the industry. This Condition reinforces the importance of following established operating procedures.

Because of the importance of temperature and pressure to effective combustion and safety, boiler fuel trains include low limit switches for temperature and pressure. Hazardous waste fuel pressure and temperature at the burner cannot be lower than the setpoints established in the boiler trip list that the Permittees submitted to U.S. EPA. As an example, if the hazardous waste fuel pressure becomes lower than the atomizing steam pressure, it would create potential dangers to the combustion system. Instead of atomizing the fuel, steam might prevent fuel from entering the burner. Similarly, if the hazardous waste fuel temperature becomes too low, it would not allow good atomization, and therefore, combustion.

The Permittees could potentially obtain and submit data to demonstrate that greater variations in the fuel temperature, pressure, and the atomizing steam pressure will not adversely affect the required destruction and removal efficiency (DRE) for those particular boilers. The demonstration should include empirical data. With such data, the Permittees may pursue a permit modification under 40 CFR § 270.42 to change this Condition. U.S. EPA would be happy to work with the Permittees during the 30 day time period between permit issuance and effective date to pursue this change.

As to the other issues: (1) Sufficient justification was provided to support reducing the minimum temperature to 140° F and the requested change was made. (2) As requested, the permit was revised so that steam tracing is not mandated as the means of maintaining the

temperature over the piping system. The additional flexibility is appropriate, as installation of a heating system may be a more effective means of maintaining and controlling fuel temperature. (3) Additional flexibility is appropriate, so the condition is revised to provide that failure to meet the parameter must result in either waste feed cutoff or tripping the boiler.

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was not changed except as described above.

21. **Comment # 21 (Page 13 of 15):** GE requested the deletion of Condition II.C.1.c, asserting that (1) the condition is vague and GE does not understand what specific requirement is being imposed, (2) EPA has no legal authority to include this Condition.

U.S. EPA's Response:

This permit contains common terminology used by the power industry. This Condition is meant to ensure that the boilers are operated with typical industry standards and general good engineering practice. The words "permissives" and "interlocking" are commonly used terms familiar to electrical/electronic control engineers. "Permissives" means a set of conditions established for a boiler and electrically wired to a master controller. "Interlocking" is an electrical control term describing interconnections of electrical circuitry. These controls help ensure that the various pieces of equipment operate in proper sequence and proper relationship to each other. If any one of these conditions is not met (or "satisfied" in engineering terms) it would lock out the system, thereby not allowing the next sequential operations to proceed. These controls will either prevent boiler startup or trigger boiler shutdown depending on when they are activated.

The condition gives the Permittees flexibility on where and how permissive and interlocking controls will be used in boiler design and operation, and has been modified slightly to reinforce this flexibility and the purpose of the condition. The Permittees should keep information concerning the settings for the permissive and interlocking controls on site.

40 CFR § 266.102(e)(2)(i)(D), states that permits will specify the scope of any "allowable variation in boiler and industrial furnace system design or operating procedures." It is, therefore, appropriate for U.S. EPA to impose Condition II.C.1.c, because it provides necessary guidelines for boiler operating procedures. The condition reinforces that these specific elements are an important part of the process that must be maintained as stated more generally in Condition I.E.6.

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was modified slightly as explained above.

22. **Comment # 22 (Page 13 of 15)**: GE requested that Condition II.C.1.d be modified so that it would have other options available under 40 CFR § 270.10(h), rather than having to conduct a trial burn every 5 years. GE also asserted that an absolute deadline is not appropriate because it cannot control the timing of U.S. EPA's approval of the trial burn plan that must precede any trial burn.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments. GE's boilers are approaching the ends of their useful lives. The U.S. EPA has also received new information from GE on the reliability of thermocouples monitoring the combustion chamber temperature. GE has also informed U.S. EPA that the trial burn was conducted after a recent boiler cleaning. In light of these additional facts it is especially important that another trial burn be conducted in the 5 year time frame, or perhaps sooner to address concerns about the scope of the latest trial burn.

U.S. EPA recognizes, however, that it is possible that a delay in the U.S. EPA's approval of a trial burn plan would impact the 5-year schedule, the permit has been revised to add the phrase ".... unless otherwise directed by the Director." This language provides flexibility in the event of approval delays, and also leaves open the possibility that the Permittees could pursue alternatives to a trial burn.

No other changes have been made to the provision.

23. **Comment # 23 (Page 13 of 15):** GE requested that Condition II.C.2 be deleted because (1) it did not understand what action is required if it fails to satisfy a parameter, (2) it asserts that boiler operating parameters are irrelevant to the permit, and (3) the parameters identified in the condition are not included in the approved trial burn plan. GE also asserted that because the requirements are unclear, it has not received sufficient notice of what actions are required to comply with the permit, so that the term must either be deleted or revised and re-proposed.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

The U.S. EPA believes that the limitations questioned by the Permittees in this comment are conditions that are necessary and appropriate under 40 CFR § 266.102(e) and 40 CFR § 270.32(b)(2) to ensure protective operation of the boilers in light of the design, operation, and age of the equipment being permitted.

Whether or not to vary or optimize any or all of these parameters during the trial burn is a decision that the applicants make as part of the Trial Burn Plan submitted under 40 CFR § 266(c)(6). U.S. EPA's approval of the Trial Burn Plan does not limit the potential scope of parameters and conditions addressed in the permit.

If any one of the standards for these parameters is not met (or "satisfied" in engineering terms), the Permittees are out of compliance with the permit and are therefore subject to enforcement action. To clarify, the provision will be revised to read "the following parameters must be monitored and the following standards must be met."

While U.S. EPA does not believe this term was unclear as initially drafted, it is well-established that to the extent clarification is needed, the response to comments process is sufficient to provide such clarification without need for re-proposal of the permit in whole or

in part. See 40 CFR § 124.14(b) and In re Amoco Oil, 4 E.A.D. 954, 980 (EAB 1993).

This condition was not changed except as described above.

24. **Comment # 24 (Page 13 of 15):** GE requested the deletion of Condition II.C.2, stating that CO concentration is sufficient to monitor combustion and that steam header average pressure is not sufficiently related to combustion efficiency. GE also asserted that steam header pressure was not part of the approved trial burn plan and that the record does not provide sufficient basis to set a permit limit. GE also requests that if the condition is not deleted: (1) the limit be listed as an hourly rolling average; (2) that no minimum limit be set; and (3) that the maximum limit be set at 194 psig, a point just below the setting for the initial pressure relief point.

U.S. EPA's Response:

40 CFR § 102(e)(2)(i) specifies in part that "..... for each hazardous waste, the permit will specify acceptable operating limits including, *but not limited to*, the following conditions as appropriate:.....

...(B) *Minimum and Maximum device production rate* ....." (emphasis added)

The U.S. EPA believes that this operating parameter limit is necessary to properly characterize production rate (i.e., of steam) in the boilers. Steam temperature and pressure are essential factors for characterizing steam quality and flow. Therefore, the steam header pressure is being retained.

Steam header pressure is protected by a series of relief valves. Each boiler is protected by a series of ASME stamped safety relief valves. Any significant increase in the steam header pressure setting would impact on the boiler working pressure, therefore, the safety of boiler operations.

A boiler is a heat exchange device that converts the heat of the flue gases to steam, generated as a result of the heat exchange through boiler tubes and membrane walls. Steam output is a measurement of heat recovery. This condition helps assure that the Permittees meet the definition of "boiler" per 40 CFR § 260.10, including a 60 % minimum recovery efficiency and a minimum 75 % utilization.

GE stated that the relief valves are set at 195 psig, 200 psig, and 205 psig. This confirms the nominal header pressure of 170-180 psig, because, in general, steam relief valves start to relieve steam pressure at 5 to10 % over the set header pressure depending on the downstream steam pressure requirement and the system design pressure. GE's proposal to set the maximum limit just below the first relief point is reasonable and the condition will be revised as requested to set a maximum steam header pressure at 194 psig. The permit does not require a minimum steam header pressure because the boiler is protected by a non-return valve installed on the steam drum.

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was

not changed except as noted above.

25. **Comment # 25 (Page 13 of 15)**: GE requested the deletion of Condition II.C.2 on feedwater temperature, because the limit is not required, was not part of the trial burn plan, is not directly related to hazardous waste combustion efficiency, and does not have sufficient support in the record. GE also requests that if the condition is not deleted: that the limit be measured as an hourly rolling average, and that it be revised from 255^0 to 251^0 F.

U.S. EPA's Response:

Operation of the boiler outside of the envelope defined by the trial burn period creates uncertainty about the representativeness of the emissions from the trial burn period, and major shifts in certain operating parameters can elevate the risk of catastrophic failure which could result in fugitive emissions or other accidental releases to the environment. U.S. EPA believes that establishing this limit is a reasonable and necessary exercise of its authority under 40 CFR § 266.102(e) and 40 CFR § 270.32(b)(2).

U.S. EPA accepts the proposed change to the minimum feedwater temperature from 255° F to 251° F (hourly rolling average).

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was not changed except as described above.

26. **Comment # 26 (Page 13 of 15):** GE requested that the condition on maximum hazardous fuel input be removed because CO monitoring is sufficient, U.S. EPA lacks authority to impose the condition, and the parameter was not proposed in the Trial Burn Report. GE also requested clarification that it is heat input from fuel that is being measured rather than fuel input, and requested that the limit be changed from 72.90 to 72.9 as an hourly rolling average.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

Elimination of the second decimal place and addition of the word "heat" is acceptable to provide clarification. It should be noted that the heat input is based on Higher Heating Value commonly used in the U.S., not the Lower Heating Value commonly used outside the U.S. The condition has also been clarified, as requested, to show that the standard will be measured as an hourly rolling average.

No changes were made to the condition other than the revisions described above.

27. **Comment # 27 (Page 13 of 15)**: Condition II.C.2 Maximum Hazardous Fuel Input. GE proposed to add "hourly rolling average" after pounds/hour.

U.S. EPA's Response:

The provision has been changed as requested. Please see the General Responses by U.S. EPA

to GE's Comments.

28. **Comment # 28. (Page 13 of 15)**: Condition II.C.2 Maximum steam output with hazardous waste fuel. GE stated that this condition limiting steam output is not necessary because: (1) total heat input limits provide sufficient limits on production rates as provided for in 40 CFR § 102(e)(2)(i); (2) and the parameter was not proposed in the Trial Burn Report; (3) CO monitoring is sufficient to indicate combustion effectiveness; and (4) steam output is not sufficiently related to combustion of hazardous waste fuel. GE also proposed to add "hourly rolling average" after pounds/hr if the condition is not removed.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

As GE's comment acknowledges, 40 CFR § 266.102(e)(2) specifically lists minimum and maximum production rate as a requirement to ensure compliance with the organic emission standards. In addition, steam output can represent another measurement of hazardous waste input to boilers. The boilers do not have a redundant instrumentation system, so this condition provides secondary or a backup monitoring of waste burning conditions. As described in the general comments, it is important to ensure close monitoring of the operations of these boilers given their age, the limitations of the trial burn, and the concerns related to the thermocouples. This additional check on the integrity and accuracy of the heat input data is important for this equipment. Region 5 is aware of at least one other facility with very similar boilers burning very similar waste types that has had difficulty with the accuracy of its metering devices. Gathering data on steam, heat, flue gas flow and oxygen measurements allows correlation that helps ensure the accuracy of the facility's monitoring.

The "hourly rolling average" clarification has been added as requested. This condition was not otherwise changed.

29. **Comment # 29 (Page 13 of 15):** Condition II.C.2 - Maximum Total Heat Input. GE suggested changing the numerical value from "75.00" to "75.0" and specifying that it would be measured as an hourly rolling average.

U.S. EPA's Response:

Elimination of the second decimal place and addition of "hourly rolling average" are acceptable to provide clarification. The requested changes have been made.

30. **Comment # 30 (Page 13 of 15)**: Condition II.C.2 - Minimum Heat Input. GE requested that (1) the word "total" be inserted between "minimum" and "heat" (2) "hourly rolling average" be added, and (3) the numerical value be changed from "59.40" to "59.4."

U.S. EPA's Response:

Minimum heat input is limited to the minimum heat supplied to the boiler through the burner system alone. If the word "total" is inserted, it provides a different meaning. Total heat input

to a boiler includes heat from combustion air, feedwater, fuel, chemical feed, atomizing steam, etc. The trial burn data addressed the minimum heat supplied to the boiler through the burner system alone. If the Permittees wish to make this modification in the future, they must provide a complete heat and mass balance diagram with the revised trial burn report to account for all elements of heat input to develop an appropriate standard. If the Permittees submit a permit modification request with the above-mentioned documents, U.S. EPA will review the request to modify the condition.

Elimination of the second decimal place and addition of "hourly rolling average" are acceptable to provide clarification. Those requested changes have been made.

31. **Comment # 31 (Page 13 of 15)**: Condition II.C.2 - Minimum Oxygen Concentration. GE requested that the condition be removed because CO monitoring is sufficient, U.S. EPA lacks authority to impose the condition, and the parameter was not proposed in the Trial Burn Report. GE also requested that if the condition is not removed, that "hourly rolling average" be added to clarify how compliance will be measured.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

No combustion system can achieve complete combustion under stoichiometric condition (i.e., theoretically required air or no excess oxygen in the flue gas). The amount of excess oxygen required depends on the physical and chemical characteristics (e.g., hydrogen to carbon ratio) of the fuel -- in this case, the hazardous waste fuel and natural gas. For example, burning natural gas requires much less excess combustion air than burning coal under the optimum combustion condition.

Without ensuring a minimum oxygen level in flue gas, it is possible that a "reducing" condition may be developed in the boiler, which would accelerate the deterioration of the boiler's internal components and quickly damage the combustion chamber thermocouple. Because the boilers are old and are equipped with a single element thermocouple in the combustion chamber, it is necessary to monitor the oxygen concentration in the flue gas stream to ensure good combustion and compliance with BIF Rule requirements.

If adequate combustion air is not provided, the flame temperature would rise. High flame temperature would enhance the formation of oxides of nitrogen (NO_x), and the boilers would release those pollutants to the environment.

Since combustion air (the source of the oxygen) is part of the burner firing system and 40 CFR § 266.102(e)(2)(i)(C) stipulates that such factors must be controlled, specifying a minimum flue gas oxygen concentration in the permit ensures that an optimum combustion could be achieved.

In evaluating this comment, U.S. EPA also noted that during the trial burn, the oxygen concentration in the flue gas ranged from 5.2 % (Condition 1, Run # 6) to 10.9 % (Condition 2, Run # 3). GE's trial burn data show that at a lower combustion temperature, higher oxygen

is required to comply with the BIF Rule. U.S. EPA has reconsidered the minimum oxygen concentration of 3 % stipulated in the draft permit. The originally specified 3 % oxygen concentration is adequate for a boiler fired only by natural gas. Because the trial burn report indicates a higher oxygen concentration is needed to demonstrate compliance with the BIF Rule when burning hazardous waste fuel, U.S. EPA has determined that the minimum oxygen concentration (hourly rolling average) must be increased to 5.2 %.

The addition of "hourly rolling average" is acceptable to provide clarification. No other changes were made to this condition, except as described above.

32. **Comment # 32 (Page 13 of 15)**: Condition II.C.2 - Maximum Stack Gas Temperature. GE requested that the condition be removed because monitoring CO and boiler chamber temperature is sufficient, U.S. EPA lacks authority to impose the condition, and the parameter was not proposed in the Trial Burn Report. GE also suggested that if the condition is not removed the maximum stack gas temperature be increased from 595 °F to 625 °F.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

The stack temperature is related not only to the combustion temperature, as stated by GE, but also to the steam production rate and to the overall thermal efficiency of the boiler. Regulations at 40 CFR § 260.10 require that these units demonstrate a thermal efficiency of 60 % in order to be considered a "boiler" regulated under 40 CFR § 266.100 et seq., as opposed to an incinerator. Hazardous waste incinerators are regulated under 40 CFR § 264.340 et seq., and 40 CFR Part 63 Subpart EEE. Monitoring the stack temperature will allow the boilers' regulatory status to be verified in real time. To reinforce the importance of this verification, Condition II.C.2 will be revised to make clear that the boilers must meet the requirements of 40 CFR § 260.10. U.S. EPA also requests that the Permittees provide a calculation of boiler steam utilization within 3 months of the issuance of the permit.

U.S. EPA accepts the proposal for a revised maximum temperature of 625 ^{0}F (hourly rolling average) and the provision was modified to include that change and the other change discussed above.

33. **Comment # 33 (Page 13 of 15):** Condition II.C.2 - Minimum Boiler Chamber Temperature. GE suggested the addition of "hourly rolling average" for clarification.

U.S. EPA's Response:

The addition of "hourly rolling average" is acceptable to provide clarification.

34. **Comment # 34 (Page 13 of 15)**: Condition II.C.2 - Minimum Atomizing Steam Pressure. GE requested that the condition be removed because CO monitoring is sufficient, U.S. EPA lacks authority to impose the condition, and the parameter was not proposed in the Trial Burn Report. GE also suggests that if the condition is not removed, the minimum steam atomizing pressure be changed from 25 to 20 psig (hourly rolling average).

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

Operation of the boiler outside of the envelope defined by the trial burn period creates uncertainty about the representativeness of the emissions from the trial burn period. Major changes to the waste feed mechanism or the way it is operated can reduce the effectiveness of the atomization that is essential to the continued efficient combustion of a viscous waste such as is burned in the GE boilers. U.S. EPA therefore believes that establishing this limit and the other limits contained in the permit is a reasonable and necessary exercise of its authority under 40 CFR § 266.102(e).

U.S. EPA agrees, however, with GE's justification for reducing the standard for minimum steam atomizing pressure and the standard has been revised as suggested. No other changes were made to the provision.

35. **Comment # 35 (Page 13 of 15)**: Condition II.C.2 - Maximum Combustion Air Flow. GE suggested that the combustion air flow be based on hourly basis.

U.S. EPA's Response:

Although it is customary to measure air flow in CFM (cubic foot per minute), implementing this permit limitation via an hourly average would be consistent with the implementation of other parameters. Therefore, GE's comment is accepted and changes are incorporated in the final permit.

36. **Comment # 36 (Page 13 of 15)**: Condition II.C.2 - Maximum Particulate Emission. GE stated that this condition is not necessary and should be deleted because the waste fuel ash limit would ensure compliance with the maximum particulate emission requirement of the BIF Rule and because this parameter is not routinely monitored.

U.S. EPA's Response:

The maximum particulate emission is a regulatory requirement (See 40 CFR § 266.105(a)) which applies at all times. However, U.S. EPA agrees that the Permittees are not required to monitor it on a continuous basis, unlike many of the other operating parameters. As a result, U.S. EPA has added a parenthetical clarification to the table in the permit stating that the value of 0.08 grains/dscf is not required to be continuously monitored, but applies at all times and must be met during any particulate matter stack test.

37. **Comment # 37 (Page 14 of 15)**: Condition II.C.3 - AWFCO Parameters. GE suggested that high hazardous waste fuel pressure, low hazardous waste fuel pressure, low hazardous waste fuel temperature, and low atomizing steam pressure be deleted from AWFCO, consistent with its previous comments concerning those parameters.

U.S. EPA's Response:

As described in responses to previous comments, these parameters are critical in relation to the safety and effectiveness of boiler operations. Please also see the General Responses by U.S. EPA to GE's Comments. This provision was not changed.

38. **Comment # 38 (Page 14 of 15)**: Condition II.C.3.b. GE stated that the regulatory requirements on Automatic Waste Feed Cutoff (AWFCO) verification testing is too disruptive and burdensome to their operations and suggested a revision to provide for less frequent but more thorough testing. GE also notes that "some EPA inspectors have expressed to GE that AWFCO system testing that actually closes the AWFCO valve is preferable."

U.S. EPA's Response:

AWFCO testing is a regulatory requirement. However, U.S. EPA has some flexibility under 40 CFR § 266.102(e)(8)(iv), depending on the compliance history of the boilers. If the Permittees can demonstrate that their boiler operations have been steady with minimum excursions (i.e., exceedances of operating limits, etc.) less frequent testing of AWFCO may be justified. U.S. EPA does not currently have enough information to make that determination.

The Permittees may submit a permit modification request to U.S. EPA for less frequent testing of AWFCOs, which should include proposed methods of testing/demonstration (e.g., actual shutoff of valves, or simulated shutoff without actually closing the feed valves) and support for the position that more frequent AWFCO testing is disruptive to the boiler operations. It is noted, however, that the view of "some inspectors" that actual shutoff of valves may be a preferable testing method does not necessarily reflect the U.S. EPA's position.

The provision was not changed.

39. **Comment # 39 (Page 14 of 15)**: Condition II.C.3.c - AWFCO Frequency. GE asserts that U.S. EPA has not provided a justification for the limit on the number of AWFCO activations per operating period consistent with 40 CFR § 266.102(e)(7)(ii). GE requested that this condition be deleted.

U.S. EPA's Response:

The frequency of AWFCO activation is an indication of how well the boilers are operated within the allowable limits. A frequent occurrence of AWFCOs shows that the boilers could not be controlled and operated under a steady state condition. 40 CFR § 266.102(e)(7)(ii) allows U.S. EPA to limit the number of cutoffs per operating period. Due to the age of the boilers U.S. EPA has legitimate concerns over the Permittees' boiler operations. However, U.S. EPA believes that the Permittees can have greater operational flexibility by allowing 14 AWFCOs per week, instead of 2 AWFCOs per day without compromising boiler safety and potential releases to the environment. The final permit reflects this change.

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was

not changed except as described above.

40. **Comment # 40 (Page 14 of 15)**: Condition II.C.4 - Boiler Ancillary Equipment. GE requested the deletion of this provision and questioned U.S. EPA's authority to impose such a condition.

U.S. EPA's Response:

Proper maintenance of boiler ancillary equipment is an essential part of a successful and safe boiler operation. To the extent this requirement overlaps with Condition I.E.6, it clarifies and reinforces the importance of proper maintenance of this particular equipment and puts the Permittees on fair notice of that fact. Therefore, it is appropriate to retain this condition to ensure that the hazardous waste burning operation operates properly.

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was not changed.

41. **Comment # 41 (Page 14 of 15)**: Condition II.C.5.a - Boiler Ash Removal. GE requested "all" ash be modified with "to the extent practicable."

U.S. EPA's Response:

The requested change has been made to this condition. U.S. EPA requests that the Permittees submit a copy of their boiler cleaning protocols within 3 months of the issuance of this permit to provide further background on the measures they will take to remove as much ash as practicable.

42. **Comment # 42 (Page 14 of 15):** Condition II.C.5.b Certification by State Boiler Inspector. GE requested the deletion of this provision, questioning U.S. EPA's authority to impose such a condition and asserting that the requirement is redundant and vague.

U.S. EPA's Response:

U.S. EPA agrees that the operational and safety requirements addressed by the State boiler inspector are either already covered by this permit or are part of State requirements that may extend beyond the scope of RCRA (and for which the State has independent enforcement authority). While the condition has been removed as requested, compliance with the State boiler requirements in addition to this permit is essential to ensure that public health and safety are protected. The rest of Condition II.C.5 has been renumbered accordingly.

43. **Comment # 43 (Page 14 of 15)**: Condition II.C.5.c - ASME Stamp. GE requested the deletion of this condition, because the original boilers met the ASME requirements, so that there is nothing that GE needs to do to comply with the requirement. GE also questioned U.S. EPA's authority to include this requirement.

U.S. EPA's Response:

It is the intent and obligation of U.S. EPA to make sure that hazardous wastes burned in

boilers do not pose an unacceptable risk of accidental or fugitive releases. The ASME standards are designed to help accomplish that same goal. Although the boilers were originally manufactured in accordance with ASME Code, this requirement ensures that these boilers have not been altered in ways that make them inconsistent with the ASME requirements. This requirement would also be relevant and important if the Permittees decided to replace a boiler under this permit. Please also see the General Responses by U.S. EPA to GE's Comments. To provide the Permittees with operational flexibility, this condition was revised to replace "and so stamped" with "or equivalent requirements."

44. **Comment # 44. (Page 14 of 15)**: Condition II.C.5.d - DCS System. GE requested that this condition be revised to require that "The Distributed Control System (DCS) must be maintained in good operating condition" because: (1) the language of the draft permit would turn its supplier's recommendations into legal requirements, and (2) a DCS does not require calibration.

U.S. EPA's Response:

U.S. EPA recognizes that through operational experience or due to system design, the Permittees may decide based on good engineering judgment to deviate from the instrumentation suppliers' recommendations in order to improve operations of the DCS system. The permit was therefore modified to add "or in an equivalent manner" after "must be maintained as required by the instrumentation supplier." To the extent this requirement overlaps with Condition I.E.6, it clarifies and reinforces the importance of proper maintenance of this particular equipment and puts the Permittees on fair notice of that fact.

Because operating and emissions monitors are part of the DCS system, the system's accuracy is important. The permit considers these process monitors to be part of the DCS, which serves its function properly only if accurately calibrated. U.S. EPA therefore believes that it is appropriate to require proper calibration as a permit condition. The DCS incorporates a data acquisition system which feeds signals reflecting the monitored parameters into the computer system through metering elements and various transducers. To ensure that accurate signals are transmitted through the metering devices, periodic calibration of the devices is required.

Please also see the General Responses by U.S. EPA to GE's Comments. This condition was not changed except as described above.

45. **Comment # 45 (Page 14 of 15)**: Condition II.C.5.e - Boiler Cleaning. GE objected to this condition, arguing that the U.S. EPA does not have authority to include it and that Title 680 of Indiana has rules governing the operation and maintenance of boilers. In addition, GE requested that if the provision is not deleted: (1) reference to "chemical" cleaning of boiler tubes be removed; (2) the term "retubing" be removed; and (3) that the term "reasonable" be inserted to describe maintenance of heat transfer efficiency.

U.S. EPA's Response:

Please see the General Responses by U.S. EPA to GE's Comments.

Because U.S. EPA's regulations covering hazardous waste burning boilers contain requirements concerning boiler efficiency, it is necessary to include requirements in the RCRA permit to reasonably ensure that the efficiency requirement will continue to be met, especially as the boilers age.

"Retubing" is a commonly used and understood term in the industry. While it contemplates "replacement" it also implies consideration of additional engineering requirements on the replacement part (e.g., boiler tubes are fabricated from special alloy steel, shaped for specific boiler design, treated and tested in accordance with ASME Code and B&W's requirements). To the extent this requirement overlaps with Condition I.E.6, it clarifies and reinforces the importance of proper maintenance of this particular equipment and puts the Permittees on fair notice of that fact.

The word "chemical" was removed from the provision as requested and the word "reasonable" was inserted after "heat transfer efficiency" as requested. The provision was otherwise not changed.

46. **Comments # 46 (Page 15 of 15)**: Condition II.C.5.f - Calibration and Maintenance of Instrumentation Devices. GE proposed a number of revisions to this condition. GE asserts that the Distributed Control System (DCS) was already addressed in Condition II.C.5.d so it is redundant to again address it here. GE also asserts that use in the condition of "etc." creates ambiguity and vagueness. It is used in a clause that sets forth examples, so it is unnecessary.

Next, GE asserts that it should not be required to maintain the instrumentation and control systems as required by the respective suppliers. GE has years of operational experience with this instrumentation and these systems that the suppliers do not. Also, the suppliers' suggested maintenance practices suffer from an inherent bias in that they receive income from conducting maintenance activities that they recommend. Given this bias, the suppliers should not set the standard in the permit. Instead, the standard should be that GE maintain the instrumentation and control systems "in good operating condition".

GE also requests that the calibration and maintenance requirements should apply to a defined list of field instrumentation to provide clarity.

GE also states that the requirement in the second sentence of the condition is pointless and should be deleted because the DCS programming has been in place for many years and works correctly. If the language is not deleted, GE states that an annual requirement calibrating or checking programmable logic controllers is not needed; the programming should only need to be checked at the beginning of the permit and then only when a programming change is made.

U.S. EPA's Response:

The U.S. EPA finds GE's proposed language reasonable and clear, but believes it may be somewhat limited compared to the more general language in the draft permit. As has been stated in earlier responses, U.S. EPA needs to ensure that reasonable measures are taken to prevent the development of situations that may lead to accidental releases, fugitive emissions,

and improperly characterized emissions. Therefore, U.S. EPA needs to ensure the proper monitoring, recording, and operation of certain devices and systems that may fall outside of the specific list of "emission and regulatory" monitors provided in GE's comments. The U.S. EPA cannot provide an exhaustive list of all such devices and systems, because we do not have a complete record on GE's monitoring and data acquisition system.

As a result, the requested language has been added in large part to the permit, but has been modified slightly to read:

All instrumentation and control systems must be properly calibrated and maintained in good operating condition, including but not limited to: the DCS; transducers; indicator controllers; stack CO monitor; stack O_2 monitor; natural gas flow meters; hazardous waste fuel flow meters; boiler combustion chamber thermocouples; and combustion air flow meters. All instrumentation shall be calibrated each calendar month and programming in the DCS for calculations of heat input and mass flow shall be checked within thirty (30) days of the effective date of this permit, and each time thereafter that such programming is revised, to confirm that such calculations are being performed correctly.

47. **Comment # 47 (Page 15 of 15)**: Condition II.C.6 - Additional Work to Be Completed. GE requested that this condition be deleted because it is redundant to existing regulatory requirements incorporated in the permit and to Condition II.C.5.d.

U.S. EPA's Response:

Condition II.C.6 clarifies and reinforces these specific requirements, putting the Permittee on notice of their importance. The provision was not changed.

48. **Comments # 48 through # 56** - GE identified a number of typographical errors, clarifications, etc.

U.S. EPA's Response:

U.S. EPA reviewed these comments and corrected the permit provisions as requested.

CHANGES TO THE DRAFT PERMIT

COVER SHEET

1. Page i, Facility Name and Location: The spacing has been corrected.

   See U.S. EPA Response to GE's Comment #48 for the reasons for this change.

2. Page iii, Signature pages: Date referenced in draft permit was deleted.

TABLE OF CONTENTS

3. Page ii: The title for Condition II.A.6 has been changed from "Closure and Post Closure" to

"Closure" to conform to the text of the permit. Condition I.E.12 was left intentionally blank. The title for Condition I.G has been changed from "Submissions" to "Submittals" to conform to the text of the permit. The index page numbers have been revised to due the changes in permit conditions.

See U.S. EPA Responses to GE's Comment #48 and #49 for the reasons for some of these changes.

SECTION I -- STANDARD PERMIT CONDITIONS

(**Note**: Page numbers are the renumbered page numbers appear in the final federal permit.)

4. Page 1 of 16, Condition I.A. Effect of Permit, 3rd paragraph: Reference to sections 3008(a) and 3008(h) was removed..

   See U.S. EPA Response to GE's Comment #4 for the reasons for this change.

5. Page 1 of 16, Condition I.B.1, Permit Action, 2nd paragraph: "You must not perform ..... a later date" was revised to read:

   "You may request a modification of this permit under the procedures specified in 40 CFR § 270.42. A Class 1 modification of this permit is generally allowed without prior approval by U.S. EPA except under certain conditions as described in 40 CFR § 270.42(a)(2). A Class 2 modification requires prior approval by U.S. EPA as described in 40 CFR § 270.42(b). However, you may perform construction associated with a Class 2 permit modification request beginning 60 days after submission of the request unless the Director, Waste, Pesticides and Toxics Division, U.S. EPA (Director) establishes a later date under 40 CFR § 270.42(b)(8). You must not perform any construction associated with a Class 3 permit modification request until such modification request is granted and the modification becomes effective." (40 CFR § 270.42(b)(8))

   See U.S. EPA's Response to GE's Comment # 5 for the reasons for this change.

6. Page 3 of 16, Condition I.E.2, first sentence: The term "permit regulated" was changed to "permit-regulated." This was an editorial correction.

   See U.S. EPA's Response to GE's Comment # 50 for the reasons for this change.

7. Page 3 of 16, Condition I.E.3, Permit Expiration: The comma after 270.50 was deleted. This was an editorial correction.

   See U.S. EPA's Response to GE's Comment # 51 for the reasons for this change.

8. Page 4 of 16, Condition I.E.8.d: The term "at reasonable times" was shifted within the sentence to make the format consistent with the preceding sentences.

See U.S. EPA's Response to GE's Comment # 52 for the reasons for this change.

9. Page 4 of 16, Condition I.E.9.a Monitoring and Records, 5th line: "..... specified in the state-approved waste analysis....." was revised to read: "..... specified in the U.S. EPA-approved waste analysis ....."

See U.S. EPA's Response to GE's Comment # 6 for the reasons for this change.

10. Page 5 of 16, Condition I.E.9.d: The comma was deleted after "documents" and a parenthetical reference to 40 CFR § 270.74(b) was added at the end of the condition. This was an editorial correction and clarification.

See U.S. EPA's Response to GE's Comment # 53 for the reasons for this change.

11. Page 5 of 16, Condition I.E.11, Reporting Anticipated Noncompliance: "Advance notice will not constitute a defense for any noncompliance" was replaced with:

"You may not treat, store or dispose of hazardous waste in the modified portion of the facility, except as provided in 40 CFR § 270.42, until: (40 CFR § 270.30(l)(2))

> **I.E.11.a** You have submitted to the Director by certified mail or hand delivery a letter signed by Permittees and a registered professional engineer stating that the facility has been constructed or modified in compliance with this permit; and
>
> **I.E.11.b** The Director has inspected the modified facility and found it to be in compliance with the conditions of this permit or if you have not received notice from the Director, within 15 days of the date of submission of the letter in paragraph I.E.11.a above, of his or her intent to inspect, prior inspection is waived and you may commence treatment, storage, or disposal of hazardous waste. (40 CFR§ 270.30(l)(2))"

See U.S. EPA's Response to GE's Comment # 7 for the reasons for this change.

12. Page 6 of 16, Condition I.E.12, Certification of Construction: This condition has been deleted and replaced with the notation: "This Section intentionally left blank."

See U.S. EPA's Response to GE's Comment # 8 for the reasons for this change.

13. Page 6 of 16, Condition I.E.13 Transfer of Permit, last sentence: "..... 40 CFR Parts 264, 268, and 270." was changed to read: "..... 40 CFR Parts 264 and 270."

See U.S. EPA's Response to GE's Comment # 9 for the reasons for this change.

14. Page 6 of 16 Condition I.E.14.b under Twenty-Four Hour Reporting was revised to read:

"**I.E.14.b** The report must include the following information (40 CFR § 270.30(l)(6)): (1) the release of any hazardous waste that may endanger public drinking water supplies; (2)

the release or discharge of hazardous waste from the hazardous waste management facility; or (3) a fire or explosion from the hazardous waste management facility. The oral report describing the occurrence and its cause must include the following details:"

See U.S. EPA's Response to GE's Comment # 11 for the reasons for this change.

15. Page 7 of 16, Condition I.E.14.c last paragraph: ".....written notice be provided....." was changed to read: ".....the written report be provided ....."

See U.S. EPA's Response to GE's Comment # 12 for the reasons for this change.

16. Page 8 of 16, Condition I.G, Reports, Notifications and Submittals to the Director: "express mail delivery" was added as an option for delivery of submittals.

See U.S. EPA's Response to GE's Comment # 54 for the reasons for this change.

SECTION II -- BOILERS

17. Page 10 of 16, Condition II.A General, first sentence: "applicable" was inserted before "requirements" for clarification.

See U.S. EPA's Response to GE's Comment # 16 for the reasons for this change.

18. Page 11 of 16, Condition II.A.7 Financial Requirements: "40 CFR Subpart H, ..." was corrected to read "40 CFR Part 264 Subpart H, ..." for clarification.

See U.S. EPA's Response to GE's Comment # 55 for the reasons for this change.

19. Page 11 of 16, Condition II.B.2 Co-Firing with Natural Gas: The paragraph was revised to read:

" In each boiler (H-530A and H-530B), natural gas must be fired whenever hazardous waste fuel is fired. The minimum heat input from the natural gas in each boiler when hazardous waste fuel is burned shall be 1.10 million BTU per hour (hourly rolling average)."

See U.S. EPA's Response to GE's Comment # 18 for the reasons for this change.

20. Page 11 of 16, Condition II.B.3.a: "as generated" was changed to "as-generated" for clarification.

See U.S. EPA's Response to GE's Comment # 56 for the reasons for this change.

21. Page 12 of 16, Condition II.B.3.b, first sentence: The condition was revised to read:

"The hazardous waste fuel feed rate limits on metals and on total chloride and chlorine set forth in Condition II.B.3.c below are based on the approved Trial Burn Report and the

Adjusted Tier I feed rate screening limits in 40 CFR § 266.106 and 266.107."

See U.S. EPA's Response to GE's Comment #19 for the reasons for this change.

22. Page 12 of 16, Condition II.B.3.c: The first two sentences have been revised for clarification. "Maximum" has been deleted from the first sentence. The second sentence will read:

"The feed rate of each of the following constituents shall not exceed the respective maximum feed rate shown:"

See U.S. EPA's Response to GE's Comment #57 for the reasons for this change.

23. Page 12 of 16, Condition II.B.3.c Table. "(TI)" is replaced with "(Tl)" to correct a typographical error.

See U.S. EPA's Response to GE's Comment #58 for the reasons for this change.

24. Page 12 of 16, Condition II.B.4, Hazardous Waste Fuel Temperature and Pressure, first paragraph. The condition was revised to read:

"The hazardous waste fuel must be maintained at a minimum temperature of 140° F (hourly rolling average) and the temperature must be monitored on a continuous basis. When the temperature falls below a set point, it should trigger boiler trip or automatic waste feed cutoff."

See U.S. EPA's Response to GE's Comment # 20 for the reasons for this change.

25. Page 13 of 16, II.C.1.a. "These boilers are designed and manufactured by Bobcock & Wilcox (B&W)..." was corrected to read: "These boilers were designed and manufactured by Babcock & Wilcox (B&W)..." and "70,000 Btu/hr....." was revised to read: "70,000 pounds/hr....." to correct typographical errors.

See U.S. EPA's Response to GE's Comments #59, 60 and 61 for the reasons for this change.

26. Page 13 of 16, II.C.1.c. The Phrase "to ensure safe and proper operation" was added to the end of the first sentence. In the second sentence, "any" was deleted and "control" was made plural.

See U.S. EPA's Response to GE's Comment #21 for the reasons for these changes.

27. Page 13 of 16, II.C.1.d. The phrase "unless otherwise directed by the Director" was added to the end of the sentence.

See U.S. EPA's Response to GE's Comment # 22 for the reasons for this change.

28. Page 14 of 16, II.C.2 Boiler Operating Conditions: The following revisions were made:

(1) In the first sentence "the following conditions must be monitored and satisfied" was replaced by "the following parameters must be monitored and the following standards must be

met" for clarity;
(2) Abbreviations for HRA and SCFH were added;
(3) Hourly rolling average was added to Items 2, 3, 4, 5, 6, 7, 8, 10, and 11 in the table;
(4) "Heat" was inserted between Fuel and Input for Item 3 in the table;
(5) The unit of measurement for Item 13, Maximum Combustion Air Flow was changed from scfm to an hourly rolling average.
(6) A footnote to the table was added for Item 14 (maximum particulate emission) that reads: "No continuous monitoring of this item is required. It shall apply at all times and shall be met during any particulate matter stack test.";
(7) The numerical values in the table were revised as follows:

Parameter No. & Description	Draft Permit	Final Permit
1. Steam Header Pressure, psig	175 (avg.)	194 (max.)
2. Mini. Feedwater Supply Temp. (° F)	255	251
3. Max. Haz. Fuel Heat Input (MM Btu/hr.)	72.90	72.9
6. Max. Total Heat Input (MM Btu/hr.)	75.00	75.0
7. Min. Heat Input (MM Btu/hr.)	59.40	59.4
8. Minimum Oxygen Conc. in Flue Gas (%)	3.0	5.2
9. Max. Stack Gas Temp. (° F)	595	625
11. Min. Atom. Steam Pressure (psig)	25-45	20

(8) After the table, a sentence was added reading: "The boilers must also meet the requirements of 40 CFR § 260.10."

See U.S. EPA's Response to GE's Comments # 23-36 for the reasons for these changes.

29. Page 15 of 16, Condition II.C.3.c. "..... shall not exceed 2 times per day" was changed to read "..... shall not exceed 14 times per week."

See U.S. EPA's Response to GE's Comment # 39 for the reasons for this change.

30. Page 15 of 16, Condition II.C.5.a: The phrase ", to the extent practicable," was added after "Each boiler must be cleaned annually by removing..."

See U.S. EPA's Response to GE's Comment #41 for the reasons for this change.

31. Page 15 of 16, Condition II.C.5.b. This condition has been deleted and the rest of Condition II.C.5 has been renumbered accordingly.

See U.S. EPA's Response to GE's Comment #42 for the reasons for this change.

32. Page 15 of 16, Condition II.C.5.b. "and so stamped" was replaced with "or equivalent requirements."

See U.S. EPA's Response to GE's Comment #43 for the reasons for this change.

33. Page 15 of 16, Condition II.C.5.c. This condition was changed to add "or in an equivalent

manner," after "must be maintained as required by the instrumentation supplier."

See U.S. EPA's Response to GE's Comment #44 for the reasons for this change.

34. Page 15 of 16, Condition II.C.5.d: The word "chemical" was deleted and the word "reasonable" was added before "heat transfer efficiency".

See U.S. EPA's Response to GE's Comment #45 for the reasons for this change.

35. Page 15 of 16, Condition II.C.5.e - Calibration and Maintenance of Instrumentation Devices. This condition has been revised to read:

"All instrumentation and control systems must be properly calibrated and maintained in good operating condition, including but not limited to: the DCS; transducers; indicator controllers; stack CO monitor; stack O_2 monitor; natural gas flow meters; hazardous waste fuel flow meters; boiler combustion chamber thermocouples; and combustion air flow meters. All instrumentation shall be calibrated each calendar month and programming in the DCS for calculations of heat input and mass flow shall be checked within thirty (30) days of the effective date of this permit, and each time thereafter that such programming is revised, to confirm that such calculations are being performed correctly."

See U.S. EPA's Response to GE's Comment #46 for the reasons for this change.

36. Page 16 of 16, Condition II.D. The citation "40 CFR § 266.103(e)(10)" was revised to "40 CFR § 266.102(e)(10)" to correct a typographical error.

See U.S. EPA's Response to GE's Comment #62 for the reasons for this change.

PAGE NUMBERING CHANGES

37. Total number of pages increased from 15 to 16 and pages have been renumbered accordingly.

DETERMINATION

Based on a full review of all relevant data provided to the U.S. EPA, the U.S. EPA has determined that the final permit contains such terms and conditions necessary to protect human health and the environment.

GE Plastics

GE Plastics Mt. Vernon, Inc.
1 Lexan Lane, Mt. Vernon, IN 47620-9364
812-831-7000

September 25, 2002

Certified Mail: 7001 2510 0007 7932 7388

Mr. Doug Griffin
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
100 N. Senate Ave.
P.O. Box 6015
Indianapolis, IN 46206-6015

Subject: GE Plastics Mt. Vernon, Inc. (GEPMV)
IND 006 376 362

Dear Mr. Griffin,

Section V.D. of the IDEM Hazardous Waste Management Permit for the container storage building located at GE Plastics Mt. Vernon, Inc. (GEPMV) requires that the agency be notified of the identification of new solid waste management units (SWMU) or information pertaining to existing units. This letter serves as notification to the Commissioner of the discovery of a release from an existing solid waste management unit, SWMU 77 Site Sewer System into SWMU 27 Impoundment Basin. Information pursuant to V.D. 2 is provided as follows:

On September 9, wastewater from a 24" vitrified clay sewer pipe, plugged in 1990, and was observed flowing at an estimated 1gpm into SWMU 27. An estimated 1440 gallons of pH 11.31 wastewater flowed into SWMU 27. The sewer pipe located @ 50 feet northwest of the SWMU 27 pump station, see attachment, was filled with flowable fill abating the flow of wastewater into SWMU 27. The accumulated wastewater was pumped from SWMU 27 to the site wastewater treatment plant.

I may be contacted at (812) 831-7307 concerning any questions about this submittal.

Sincerely,

David K. Perkins
Principal Water and Waste Programs Leader
GE Plastics Mt. Vernon, Inc.

Enclosure

cc: Don Heller, USEPA Region V **Certified Mail: 7001 2510 0007 7932 7531**
Jeff Bryan, Earth Tech

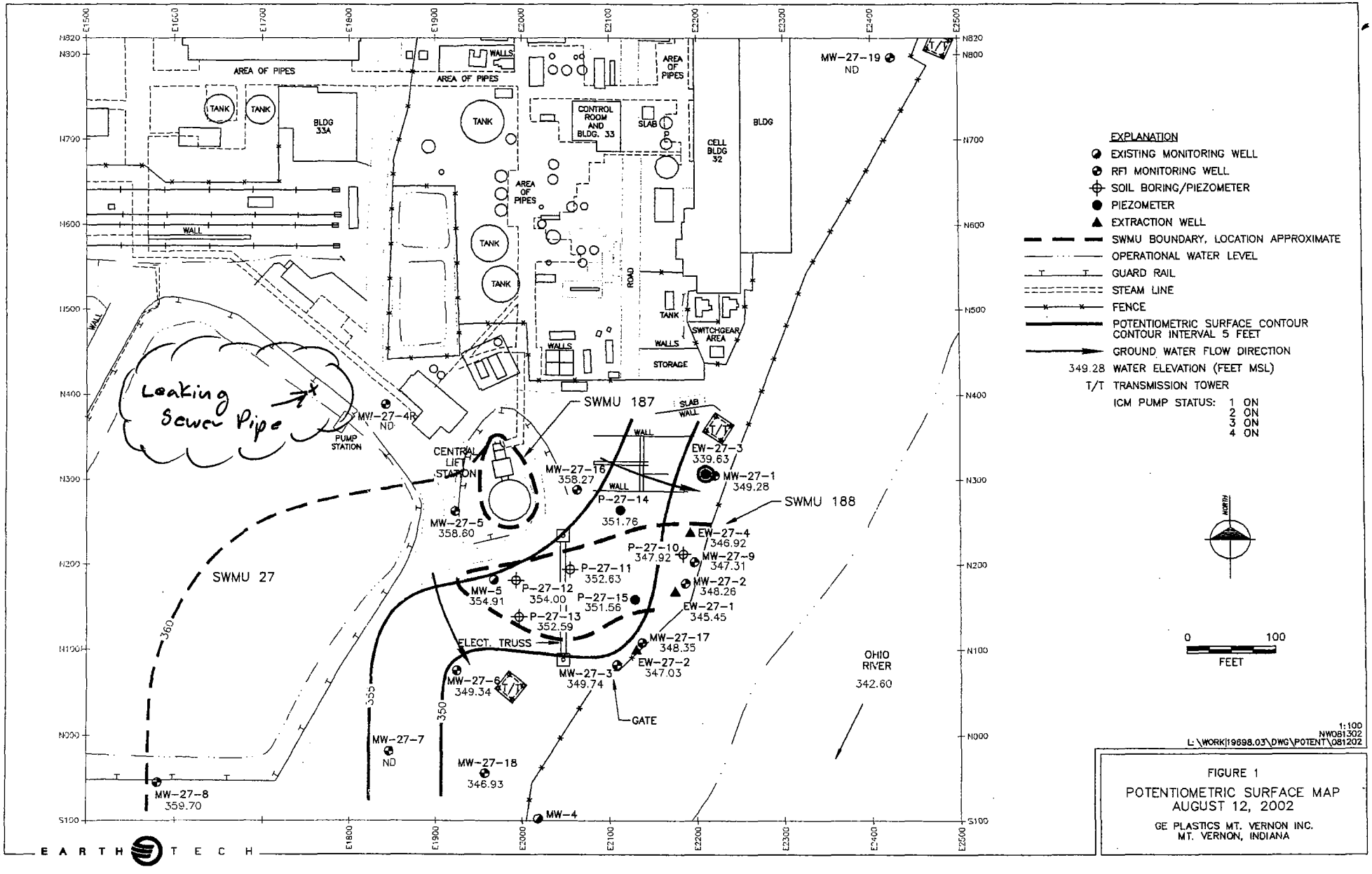


FIGURE 1

POTENTIOMETRIC SURFACE MAP
AUGUST 12, 2002

GE PLASTICS MT. VERNON INC.
MT. VERNON, INDIANA

GE Plastics

GE Plastics Mt. Vernon, Inc.
1 Lexan Lane, Mt. Vernon, IN 47620-9364
812-831-7000

August 19, 2002

Certified Mail: 7001 2510 0007 7932 7470

Mr. Chris L. Meyer
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
100 N. Senate Ave.
P.O. Box 6015
Indianapolis, IN 46206-6015

Subject: GE Plastics Mt. Vernon, Inc. (GEPMV)
IND 006 376 362

Dear Mr. Meyer,

Section V.D. of the IDEM Hazardous Waste Management Permit for the container storage building located at GE Plastics Mt. Vernon, Inc. (GEPMV) requires that the agency be notified of the identification of new solid waste management units (SWMU) or information pertaining to existing units. This letter serves as notification to the Commissioner of the discovery of a release from an existing solid waste management unit, SWMU77 Site Sewer System. Information pursuant to V.D. 2 is provided as follows:

On July 19, 2002, while excavating the foundation for a scrubber in the Phosgene Plant. It was discovered that the sewer flowing then this area was leaking, see attached Figure 1. Upon discovery wastewater flows to this section of sewer were re-routed around the leaking section, abating the leak. On July 24, 2002, soil sampling of the excavation was conducted. Results were received on August 15th. Analysis of the thirteen (13) samples collected was performed for Total Organic Carbon (TOC), % solids and pH, see Table 1. The three samples exhibiting the highest TOC values were analyzed for VOCs and SVOCs, see Table 2. All VOC and SVOC compounds were below quantitation limit, with the exception of Di-n-Butyhphthlate. All three results for Di-n-Butylphthlate are five (5) orders-of-magnitude below IDEM's Risc residential default clean-up value of 2000 mg/kg. A composite sample of the excavated soil was collected an analyzed for waste disposal characterization. The results, see Table 3, show that the excavated soil is not a RCRA characteristic hazardous waste. Disposal of the soil at BFI's Laubascher Meadows Landfill is pending BFI approval.

I may be contacted at (812) 831-7307 concerning any questions about this submittal.

Sincerely,

David K. Perkins
Principal Water and Waste Programs Leader
GE Plastics Mt. Vernon, Inc.

cc: Don Heller, USEPA Region V **Certified Mail: 7001 2510 0007 7932 7463**

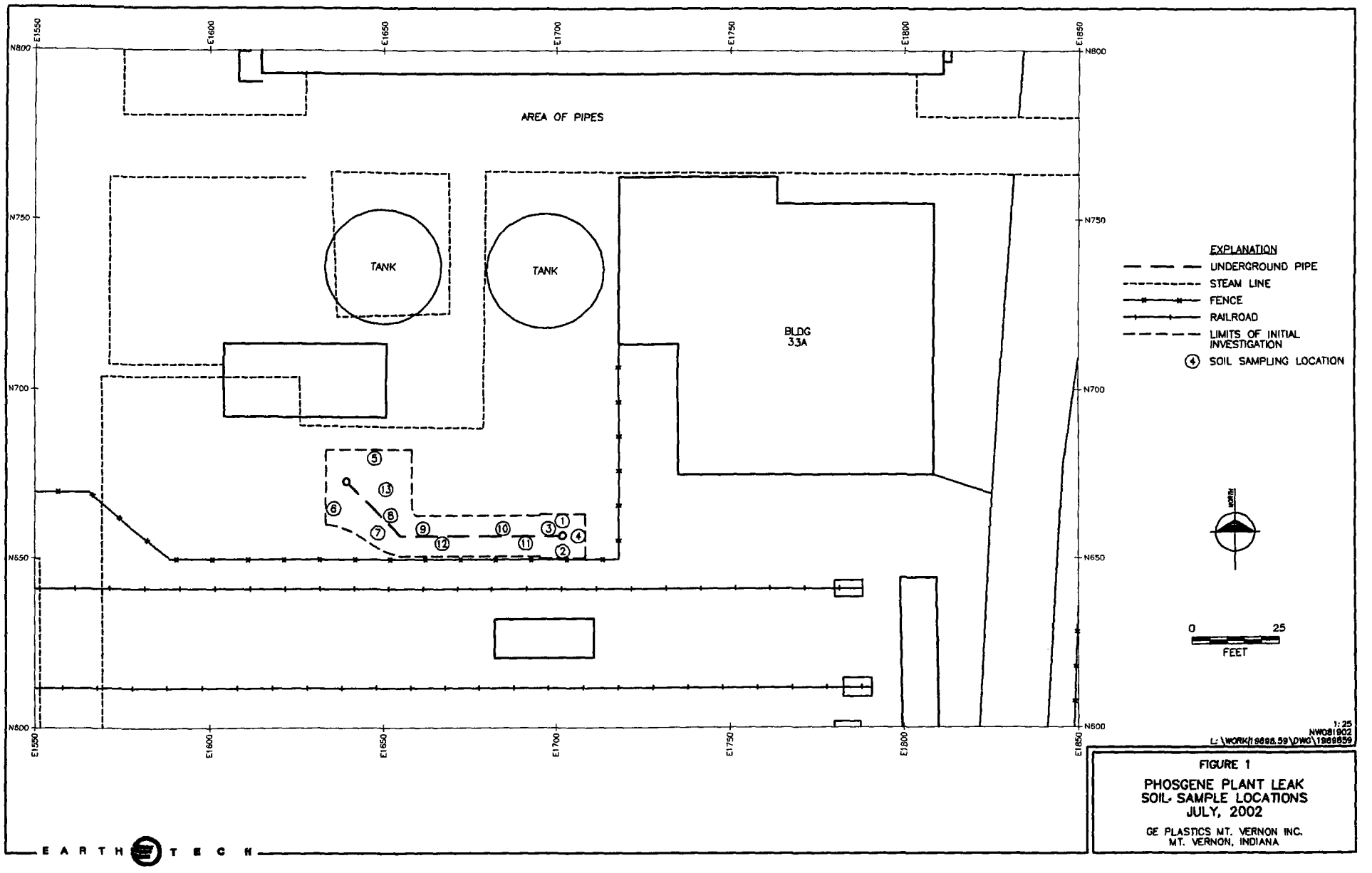


FIGURE 1

PHOSGENE PLANT LEAK
SOIL SAMPLE LOCATIONS
JULY, 2002

GE PLASTICS MT. VERNON INC.
MT. VERNON, INDIANA

GE PLASTICS, MT. VERNON INC.
PHOSGENE PLANT LEAK
SOIL SAMPLING
JULY 2002

TABLE 1
SUMMARY ANALYTICAL RESULTS

INDICATOR PARAMETERS IN SOIL

		SS #1	SS #2	SS #3	SS #4	SS #4 Dup	SS #5	SS #6	SS #7	SS #8	SS #9	SS #10
Carbon, Total Organic	%	0.10	0.12	0.06	0.10	0.07	0.42	0.29	0.20	0.11	0.07	0.09
Percent Solids	%	81	79	80	78	77	81	77	79	81	87	79
pH	pH Units	9.72	11.36	11.58	12.13	11.77	8.17	9.62	8.72	8.93	9.26	10.97

		SS #11	SS #12	SS #13	SS #13 Dup
Carbon, Total Organic	%	0.22	0.33	0.31	0.48
Percent Solids	%	81	84	80	80
pH	pH Units	10.57	9.67	10.32	9.78

TABLE 2

ANALYTICAL RESULTS SUMMARY
ORGANIC COMPOUNDS IN SOIL

ORGANICS (mg/Kg, dry)	SS #2	SS #5	SS #12	
Paraldehyde	<0.13	<0.10	<0.10	
n-Propylbenzene	<0.006	<0.005	<0.005	
Styrene	<0.006	<0.005	<0.005	
1,1,1,2-Tetrachloroethane	<0.006	<0.005	<0.005	
1,1,2,2-Tetrachloroethane	<0.006	<0.005	<0.005	
Tetrachloroethene	<0.006	<0.005	<0.005	
Tetrahydrofuran	<0.063	<0.050	<0.050	
Toluene	<0.006	<0.005	<0.005	
trans-1,2-Dichloroethene	<0.006	<0.005	<0.005	
trans-1,3-Dichloropropene	<0.006	<0.005	<0.005	
trans-1,4-Dichloro- 2-butene	<0.006	<0.005	<0.005	
1,2,4-Trichlorobenzene	<0.006	<0.005	<0.005	
1,1,1-Trichloroethane	<0.006	<0.005	<0.005	
1,1,2-Trichloroethane	<0.006	<0.005	<0.005	
Trichloroethene	<0.006	<0.005	<0.005	
Trichlorofluoromethane	<0.006	<0.005	<0.005	
1,2,3-Trichloropropane	<0.013	<0.010	<0.010	
1,2,4-Trimethylbenzene	<0.006	<0.005	<0.005	
1,3,5-Trimethylbenzene	<0.006	<0.005	<0.005	
Vinyl Chloride	<0.013	<0.010	<0.010	
Xylene (Total)	<0.006	<0.005	<0.005	
Acenaphthene	<0.33	<0.33	<0.33	
Acenaphthylene	<0.33	<0.33	<0.33	
Aniline	<0.33	<0.33	<0.33	
Anthracene	<0.33	<0.33	<0.33	
Benzidine	<5.0	<5.0	<5.0	
Benzo (a) Anthracene	<0.33	<0.33	<0.33	
Benzo (a) Pyrene	<0.33	<0.33	<0.33	
Benzo (b) Fluoranthene	<0.33	<0.33	<0.33	
Benzo (g,h,i,) Perylene	<0.33	<0.33	<0.33	
Benzo (k) Fluoranthene	<0.33	<0.33	<0.33	
Benzoic Acid	<0.33	<0.33	<0.33	
Benzyl Alcohol	<0.33	<0.33	<0.33	
Bis (2-Chloroethyl) Ether	<0.33	<0.33	<0.33	
Bis (2-Chloroisopropyl)- Ether	<0.33	<0.33	<0.33	
Bis (2-ethylhexyl)- Phthalate	<0.33	<0.33	<0.33	
Bis (2-Chloroethoxy)- Methane	<0.33	<0.33	<0.33	
4-Bromophenyl Phenylether	<0.33	<0.33	<0.33	
Butyl Benzyl Phthalate	<0.33	<0.33	<0.33	
Carbazole	<0.33	<0.33	<0.33	
4-Chloro-3-Methylphenol	<0.33	<0.33	<0.33	
2-Chloroaniline	<0.33	<0.33	<0.33	
2-Chloronaphthalene	<0.33	<0.33	<0.33	
2-Chlorophenol	<0.33	<0.33	<0.33	
4-Chlorophenylphenyl- Ether	<0.33	<0.33	<0.33	
Chrysene	<0.33	<0.33	<0.33	
Di-n-Butylphthalate	0.63	0.58	0.71	RISC Res. Default = 2,000 mg/Kg
Di-n-Octylphthalate	<0.33	<0.33	<0.33	
Dibenzo (a,h) Anthracene	<0.33	<0.33	<0.33	

TABLE 2

ANALYTICAL RESULTS SUMMARY
ORGANIC COMPOUNDS IN SOIL

ORGANICS (mg/Kg, dry)	SS #2	SS #5	SS #12
1-Chlorohexane	<0.006	<0.005	<0.005
Acetone	<0.13	<0.10	<0.10
Acrolein	<0.013	<0.010	<0.010
Acrylonitrile	<0.013	<0.010	<0.010
Benzene	<0.006	<0.005	<0.005
Bromoform	<0.006	<0.005	<0.005
Bromomethane	<0.013	<0.010	<0.010
n-Butylbenzene	<0.006	<0.005	<0.005
sec-Butylbenzene	<0.006	<0.005	<0.005
tert-Butylbenzene	<0.006	<0.005	<0.005
Carbon Disulfide	<0.006	<0.005	<0.005
Carbon Tetrachloride	<0.006	<0.005	<0.005
Chlorobenzene	<0.006	<0.005	<0.005
Chlorodibromomethane	<0.006	<0.005	<0.005
Chloroethane	<0.013	<0.010	<0.010
2-Chloroethyl Vinyl Ether	<0.13	<0.10	<0.10
Chloroform	<0.006	<0.005	<0.005
Chloromethane	<0.013	<0.010	<0.010
2-Chlorotoluene	<0.006	<0.005	<0.005
4-Chlorotoluene	<0.006	<0.005	<0.005
cis-1,2-Dichloroethene	<0.006	<0.005	<0.005
cis-1,3-Dichloropropene	<0.006	<0.005	<0.005
1,2-Dibromo-3- chloropropane	<0.013	<0.010	<0.010
1,2-Dibromoethane	<0.006	<0.005	<0.005
Dibromomethane	<0.013	<0.010	<0.010
1,2-Dichlorobenzene	<0.006	<0.005	<0.005
1,3-Dichlorobenzene	<0.006	<0.005	<0.005
1,4-Dichlorobenzene	<0.006	<0.005	<0.005
Dichlorobromomethane	<0.006	<0.005	<0.005
Dichlorodifluoromethane	<0.013	<0.010	<0.010
1,1-Dichloroethane	<0.006	<0.005	<0.005
1,2-Dichloroethane	<0.006	<0.005	<0.005
1,1-Dichloroethylene	<0.006	<0.005	<0.005
1,2-Dichloropropane	<0.006	<0.005	<0.005
2,2-Dichloropropane	<0.006	<0.005	<0.005
Ethyl Acetate	<0.013	<0.010	<0.010
Ethyl Ether	<0.006	<0.005	<0.005
Ethyl Methacrylate	<0.013	<0.010	<0.010
Ethylbenzene	<0.006	<0.005	<0.005
Hexachlorobutadiene	<0.006	<0.005	<0.005
2-Hexanone	<0.013	<0.010	<0.010
Iodomethane	<0.013	<0.010	<0.010
Isopropylbenzene	<0.006	<0.005	<0.005
4-Isopropyltoluene	<0.006	<0.005	<0.005
Methyl Ethyl Ketone	<0.063	<0.050	<0.050
4-Methyl-2-Pentanone	<0.013	<0.010	<0.010
Methyl(tert)butyl Ether	<0.013	<0.010	<0.010
Methylene Chloride	<0.013	<0.010	<0.010
Naphthalene	<0.006	<0.005	<0.005

TABLE 2

ANALYTICAL RESULTS SUMMARY
ORGANIC COMPOUNDS IN SOIL

ORGANICS (mg/Kg, dry)	SS #2	SS #5	SS #12
Dibenzofuran	<0.33	<0.33	<0.33
1,2-Dichlorobenzene	<0.33	<0.33	<0.33
1,3-Dichlorobenzene	<0.33	<0.33	<0.33
1,4-Dichlorobenzene	<0.33	<0.33	<0.33
3,3'-Dichlorobenzidine	<0.66	<0.66	<0.66
2,4-Dichlorophenol	<0.33	<0.33	<0.33
Diethylphthalate	<0.33	<0.33	<0.33
Dimethylphthalate	<0.33	<0.33	<0.33
2,4-Dimethylphenol	<0.33	<0.33	<0.33
4,6-Dinitro- 2-Methylphenol	<1.3	<1.3	<1.3
2,4-Dinitrophenol	<1.3	<1.3	<1.3
2,6-Dinitrotoluene	<0.33	<0.33	<0.33
2,4-Dinitrotoluene	<0.33	<0.33	<0.33
1,2-Diphenylhydrazine	<0.33	<0.33	<0.33
Fluoranthene	<0.33	<0.33	<0.33
Fluorene	<0.33	<0.33	<0.33
Hexachlorobenzene	<0.33	<0.33	<0.33
Hexachlorobutadiene	<0.33	<0.33	<0.33
Hexachlorocyclopentadiene	<0.33	<0.33	<0.33
Hexachloroethane	<0.33	<0.33	<0.33
Indeno (1,2,3-cd) Pyrene	<0.33	<0.33	<0.33
Isophorone	<0.33	<0.33	<0.33
2-Methylnaphthalene	<0.33	<0.33	<0.33
2-Methylphenol	<0.33	<0.33	<0.33
4-Methylphenol	<0.33	<0.33	<0.33
N-Nitrosodi-n-Propylamine	<0.33	<0.33	<0.33
N-Nitroso-di-methylamine	<0.33	<0.33	<0.33
N-Nitroso-di-Phenylamine	<0.33	<0.33	<0.33
Naphthalene	<0.33	<0.33	<0.33
2-Nitroaniline	<0.33	<0.33	<0.33
3-Nitroaniline	<0.33	<0.33	<0.33
4-Nitroaniline	<0.33	<0.33	<0.33
Nitrobenzene	<0.33	<0.33	<0.33
2-Nitrophenol	<0.33	<0.33	<0.33
4-Nitrophenol	<1.3	<1.3	<1.3
Pentachlorophenol	<1.3	<1.3	<1.3
Phenanthrene	<0.33	<0.33	<0.33
Phenol	<0.33	<0.33	<0.33
Pyrene	<0.33	<0.33	<0.33
Pyridine	<0.33	<0.33	<0.33
1,2,4-Trichlorobenzene	<0.33	<0.33	<0.33
2,4,5-Trichlorophenol	<0.33	<0.33	<0.33
2,4,6-Trichlorophenol	<0.33	<0.33	<0.33

TABLE 3

WASTE CHARACTERIZATION ANALYTICAL RESULTS

sample	analyte	result	unit
CS#1	Percent Solids	81	%
CS#1	Arsenic, TCLP	<0.20	mg/L
CS#1	Barium, TCLP	1.46	mg/L
CS#1	Cadmium, TCLP	<0.02	mg/L
CS#1	Chromium, TCLP	<0.08	mg/L
CS#1	Lead, TCLP	<0.10	mg/L
CS#1	Selenium, TCLP	<0.20	mg/L
CS#1	Silver, TCLP	<0.02	mg/L
CS#1	Mercury, TCLP	<0.0004	mg/L
CS#1	Benzene	<0.10	mg/L
CS#1	Carbon Tetrachloride	<0.10	mg/L
CS#1	Chlorobenzene	<0.10	mg/L
CS#1	Chloroform	<0.10	mg/L
CS#1	1,2-Dichloroethane	<0.10	mg/L
CS#1	1,1-Dichloroethylene	<0.10	mg/L
CS#1	Methyl Ethyl Ketone	<5.0	mg/L
CS#1	Tetrachloroethene	<0.10	mg/L
CS#1	Trichloroethene	<0.10	mg/L
CS#1	Vinyl Chloride	<0.10	mg/L
CS#1	1,4-Dichlorobenzene	<0.005	mg/L
CS#1	2,4-Dinitrotoluene	<0.005	mg/L
CS#1	Hexachlorobenzene	<0.005	mg/L
CS#1	Hexachlorobutadiene	<0.005	mg/L
CS#1	Hexachloroethane	<0.005	mg/L
CS#1	2-Methylphenol	<0.005	mg/L
CS#1	3 & 4 Methylphenol	<0.005	mg/L
CS#1	Nitrobenzene	<0.005	mg/L
CS#1	Pentachlorophenol	<0.005	mg/L
CS#1	Pyridine	<0.005	mg/L
CS#1	2,4,5-Trichlorophenol	<0.005	mg/L
CS#1	2,4,6-Trichlorophenol	<0.005	mg/L
CS#1	pH	10.36	pH Units
CS#1	Phenolics, Total	0.74	mg/kg dry

GE Plastics

GE Plastics Mt. Vernon, Inc.
1 Lexan Lane, Mt. Vernon, IN 47620-9364
812-831-7000

July 25, 2002

Certified Mail: 7001 2510 0007 7932 5803

Mr. Chris L. Meyer
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
100 N. Senate Ave.
P.O. Box 6015
Indianapolis, IN 46206-6015

Subject: GE Plastics Mt. Vernon, Inc. (GEPMV)
IND 006 376 362

Dear Mr. Meyer,

Section V.D. of the IDEM Hazardous Waste Management Permit for the container storage building located at GE Plastics Mt. Vernon, Inc. (GEPMV) requires that the agency be notified of the identification of new solid waste management units (SWMU) or information pertaining to existing units. This letter serves as notification to the Commissioner of the discovery of a release from an existing solid waste management unit, SWMU77 Site Sewer System. Information pursuant to V.D. 2 is provided as follows:

On July 9, 2002 a small cave-in was discovered at the intersection of 5th Street and Coal Road. The grouting had failed around a sewer pipe at the manhole. The grouting was repaired and the manhole and sewer returned to service.

I may be contacted at (812) 831-7307 concerning any questions about this submittal.

Sincerely,

David K. Perkins
Principal Water and Waste Programs Leader
GE Plastics Mt. Vernon, Inc.

cc: Don Heller, USEPA Region V **Certified Mail: 7001 2510 0007 7932 5797**

GE Plastics

GE Plastics Mt. Vernon, Inc.
1 Lexan Lane, Mt. Vernon, IN 47620-9364
812-831-7000

February 28, 2002

Certified Mail: 7000 1670 0001 7800 8531

Mr. Chris L. Meyer
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
100 N. Senate Ave.
P.O. Box 6015
Indianapolis, IN 46206-6015

Subject: GE Plastics Mt. Vernon, Inc. (GEPMV)
IND 006 376 362

Dear Mr. Meyer,

Section V.D. of the IDEM Hazardous Waste Management Permit for the container storage building located at GE Plastics Mt. Vernon, Inc. (GEPMV) requires that the agency be notified of the identification of new solid waste management units (SWMU) or information pertaining to existing units. This letter serves as notification to the Commissioner of the discovery of a new solid waste management unit, V-310B Spill Area. Specific required information is provided as follows:

D. 1. General Information

a. The location of the unit on the site topographic map:
The approximate location of the V-310B Spill Area is shown on Attachment I.

b. Designation of the type of unit:
Soil

c. General dimensions and structural description (supply any available drawings):
Approximately 8 ft. X 20 ft., see Attachment II.

d. Specification of all waste(s) that have been managed at the unit:
V-310B process intermediate, approximate composition:
27% acetone
45% phenol
10% cumene
5% alpha-methyl styrene
10% water
3% other

e. When the unit was operated:
The spill occurred on January 29, 2002

D. 2. Release Information

On January 29, 2002, approximately 64 lbs. of acetone, 564 lbs. of phenol and 24 lbs. of cumene were released to the soil, see Attachment IV (a copy of the 40 CFR 355.40(b)(3) written report). To minimize the potential for migration of contaminants, approximately 20 cu. yds. of soil was excavated. Based on process

knowledge, it was concluded that the soil removed was not a hazardous waste pursuant to 40 CFR 261 Subpart C or D. Accordingly, the soil was disposed of at BFI's Laubscher Meadows landfill, a Subtitle D permitted facility. After the 20 cu. yds. of soil was removed, samples were collected from the top 6 in. of the remaining soil in the bottom of the excavated area. Residual concentrations remaining in the soil 6 in. below the bottom of the excavated area are:

Acetone < 4.0 to 170 mg/Kg
Cumene < 4.0 to 45 mg/Kg
Phenol 49 to 690 mg/Kg

The approximate locations of these samples are depicted in Attachment II and sample results are provided in Attachment III.

I may be contacted at (812) 831-7307 concerning any questions about this submittal.

Sincerely,

David K. Perkins
Principal Water and Waste Programs Leader
GE Plastics Mt. Vernon, Inc.

Enclosures

cc: Don Heller, USEPA Region V **Certified Mail: 7000 1670 0001 7800 8517**

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

October 7, 1999

Certified Mail Z 505 608 467

Ms. Daniela Kliesmith
Chief, Engineering Section
IDEM – OLM
100 North Senate Avenue
Indianapolis, IN 46206-6015

RE: Withdrawal of Permit Applications

Dear Ms. Kliesmith:

As we discussed during your September 8, 1999 visit to the Mt. Vernon site, General Electric Company (GE) hereby withdraws the permit application (copy of cover letter attached) submitted July 5, 1989 for closure of the Final Effluent Holding Basin and the Impoundment Basin, as Type III restricted waste sites. GE also withdraws the November 13, 1989 request (copy attached) concerning closure of the Phenol Basin.

These three basins subsequently became subject to RCRA corrective action on February 16, 1993, the effective date of the Mt. Vernon site's Federal Hazardous Waste Management Permit. GE submitted the required RCRA Facility Investigation (RFI) report on February 28, 1997. USEPA issued a RFI determination (copy attached) September 2, 1997. USEPA determined that "no further action is required" with regard to both the Phenol Basin and Final Effluent Holding Basin. USEPA required that a Corrective Measures Study (CMS) be conducted on the Impoundment Basin. GE submitted the CMS report on August 12, 1999. The CMS report is currently under review by USEPA and IDEM.

I may be contacted at (812)831-7407 concerning any questions IDEM may have.

Sincerely,

David K. Perkins
Principal, Water & Waste Programs Leader

cc: D. Heller, USEPA Region V **Certified Mail Z 505 608 468**
C. Meyer, IDEM/OLM **Certified Mail Z 505 608 469**

Wen Huang
03/16/2000 12:39 PM

To: Tom Williams/R5/USEPA/US
cc:

Subject: Re: GE Permit

Tom, U.S. EPA issued a 5-year permit to GE on 12/31/92 which expired on 12/31/97. State reissued their permit last year (1999). State is authorized for corrective action as well as the basic program. BIF, AA/BB/CC air emission, and parts of LDRs have not been authorized to the state. Therefore, our permit will contain conditions for those RCRA activities. Our permit will not be issued until trial burn results for the boilers are approved, which will provide basis for our permit conditions for the BIFs. My estimate is, at best, a trial burn in the fall this year and issue our permit next summer.

To make the long story short, we did not comments on COCs or ROCs prepared for GE by Radian. Radian used similar rationale (Tier III BIF), which I rejected and Radian agreed, for other facilities. Our list of NODs is quite lengthy. I plan to send them out next week.

Wen

Tom Williams
03/15/2000 05:31 PM

To: Wen Huang
Subject: Re: GE Permit
Thanks, let me know whenever you want me to review anything.

Query - are the storage units already covered under an existing permit that we will be modifying? If so, does it include corrective action provisions, and did we or IDEM issue that portion? If there is no permit yet, who will be issuing the corrective action provisions? thanks, tmw 6-0814

Wen Huang

Wen Huang
03/15/2000 04:43 PM

To: Tom Williams
Hi Tom,

I inherited GE Plastic from Nate after reorganization last year. I went over the permit application (Trial Burn Plan basically) and discovered the approach GE proposed is totally unacceptable. I am preparing my first NODs and hopefully it would get sent out shortly. IDEM also completed their review and I have received their comments, which will be included in the NODs. We will be issuing a joint permit with the IDEM, because storage tanks are covered under the RCRA basic program the state has been authorized for. EPA's NODs will consist of 3 parts, namely, trial burn plan, QAPP, human health risk assessment workplan and eco risk assessment workplan.

Yes, we had our contractor reviewed the trial burn plan. Unfortunately, the reviewer had his eyes grown in the wrong side of his head. I decided not to include their comments in my NODs. I will keep you informed.

Wen

Tom Williams
03/15/2000 11:24 AM

To: Wen Huang cc: Bobb Beauchamp, Sandra Otaka

Subject: Re: GE Permit

Wen, this matter has been reassigned to me. I generally understand from speaking with Bobb that we have a contractor reviewing the Part B application for the 2 boilers at the facility. Do we have a projected schedule for getting a draft out for public comment and a trial burn?

Thanks. I look forward to working with you on this. tmw 6-0814

---------- Forwarded by Tom Williams/R5/USEPA/US on 03/15/2000 11:19 AM ----------

Bobb Beauchamp 03/15/2000 11:09 AM

To: Tom Williams
Subject: Re: GE Permit

Tom, this is the last e-mail nate sent me on the GE permit case.

---------- Forwarded by Bobb Beauchamp/R5/USEPA/US on 03/15/2000 11:09 AM ----------

Nate Nemani
02/01/2000 02:48 PM

To: Bobb Beauchamp cc: Wen Huang

Bobb:

We had a reorganization recently in the section, as a result I have been reassigned to the Corrective Action section from the Permitting section . Wen Huang of the Permitting and Technical Support section is handling the permitting issues relating to the BIF at the GE, Plastics Mt. Vernon , Ind. I am copying Wen on this memo so that he is aware of your enquiry and also to seek your input if necessary on any legal issues. The State of Indiana had recently issued a State RCRA permit for authorized portions (Storage, Treatment etc.,).. Therefore, when eventually any R5 "permit' for the BIF (after successful completion of the Trial Burn based on an approved TB Plan) will really be a **Permit Modification** to the state RCRA permit since there can only be one RCRA Permit per facility.

If you have any other questions, please contact Wen Huang or myself.

Nate

RMARSHAL@dem.state.in.us on 01/28/2000 08:49:21 AM

To: Wen Huang

Subject: Review of G.E. Permit Application for BIFs

Attached is IDEM's comments on the permit application.
Let me know when you receive this.
Feel free to contact me if you have any problems and/or questions.

Robert Marshall, Hazardous Waste Permitting Section- IDEM
e-mail: rmarshal@dem.state.in.us
317-232-4534

- Review.wpd

IDEM's Review Comments
RCRA Part B Permit Application
Boilers H-530A and H-530B
General Electric Company
Mt. Vernon, Posey County
IND 006 376 362

SECTION C - WASTE CHARACTERISTICS
C-1b - Waste in Tank Systems

1. Provide details on the tank storage procedures used to ensure that the facility is in compliance with 40 CFR 262.34 standards.

SECTION D - PROCESS INFORMATION
D-9 - Boilers and Industrial Furnaces (BIFs)
1.2 - Testing Overview

2. GE is proposing running a single boiler during the first test. Stack velocity will be about half the velocity when running both boilers. This will result in lower particulate entrainment, allowing more particulate to settle out in the stack compared to running both boilers. Stack testing during this test will underestimate particulate and metals emissions.

3. The principal organic hazardous constituent (POHC) selected, naphthalene, should be approved. Another POHC should also be designated.

1.3.1 - Production Rate Demonstration Requirement

4. The product of a boiler is steam. The trial burn plan should be revised to set minimum and maximum production rates as required by the regulation.

2.2 - Engineering Description

5. GE should provide a complete description of the boiler control logic in this section.

2.2.6 - Prime Mover and Combustion Gas Velocity Indicator (CGVI)

6. GE should provide a blower curve for the operating range and provide a discussion relating motor amperage to air flow which addresses ambient temperature and humidity and the pressure drop due to damper position.

2.3.2 - POHC Selection Rationale

7. The fan specifications indicate that the air flow is 19,389 acfm. The POHC worksheet states that stack gas flow is 25,000 dscfm. These two numbers should be correlated and

justified. The trial burn plan should include a procedure to adjust the spiking rate based on measured stack gas flow.

8. In this section it is stated that a successful DRE demonstration should allow GE to burn wastes represented by waste codes in the facility's current part A permit. Trial burn approval is based on a permit which limits the facility to burning the specific waste stream burned in the trial burn.

2.3.3 - Tar Waste Ash Content

9. The facility should justify the use of a partitioning factor for ash, considering there is no air pollution control equipment. This justification should include, but not be limited to, a discussion of the partitioning factor as a function of refractory age and soot blowing.

2.6.5.1 - Minimum Atomization Steam Pressure for Tar Waste

10. The minimum atomization steam pressure should be set during the trial burn. According to the note below table 2-4, the steam pressure should be at least 40 psi greater than the tar pressure. GE should provide a discussion of waste atomization which relates steam pressure, waste feed pressure, and waste viscosity. This discussion should address the feasibility of monitoring waste feed pressure and the steam/waste pressure differential.

SECTION F - PROCEDURES TO PREVENT HAZARDS
F-4e - Personnel Protection Equipment

11. The word "receive" was omitted from the sixth sentence of this section. The sentence should read, "All personnel responsible for waste management activities in the Phenol Tar Boiler area receive proper environmental and safety training."

SECTION G - CONTINGENCY PLAN
G-2 - Emergency Coordinators

12. The third paragraph of section G-2 states that a permit modification will be necessary when a new Crisis Manager (CM) has been added to the CM roster, and a permit modification will not be necessary when a CM is removed from the CM roster. In accordance with 40 CFR 270.42(a), a permit modification would be necessary in either situation, i.e., whether a CM is added to or removed from the CM roster. The end of the paragraph should be revised to read, "A Crisis Manager may not be added to, or removed from, the CM roster (Appendix 2a) without notifying the permitting agency, as required by the permit modification provisions in 40 CFR 270.42(a)."

SECTION I - CLOSURE PLANS, POST CLOSURE PLANS, AND FINANCIAL REQUIREMENTS

13. A Quality Assurance Project Plan (QAPP) must be included which covers the sampling

and analyses in the Waste Analysis Plan and the Closure Plan.

I-1a - Closure Performance Standard

14. Items (b) and (c) should be modified to read:

"(b) Controls, minimizes or eliminates, 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 or surface waters or to the atmosphere, and

(c) Complies with 329 IAC 3.1."

I-1c - Maximum Waste Inventory

15. Provide a list of the hazardous wastes managed in the subject units and include their EPA hazardous waste codes.

I-1e(1) - Inventory Removal

16. Elaborate on the cleaning procedure to be used on the tanks and how the confirmatory samples will be collected. IDEM recommends a high-pressure wash followed by three low-pressure rinses. Two (2) confirmatory samples are then taken from the final rinse.

I-1e(2) - Disposal or Decontamination of Equipment, Structures, and Soils

17. Provide a list of the protective equipment which will be available to the decontamination crews.

18. Provide a table detailing the cleanup levels for rinsates and soil samples.

19. The proposed soil samples are insufficient to determine whether contamination has taken place. IDEM recommends two (2) borings with the intervals of six inches to a depth of one foot, and one foot intervals to a depth of five feet for a total of six (6) samples per boring.

20. IDEM recommends the terminology RCRA metals instead of Toxicity Characteristic Leaching Procedure (TCLP) metals. RCRA metals refers to arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver. These metals should be tested for totals and not TCLP.

21. The fifth paragraph of this section states, "The analytical results will be compared to background data to determine if the soils are contaminated." Provide a description of how this background data will be obtained. IDEM recommends that for metals, four (4) background borings be taken. The background borings should be performed in areas

unaffected by past or present hazardous waste operations. The sampling intervals should correlate with the investigative soil boring intervals mentioned previously. Cleanup levels for metals are calculated as the mean of the four sample concentrations for each depth interval plus two standard deviations. The analytical data for volatile and semi-volatile organic compounds can not be compared to background levels. The cleanup levels for these compounds should be the practical quantitation limit (PQL) of the analytical method.

I-4 - Closure Cost Estimate

22. Correct for the discrepancy between the amount of the closure cost estimate provided on page I-8 and the one provided in Appendix I-1. In addition, the total closure cost estimate amount in Appendix I-1 is incorrect due to calculation errors; the total should be $211,025.

20 NORTH WACKER DRIVE, SUITE 1260, CHICAGO, IL 60606

TECHLAW INC.

PHONE: (312) 578-8900
FAX: (312) 578-8904

RZ2.R05702.01.ID.017

October 21, 1999

Mr. Gary Victorine
U.S. Environmental Protection Agency
Region 5, DW-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W9-9017; EPA Work Assignment No. R05702; Comprehensive Review of HWC Permit Applications; General Electric Plastics, Mt. Vernon, Indiana; EPA ID No. IND006376362; Technical Evaluation of Part B Permit Application; Task 06 Deliverable

Dear Mr. Victorine:

Attached is TechLaw's review of the above-referenced document. It includes, a set of deficiency comments and a completed RCRA Part B Checklist (Attachment 1). The comments has been formatted to follow the outline of the RCRA Part B Checklist. Also included for your use are two electronic files formatted in Word Perfect for Window, which includes the deficiency comment's and the RCRA Part B Checklist.

Please note that the General Electric (GE) Plastics Trial Burn Plan and associated Process Information (Section D) for the boilers, was previously reviewed and comments were provided to U.S. EPA Region 5 under separate cover, dated August 19, 1999. In addition, the application provided to TechLaw Inc. did not include a Risk Assessment Protocol Plan. Therefore, no Risk Assessment Protocol review is included in this deliverable.

Additionally, according to page B-1 of the Permit Application, GE has submitted a separate Part B Permit Application to the Indiana Department of Environmental Management (IDEM) for the facility's RCRA container storage area. Therefore, our review focused on the Phenol Plant boilers and associated equipment and did not include the container storage area.

TechLaw has provided deficiency comments regarding the financial assurance mechanism for both closure and liability. Information associated with financial assurance is often submitted to a review specialist within the U.S. EPA and not submitted or reviewed as part of the RCRA Part B Permit Application. If this is the case, U.S. EPA Region 5 may wish to delete the comments contained in Sections I-5, I-8a, I-8b of this NOD.

The Waste Analysis Plan references Table 2-2 of Section D for constituent data on the analyses of the phenol distillation tar. However, this data was not included in the application, and therefore could not be reviewed.

If you have any questions, please contact me at (312) 345-8938 or Mr. Bert O'Connell at (703) 818-3246.

Sincerely,

John Koehnen

John Koehnen
Regional Manager

cc: F. Norling, EPA Region 5, w/o attachment
B. Jordan/Central Files
W. O'Connell
Chicago Central Files

TECHNICAL EVALUATION OF PART B PERMIT APPLICATION
GENERAL ELECTRIC PLASTICS

MT. VERNON, INDIANA
EPA ID NO. IND006376362

NOTICE OF DEFICIENCIES

Submitted to:

Mr. Gary Victorine
U.S. Environmental Protection Agency
Region 5 DW-8J
77 West Jackson Boulevard
Chicago, Illinois 60604

Submitted by:

TechLaw, Inc.
20 North Wacker Drive
Suite 1260
Chicago, Illinois 60606

EPA Work Assignment No.	R05702
Contract No.	68-W9-9017
EPA WAM	G. Victorine
Telephone No.	312-886-1479
TechLaw WAM	W. O'Connell
Telephone No.	703-818-3246

October 21, 1999

GENERAL ELECTRIC PLASTICS
MT. VERNON, INDIANA
EPA ID NO. IND006376362
TECHNICAL EVALUATION OF PART B PERMIT APPLICATION

GENERAL COMMENTS

1. Section G of the permit application provides a Contingency Plan that will reportedly be used to minimize hazards to human health and the environment caused by fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents. However, several subsections in Section G were found to be technically inadequate. For example, General Electric (GE) has not provided detailed information regarding the storage and treatment of released material or post-emergency equipment maintenance. As outlined in the specific comments, significant additional information will be needed to complete the Contingency Plan.

2. Section H of the permit application provides information regarding Personnel Training at the GE facility. This section was found to be deficient in several areas. For example, GE has not provided detailed descriptions of the introductory training provided to employees, or explained how the training applies to all employees who deal with hazardous waste. Specific comments have been included which describes the information still required to meet the requirements for Personnel Training.

3. Section I of the permit application provides GE's Closure Plans, Post-closure Plans, and Financial Requirements. The information regarding the facility's Closure Plan and closure cost estimate were found to be technically inadequate. For example, GE has not demonstrated how the Closure Plan will meet the closure performance standards, nor has GE provided detailed descriptions of the planned closure activities and their associated costs. Specific comments have been included which describes the information still required to meet the requirements for the facility's Closure Plan and closure cost estimate.

GENERAL ELECTRIC PLASTICS
MT. VERNON, INDIANA
EPA ID NO. IND006376362
TECHNICAL EVALUATION OF PART B PERMIT APPLICATION

SPECIFIC COMMENTS

A. **PART A APPLICATION**: 270.10(d), 270.11(a) and (d), 270.13

The topographic map submitted as Figure A-1 does not fulfill the requirements of 40 CFR 270.13(l). Revise the map to extend one mile beyond the boundaries of the source unit and to depict each of the facility's intake and discharge structures. Alternatively, GE may elect to revise the application to reference other maps included in the Permit Application which would meet the required criteria.

B. **FACILITY DESCRIPTION**

B-2 **Topographic Map:**

B-2a **General Requirements:** 270.14(b)(19)

Figures B-1 through B-5 do not meet the requirements specified in 40 CFR 270.14(b)(19). Specifically:

- Figures B-1, B-2, B-3, B-4, and B-5 are at scales of 1 inch equals more than 200 feet (e.g., 1 inch equals 2000 feet, 219 feet, 300 feet, 300 feet, and 2000 feet, respectively). In addition, the text on page B-4 mistakenly identifies the scale of Figure B-2 as 1 inch equals 100 feet.

- None of the maps contain labeled contours which clearly show the expected pattern of surface water flow in the vicinity of, and from, the operational unit (e.g., contours of 5 feet if relief is greater than 20 feet; contours of 2 feet if the relief is less than 20 feet). The contours on Figure B-2 are labeled in a type so small it is practically illegible.

- The 100-year floodplain is not clearly delineated on any of the figures. Although the 100-year flood elevation is identified as 372 [feet] in Figure B-2, the border of the floodplain in relation to the facility is not shown on the map.

- Figures B-2 and B-5 lack map (i.e., North) orientation arrows.

Revise Figures B-1 through B-5 to include maps with scales of 1 inch equals no more than 200 feet, include legible contour lines of the appropriate interval distance, identify the 100-year floodplain, and include map orientation arrows.

B-3 **Location Information**

B-3b **Floodplain Standard**: 270.14(b)(11)(iii), 264.18(b)

Section B-3b refers to Figure B-2 to illustrate that the GE facility lies outside the 100-year floodplain. However, as noted in Specific Comment B-2a, Figure B-2 does not clearly show the border of the floodplain in relation to the facility. Revise the figure to demonstrate that the facility does not lie in the 100-year floodplain.

B-4 **Traffic Information**: 270.14(b)(10)

Other than simply stating that the number of vehicles on plant roads varies from "none to moderate," Section B-4 does not include estimated traffic volumes at the facility, with regard to the number and types of vehicles. Revise the Permit Application to provide estimates of traffic volumes at the facility, including the number of vehicles of each type.

C. **WASTE CHARACTERISTICS**: 270.14(b)(2), 264.13(a), 266.102(a)(2)(iii), 266.102(b)

C-1h **Waste in Boilers and Industrial Furnaces**: 266.102(b), 270.66(c)

Revise the application to include the following information for each waste feed stream:

- Heating value;
- Levels of antimony, arsenic, barium, beryllium, cadmium, chromium, lead, mercury, silver, thallium, total chlorine/chloride, and ash; and,
- Viscosity or description of the physical form of the feed stream.

In addition, for each hazardous waste fuel fired, the application must be revised to include the identification of Appendix VIII constituents excluded from analysis, and the basis for their exclusion must be explained.

C-2 **Waste Analysis Plan**: 270.14(b)(3), 264.13(b) and (c), 266.102(a)(2)(ii), 266.104(a)(2), 268.7

C-2b **Test Methods:** 264.13(b)(2)

Table C-1 identifies multiple methods for the analysis of several metals parameters. Clarify when one method should be chosen over the other, and ensure that the analytical laboratory is able to achieve the detection limits of both analyses. The application must also be revised to include the most recent (updated) versions of the referenced SW-846 methods, and the required detection limits. For example, the following changes should be made on Table C-1:

- Method 6010B should be referenced not 6010A;
- For arsenic the methods should be 7060A and 7061A;
- For barium the methods should be 7080A and 7081A;
- For cadmium the method should be 7131A;
- For mercury the method should be 7471A; and,
- For silver the method should be 7760A.

SW-846, Final Update III, June 1997 document should be referenced and used for the analyses.

C-2c **Sampling Methods:** 264.13(b)(3), Part 261, Appendix I, Part 266 Appendix IX

Provide details on the sampling QA/QC program that will ensure sample representativeness of the waste streams.

C-2g **Additional Requirements Pertaining to Boilers and Industrial Furnace Facilities:** 266.102(e)(6)(ii)(C), 266.102(e)(6)(iii)

Section C-2d states that "ash and chromium concentrations are employed in determining maximum allowable feed rates." Although Appendices C-4 and C-5 provide the concentration calculations for the ash and chromium, the application must include the feed rate limits for the remaining BIF metals. The application must be revised to provide the feed rate limits for the BIF metals that are to be analyzed in the phenolic tar waste stream. Ensure that the feed rates of arsenic, antimony, barium, beryllium, cadmium, chromium, lead, mercury, thallium and silver in all feed streams do not exceed the screening limits specified in 40 CFR 266 Appendix I. In addition to the feed rate, revise the application to state that the flow rate of each feedstream is monitored continuously.

C-3 Waste Analysis Requirements Pertaining to Land Disposal Restrictions

C-3a **Waste Analysis:** 261.21 through 261.24, 264.13(a)(1), 268.1, 268.7, 268.9, 268.32 through 268.37, 268.41 through 268.43

For each hazardous waste stored/managed at the facility, provide analytical data necessary to determine whether the waste is a restricted waste and whether the waste is being managed properly under the requirements of 40 CFR 268. Alternatively, provide information from (verifiable) process knowledge of the waste to determine if the waste is restricted. If process knowledge is used, then this information must be documented and presented for review.

C-3a(3) **Listed Wastes:** 264.13(a)(1), 268.7, 268.33, 268.34, 268.35, 268.36, 268.41, 268.42, 268.43

Revise the application to describe the procedures used to determine whether a listed waste meets the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate treatment technology. Process knowledge may be used to make this determination. However, if process knowledge is used, then this information must be documented

C-3a(4) **Characteristic Wastes:** 261.3(d)(1), 264.13(a)(1), 268.7, 268.9, 268.37, Part 268 Appendix I, Part 268 Appendix IX

Revise the application to describe the procedures used to determine whether the D018 characteristic wastes meet the applicable treatment standards or to demonstrate that the waste has been treated by the appropriate specified treatment technology. Process knowledge may be used to make this determination. If process knowledge is used, then this information must be documented. Ensure that where treatment standards are based on concentrations in the waste extract, the facility will use TCLP to determine if the wastes meet treatment standards. Finally, indicate that if, after treatment, a waste displays a "characteristic" for the first time, the characteristic waste code will be added to the land disposal notification forms and facility records. Describe the procedures to make this determination. Indicate that the wastes will be re-treated, as appropriate, in order to meet the characteristic treatment standard, prior to land disposal.

C-3a(8) **Contaminated Debris:** 268.2, 268.7, 268.36, 268.45, 270.13(n)

The application states that process knowledge will be used to determine the debris and contaminant categories. However, if process knowledge is to be used, adequate documented must be provided. Revise the application to indicate how hazardous debris will

be managed. Ensure that hazardous debris that exhibits the characteristics of ignitability, corrosivity, or reactivity must be treated using one of the extraction, destruction, or immobilization technologies identified in Table 1 of 40 CFR 268.45.

C-3a(9) **Waste Mixtures and Wastes with Overlapping Requirements:** 264.13(a)(1), 268.7, 268.9, 268.41(b), 268.43(b), 268.45(a)

Revise the application to clearly describe the procedures that will be used to demonstrate that waste mixtures and wastes carrying multiple waste codes are properly characterized and meet treatment standards prior to land disposal.

C-3c **Requirements Pertaining to the Storage of Restricted Wastes:** 268.50

Revise the application to indicate where wastes restricted from land disposal are stored. Ensure that the wastes are stored in tanks, containers or (a) containment building(s) on-site.

C-3c(1) **Restricted Wastes in Containers:** 268.50(a)(2)(i)

Revise the application to indicate that each container will be clearly marked to identify its contents and the start date for each accumulation period.

C-3c(2) **Restricted Wastes in Tanks:** 268.50(a)(2)(ii)

The application must be revised to clearly state that each tank that stores wastes will be clearly marked with a description of its contents, the quantity of each waste received and the start date for each accumulation period.

F. PROCEDURES TO PREVENT HAZARDS

F-1 **Security:** 264.14, 270.14(b)(4)

F-1a **Security Procedures and Equipment:** 264.14, 270.14(b)(4)

F-1a(3) **Warning Signs:** 264.14(c)

GE states that warning signs have been posted at plant entry gates and can be seen from any approach to the gates, however 40 CFR 264.14(c) requires that warning signs be posted not only at gates, but also at other locations. The signs must be posted "in sufficient numbers to be seen from any approach to the active portion of the facility," not just upon approach of the gates. Revise the application to indicate whether additional signs have been or need to be posted at locations other than the gates, to meet this requirement.

F-2 **Inspection Schedule:** 264.15, 270.14(b)(5)

The inspection schedule presented does not appear complete other sections of the application identify equipment which are not included in the inspection schedule. For example, air horns (p. G-5); alarm system (p. G-5); toxic gas push button alarms (p. G-14); distributive control system (p. F-5), etc. In addition, GE must discuss the inspection of the concrete containment area at the boilers, any warning signs, and the waste feed tanks (V-525A and B). Revise the inspection schedule to include these items.

F-2a **General Inspection Requirements:** 270.14(b)(5), 264.15(a) and (b), 264.33

While Appendix F-2 provides specific information regarding the inspection schedule for the phenol tar boilers and security devices, few details are provided with regard to safety inspections (referenced on page F-2) conducted for all plant facilities. The following specific information is needed regarding the safety inspections at the facility:

- Indicate whether non-routine inspections are conducted (e.g., following storms). If so, provide a discussion regarding these activities or provide copies of inspection logs covering non-routine inspections or modify the appropriate inspection log form to indicate this inspection item.

- Revise the application to indicate that a written inspection schedule, and inspection logs, are kept to chronicle the dates and results of the inspections. Provide an example of the safety inspection log in order to illustrate the extent and level of detail of the inspection. The schedule must identify the types of problems to be evaluated during the inspection. Also, state the exact location at the facility where the inspection records are kept.

- GE states that reports of problems are sent to each operation manager for immediate action. Ensure that all staff involved in any remedial action, are included in Section H of the Permit Application.

- Contrary to the text on page F-2, the inspection schedule (Appendix F-2) does not include safety and emergency equipment in the list of areas/equipment to be inspected. Revise the inspection schedule to specify the types, numbers, and locations of all emergency equipment listed in the Contingency Plan. Also, describe routine maintenance procedures for monitoring, fire control, spill control, and decontamination equipment.

F-2b **Specific Process Inspection Requirements:** 270.14(b)(5), 264.15(b)(4)

F-2b(9) **Boiler Inspection:** 264.15, 266.102(a)(2)(ii), 266.102(e)(8), 266.111(e)(3)

It is not adequate to simply state that boiler inspections are conducted in accordance with 40 CFR 266 standards. Revise the permit application as follows:

- Demonstrate that the BIF unit will be subject to thorough visual inspections for signs of leaks, spills, and fugitive emissions when it contains hazardous waste (at least daily). According to Appendix F-2, the planned daily inspections only includes the pumps, valves, and piping at the units.

- Ensure that the Inspection Log Form (Appendix F-3) addresses all items identified in the inspection schedule. Include all of the monitoring equipment (i.e., CEMs, temperature gauges) on the inspection form.

- Include a description of the automatic waste feed cutoff system testing procedures. Simply stating that the waste feed cutoff systems will be checked for operability is inadequate. Revise the application to describe the specific procedures to test the automatic waste feed cutoff systems.

F-3 **Waiver or Documentation of Preparedness and Prevention Requirements:** 270.14(b), 264.32(a) through 264.32(d)

F-3a **Equipment Requirements:** 270.14(b), 264.32

F-3a(1) **Internal Communications:** 264.32(a)

The text in Section F-3a refers the reader to Sections G-4 and G-5 for information on the facility's emergency alarm system and internal communications equipment. However, Sections G-4 and G-5, and associated figures, do not indicate (if present) the locations of the emergency alarm system and internal communications equipment in the vicinity of the phenol tar boilers. Revise the permit application to describe the location of all alarms at the units and indicate their position on an appropriate map of the facility.

F-3a(2) **External Communications:** 264.32(b)

Although Sections G-4 and G-5 include information regarding the facility's emergency phone system, the Permit Application does not identify the locations of telephones or other devices used to contact external emergency responders. Item C on page G-6

states that the emergency control team can be contacted outside the plant over the emergency phone system located in the ECC. Clarify if the same system is used for contacting outside assistance.

F-3a(3) **Emergency Equipment:** 264.32(c)

Provide a figure which shows the location of all emergency equipment in the vicinity of the phenol tar boilers.

F-3b **Aisle Space Requirement:** 264.35

The application simply states that sufficient aisle space is maintained. This is not adequate. Revise this section to describe the width of the aisle space and explain how it is maintained, and if possible provide a figure of the boiler area illustrating that personnel, equipment, etc. have unobstructed access.

F-4 **Preventative Procedures, Structures, and Equipment:** 270.14(b)(8)

F-4b **Run-Off:** 270.14(b)(8)(ii)

Further information is needed regarding the procedures and structures used to prevent runoff in the phenol tar boiler area. Although the text in Section F-4b states that runoff from the phenol tar boiler area is controlled by means of bermed concrete surrounding the entire boiler area, the photographs of the boilers in Part A do not appear to show a berm. Also, it appears that there may be gravel areas adjacent to the boilers. Revise the application to clarify this issue, and to include information on the berm, including its height, capacity, any coatings, and a summary of the specific procedures undertaken in the event of a spill.

F-5 **Prevention of Reaction of Ignitable, Reactive, and Incompatible Wastes:** 270.14(b)(9)

F-5a **Precautions to Prevent Ignition or Reaction of Ignitable or Reactive Wastes:** 270.14(b)(9), 264.17(a)

The text in Section F-5a states that smoking is confined to permitted designated areas. Confirm that "No Smoking" signs have been conspicuously placed wherever a hazard exists from ignitable or reactive waste.

The text also states that closely controlled issuance of cutting, welding, or hot work permits is observed whenever a potentially hazardous situation might be encountered. Revise this section to include an example of the internal permit and describe the criteria used to identify potentially hazardous situations.

F-5f **Management of Incompatible Wastes in Tank Systems:** 270.16(j), 264.199

Revise the application to include procedures to ensure that incompatible wastes and materials are not stored in the same tank or in an unwashed tank that previously held an incompatible waste or material.

G. **CONTINGENCY PLAN:** 270.14(b)(7), 264.50 through 264.56, 264.52(b)

G-2 **Emergency Coordinators (Incident Commanders):** 264.52(d)

Appendix 2a provides the names, addresses, and telephone numbers for the Crisis Managers (CMs). The addresses show that several of the CMs do not reside in the same city as the facility. Revise Section G-2 to demonstrate that the CMs are "available to respond to an emergency by reaching the facility within a short period of time" as required by 40 CFR 264.55.

The "Emergency Team" is not defined in Section G-2. Revise the application to provide this information.

Page G-2 references additional documents to be used by personnel when responding to emergencies (i.e., Mount Vernon Crisis Management Manual, Crisis Manager's Handbook). These documents should be included as appendices/attachment to the Contingency Plan to ensure that it is a stand-alone document.

G-4 **Emergency Actions**

G-4a **Notifications:** 264.56(a), OAC 3745-54-56

Appendix 3 contains the emergency response phone numbers for the facility. However, several of the listed agencies, and their anticipated role(s), are not discussed in the text in Section G-4a. Revise the text to explain the circumstances under which the following agencies will be contacted:

- Posey County Sheriff's Department (and local Emergency Planning Committee)
- Mt. Vernon Fire and Rescue
- Posey County EMS
- Posey County Civil Defense
- Marrs Township Fire Department

In addition, Figure 3 of Appendix 1 lists some agencies, and their anticipated role(s), which are not discussed in the text in Section G-4a. Revise the text to explain the circumstances under which the following agencies will be contacted, and revise Appendix 3 to include the following agencies and their phone numbers:

- Evansville Fire Department
- Indiana State Police
- Deconness Hospital
- St. Mary's Hospital
- Mutual Aid Association

The top of page G-5 identifies four distinct signals used as part of an alarm system. Item "f" on page G-9 mentions an emergency evacuation alarm box. Revise the Permit Application to describe the facility's alarm system.

G-4d **Control Procedures:** 264.52(a)

The control procedures to be used in the event of a fire or explosion are not adequately discussed in Section G-4d. In addition, the facility must be prepared to address other emergency situations, such as a 24-hour, 24-inch rainfall event or a tornado. Revise the text to include steps to be taken in the aforementioned situations.

G-4f **Storage and Treatment of Released Material:** 264.56(g)

Section G-4f of the Permit Application indicates that the released material will be collected and containerized pending characterization of the (released) material and arrangements will be made for it's disposal. However, this information fails to include the following information concerning the management of various materials that result from a release, fire, or explosion at the facility:

- The methods used for collection;
- The types of containers used for the collected materials;
- Examples of labels that will be placed on the containers;
- The location within the plant used for storage of the hazardous materials;
- The method of characterization; and
- The disposal and treatment methods used.

Revise the application to provide this information.

G-4h **Post-Emergency Equipment Maintenance:** 264.56(h)(2)

Section G-4h does not identify the procedures that will be used to ensure that the emergency equipment listed in the Contingency Plan is cleaned and ready to be used for its intended purposes before operations resume. Revise this section to discuss the inspection procedures, and any associated checklists (if applicable) to be used to ensure that decontamination of the emergency supplies is performed.

G-4i **Container Spills and Leakage:** 264.52, 264.171

According to Section G-4i, in the event of container spills or leakage the material will be contained and absorbent will be applied. However, steps necessary to determine the contents of the container must be identified before the proper absorbent can be selected and applied. Revise this section to include procedures for determining the contents of the containers and select the proper absorbent.

Revise the text to indicate the timing of the procedures to demonstrate that remedial actions will take place expeditiously.

G-4j **Tank Spills and Leakage**

G-4j(1) **Stopping Waste Addition:** 264.196(a)

The first bullet in Section G-4j states that the flow of hazardous waste into a leaking tank system will be stopped ". . . if determined that the tank is unfit for use or that the release cannot be controlled." It is not acceptable to allow the flow of hazardous waste to continue while evaluating a release. Revise the application to state that upon detection of a leak or spill from a tank system or secondary containment system, all available measures will be taken to stop the flow of hazardous waste, and the system will be inspected to determine the cause of the release, as required by 40 CFR 264.196(a).

G-4j(2) **Removing Waste:** 264.196(b)

The third bullet in Section G-4-j states that ". . .material accumulated in the containment area will be removed within 24 hours after detection of the leak . . ." Revise the application to state that any waste which has been released will be removed within 24 hours, not just the material in the containment area.

G-4j(3) **Containment of Visible Releases:** 264.196(c)

Revise the application to indicate that any visible contamination of the soil or surface water will be removed and properly disposed, as required by 40 CFR 264.196(c).

G-4j(4) **Notifications, Reports:** 264.196(d)

Revise the application to demonstrate that any release to the environment (except a leak or spill that is less than or equal to one pound and immediately contained and cleaned up) will be reported to the Regional Administrator within 24 hours of its detection.

G-4j(5) **Provisions of Secondary Containment, repair or closure:** 264.196(e)

Revise the application to state the following, as required by 40 CFR 264.196(e):

- If the release has not damaged the integrity of the system, provide procedures to ensure that the released waste will be removed and repairs, if necessary, will be made, prior to returning the system to service.

- If the cause of the release is from the primary tank system into the secondary containment system, provide procedures to ensure that the primary tank system will be repaired before returning it to service.

G-5 **Emergency Equipment:** 264.52(e)

Revise Section G-5 to describe the locations of the emergency equipment and/or refer the reader to Figure 1 of Section G, which illustrates the location of some emergency equipment.

Revise Appendix 5 to include a physical description of each item on the list as required by 40 CFR §264.52(e).

G-6 **Coordination Agreements:** 264.52(c)

Appendices 6 and 7 of Section G list the organizations that have been provided with a copy of GE's Contingency Plan and have entered into mutual aid agreements. This section should be revised to include the following information to meet the requirements of 40 CFR 264.52(c) and 40 CFR 264.37:

- Descriptions of the emergency services that each establishment will provide to GE;
- The names of any emergency response contractors and equipment suppliers who will be utilized by GE to provide emergency services;
- A statement that police, fire departments, and emergency response teams are familiar with the properties of hazardous waste or hazardous materials handled at the facility and associated hazards, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes;

- A statement or documentation regarding whether state or local authorities have declined to enter into an agreement with GE. This agreement must be documented by the owner or operator in the operating record; and
- Provide copies of the letters from the organizations stating that they either agree or refuse to enter into a mutual aid agreement.

Page G-15 of the Permit Application indicates that only selected agencies have a copy of the Contingency Plan. All members/agencies must have a complete copy of the Contingency Plan. Revise the Permit Application to ensure that all organizations who have entered into a coordination agreement or mutual aid agreement with GE receive a copy of the Contingency Plan.

Also, identify the location(s) where the Contingency Plan is kept at the GE facility.

G-7 **Evacuation Plan:** 264.52(f)

The evacuation plan outlined in Section G-7 is unclear. Bullet #2 states that ". . .most personnel in the plant should immediately evacuate following the primary evacuation exit . . ." However, Bullet #3 states that "All personnel should immediately evacuate to the muster areas . . ." Revise the application to clarify the evacuation plan for all personnel and explain under what circumstances each evacuation route should be used.

Figure 2 does not clearly illustrate the evacuation routes for workers operating near the boilers. The illustrative arrows only show evacuation directions for a selected few areas of the building, and do not indicate the evacuation route from the muster area. Revise the figure to more clearly indicate the evacuation routes.

G-8 **Required Reports:** 264.56(j)

Revise the application to include information regarding the maintenance of records identifying the time, date, and details of an emergency incident.

H. **PERSONNEL TRAINING**: 270.14(b), 264.16

The acronyms used in Appendix H-1 have not been defined. Revise the permit application to define each of the acronyms used in Appendix H-1.

H-1 **Outline of the Training Program:** 264.16(a)(1)

The discussion of the training program in Section H-1 does not meet the requirements in 40 CFR 264.16(a)(1). Revise this section to include the following:

- A brief description on how training is designed to meet actual job tasks;

- A description of the type and amount of both introductory and continuing training that will be given to each person who handles hazardous wastes;
- An outline and discussion on the type and amount of training that each job title receives at the facility;
- An outline and discussion on the Safe Job Procedures training, Standard of Operating Procedures (SOP) training and leak and detection program training; and
- A description of the type and amount of introductory and continuing training the BIF unit personnel receive.

H-1a **Job Title/Job Description:** 264.16(d)(1), 264.16(d)(2)

Many of the job titles listed in Appendix H-1 as being involved in hazardous waste management at the facility, are not listed in Appendix H-2, which provides the job descriptions. Revise the application to provide the job title and job description of each employee whose position at the facility is related to hazardous waste management, and the requisite skills, training (introductory and continuing), education, and certifications required for each position.

In addition, other sections of the application identify job titles who have hazardous waste-related responsibilities but are not discussed in Section H (e.g., Crisis Manager, Area Emergency Coordinator, Site General Manager, EMTs, First Responders, and Environmental Duty Officer). Revise the permit application to provide a detailed job description for each job title that has the potential to handle hazardous waste.

H-1b **Training Content, Frequency and Techniques:** 264.16(b), (c), and (d)(3)

The text in Section and for H-1b lists training provided to employees who are newly assigned to the Phenol Plant, RCRA Contacts, Plant Manager, and unit personnel (defined in Section H-1d as "Shift Operators, Shift Leads, Analyzer Technician, etc."). Revise the text to clarify that all facility personnel involved in hazardous waste management take part in an annual review of the initial training, as required by 40 CFR 264.16(c).

The outline of the annual hazardous waste training program is given in Appendix H-3 of the Permit Application, while the training for unit personnel is given in Appendix H-4. An outline of the introductory training program is not provided. Revise the application to clearly indicate the content of the introductory training program and to specify the amount of time that is dedicated for each portion of the training for both introductory and continuing courses.

Shift operators and lab leads are reportedly responsible for sampling activities, according to Appendix H-2. However, sampling does not appear to be addressed in the course outlines provided in Appendix H-3. Revise the permit application to include an outline of training provided for those employees who conduct sampling activities.

H-1c **Training Director:** 264.16(a)(2)

Section H-1c describes the needed qualifications of the training director of the training program. Revise this section to meet the requirements of 40 CFR 264.16(a)(2) with documentation showing the qualifications, skills, and education of GE's current training director that demonstrates his/her ability to direct the RCRA training program.

H-1d **Relevance of Training to Job Position:** 264.16(a)(2)

Section H-1d briefly discusses the relevance of hazardous waste management training to broad categories of job positions. Revise this section to include a detailed discussion which demonstrates the relevance of training to each job position. Also, specifically indicate the introductory and continuing training required for each job title.

H-1e **Training for Emergency Response:** 264.16(a)(3)

Section H-1e of the permit modification identifies the emergency response training that all facility personnel must complete for their specific job positions. Simply describing the instruction that facility personnel receive on the topics covered in 40 CFR 264.16(a)(3) is inadequate. Revise this section to include an emergency response training outline that covers the topics required under 40 CFR 264.16(a)(3), and include the following:

- An explanation of how each topic is applicable to the specific job positions;
- The amount of time spent on each topic; and
- The total amount of time specific job positions must spend on emergency response training.

H-2 **Implementation of Training Program:** 264.16(b), (d)(4) and (e)

The text in Section H-2 states that new employees will not work in an unsupervised positions until training has been received. Revise this section to discuss how successful completion of both classroom and on-the-job training is evaluated. If applicable, this revision should include an exhibit with required written or oral examinations.

Revise Section H-2 to explain that personnel training records may accompany personnel transferred within the same company, as required by 40 CFR 264.16(4)(e).

I. CLOSURE PLANS, POST-CLOSURE PLANS, AND FINANCIAL REQUIREMENTS: 270.14(b)(13) and (15) through (18), 264.110 through 264.151

I-1 Closure Plans: 270.14(b)(13), 264.112(a)(1) and (2)

I-1a Closure Performance Standard: 264.111

Section I-1a lists the requirements of 40 CFR 264.111 and states that GE will meet them. This is not adequate. Revise the application to describe how GE's Closure Plan will meet the requirements. Specifically, describe how closure:

- Minimizes the need for further maintenance;
- Controls, minimizes, or eliminates the post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and
- Complies with the closure requirements of Subpart G and unit-specific closure requirements.

I-1b Partial Closure and Final Closure Activities: 264.112(b)(1) through 264.112(b)(7)

The information presented in Section I-1b is not adequate. Revise the application to describe the applicable time frames, and all activities required for:

- Partial closure, if applicable;
- Final closure; and
- Maximum extent of operation that will be active during life of facility.

I-1c Maximum Waste Inventory: 264.112(b)(3)

Section I-1c does not fulfill the requirements of 40 CFR 264.111(b)(3). Revise this section to give the waste inventory at the time of closure. This inventory should include the volume and a list of all wastes associated with operation of the boilers, including ash. Describe the sequence in which units will be operated during the active life of the facility, and the order in which they will be closed.

I-1d Schedule for Closure: 264.112(b)(6)

The closure schedule included in the permit application does not address all activities associated with the closure of units, such as dismantling the boilers or tanks. Revise the closure schedule to include more detail and address each potential activity associated with closure of the units.

Also, Steps 7 and 8 of the closure schedule appear to be performed simultaneously, leaving no time for confirmatory sampling. Revise the closure schedule to include adequate time for necessary confirmatory sampling.

I-1e **Closure Procedures:** 264.112, 264.114

I-1e(1) **Inventory Removal:** 264.112(b)(3), 264.112(b)(4), 264.114

Section I-1e(1) does not identify the type(s) of off-site hazardous waste management units to be used for wastes shipped off-site for disposal. Revise the permit application to include this information.

I-1e(2) **Disposal or Decontamination of Equipment, Structures, and Soils:** 264.112(b), 264.114

The method proposed in Section I-1e(2) to determine when decontamination is complete is not acceptable. The last paragraph of the section states that decontamination will be considered complete when "analytical results from final rinsate sampling indicate that the concentrations of the target parameters are below their respective cleanup levels." The text does not indicate how the "respective cleanup levels" will be determined, or the steps which will be taken if the decontamination is not determined to be complete. Revise the text to include this information.

A detailed discussion regarding GE's sampling program is needed in the Permit Application. Specifically:

- Clarify whether the samples will be grab or composite;
- Illustrate the location of soil samples on a map;
- Indicate the source of the background data which will be used to determine if the soils are contaminated;
- Denote the number of verification samples which will be collected after soils are excavated;
- Explain how the estimate of five cubic yards of contaminated soils was reached; and
- Describe how waste residues and rinse waters from decontamination activities will be collected.

In addition it is not appropriate to use TCLP analysis to evaluate whether soil contamination is present. TCLP analysis is used to determine whether a waste is hazardous. Revise the permit application to indicate that totals analyses will be performed on the soil samples.

I-1e(5) **Closure of Tanks:** 270.14(b)(13), 264.197, 264.112(b)(3)

The Permit Application does not provide adequate information in Section I-1e(5) regarding tank closure. Revise the application to describe how all hazardous waste residues, contaminated containment system components (liners, etc.), contaminated soils, and structures and equipment contaminated with waste will be removed or decontaminated at closure and managed as hazardous waste. The description should address the following:

- Waste removal from tanks and equipment;
- Decontamination of all components;
- Verification of decontamination;
- Disposal of wastes and residues; and
- Maximum inventory.

If contaminated soils cannot be practicably remediated or the tank/tank systems decontaminated at closure, provide for closure (and post-closure) of the tank system as a landfill.

I-1e(12) **Closure of Boilers and Industrial Furnaces (BIFs):** 266.102(a)(2)(vii)

Section I-1e(1) discusses the closure of the boilers and refers the reader to Section I-2(2). Neither section appears to address the removal of other residues (such as ash) associated with the operation of the boilers. Revise the permit application to include a description of how, all hazardous waste and hazardous waste residues such as ash will be removed from the BIF unit. If necessary, describe how the BIF unit and associated equipment will be dismantled and disposed of, if the decontamination procedures are not successful. If any wastes, waste residues, contaminated components, subsoils, structures, or equipment remain after closure, provide plans for closing the BIF unit as a landfill and provide a contingent post-closure plan. Revise Section I-1e(2) as necessary to incorporate these descriptions.

I-4 **Closure Cost Estimate:** 270.14(b)(15), 264.142

The closure cost estimate requires more detail than GE has provided. Revise the permit application to itemize the costs being attributed to administrative labor. Also, address the costs of ash disposal, steam cleaning the boilers, dismantling the equipment, disposal of dismantled equipment, and the cost of operating boilers to dispose of final waste inventory (only address labor costs, not other operating costs, etc.).

The closure cost estimate must be equal to the cost of final closure at the point at which facility closure would be most costly, as per 40 CFR 264.142. Revise the text to explain how a maximum waste inventory scenario would result in the most costly scenario possible, and if it would not, revise the closure cost estimate to reflect the most costly scenario.

Page I-8 states that $101,280 will be needed to close the hazardous waste management units at the GE facility. However, Appendix I-1 states this cost is $210,980. Revise the permit application to address this discrepancy.

I-5 **Financial Assurance Mechanism for Closure:** 264.143(f), 264.151(f) through (h)

I-5e **Financial Test and Corporate Guarantee for Closure**: 264.143(f), 264.151(f), 264.151(h)

Section I-5 of the application states that GE has decided to use the financial test mechanism as their chosen financial assurance mechanism. However, the appropriate documents have not been submitted to meet the requirements of 40 CFR 264.151(f). Revise Section I-5 to include the following in order to meet the requirements of 40 CFR §264.151(f):

- A letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.151(f);
- A copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year; and
- A special report from the certified public accountant.

If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding items.

I-8 **Liability Requirements**: 270.14(b)(17), 264.147

I-8a **Coverage for Sudden Accidental Occurrences**: 264.147(a)

I-8a(2) **Financial Test or Corporate Guarantee for Liability Coverage:** 264.147(a)(2), 264.147(f) and (g), 264.151(f) and (g)

Section I-8 of the permit modification states that GE has decided to use the financial assurance test and corporate guarantee to satisfy the requirement for liability insurance. However, the appropriate documents have not been submitted to meet the requirement. Revise the application to provide the following:

- A letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.151(g);
- A copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year; and
- A special report from the certified public accountant.

However, if GE is using the financial test to demonstrate both assurance for closure and liability coverage, the letter specified in 40 CFR 264.151(g) must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 40 CFR 264.151(f) is not required. Alternatively, the owner/operator may submit a corporate guarantee with wording identical to the wording specified in 40 CFR 264.151(h)(2).

I-8b **Coverage for Nonsudden Accidental Occurrences**: 264.147(b)

I-8b(2) **Financial Test or Corporate Guarantee for Liability Coverage**: 264.147(a)(2), 264.147(f) and (g), 264.151(f) and (g)

As stated previously in Specific Comment I-8a(2), GE is required to submit the appropriate documents in order to satisfy the requirements for liability insurance. Revise the permit application to provide the appropriate documents.

J. CORRECTIVE ACTION FOR SOLID WASTE MANAGEMENT UNITS:

J-1 **Solid Waste Management Units**: 270.14(d)(1), 264.101

J-1a **Characterize the Solid Waste Management Unit**

The first paragraph of Section J-1 states that 185 Solid Waste Management Units (SWMUs) were identified at the GE facility in 1991. Section J-1a states that information on the SWMUs is available in the RCRA Facility Assessment and RCRA Facility Investigation (RFI) documents. However, information required for each SWMU by 40 CFR 270.14(d)(1) must be included in the Permit Application. Revise the Permit Application to identify all solid waste management units at the facility, including hazardous and non-hazardous waste units, as well as active and inactive units, if known. For each SWMU, provide the following:

- Type of each unit;
- Location of each existing or closed unit on the topographic map. [See comment B-2.];
- Engineering drawings for each unit, if available;
- Dimensions and materials of construction of each unit;
- Dates when the unit was in operation;

- Description of the wastes placed in each unit; and
- Quantity or volume of waste, if known.

J-2 **Releases**

The text in Section J-2 states that two SWMUs at the GE facility were identified in the RFI as "potentially impacting environmental media near the units." Revise the application to provide further information regarding the nature of the impact caused by the units. If a release has occurred at either unit, revise the application to characterize the release(s) as follows:

- Date of the release;
- Type of waste of constituent released;
- Quantity or volume released;
- Nature of the release:
  - spill,
  - overflow,
  - ruptured pipe or tank,
  - result of the unit's construction (e.g., unlined surface impoundment, leaky tank),
  - other.
- Groundwater monitoring and other analytical data available to describe nature and extent of release. If other than groundwater monitoring data, please describe;
- Physical evidence of distressed vegetation or soil contamination;
- Historical evidence of releases such as tanker truck accidents;
- Any state, local or federal enforcement action that may address releases;
- Any public citizen complaints about the facility that could indicate a release; and
- Any information showing the migration of the release.

J-2b **No Releases**

If GE maintains that no releases have occurred at the facility, the Permit Application must be revised to describe the methods used to determine that releases from solid waste management units have not occurred (e.g., review of groundwater monitoring data).

K. **OTHER FEDERAL LAWS:** 270.14(b)(20), 270.3

Appendix K-1 contains a copy of the letter sent by a GE contractor to the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology on May 27, 1997 in order to obtain information on any known historical, architectural, or archaeological sites listed on or eligible for inclusion in the National Register of Historic Places which will be affected by the issuance of the Permit. Considering that

GE has not received a response to this letter in the two years since the permit application submittal, the sending of another letter is warranted to demonstrate that GE has sufficiently attempted to obtain this information.

Appendix K-2 contains a copy of the letter received by GE from the U.S. Department of Interior, Fish and Wildlife Service, Bloomington Field Office. The inclusion of this letter does not demonstrate that GE is in compliance with the Endangered Species Act, but rather provides a series of suggestions to avoid impacts to endangered species and their habitats. Revise Section K to include a discussion of how GE has complied with the Endangered Species Act.

L. PART B CERTIFICATION: 270.11

The permit application certification is signed by the Lexan Manufacturing Manager. However, 40 CFR 270.11 requires signatures as follows: (1) for a corporation, a principal executive officer (at least at the level of vice-president); (2) for a partnership or sole proprietorship, a general partner or the proprietor, respectively. Clarify whether the Lexan Manufacturing Manager has the authority to sign the certification, and if necessary, provide an alternate certification.

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

August 11, 1999

Certified Mail Z 505 608 749

Mr. Chris Meyer
Indiana Department of Environmental Management
Office of Solid & Hazardous Waste
100 North Senate Avenue
Indianapolis, IN 46204

Re: IND 006376362 Hazardous Waste Management Permit

Dear Mr. Meyer:

Pursuant to Condition V.D.2 of the IDEM Hazardous Waste Management Permit for the container storage building located at GE Plastics (GEP) Mt. Vernon, Indiana manufacturing facility, this letter serves as notification to the Commissioner of the discovery of materials which may contain hazardous constituent(s) released from SWMU 40, BPA Tar Burner.

On July 14, 1999, a contractor was conducting exploratory excavation to locate an underground utility line at the location of the former BPA tar burner. The contractor encountered materials that visually appeared to be remnant BPA tars and heat transfer fluid from the former BPA Tar Burner unit. The excavation was halted and all excavated materials were returned to the excavated area.

I may be contacted at (812)831-7307 concerning any questions IDEM-OSHWM staff may have.

Sincerely,

David K. Perkins
Principal Water and Waste Programs Leader

cc: Don Heller, USEPA Region V

DKP/dlw

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

July 16, 1999

Certified Mail Z 505 608 737

Mr. Chris Meyer
Indiana Department of Environmental Management
Office of Solid & Hazardous Waste
100 North Senate Avenue
Indianapolis, IN 46204

Re: IND 006376362 Hazardous Waste Management Permit

Dear Mr. Meyer:

Pursuant to Condition V.D.1 of the IDEM Hazardous Waste Management Permit for the container storage building located at GE Plastics (GEP) Mt. Vernon, Indiana manufacturing facility, this letter serves as notification to the Commissioner of the discovery of a new SWMU. On June 24, 1999, a GEP geotechnical subcontractor while conducting core drilling east of SWMU 26, encountered soil with a diesel fuel odor. Upon investigation, GEP has determined that the likely source of the diesel fuel soil contamination was a former above ground #2 diesel fuel storage tank and/or associated equipment. The tank and associated equipment were removed in 1989. Specific information required bv Condition V.5.1 is provided as follows:

a. The location of the site on the site topographic map;
See attached Figure A-1, Site Location Map from the permit and Figure 4, Facility Plan from the RFI Workplan.

b. Designation of the type of unit;
One 15,000 gallon capacity above ground #2 diesel fuel storage tank and associated equipment.

c. General dimensions and structural description, supply any available drawings;
See attached drawings titled "Fuel Oil Storage Permit Plan and " #2 Fuel Oil Piping SH2"

d. When the unit was operated;
1980-1989

d. Specification of all waste(s) that have been managed at the unit;
#2 diesel fuel (not a waste)

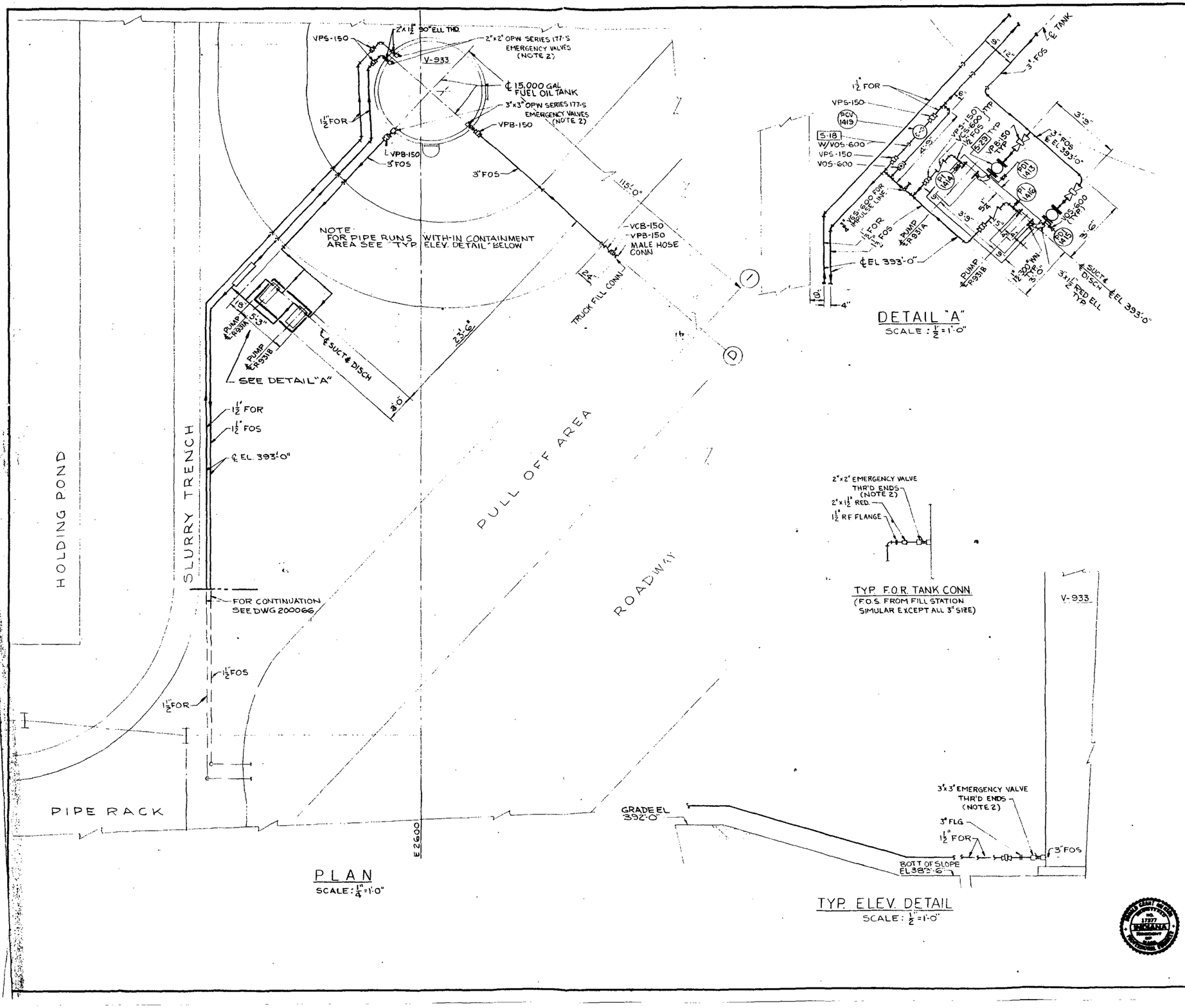
I may be contacted at (812)831-7307 concerning any questions IDEM-OSHWM staff may have.

Sincerely,

David K. Perkins
Principal Water and Waste Programs Leader

cc: Don Heller, USEPA Region V

DKP/dlw



NOTE:
1. ALL PIPING TO BE RUN TO SUIT FIELD CONDITIONS.
2. EMERGENCY VALVES TO BE FURNISHED BY OWNER & INSTALLED BY CONTRACTOR.

REV NO	DATE	DESCRIPTION	ENGR.	SUP. ENG.
	2/1/79	FIRST ISSUE FOR CONSTRUCTION	DLM	DAP

ENGINEER D.G. MUNSON
STATE REG. INDIANA NO. 17377

united engineers & constructors inc
BOSTON, MASSACHUSETTS 02110

COAL FIRED STEAM GENERATING PLANT
FOR
GENERAL ELECTRIC – PLASTICS DIVISION
MT. VERNON, INDIANA

NO.2 FUEL OIL PIPING SH 2

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RECO PROJECT 72088
G.E. DWG NO
U E & C DWG NO 200055

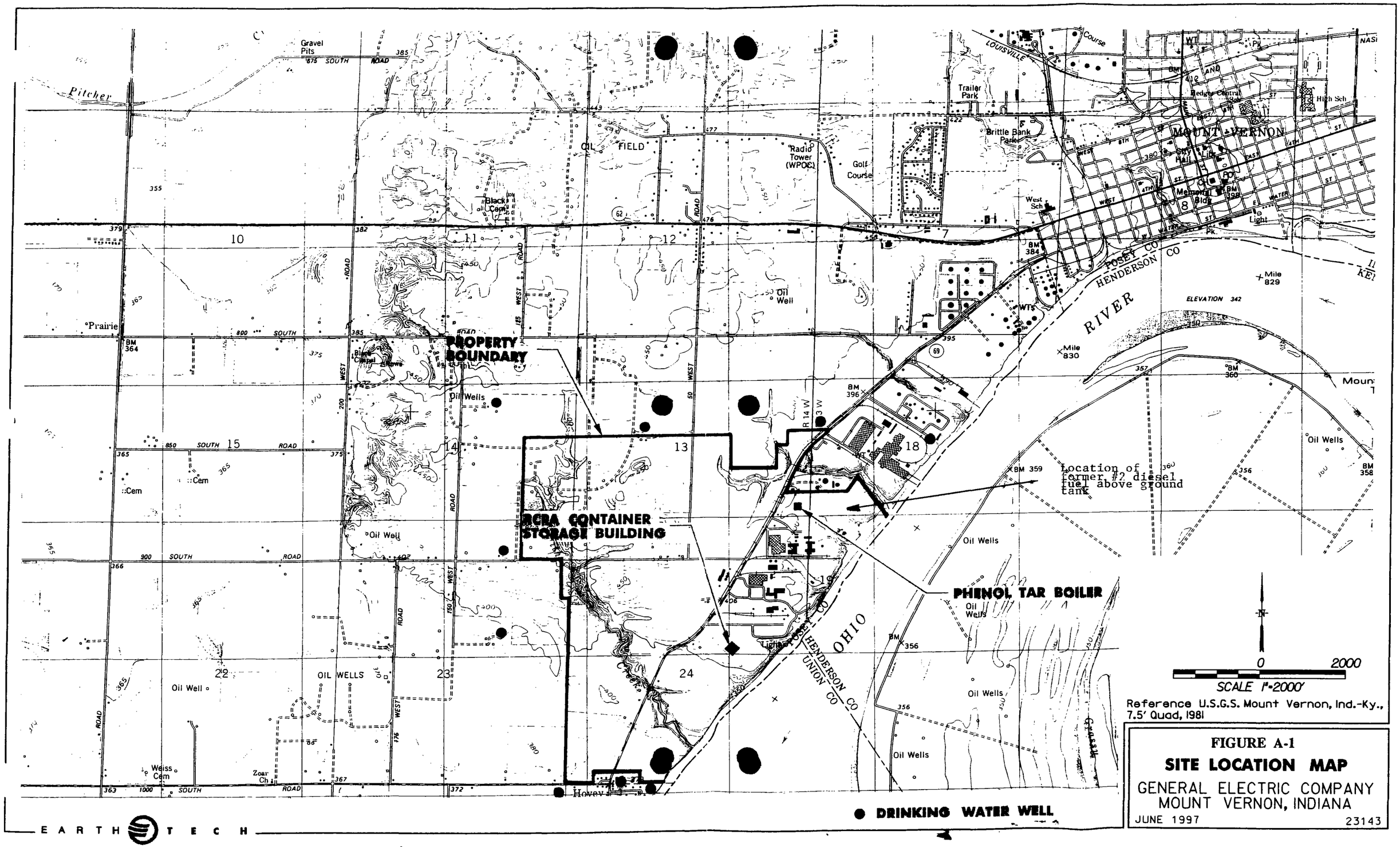


FIGURE A-1

SITE LOCATION MAP

GENERAL ELECTRIC COMPANY
MOUNT VERNON, INDIANA

JUNE 1997 23143

EARTH TECH

DRAWN BY	DATE	APPROVED BY	DATE
NW	2/27/97	JDB	2/27/97

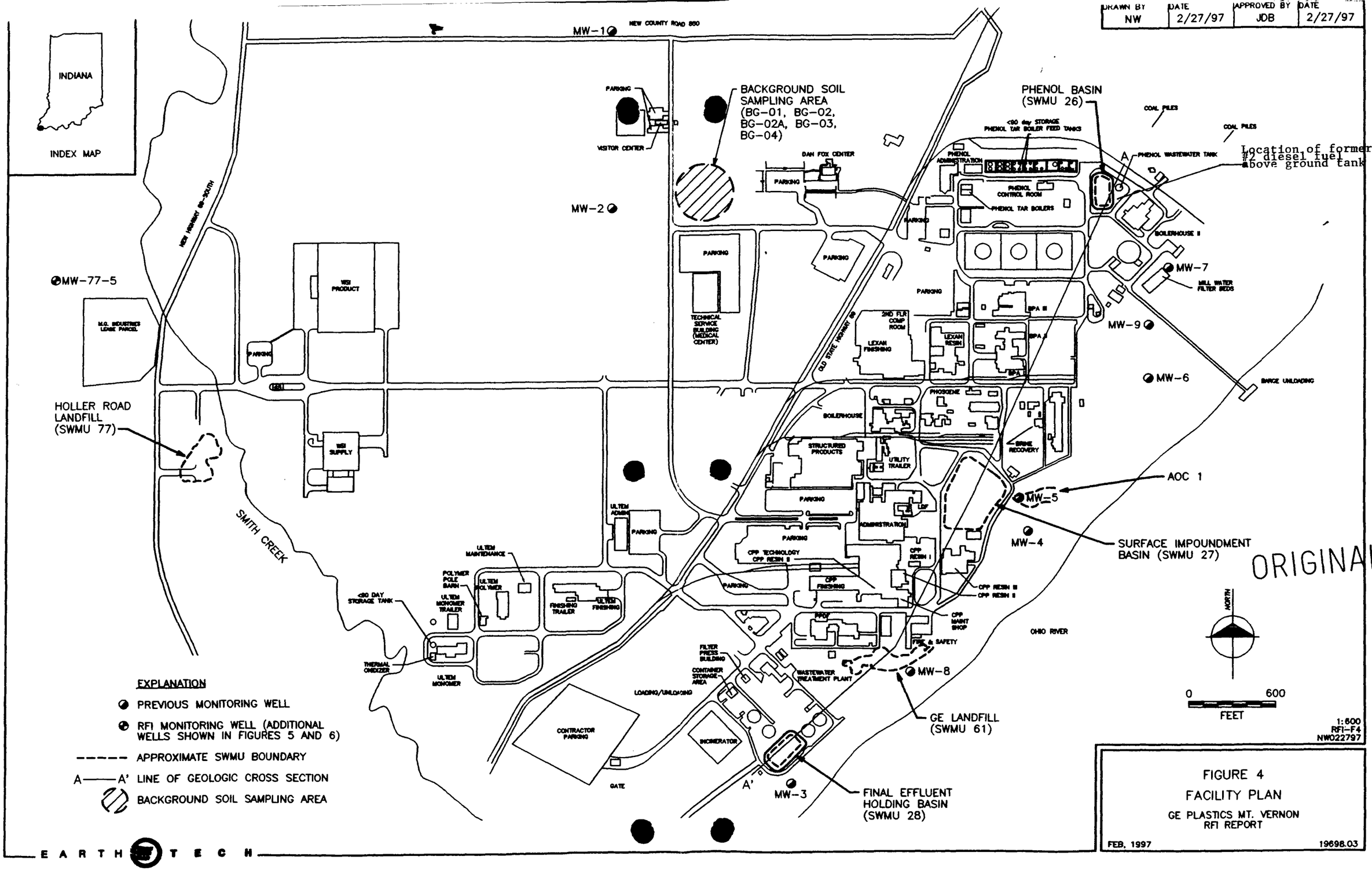
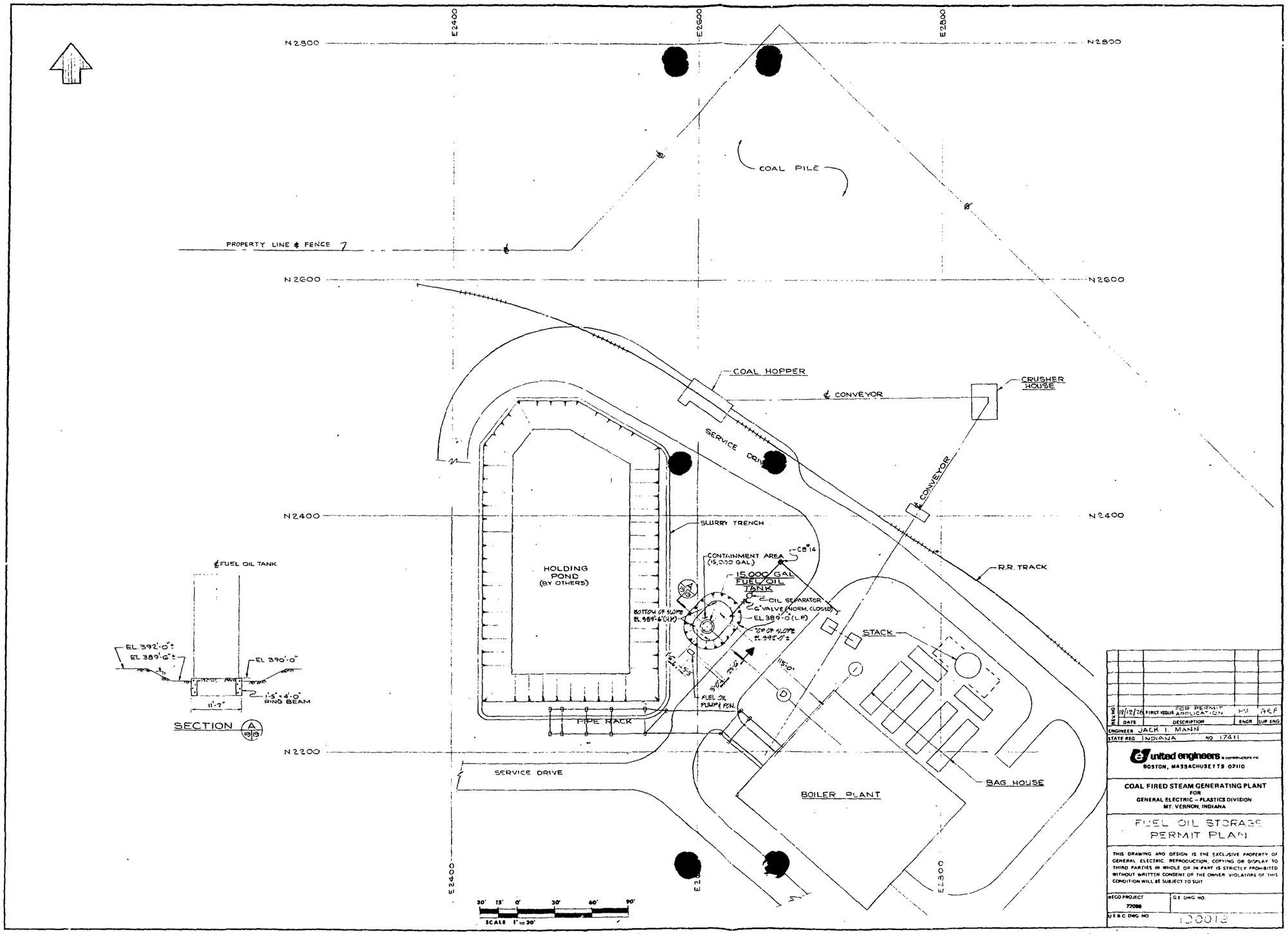


FIGURE 4
FACILITY PLAN
GE PLASTICS MT. VERNON
RFI REPORT

FEB. 1997 19698.03



REV NO	DATE	DESCRIPTION	ENGR	SUP ENG
	10/12/78	FOR PERMIT FIRST ISSUE APPLICATION	HJ	ARF

ENGINEER JACK I. MANN
STATE REG INDIANA NO 17411

united engineers & contractors inc
BOSTON, MASSACHUSETTS 02110

COAL FIRED STEAM GENERATING PLANT
FOR
GENERAL ELECTRIC – PLASTICS DIVISION
MT. VERNON, INDIANA

FUEL OIL STORAGE
PERMIT PLAN

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RECO PROJECT 72098
G E DWG NO.
U E & C DWG NO 130013

RECORD FILM 24 6611-001

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

May 18, 1999

Mr. Chris Meyer
Indiana Department of Environmental Management
Office of Solid & Hazardous Waste Management
100 North Senate Avenue
Indianapolis, IN 46206

Re: RCRA Part B Permit

Dear Mr. Meyer:

On May 13, 1999, the state RCRA Part B Permit for GE Plastics, Mt. Vernon, IN became effective. At that time, oversight for RCRA Corrective Action was legally transferred to IDEM from U.S. EPA Region V. Based on our prior discussion, it is GE Plastic's understanding that IDEM accepts all approvals and authorizations given by EPA for corrective action activities completed or in-progress as of May 13, 1999. Please contact me at once if this is not correct. It is also GE Plastic's understanding that EPA will continue to play a role in the regulatory oversight of corrective action activities at the Mt. Vernon facility. To facilitate this IDEM-EPA partnership, GE Plastics will also copy EPA on all corrective action correspondence and reports.

I may be contacted at (812) 831-7307 concerning any questions you may have.

Sincerely,

David K. Perkins
Principal Environmental Engineer

cc: D. Heller, U.S. EPA, Region

DKP/dlw

file: RQ, Corrective Action

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.ai.org/idem

April 26, 1999

NOTICE OF DECISION

Please be advised that on April 26, 1999, the Commissioner of the Indiana Department of Environmental Management (IDEM) issued a Hazardous Waste Management Permit Renewal requested under Indiana Code 13-22 and Rule 329 IAC 3.1 to General Electric Company, located in Mount Vernon, Indiana. The Permit will allow General Electric Company to continue to operate a hazardous waste container storage facility.

If you wish to challenge this decision, IC 13-15-6-1 and IC 4-21.5-3-7 require that you file a Petition for Administrative Review. If you seek to have the effectiveness of the permit stayed during the Administrative Review, you must also file a Petition for Stay. The Petition(s) must be submitted to the Office of Environmental Adjudication at the following address within fifteen days of your receipt of this notice:

Office of Environmental Adjudication
ISTA Building
Suite 618
150 W. Market Street
Indianapolis, Indiana 46204

The Petition(s) must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision, or otherwise entitled to review by law. Identifying the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, or date of this notice will expedite review of the petition. Additionally, IC 13-15-6-2 requires that your Petition include:

1. The name and address of the person making the request.

2. The interest of the person making the request.

3. Identification of any persons represented by the person making the request.

4. The reasons, with particularity, for the request.

5. The issues, with particularity, for the request.

6. Identification of the permit terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing permits of the type granted or denied by the Commissioner's action.

Pursuant to IC 4-21.5-3-1(f), any document serving as a petition for review or review and stay must be filed with the Office of Environmental Adjudication. Filing of such a document is complete on the earliest of the following dates:

1. The date on which the petition is delivered to the Office of Environmental Adjudication (OEA).

2. The date of the postmark on the envelope containing the petition, if the petition is mailed by United States mail; or

3. The date on which the petition is deposited with a private carrier, as shown by a receipt issued by the carrier, if the petition is sent by private carrier.

Pursuant to IC 4-21.5-3-3, the Office of Environmental Adjudication will provide you with notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this decision if you submit a written request to the Office of Environmental Adjudication at the above address. If you do not provide a written request to the Office of Environmental Adjudication, you will no longer be notified of any proceedings pertaining to this decision.

A Response to Comments has been prepared for comments received during the public comment period. The Response to Comments is enclosed for your information.

If you have any procedural or scheduling questions regarding your petition(s), you may contact OEA at 317/232-8591.

For further information regarding this notice, please contact Mr. Robert Marshall at 317/232-4534.

Sincerely,

Thomas E. Linson, Chief
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

Enclosure

RESPONSE TO COMMENTS
RCRA DRAFT PERMIT
GENERAL ELECTRIC COMPANY
MOUNT VERNON, INDIANA
IND006376362

INTRODUCTION

The public comment period for the General Electric Company Draft Permit began on February 3, 1999, with a public notice in the Mount Vernon Democrat, a radio announcement on radio station WPCO AM/WBLZ FM and a mass mailing to interested parties. The notice and announcement requested comments regarding the Draft RCRA Permit. Written comments were accepted during the public comment period, which ended on March 22, 1999.

This Response to Comments is issued pursuant to 329 IAC 3.1-13-13, which requires that the Indiana Department of Environmental Management (IDEM) shall:

1. briefly describe and respond to all significant comments on the Draft Permit;

2. specify which provisions, if any, of the Draft Permit have been changed, and the reasons for the change; and

3. explain the right to request an adjudicatory hearing on the permit as specified in IC 4-21.5.3.5 (see Notice of Decision).

RESPONSE TO PUBLIC COMMENTS

No public comments were received.

RESPONSE TO FACILITY COMMENTS

Pursuant to the issuance of the Draft IDEM RCRA Permit dated February 3, 1999, General Electric Company submitted the following comments in accordance with the public comment procedures. The comments on the State portion of the permit are described in the following sections along with IDEM's response and any changes made as a result of the comments.

1. COMMENT: Condition III.A, Waste Identification

GE requests that the draft permit be revised to add a statement allowing the storage of any RCRA P & U listed waste codes (40 CFR 261.33) generated by the facility as discarded lab chemicals. Only small amounts of these materials are typically generated, and lab

packing is often required to allow off-site shipment for disposal. Allowing the storage of P & U listed lab chemicals in the building will facilitate the preparation of lab packs of materials from different locations across the site.

GE suggests that the following sentence (bold font) be added after the last sentence of Condition III.A.2 in Page 23.

"....from storing hazardous waste that is not identified in Permit Condition III.A.1." **Small quantities of lab chemicals carrying any of 40 CFR 261.33 P & U-listed waste codes may be stored in the building for lab packing purposes.**

RESPONSE:

The requested language is acceptable.

CHANGE:

Permit Condition III.A.2 has been modified as requested.

2. COMMENT: Section G

GE recently submitted a Permit Application to the U.S. EPA for the two hazardous waste boilers that are currently operated under RCRA interim status. GE requests that several portions of Section G included in the draft permit be updated with the attached revisions. The Contingency Plan is a living document intended to serve the entire facility in the event of an emergency, and is a requirement that is not limited to the Container Storage Building, but affects the RCRA BIF units as well as less than 90 accumulations areas. As such, the facility should be operated under one Contingency Plan document.

The main changes include:

- The following statement was added to the discussion of Emergency Coordinators included in Section G-2 to require that no individuals be added to the Crisis Managers roster without prior modification of the permit per the procedures described in 40 CFR 270.42(a). Notification of the permit modification will not be submitted if Crisis Managers are removed from the roster.

  "A new Crisis Manager may not be added to the CM roster (as described in Appendix 2a) without prior notification to the permitting agency, as required by the permit

modification provisions in 40 CFR 270.42(a). A permit modification will not be necessary when Crisis Managers are removed from the CM roster."

- Incorporation of Evacuation Routes for RCRA BIF units, as Figure 2.

- Figure 2 in draft permit was renamed as Figure 2A and is herein included.

- Appendix 2 (Waste Profile Table) was revised to only include routinely generated waste streams. The Appendix 2 table included in the draft permit includes numerous waste streams that are still shown as active in GE's profile system but that were generated as a one time only waste stream resulting from in-house and off-site warehouse clean-ups. GE believes that the revised table is sufficient in identifying the type of material that facility personnel and emergency responders need to be familiar with in the event of an emergency.

- Revisions to Appendix 2a (Crisis Managers List) to incorporate recent personnel changes.

- Revisions to Appendix 4 to include copy of internal Release Reporting Procedure (to be followed by Environmental Staff) and minor revisions to the Spill/release Reporting Guidelines for operations currently included in the draft permit.

- Revisions to the format of Appendix 5 to make the table describing equipment and equipment capabilities easier to read. No changes were made to the equipment described.

RESPONSE:

The first bullet requests that additional wording be added to Section G-2; IDEM agrees, in part, to the revision. The proposed wording states that a permit modification will be necessary when a new Crisis Manager (CM) has been added to the CM roster, and a permit modification will not be necessary when a CM is removed from the CM roster. In accordance with 40 CFR 270.42(a), a permit modification would be necessary in either situation, i.e., whether a CM is added or removed from the CM roster.

The changes identified in the remaining six bullets are acceptable.

CHANGE:

The following statement has been included in Section G-2:

> "A Crisis Manager may not be added to, or removed from, the CM roster (Appendix G-2a) without notifying the permitting agency, as required by the permit modification provisions in 40 CFR 270.42(a)."

The additional changes, referenced in bullets two through seven, have been applied as requested.

3. COMMENT: Section J

GE requests that paragraph J-2 of the Corrective Action for Solid Waste Management Units section be revised to reflect that SWMUs 26, 28, & 77 have been determined by the U.S. EPA as requiring no further action.

RESPONSE:

IDEM agrees to modify the permit to reflect the current status of the aforementioned SWMUs.

CHANGE:

Permit Condition V.C. has been revised to include the required action at each of the identified SWMUs. The required action listed for SWMUs 26 and 28 is, "No further action at this time." SWMU 77 was revised to state, "Required action: Maintain Landfill Cover."

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(800) 451-6027
www.ai.org/idem

VIA CERTIFIED MAIL Z 376 730 308

April 26, 1999

RECEIVED
APR 28 1999
WASTE MANAGEMENT BRANCH
Waste, Pesticides & Toxics Division
U.S. EPA – REGION 5

Mr. Hak Cho
Technical Programs Section
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, Illinois 60604

Dear Mr. Cho:

Re: Final Hazardous Waste Management Permit Renewal
General Electric Company
Mt. Vernon, Posey County
IND006376362

Enclosed is a copy of the final Hazardous Waste Management Permit Renewal for the above referenced facility. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is five (5) years. The Indiana Department of Environmental Management (IDEM) may modify, revoke and reissue, or terminate this permit based on causes specified in 329 IAC 3.1-13-7.

Also, please find enclosed the Response to Comments generated as a result of the Public Notice for the Draft Permit for General Electric Company. This response was prepared in accordance with 329 IAC 3.1-13-13 which requires the Indiana Department of Environmental Management to issue a response to comments at the time that any final permit decision is issued.

If you have any questions regarding this matter, please contact Mr. Robert Marshall at 317/232-4534.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

REM
Enclosures

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(800) 451-6027
www.ai.org/idem

VIA CERTIFIED MAIL Z 376 730 307

April 26, 1999

Ms. Evelyn R. Ponton, Environmental Engineer
General Electric Company
One Lexan Lane
Mt. Vernon, Indiana 47620-9364

Dear Ms. Ponton:

Re: Final Hazardous Waste Management
Permit Renewal
General Electric Company
Mt. Vernon, Posey County
IND006376362

Enclosed is a copy of the final Hazardous Waste Management Permit Renewal for your facility at the above-referenced location. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is five (5) years. The Indiana Department of Environmental Management (IDEM) may modify, revoke and reissue, or terminate this permit based on causes specified in 329 IAC 3.1-13-7.

You have the right to appeal any condition of the permit pursuant to IC 4-21.5-3-7. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

You will also find enclosed the IDEM Response to Comments generated as a result of the Public Notice of the Draft permit for General Electric Company. This response was prepared in accordance with 329 IAC 3.1-13-13, which requires IDEM to issue a Response to Comments at the time that any final permit decision is issued.

If you have any questions regarding this matter, please contact Mr. Robert Marshall at 317/232-4534.

Sincerely,

Thomas E. Linson, Chief
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

Enclosure
cc: Mr. Hak Cho, U.S. EPA, Region 5
Ms. Glynda Oakes
Posey County Health Department
Ms. Kim Mayo, HW Compliance (with enclosure)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:
DW-8J

CERTIFIED MAIL: P 401 182 511
RETURN RECEIPT REQUESTED

March 12, 1999

Thomas E. Linson, Chief
Hazardous Waste Facilities Branch
Office of Solid and Hazardous Waste Management
Department of Environmental Management
Post Office Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015

RE: RCRA Permit Renewal
General Electric Company, Plastics
Mt. Vernon, Indiana
IND 006 376 362

Dear Mr. Linson:

Thank you for the copy of the draft RCRA permit for the General Electric Company Plastics facility, Mt. Vernon, Indiana (GE).

Under Condition V. of the draft RCRA permit, the IDEM may wish to update the following required actions at speci[illegible] [illegible]ste management units (SWMUs) at the GE facility:

1. August 7, 1997, modification to the Federal [illegible] which added SWMUs 187 and 188 to the RCRA [illegible] Investigation (RFI), and imposed interim me[illegible] [illegible].

2. September 2, 1997, completion of RFI and de[illegible] further actions at SWMUs 27, 28, 26, 61 and [illegible]

3. September 9, 1998, Corrective Measures Stud[illegible] approval for SWMUs 27 and 61; and

4. October 28, 1998, approval of RFI Workplan [illegible] 187 and 188.

P 4[illegible]
Rec[illegible] Certif[illegible]
No Insuran[illegible]
Do not use fo[illegible]
(See Reverse)
UNITED STATES POSTAL SERVICE
PS Form 3800, June 1991 (Reverse)

Sent to: T. Linson - IDEM
Street and No.: 100 N. Senate Avenue
P.O., State and ZIP Code: Indianapolis, IN 46206
Postage: $ .33
Certified Fee: 1.40
Special Delivery Fee:
Restricted Delivery Fee:
Return Receipt Showing to Whom & Date Delivered: 1.25
Return Receipt Showing to Whom, Date, and Addressee's Address:
TOTAL Postage & Fees: $ 2.98
Postmark or Date: CHICAGO ILL MAR 12 1999 USPO

Heller
IL/IN/MI
DW-8J

Condition V.C. could be revised to read as follows:

C. IDENTIFICATION OF SWMUs AND REQUIRED ACTIONS

The IDEM has evaluated the major SWMUs at the Mt. Vernon facility and has determined that the following actions will be required at each unit:

1. Waste Water Impounding Basin 14A (SWMU 27)
   Required action: complete Corrective Measures Study (CMS);

2. Waste Water Effluent Lagoon 16G (SWMU 28)
   Required action: no further action at this time;

3. Waste Water Retention Basin 3K (SWMU 26)
   Required action: no further action at this time;

4. Closed Landfill (SWMU 61)
   Required action: complete CMS;

5. Holler Road Landfill (SWMU 77)
   Required action: maintain landfill cover;

6. Central Lift Station (SWMU 187)
   Required action: complete RCRA Facility Investigation (RFI); and

7. Remnant Valley (SWMU 188)
   Required actions: continue interim measures and complete RFI.

Please contact me at (312) 353-1248, if I can be of further assistance.

Sincerely,

Donald A. Heller

Donald A. Heller, Environmental Scientist
IL/IN/MI Section
Waste Management Branch

cc: Nate Nemani, WMB
File

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

February 18, 1999

Mr. Hak K. Cho, Chief
IL/IN/MI Permits Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard (DW-8J)
Chicago, Illinois 60604-3590

RE: General Electric Company
Mt. Vernon, Indiana
IND 006 376 362
RCRA Part B Application - Hazardous Waste Boilers

Dear Mr. Cho:

General Electric Company is submitting for your review and approval two (2) copies of the RCRA Part B Application for the continued operation of its hazardous waste boilers, as requested in your RCRA Part B Call-In letter dated August 17, 1998.

All sections of the Part B Application, with the exception of Section D, have been organized in accordance with the Region V Permit Checklist. For your convenience in reviewing Section D, we have included with the Section D report a copy of the Section D checklist, indicating where in the report are specific requirements addressed.

General Electric is including with this Part B Application, a workplan for conducting a human health and ecological risk assessment as part of the permitting process.

Should you have any questions, do not hesitate to contact me at 812-831-4601.

Sincerely,

Evelyn R. Ponton

Evelyn R. Ponton
Environmental Engineer

cc: Mr. Thomas Linson, IDEM
Chris MCBride, Focus Environmental
Tom Tsekouras, General Electric

Please print or type with ELITE type (12 characters inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

For EPA Regional Use Only	EPA United States Environmental Protection Agency Washington, DC 20460 **Hazardous Waste Permit Application Part A** *(Read the Instructions before starting)*	
Date Received Month Day Year		

I. Installation's EPA ID Number ***(Mark 'X' in the appropriate box)***

[X] A. First Part A Submission	[ ] B. Part A Amendment # _____

C. Installation's EPA ID Number	D. Secondary ID Number *(If applicable)*
IND006376362	

II. Name of Facility

General Electric Company

III. Facility Location ***(Physical address not P.O. Box or Route Number)***

A. Street

One Lexan Lane

Street ***(Continued)***

City or Town	State	Zip Code
Mt. Vernon	IN	47620

County Code *(If known)*	County Name
129	Posey

B. Land Type	C. Geographic Location		D. Facility Existence Date
(Enter code)	*LATITUDE (Degrees, Minutes, & Seconds)*	*LONGITUDE (Degrees, Minutes & Seconds)*	Month Day Year
P	37 54 015	087 56 010	11 1960

IV. Facility Mailing Address

Street or P.O. Box

SAME

City or Town	State	Zip Code

V. Facility Contact ***(Person to be contacted regarding waste activities at facility)***

Name *(Last)*	*(First)*
Ponton	Evelyn
Job Title	**Phone Number** *(Area Code and Number)*
Environmental Engineer	812-831-4601

VI. Facility Contact Address ***(See instructions)***

A. Contact Address Location Mailing Other	B. Street or P.O. Box
[X] [ ] [ ]	

City or Town	State	Zip Code

Please print or type with ELITE type (12 characters [illegible]nch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*	Secondary ID [illegible]mber *(Enter from page 1)*
IND006376362	

VII. Operator Information *(See instructions)*

Name of Operator		
General Electric Company		
Street or P.O. Box		
One Lexan Lane		
City or Town	**State**	**ZIP Code**
Mt. Vernon	IN	47620

Phone Number *(Area Code and Number)*	B. Operator Type	C. Change of Operator Indicator	Date Changed Month Day Year
812-831-7000	P	Yes [ ] No [X]	

VIII. Facility Owner *(See Instructions)*

A. Name of Facility's Legal Owner		
General Electric Company		
Street or P.O. Box		
One Lexan Lane		
City or Town	**State**	**ZIP Code**
Mt. Vernon	IN	47620

Phone Number *(Area Code and Number)*	B. Owner Type	C. Change of Owner Indicator	Date Changed Month Day Year
812-831-7000	P	Yes [ ] No [X]	

IX. SIC Codes *(4-digit, in order of significance)*

Primary		Secondary	
2821	*(Description)* Plastic, Mtrls & Synth.	2865	*(Description)* Cyclic Crudes & Intermedts.
Secondary		**Secondary**	
2869	*(Description)* Industrial Organic Chem	2812	*(Description)* Alkalies & Chlorine

X. Other Environmental Permits *(See instructions)*

A. Permit Type *(Enter code)*	B. Permit Number	C. Description
N	IND002101	NPDES
R	IND00637362	RCRA
P	PSD65 1757	PSD
E	See Page A-2(a)	Air Operation Permits
E	APPR NO 1897	IDEM-OWM, Phenol Wastewater
		Tank Construction Permit
E	65-08	Solid Waste Permit

AIR OPERATION PERMITS

65-01-94-0202
65-01-94-0203
65-01-94-0204
65-01-94-0205
65-01-94-0206
65-01-94-0207
65-01-94-0208
65-01-94-0209
65-01-94-0210
65-01-94-0211
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65-01-94-0220
65-01-94-0226
129-1886
129-3607
129-3877
129-4685
129-5500
129-5608
129-5947
129-8316

Please print or type with ELITE type (12 characters [illegible]inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*	Secondary ID [illegible]ber *(Enter from page 1)*
IND006376362	

XI. Nature of Business *(Provide a brief description)*

General Electric Company at the Mt. Vernon, IN facility manufactures phenol, acetone, bis-phenol A, chlorine, soldium hydroxide, phosgene, and engineering plastics (polycarbonate, polybutylene, nylon, polyetherimide) in resin, pellet and sheet form.

XII. Process Codes and Design Capacities

A. PROCESS CODE - *Enter the code from the list of process codes below that best describes each process to be used at the facility. Thirteen lines are provided for entering codes. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in item XIII.*

B. PROCESS DESIGN CAPACITY - *For each code entered in column A, enter the capacity of the process.*

1. AMOUNT - *Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.*
2. UNIT OF MEASURE - *For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.*

C. PROCESS TOTAL NUMBER OF UNITS - *Enter the total number of units used with the corresponding process code.*

PROCESS CODE	PROCESS	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
	Disposal:	
D79	Underground Injection	Gallons; Liters; Gallons Per Day; or Liters Per Day
D80	Landfill	Acre-feet or Hectare-meter
D81	Land Treatment	Acres or Hectares
D82	Ocean Disposal	Gallons Per Day r Liters Per Day
D83	Surface Impoundment	Gallons or Liters
D99	Other Disposal	Any Unit of Measure Listed Below
	Storage:	
S01	Container (Barrel, Drum, Etc.)	Gallons or Liters
S02	Tank	Gallons or Liters
S03	Waste Pile	Cubic Yards or Cubic Meters
S04	Surface Impoundment	Gallons or Liters
S05	Drip Pad	Gallons or Liters
S06	Containment Building-Storage	Cubic Yards or Cubic Meters
S99	Other Storage	Any Unit of Measure Listed Below
	Treatment:	
T01	Tank	Gallons Per Day or Liters Per Day
T02	Surface Impoundment	Gallons Per Day or Liters Per Day
T03	Incinerator	Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; or Btu's Per Hour
T04	Other Treatment	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T80	Boiler	Gallons or Liters
T81	Cement Kiln	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T82	Lime Kiln	
T83	Aggregate Kiln	
T84	Phosphate Kiln	
T85	Coke Oven	
T86	Blast Furnace	
T87	Smelting, Melting, Or Refining Furnace	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
T88	Titanium Dioxide Chloride Process Oxidation Reactor	
T89	Methane Reforming Furnace	
T90	Pulping Liquor Recovery Furnace	
T91	Combustion Device Used In The Recovery Of Sulfur Values From Spent Sulfuric Acid	
T92	Halogen Acid Furnaces	
T93	Other Industrial Furnaces Listed in 40 CFR §260.10	
T94	Containment Building-Treatment	Cubic Yards or Cubic Meters
	Miscellaneous (Subpart X):	
X01	Open Burning/Open Detonation	Any Unit of Measure Listed Below
X02	Mechanical Processing	Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Pounds Per Hour; or Kilograms Per Hour
X03	Thermal Unit	Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; or Btu's Per Hour
X04	Geologic Repository	Cubic Yards or Cubic Meters
X99	Other Subpart X	Any Unit of Measure Listed Below

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
Gallons	G	Short Tons Per Hour	D	Cubic Yards	Y
Gallons Per Hour	E	Metric Tons Per Hour	W	Cubic Meters	C
Gallons Per Day	U	Short Tons Per Day	N	Acres	B
Liters	L	Metric Tons Per Day	S	Acre-feet	A
Liters Per Hour	H	Pounds Per Hour	J	Hectares	Q
Liters Per Day	V	Kilograms Per Hour	R	Hectare-meter	F
				Btu's Per Hour	I

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Form Approved. OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*	Secondary ID Number *(Enter from page 1)*
IND006376362	

XII. Process Codes and Design Capabilities *(Continued)*

EXAMPLE FOR COMPLETING ITEM XII (Shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	For Official Use Only
X	1	S	0	2	533.788	G	001	
	1	T	8	0	11,034	J	002	
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
1	0							
1	1							
1	2							
1	3							

NOTE: If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in item XIII.

XIII. Other Processes *(Follow instructions from item XII for D99, S99, T04 and X99 process codes)*

Line Number (Enter #s in seq w/XII)		A. Process Code (From list above)			B. PROCESS DESIGN CAPACITY 1. Amount (Specify)	2. Unit Of Measure (Enter code)	C. Process Total Number Of Units	D. Description Of Process
X	1	T	0	4				In-situ Vitrification
	1							
	2							
	3							
	4							

Please print or type with ELITE type (12 characters [illegible] inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*	Secondary ID Number *(Enter from page 1)*
IND006376362	

XIV. Description of Hazardous Wastes

A. **EPA HAZARDOUS WASTE NUMBER** - *Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR, Part 261 Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.*

B. **ESTIMATED ANNUAL QUANTITY** - *For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.*

C **UNIT OF MEASURE** - *For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:*

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. **PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous waste: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in item XII A. on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:

1. *Enter the first two as described above.*
2. *Enter "000" in the extreme right box of item XIV-D(1).*
3. *Enter in the space provided on page 7, Item XIV-E, the line number and the additional code(s).*

2. **PROCESS DESCRIPTION:** *If a code is not listed for a process that will be used, describe the process in the space provided on the form (D.(2)).*

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. *Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.*
2. *In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.*
3. *Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.*

EXAMPLE FOR COMPLETING ITEM XIV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

Line Number		A. EPA HAZARD WASTE NO. (Enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESS (1) PROCESS CODES (Enter code)									D. PROCESS (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
X	1	K	0	5	4	900	P	T	0	3	D	8	0				
X	2	D	0	0	2	400	P	T	0	3	D	8	0				
X	3	D	0	0	1	100	P	T	0	3	D	8	0				
X	4	D	0	0	2												Included With Above

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved, OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*	Secondary ID Number *(Enter from page 1)*
IND006376362	

XIV. Description of Hazardous Wastes *(Continued)*

Line Number	A. EPA HAZARD WASTE NO. (Enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (Enter code)	D. PROCESSES (1) PROCESS CODES (Enter code)	D. PROCESSES (2) PROCESS DESCRIPTION (If a code is not entered in D(1))
1	K022	50,000	T	T80	
2	D018				included with above
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
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Please print or type with ELITE type (12 characters [illegible]nch) in the unshaded areas only

Form Approved. OMB No. 2050-0034 Expires 10/31/99
GSA No. 0248-EPA-OT

EPA I.D. Number *(Enter from page 1)*	Secondary ID Number *(Enter from page 1)*
IND006376362	

XV. Map

Attach to this application a topographic map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in this map area. See instructions for precise requirements.

XVI. Facility Drawing

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

XVII. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

XVIII. Certification(s)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Owner Signature	Date Signed
Name and Official Title (Type or print) Bob Richard	Lexan Manufacturing Manager
Owner Signature Robert A Richard	Date Signed 2/18/99
Name and Official Title (Type or print)	
Operator Signature Robert A Richard	Date Signed 2/18/99
Name and Official Title (Type or print) Bob Richard	Lexan Manufacturing Manager
Operator Signature	Date Signed
Name and Official Title (Type or print)	

XIX. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (Refer to instructions for more information)

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

February 18, 1999

Mr. Hak K. Cho, Chief
IL/IN/MI Permits Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard (DW-8J)
Chicago, Illinois 60604-3590

RE: General Electric Company
Mt. Vernon, Indiana
IND 006 376 362
RCRA Part B Application - Hazardous Waste Boilers

Dear Mr. Cho:

General Electric Company is submitting for your review and approval two (2) copies of the RCRA Part B Application for the continued operation of its hazardous waste boilers, as requested in your RCRA Part B Call-In letter dated August 17, 1998.

All sections of the Part B Application, with the exception of Section D, have been organized in accordance with the Region V Permit Checklist. For your convenience in reviewing Section D, we have included with the Section D report a copy of the Section D checklist, indicating where in the report are specific requirements addressed.

General Electric is including with this Part B Application, a workplan for conducting a human health and ecological risk assessment as part of the permitting process.

Should you have any questions, do not hesitate to contact me at 812-831-4601.

Sincerely,

Evelyn R. Ponton

Evelyn R. Ponton
Environmental Engineer

cc: Mr. Thomas Linson, IDEM
Chris MCBride, Focus Environmental
Tom Tsekouras, General Electric

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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100 North Senate Avenue
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Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.ai.org/idem

FEDERAL EXPRESS

~~XXXCERTIFIEDXMAIL~~

February 3, 1999

Alexandrian Public Library
115 West Fifth Street
Mt. Vernon, Indiana 47620-1869

Dear Sir/Madam:

Re: Draft Hazardous Waste Management
Permit Renewal
General Electric Company
Mt. Vernon, Indiana
IND006376362

The Indiana Department of Environmental Management (IDEM) intends to issue a Hazardous Waste Management Permit Renewal to General Electric Company located in Mt. Vernon, Indiana. In accordance with the public involvement procedures of 329 IAC 3.1-13-10, a public notice will be published in a local newspaper on February 3, 1999. A public comment period of forty-five (45) days will then commence during which comments on the draft permit will be accepted by the IDEM.

Please make available for public examination this letter and the enclosed documents for at least seventy-five (75) days. The following items are enclosed.

-- Permit Application
-- Draft Permit
-- Fact Sheet
-- Public Notice

Upon receipt of this letter, please complete the attached verification statement and return it to this office. A self-addressed, stamped envelope is enclosed for your convenience.

Thank you for your assistance. If you have any questions, please call (800) 451-6027, press 0, and ask for Mr. Robert Marshall at extension 2-4534, or call 317/232-4534.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

REM/go
Enclosures
cc: Mr. Hak Cho, U.S. EPA, Region 5

VERIFICATION OF RECEIPT OF PUBLIC REVIEW MATERIALS

NAME OF HEALTH DEPARTMENT OR LIBRARY CONTACT, HEALTH DEPARTMENT OR LIBRARY, AND LOCATION:

Alexandrian Public Library
115 West Fifth Street
Mt. Vernon, Indiana 47620-1869

FACILITY NAME, LOCATION AND I.D. NO.:

General Electric Company
One Lexan Lane
Mt. Vernon, Indiana 47620
IND006376362

MATERIALS RECEIVED:

Permit Application
Draft Permit
Fact Sheet
Public Notice

DATE RECEIVED/MADE AVAILABLE TO PUBLIC: _____

SIGNATURE OF RECEIVING PARTY: _____

PLEASE RETURN IN SELF-ADDRESSED POSTAGE PAID ENVELOPE.

GE PLASTICS, Mt. VERNON, INDIANA BIF PART B PERMIT APPLICATION MEETING, November 20, 1998

AGENDA

1) INTRODUCTIONS

2) FACILITY (BIF) DESCRIPTION AND REGULATORY BACKGROUND

3) GENERAL STATUS AND OVERALL CONTENT OF BIF PART B .

4) TRIAL BURN PLAN
   a) Feed Stream(s) characteristics
   b) Chemical analysis of feed
   c) Levels of metals (Sb, As, Ba, Cd, Cr, Pb,Hg, Ag, Tl,) Total Chlorine/ Chloride, Ash
   d) Identification and approx. Quantification of organic constituents to 40 CFR Part261, App.VIII hazardous constituents present in the waste stream.
   e) Trial burn operating conditions and objectives
   f) Test protocol

5) DATA QUALITY OBJECTIVES (DQO)------- REGULATORY/PERMIT FOCUS
   a)Selection of Tier approach for Metal and Cl emissions
   b) Selection of POHCs (DREs)
   c) Feed rates (worst case)
   d) Waste Analysis Plan.(?)

6) DATA QUALITY OBJECTIVES (DQO)------ RISK ASSESSMENT FOCUS
   a) Metals (Tier), Cr.+6 etc
   b) Dioxin/FuranTesting (Method 23A)
   c) Total organics
   d) PICs measurement (PAH, Phosgene,BPA, Phenol, Cumene etc.)

7) QA/QC PLAN. EPA R5 QAPP POLICY.

8) ANALYTICAL METHODS AND DETECTION LIMITS. (Feed and Emissions)

9) RISK ASSESMENTS
   a) Human Health
   b) Ecological

10) EPA GUIDANCE DOCUMENTS.

11) Miscellaneous and Other issues.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Commissioner

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Indianapolis, Indiana 46206-6015
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(800) 451-6027
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RECEIVED
SEP 02 1998
DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA – REGION 5

VIA CERTIFIED MAIL P 126 020 005 August 31, 1998

Ms. Evelyn R. Ponton, Environmental Engineer
General Electric Company
One Lexan Lane
Mt. Vernon, Indiana 47620-9364

Dear Ms. Ponton:

Re: Part B Permit Application
Notice of Deficiency
General Electric Company
Mt. Vernon, Posey County
IND 006 376 362

The Indiana Department of Environmental Management (IDEM) has reviewed your RCRA Part B Permit Application dated May 23, 1998. The Permit Application has been reviewed for technical adequacy and determined to be inadequate pursuant to 329 IAC 3.1.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies and provides discussion relevant to the revision. The information requested by the NOD must be submitted, in full, before the application may be considered complete.

The revised portions of the Part B Permit Application must be received by this office within forty-five (45) days of the date of this notice. Each page of your submission must be uniquely numbered and must have the date of the submission. A certification statement identical to the one stated in 40 CFR 270.11(d) must accompany all submissions. Please submit five (5) copies of the requested information to IDEM at the address above, and two (2) copies to the U.S. EPA at the following address:

Mr. Hak Cho
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

In addition, please provide a copy of the complete, revised permit application on diskette (WordPerfect 8.0 or compatible) to IDEM.

The Commissioner may deny any application if you fail to submit the required information. Please note that IDEM's review of your application includes a review of the compliance status of your facility with respect to both your current permit and the rules adopted by the Solid Waste Management Board. IDEM may delay or deny the issuance of your RCRA Part B Permit if it is determined that your facility is currently not in compliance. It is the responsibility of the applicant to ascertain its compliance status and maintain compliance at all times.

If you have any questions regarding this matter, please contact Mr. Robert Marshall, at (317)232-4534.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

REM
Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region 5 ✓
Posey County Health Department
Mr. Stanley Hunnicutt, IDEM
Mr. Eric Schmidt, IDEM
Mr. Chris Myer, IDEM
Ms. Debbie French, IDEM

RCRA Part B Permit Application
Notice of Deficiency
General Electric Company
Mt. Vernon, Posey County
IND 006 376 362

SECTION C - WASTE CHARACTERISTICS

C-1a - Containerized Wastes

1. Identify the container construction materials (fiber glass, polyethylene, steel, etc.) and demonstrate the compatibility of the waste with container construction materials. An example statement is "Hazardous wastes at the GE Mount Vernon facility are stored in cardboard, fiber, plastic, and metal containers determined to be compatible with the waste material in accordance with US Department of Transportation (DOT) requirements specified in 49 CFR 172.101." Permit Section C is an independent section and should not reference other permit sections.

C-2a - Parameters and Rationale

2. Provide a list of parameters (i.e. RCRA metals [arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver], volatile organic compounds, semi-volatile organic compounds, BTU, pH, flash point, and viscosity) used to characterize each wastestream and provide the rationale for the parameter's selection. Wastestreams should be analyzed by the TCLP (SW-846 method 1311) as per 40 CFR 268.7(a). Appendix C-2, Sample Waste Profile Form, indicates that the wastestreams have been analyzed for the examples.

C-2b - Test Methods

3. Indicate the specific analytical methods for all parameters.

   For example:

Parameter	SW-846 Method
Arsenic	6010B, 7060A, or 7061A
Barium	6010B, 7080A, or 7081
Cadmium	6010B, 7130, or 7131A
Chromium	6010B, 7190, or 7191
Lead	6010B, 7420, or 7421

Mercury	7470A (liquid) or 7471A(nonliquid)
Selenium	6010B or 7740
Silver	6010B or 7760A
SVOCs	8270C
VOCs	8260B
PCBs	8081A & 8082
TCLP	1311
Paint Filter Test for Free Liquids	9095A
pH	9040B (aqueous) or 9045C (solids)

4. For section C-2b, Test Methods, provide a complete Quality Assurance Project Plan (QAPP) for the waste analysis plan. Guidelines for developing the QAPP and its essential elements are found in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods" (SW-846), chapter one. The QAPP in the Closure Plan may be included by reference.

C-2c - Sampling Methods

5. Indicate (reference) or describe the specific sampling procedures (e.g., ASTM/SW-846) used to sample wastes.

Appendix C-1 - Waste Profile Table

6. Note that Wastestream NH-174, which contains PCBs, is regulated under TSCA.

SECTION D - PROCESS INFORMATION
D-1a(3)(a) - Requirement for Base or Liner to Contain Liquids

7. A technical data sheet was submitted which describes the Rustoleum Overkote™ Plus coating used on the base of the container storage area. This data sheet refers to a corrosion resistance chart. Submit a copy of the corrosion resistance chart in order to document compatibility with the waste streams permitted to be stored.

D-1a(3)(e) - Removal of Liquids from Containment Systems

8. IDEM recommends revising the analytical methods, since some of the methods have been deleted or revised; for example SW-846 method 8240 has been replaced with SW-846 method 8260B.

SECTION F - PROCEDURES TO PREVENT HAZARDS
F-4e - Personnel Protection Equipment

9. Provide a general list of protective equipment within the text of this section. For example, "Available protective equipment includes: MSA air masks (same as SCBA), air-line masks, cartridge respirators, disposable uniforms, neoprene gloves, butyl rubber gloves, disposable gloves, steel-toed boots, safety glasses, chemical goggles, full-face shield, and hard hats."

10. The last sentence of this section refers to the Emergency Equipment section of the Contingency Plan which is located in Appendix G-5, not Appendix G-1.

Appendix F-2 - Inspection Schedule

11. Change the inspection frequency for the hazardous waste loading/unloading area to "Weekly/Daily, when in use".

SECTION I - CLOSURE AND POST-CLOSURE PLAN
I-1e(2) - Disposal or Decontamination of Equipment, Structures, and Soils

12. The section titled Description of Facility references a map of the Container Storage Building, Figure B-3. The closure plan (Section I) is an independent section and should not reference other sections. Maps of the facility and the Container Storage Area must be included within Section I.

13. Within the Description of Facility, the second sentence states "If any cracks or gaps are observed in the visual inspection, closure will also include the collection and analysis of soil samples to determine if hazardous wastes have been released from the unit." Cracks have already been encountered in the base of the container storage area, therefore closure of this unit will require soil sampling regardless of whether additional cracks or gaps are observed. Please modify this sentence to read "If any cracks or gaps are observed during the visual inspection, additional soil sampling will be performed at these damaged locations."

14. Indicate that the analytical results submitted to IDEM for review will include the reportables listed in "Hazardous Waste Program: Analytical Data Deliverable Requirements For RCRA Closures, Risk Assessments, Site Assessments, and Remediation Projects."

15. Note that if risk based cleanup levels are used, a modification to the Closure Plan may be required to incorporate different sampling and analysis procedures.

Appendix I-1 - Sampling and Analysis Plan

16. Within the second paragraph, it is stated that soil sampling will be required "if inspection of the storage area at the time of closure indicates the presence of cracks or gaps in the containment area. The determination for the need for soil sampling will be based upon the inspection of a registered professional engineer as described in the Closure Plan." As mentioned in comment 13, soil sampling has already been determined to be necessary in the closure of this unit. Please revise this paragraph accordingly.

17. The proposed investigative boring locations must be included on a detailed drawing of the unit. Figure I.1-1, Soil Sampling Grid Pattern, could be modified to include these locations.

AUG 1 7 1998

D-8J

CERTIFIED MAIL: P 140 780 835
RETURN RECEIPT REQUESTED

Ms. Evelyn Ponton
Environmental Engineer
General Electric Company
One Lexan Lane
Mt. Vernon, IN 47620

RE: RCRA Permit Application Call-In
General Electric Company
Mt. Vernon, IN
IND 006 376 362

Dear Ms. Ponton:

On December 31, 1992, the United States Environmental Protection Agency ("U.S. EPA") issued to the General Electric Company a permit under the Hazardous and Solid Waste Amendments ("HSWA") to the Resource Conservation and Recovery Act ("RCRA") for General Electric's plant in Mt. Vernon, Indiana. That permit addressed corrective action, land disposal restrictions, and air emission standards for process vents and equipment leaks. The HSWA permit was issued concurrently with the Indiana Department of Environmental Management ("IDEM") permit which addressed other elements of the RCRA hazardous waste program for which the State had been authorized as of that date. These two permits together constitute the current RCRA permit.

The General Electric Company currently owns and operates two boilers that burn hazardous waste under interim status. Those units operate in accordance with U.S. EPA regulations governing hazardous waste combustion in boilers and industrial furnaces, promulgated on February 21, 1991, and commonly called the "BIF Rule". Permit conditions for these boilers were not included in the 1992 HSWA permit, leaving those boiler units to temporarily operate under interim status provisions of the BIF Rule.

The U.S. EPA is at this time requiring the General Electric Company to submit part B of its permit application for the Company's two hazardous waste-burning boilers pursuant to Title 40 Code of Federal Regulations ("40 CFR") Part 270.10(e)(4) and 40 CFR 270.1(c)(4).

The application should be prepared in accordance with the applicable sections of 40 CFR 270.14, 270.22, 270.24, 270.25, 270.66, 124.31, and 124.33. General Electric should submit the part B information pertaining only to the two boilers that burn hazardous waste. The application must be received by the U.S. EPA no later than six months from the receipt of this letter.

In order to ensure that permit conditions for the hazardous waste combustion operations at your site would be protective of human health and the environment, the U.S. EPA currently intends to conduct a human health and ecological risk assessment as part of the permitting process. This will include an evaluation of the impacts of both direct and indirect routes of exposure to measured and estimated emissions from your facility. If the General Electric Company would prefer to conduct this assessment itself, please contact Mr. Nate Nemani at the address and phone number listed below. It is the U.S. EPA's intent, pursuant to 40 C.F.R. 270.32(b)(2) and 42 USC §6929(c)(3), to determine whether additional permit conditions are warranted based on the results of the risk assessment, and to include those additional conditions in the federal portion of the RCRA permit. Please be advised that, in order to collect enough information to conduct the requirements of 40 C.F.R. 266, this additional information may necessitate analysis for additional parameters and/or additional conditions in the trial burn. For the latest guidance, please contact Mr. Nemani.

GE will do this per Nate N.

We request that two copies of part B of your permit application be sent to the U.S. EPA at the following address:

Mr. Hak K. Cho, Chief
IL/IN/MI Permits Section
U.S. Environmental Protection Agency
77 West Jackson Boulevard (DW-8J)
Chicago, IL 60604-3590

One copy should be sent to the Indiana Department of Environmental Management at the following address:

Mr. Thomas E. Linson, Chief
Hazardous Waste Facilities Branch
Indiana Department of Environmental Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015

Each page of the application, including all attachments (maps, specifications of the units, etc.), should be properly numbered. The application should be organized in sections which reference the applicable requirements contained in 40 CFR. Failure to furnish a complete RCRA permit application on time is grounds for termination of interim status under 40 CFR 270.10(e)(5).

Allyson Appleton 212-850-6273

Information in the application can be disclosed to the public in accordance with the Freedom of Information Act. If you wish, you may assert a claim of business confidentiality by printing the words "Confidential Business Information" on each page of the application which you believe contains such information. All incoming materials containing confidential business information should be sent in a double envelope (one inside the other). The inner envelope should be addressed to the Document Control Officer with the following instruction:

"To be opened by the Document Control Officer"

For security, the outer envelope would not include any references to the fact that it contains confidential business information.

The U.S. EPA will review business confidentiality claims under the applicable portions of 40 CFR Part 2, and may later request substantiation of such claims. If you claim part of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

Please review the requirements of 40 CFR 124.31, 124.32, and 124.[illegible] participation. Under 40 CFR 124.31, General Electric [illegible] public prior to submitting Part B of the permit applicat[illegible] from the community and informing the community of [illegible] activities. In addition, depending on the amount of pub[illegible] matter, the U.S. EPA may in the future direct General E[illegible] repository as described in 40 CFR 124.33.

We are committed to conducting the review of your per[illegible] It may be appropriate to schedule a meeting in the near [illegible] staffs to discuss what will be expected in your applicatio[illegible] The U.S. EPA will send General Electric any newly pub[illegible] assist General Electric in conducting the risk assessment[illegible]

Should you have any questions, please contact Nate Nem[illegible]

Sincerely,

ORIGINAL SIGNED BY
KARL E. BREMER

Karl E. Bremer, Chief
Waste Management Branch

cc: Thomas Linson, IDEM
Lorna Jereza, ECAB
Thomas Nash, ORC

Is your RE[illegible]

PS Form 3811, December 1994 Domestic Return Receipt

6. Signature: (Addressee or Agent) X [illegible]

NENAMEN 8-MD 1/1/95

P 140 780 835

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PS Form 3800, April 1995

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WASTE MANAGEMENT BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
N. Nemani	8-11-98			8/11/98	
TYPIST/ AUTHOR	IL/IN/MI SECTION CHIEF	MN/OH/WI SECTION CHIEF	POL.PREV.& SPEC.INTIV SEC. CHIEF	WMB BRANCH CHIEF	WPTD DIVISION DIRECTOR
	8/11/98			8/11/98	

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

May 23, 1998

Mr. Victor P. Windle, Chief
Hazardous Waste Permit Section
Office of Solid and Hazardous Waste Management
100 North Senate
P.O. Box 6015
Indianapolis, Indiana 46206-6015

RE: Hazardous Waste Permit Renewal Application
General Electric Company - Mt. Vernon, IN
EPA ID No. IND006376362

Dear Mr. Windle:

General Electric is submitting five (5) copies of the Renewal Permit Application for its hazardous waste container storage facility, as revised to address the deficiencies identified in your March 9, 1998 letter. Included with the permit application, you will find a detailed response to each one of the questions in your letter, a guide to Appendix C-1 illustrating recent changes to GE's profiling system, and MSDS's pertinent to some of the Notice of Deficiency questions.

With the exception of some large drawings, colored figures or photographs, most of the sections in the Renewal Application have been reproduced. Instructions in yellow paper are provided where insertion of Appendices or figures from the previous version of the Application is required.

An electronic copy of the Part B Renewal Application will follow under separate cover.

Should you have any questions, do not hesitate to contact me at 812.831-4601.

Sincerely,

Evelyn R. Ponton

Evelyn R. Ponton
Envirpnmental Engineer

Enclosures

cc: [redacted]
Mr. Dan Moran, Earth Tech - Indianapolis

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IDEM has no
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requirements

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRP-8J

DEC 31 1992

CERTIFIED MAIL (P 049 652 833)
RETURN RECEIPT REQUESTED

Mr. Ronald Bowman
General Manager
General Electric Company
One LEXAN Lane
Mount Vernon, Indiana 47620-9364

RE: Final Federal Permit
General Electric Company
Mount Vernon, Indiana
IND 006 376 362

Dear Mr. Bowman:

Enclosed is a copy of the Federal portion of the Resource Conservation and Recovery Act (RCRA) permit for the above-referenced facility. The RCRA permit contains both Federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Indiana RCRA program authorized under Title 40 Code of Federal Regulations (40 CFR) Part 271. Unless review is requested under 40 CFR 124.19, the Federal portion shall become effective on the date of issuance. When both this portion and the State permit are effective, the General Electric Company has an effective RCRA permit authorizing only those hazardous waste management activities specified in the RCRA permit.

The duration of the permit is 5 years. However, the United States Environmental Protection Agency (U.S. EPA) may modify, revoke and reissue, or terminate this permit based on causes as specified in 40 CFR 270.14 and 270.43.

This permit is effective on the date indicated on the signature page of the permit. Eligibility to appeal this permit is discussed further in 40 CFR 124.19. The original and one copy of the petition must be received by the U.S. EPA in Washington, D.C., at the addresses indicated below within 30 days of the date of this letter.

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL - P846-724-008

Mr. Dave Perkins
General Electric
1 Lexan Lane
Mount Vernon, Indiana 47620-9364

December 31, 1992

Dear Mr. Perkins:

Re: Final Hazardous Waste Management Permit
General Electric Company
Mount Vernon, Indiana
IND 006376362

Enclosed is a copy of the final Hazardous Waste Management Permit for your facility at the above-referenced location. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is five (5) years. The Indiana Department of Environmental Management (IDEM) may modify, revoke and reissue, or terminate this permit based on causes specified in 329 IAC 3.1-13-7.

You have the right to appeal any condition of the permit pursuant to IC 4-21.5-3-7. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

You will also find enclosed the IDEM Response to Comments generated as a result of the Public Notice of the Draft Permit for General Electric Company. This response was prepared in accordance with 329 IAC 3.1-13-13, which requires the IDEM to issue a Response to Comments at the time that any final permit decision is issued.

If you have any questions regarding this correspondence, please call Mr. Roger Letterman at 317/232-3404.

Sincerely,

for TJM

Timothy J. Method
Assistant Commissioner
Solid and Hazardous Waste Management

RL/go
Enclosures
cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Ms. Glynda Oakes

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Frank O'Bannon
Governor

John M. Hamilton
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL P 451 351 188 March 9, 1998

RECEIVED
MAR 16 1998
DIVISION FRONT OFFICE
Waste, Pesticides & Toxics Division
U.S. EPA – REGION 5

Ms. Evelyn R. Ponton, Environmental Engineer
General Electric Company
One Lexan Lane
Mt. Vernon, Indiana 47620-9364

Dear Ms. Ponton:

Re: Part B Permit Application
Notice of Deficiency
General Electric Company
Mt. Vernon, Posey County
IND 006 376 362

The Indiana Department of Environmental Management (IDEM) has reviewed your RCRA Part B Permit Application dated July 1997. The Permit Application has been reviewed for completeness and determined to be inadequate pursuant to 329 IAC 3.1.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies and provides discussion relevant to the revision. The information requested by the NOD must be submitted, in full, before the application may be considered complete.

The revised Part B Permit Application must be received by this office within forty-five (45) days of the date of this notice. Each page of your submission must be uniquely numbered and must have the date of the submission. A certification statement identical to the one stated in 40 CFR 270.11(d) must accompany all submissions. Please submit five (5) copies of the amended application to IDEM at the address above, and two (2) copies to the U.S. EPA at the following address:

Mr. Hak Cho
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604

In addition, please provide a copy of the complete, revised permit application on diskette (WordPerfect 8.0 or compatible) to IDEM.

The Commissioner may deny any application if you fail to submit the required information. Please note that IDEM's review of your application includes a review of the compliance status of your facility with respect to both your current permit and the rules adopted by the Solid Waste Management Board. IDEM may delay or deny the issuance of your RCRA Part B Permit if it is determined that your facility is currently not in compliance. It is the responsibility of the applicant to ascertain its compliance status and maintain compliance at all times.

If you have any questions regarding this matter, please contact Mr. Robert Marshall, at (317)232-4534.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Hazardous Waste Permit Section
Hazardous Waste Facilities Branch
Solid and Hazardous Waste Management

REM
Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region 5
Posey County Health Department
Mr. Barry Steward, IDEM
Mr. Eric Schmidt, IDEM
Mr. Chris Myer, IDEM
Ms. Debbie French, IDEM

RCRA Part B Permit Application
Notice of Deficiency
General Electric Company
Mt. Vernon, Posey County
IND 006 376 362

SECTION B - FACILITY DESCRIPTION
B-2a - General Requirements

1. The location of sewers is not shown in Figure B-2. GE shall submit a map which shows the locations of storm, sanitary, and process sewers.

2. A distance of 1000 feet around the container storage building is shown in Figure B-2. This radius is not relevant to the requirement of 40 CFR 270.14(b)(19). This requirement clearly distinguishes between "facility" and "operational unit" of the facility. The container storage building is an operational unit for the purposes of this section. GE shall submit a topographic map which shows a distance of 1000 feet around the facility.

SECTION C - WASTE CHARACTERISTICS
C-1a - Containerized Wastes

3. Provide a list of the containers used for storage of hazardous waste. This list should include the construction materials for each container type and information on the compatibility of wastes with the containers.

4. If GE determines a waste is restricted from land disposal based solely on process knowledge of the waste, all supportive data used to make this determination must be retained on-site in GE's files. "Process knowledge" includes detailed information on the waste obtained from existing published or documented waste analysis data or studies conducted on hazardous wastes generated by a process similar to that which generated the waste (Applies to parts C-1 and C-2).

Appendix C-1 - Waste Profile Table

5. Appendix C-1 is not consistent with the Part A Application. The following hazardous waste codes are listed in the Part A Application, but are not contained in Appendix C-1: D010 - D017, D020, D021, D023 - D025, D028 - D034, D036 - D038, D041 - D043, F004, U070, U154, U159, and U220. Revise Appendix C-1 to include these codes.

6. Waste stream G2 is listed as a non-hazardous waste. The constituents of the waste are isopropyl alcohol and glycol ether. What is the flash point of the waste?

7. In Appendix C-1 of the 1992 Hazardous Waste Management Permit, waste stream G3 was listed as a U188 hazardous waste, while it is listed as non-hazardous in the new application. Explain.

8. In Table C-1 of the Class 1 modification to the 1992 Application (approved by IDEM in July 1995), waste stream G6 was listed as a U188 hazardous waste, while it is listed as non-hazardous in the new application. Explain.

9. Are waste streams G5 and G13 the same? Are they the same as (or similar to) waste stream G33, which is listed as a hazardous waste? Are they similar to waste stream 3F, which was listed as a U055 hazardous waste in Table C-1 of the Class 1 modification to the 1992 Application? Explain.

10. In Appendix C-1 of the 1992 Hazardous Waste Management Permit, waste stream G14 was listed as a D002 characteristic hazardous waste, while it is listed as non-hazardous in the new application. Explain.

11. In Table C-1 of the Class 1 modification to the 1992 Application, waste stream G18 was listed as a U188 and U055 hazardous waste, while it is listed as a non-hazardous waste in the new application. Explain.

12. In Appendix C-1 of the 1992 Hazardous Waste Management Permit, waste stream G24 was listed as a U188 hazardous waste, while it is listed as non-hazardous in the new application. Explain.

13. What is the flash point of waste stream G28 which contains isopropyl alcohol and glycol ether?

14. In Table C-1 of the Class 1 modification to the 1992 application, waste stream G29 was listed as a U055 hazardous waste, while it is listed as a non-hazardous waste in the new application. Explain.

15. Is waste stream G52 contaminated with methylene chloride? Is it the same as waste stream Z9, which was classified as an F002 hazardous waste in Table C-1 of the Class 1 modification to the 1992 Application?

16. Is waste stream G55 (dryer beds) contaminated with any other chemicals? Explain.

17. Does waste stream G56 BPA tar contain phenol, acetone or any other chemicals? Explain.

18. In waste stream G57, pthalic anhydride should read phthalic anhydride. Is the powder contaminated with toluene or o-dichlorobenzene? In Table C-1 of the Class 1

modification to the 1992 application, this waste stream was listed as a U190 hazardous waste, while it is listed as non-hazardous in the new application. Explain.

19. Is waste stream G58 (PPS resin dust) contaminated with methylene chloride which is used as a carrier in the Lexan Plant?

20. What is the approximate ratio of ethylene glycol to water in waste stream G59? What is the flash point of the waste?

21. Should waste stream G60 be characteristic for both D001 and D018?

22. What is the flash point of waste stream G70?

23. Is waste stream G72 (monosodium phosphate) contaminated with methanol which is produced as a by-product at the CPP Resin Plant? What is the pH of the waste?

24. In Appendix C-1 of the 1992 Hazardous Waste Management Permit, waste stream G73 was listed as a D001 characteristic hazardous waste, while it is listed as non-hazardous in the new application. Explain.

25. What is the flash point of waste stream G75?

26. Is waste stream G78 contaminated with methylene chloride which is used as a carrier in the Lexan Plant?

27. In waste stream G83, what does "PPE/water" mean? Are any PPEs contaminated?

28. Waste stream G85 is listed as non-hazardous waste, but this waste contains sodium hydroxide. What is the approximate percentage of sodium hydroxide and what is the pH of the waste?

29. What is the flash point of waste stream G87?

30. Should waste stream G98 be listed as a U122 hazardous waste?

31. Is waste stream G99, which contains 1,4-butanediol, the same as waste stream G61, which is listed as a D001 characteristic hazardous waste?

32. Is waste stream G101 contaminated with methanol which is produced as a by-product in the CPP Resin Plant?

33. Waste stream G116 needs to be specified.

34. What is the flash point of waste stream G117?

35. What is the concentration of PCBs in waste streams G118 & G119?

36. Should waste stream G120 be listed as a U188 hazardous waste?

37. What is the flash point of waste stream G136?

38. Are waste streams G141 & G142 contaminated with methanol which is produced as a by-product in the CPP Resin Plant?

39. Are waste streams G146-148 contaminated with methylene chloride which is used as a carrier in the Lexan Plant ?

40. What is the pH of waste stream G150?

41. What is the pH of waste stream G157?

42. Should waste stream G159, which contains ortho-dichlorobenzene (ODCB), be listed as an F002 hazardous waste? Explain.

43. What is the pH of waste stream G161?

44. What is the concentration of PCBs in waste stream G170?

45. In Appendix C-1 of the 1992 Hazardous Waste Management Permit, waste stream G176 was listed as a D002 and D003 characteristic hazardous waste, while it is listed as non-hazardous in the new application. Explain.

46. Should waste stream G182 be listed as an F001 hazardous waste?

47. Should waste streams G190 and G191 be listed as K150 hazardous wastes? If not, explain.

48. Add two columns to the Waste Profile Table. One column for wastewater/nonwastewater and another column for restricted/prohibited waste. Identify each waste stream as wastewater or nonwastewater, restricted waste or prohibited waste.

Appendix C-2 - Sample Waste Profile Form

49. Provide two (2) examples of waste profiles from each of the seven major plants with the potential to generate hazardous wastes. If possible, one of the samples should be a high volume waste. These samples of waste profiles will be used by IDEM to review GE's

waste characterization process. The examples will not be included in the final permit which IDEM issues.

SECTION D - PROCESS INFORMATION

D-1a(1) - Description of Containers(with free liquids)

50. Provide the following information about the containers used to store hazardous waste: approximate number of each type of container, dimensions, DOT specifications or manufacturer specifications, liner specifications (if applicable), and markings and labels.

51. Describe how the facility complies with 40 CFR 264.172. For example, describe the procedure for determining compatibility of containers or liners with the a waste stream and identify compatible containers or liners for each waste stream stored in the container storage area.

D-1a(2) - Container Management Practices

52. Clearly describe practices used to insure that incompatible wastes are not mixed in containers as required by 40 CFR 270.15(d). Note that a single EPA waste code may apply to several incompatible waste streams.

53. Revise the application to state that at least 2-1/2 feet of aisle space will be maintained between rows of containers rather than "approximately 3 feet".

D-1a(3)(a) - Requirement for the Base or Liner to Contain Liquids

54. It is stated in this section that the concrete floor is a monolithic pour. According to the drawings, the floor near the walls is formed by the wall foundation. Water stops were installed in this foundation to seal the gap between that foundation and the adjacent floor slab. Provide a description of the floor that is consistent with the drawings.

55. Provide a complete specification of the water stops used.

56. Describe how the coating was replaced. Address the removal of the existing coating and procedures used to apply the new coating. Describe the new coating. (The application states "Rustoleum Epoxy Corrosion Resistant coating" was used, whereas a partial product description was submitted for "Rustoleum Overkote Plus".)

57. The drawings submitted with this application appear to be revisions of drawings in the current permit. However, no revision information is included on the drawing. Provide drawings of the base of the container storage area. Drawings shall be certified by a registered professional engineer in accordance with 40 CFR 270.14(a). Also include in the text of the application a description of modifications and repairs to the base of the container storage area which have occurred since the permit was issued.

D-1b(1) - Test for Free Liquids

58. Submit the test procedures and results or other documentation to show that the wastes to be stored in the bulk material storage area do not contain free liquids.

D-1b(2) - Description of Containers(without free liquids)

59. Provide the following information about the containers used to store hazardous waste in the bulk material storage area: approximate number of each type of container, dimensions, DOT specifications or manufacturer specifications, liner specifications (if applicable), and marking and labels.

D-1c - Compliance with Subpart CC Requirements

60. This section may be removed from the state application. IDEM is deferring to EPA for Subpart CC permitting.

61. Subparts AA and BB should be addressed by this application as applicable (40 CFR 270.24 & 270.25).

SECTION F - PROCEDURES TO PREVENT HAZARDS
F-2 - Inspection Schedule

62. The inspection schedule in Appendix F-2 must be revised to include the hazardous waste loading/unloading area.

SECTION G - CONTINGENCY PLAN
G-2 - Emergency Coordinators

63. Provide a list of the Crisis Managers names, addresses, office and home phone numbers.

G-4c - Assessment

64. The last sentence of the second paragraph should be replaced with:
"In addition, the Crisis Manager will immediately notify the National Response Center and the Indiana Department of Environmental Management, as specified in Section G-8."

G-6 - Coordination Agreements

65. Provide a complete list of the industries and authorities which comprise the Mt. Vernon Mutual Aid Association. GE must demonstrate that arrangements have been made with local police and fire departments, hospitals, contractors, and state and local emergency response teams to provide assistance in the event of an emergency.

G-7 - Evacuation Plan

66. Provide a description of the primary and alternate evacuation routes for the container storage building. (It may be possible to include this information in Figure 2, of Section G, Appendix 1.)

Appendix 3 - Emergency Telephone List

67. Amend the list to include telephone numbers for the National Response Center and IDEM's Office of Emergency Response.

SECTION H - PERSONNEL TRAINING
H-2 - Implementation of Training Program

68. Modify the second sentence of the first paragraph to read: "Future new employees will complete the training program, as described in this section, within six months of assignment to a position with hazardous waste management responsibilities and will not work in unsupervised positions until training has been received."

Appendix H-2 - Hazardous Waste Job Titles/Job Descriptions

69. Provide a job description for the "Unit Operators".

SECTION I - CLOSURE PLANS, POST CLOSURE PLANS, AND FINANCIAL REQUIREMENTS
I-1a - Closure Performance Standard

70. Item (c) should read: "Complies with 329 IAC 3.1."

I-1c - Maximum Waste Inventory

71. List all the hazardous wastes individually and include a description of each waste with its hazardous waste code.

I-1d(1)(a) - Extension for Closure Time

72. Remove "and 329 IAC 3-46-4" from the end of the sentence.

I-1e(2) - Disposal or Decontamination of Equipment, Structures, and Soils

73. The first sentence of the fourth paragraph under Visual Inspection and Decontamination must be modified to read: "Wash and rinse waters from each area of the Container

Storage Building (Areas A, B, and C of the drummed material storage area, the bulk material storage area, and the loading/unloading area) will be segregated during containment."

74. Indicate that after the triple rinsing, two (2) final rinsate samples will be collected and analyzed for confirmation that cleanup levels have been obtained. Since each area will be washed separately, two (2) final rinsate samples need to be collected from each of the areas for analysis . The samples should be representative of the rinsate. When applicable, the loss of volatile organic compounds (VOCs) should be minimized. Also indicate that care will be taken to prevent migration of waste during the decontamination process.

75. The container storage area was operated while cracks existed in the base. Revise the closure plan to indicate that soil sampling will be conducted. Sampling locations shall be chosen which coincide with known crack locations.

76. The last sentence of the first paragraph under Soil Sampling must be modified to read: "The background borings will be sampled at the same depth intervals as the investigative borings."

Appendix I-1 - Sampling and Analysis Plan

77. The second sentence under Rinsate Sampling must be modified to read: "Wash and rinsewaters from each section of the Container Storage Building (Areas A, B, and C of the drummed material storage area, the bulk material storage area, and the loading/unloading area) will be segregated during containment and two (2) samples will be collected from each area following the third rinse."

78. In Table I.1-2, Target Parameters and Cleanup Levels, revise Footnote (c) to state "40 CFR 264.94(a)(2)". The Appendix III reference in 40 CFR 265 is only applicable to interim status units.

79. In Table I.1-2, the cleanup level for silver in water is 0.1 mg/l. Silver has a secondary MCL of 0.1 mg/l.

Appendix I-1, Attachment 1 - Standard Operating Procedures

80. Indicate if preservatives will be used for each sample.

81. For decontamination of sampling equipment, IDEM prefers not to use acetone, hexane or methyl alcohol to rinse equipments due to possible analytical interference.

82. For sample packing and shipping, all samples should be kept at 4°C at all times.

GE Plastics

General Electric Company
1 Noble Lane, Mount Vernon, IN 47620-9364
812.831.7000

RECEIVED
SEP 11 1995
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

30 August 1995

Mr. Hak K. Cho
Chief, RCRA Permitting Section
U. S. Environmental Protection Agency
Region V, Waste Management Division
77 W. Jackson Blvd. HRP-8J
Chicago, Illinois 60604-3590

Ref: USEPA Part B Permit IND 006 376 362 - Removal of V-2720 Waste Water Tank from Permit

Dear Mr. Cho,

The purpose of this letter is to request a modification of General Electric Company's ("GE") Part B permit covering GE's Mt. Vernon, Indiana facility.

As we discussed during our August 24 meeting in Region V's offices, GE operates a 1,000,000 gallon tank, identified as V-2720 (the "Tank"). The Tank's purpose is to provide surge capacity and equalization for all wastewater streams from the portion of the Mt. Vernon facility that manufactures phenol. No hazardous waste is put into the Tank. Wastewater flow into and out of this tank averages about 250 gallons per minute. Typically, about 200,000 gallons of wastewater are kept in the Tank (equivalent to a 20 percent level in the Tank). This is equivalent to a retention time of 13.3 hours. At the full capacity of 1,000,000 gallons, the retention time in the Tank would be 66.7 hours (2.8 days). As I mentioned, all wastewater from the phenol plant must pass through V-2720; thus, the Tank could only store wastewater for 2.8 days at most before the phenol plant would have to cease operations.

GE incorrectly included the Tank in GE's Part B permit application. As described above, the Tank is an integral part of a wastewater treatment facility that is regulated under section 402 of the Clean Water Act. Accordingly, the Tank should not be regulated under the Resource Conservation and Recovery Act. For your information, the Tank was included in GE's most recent NPDES Permit Renewal application, which was submitted to the Indiana Department of Environmental Management on June 1, 1995.

Based on review of the pertinent regulations, removal of the Tank from the GE's Part B permit is a Class 1 modification requiring prior Agency approval.

In summary, it is requested that the modification removing the tank from the Part B permit be approved. As discussed during our meeting, GE is pursuing the closure of the entire Part B permit for the Mt. Vernon facility. We would like to discuss in detail the mechanism which will allow the proper continuation of the Corrective Action program at Mt. Vernon.

Please contact me at 812.831.7965 if you require further information, or to arrange discussions on the Corrective Action program. We look forward to your quick response on this request. Thank you.

Sincerely yours,

James R. Wilkerson
Environmental Engineer

.cc Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

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FILE
Part A

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL - P323-805-757

March 5, 1993

Mr. Gary K. Behrens
Environmental Engineer
General Electric Company
1 LEXAN Lane
Mount Vernon, Indiana 47620-9364

Dear Mr. Behrens:

Re: Compliance Schedule Submission
Final State RCRA Permit
General Electric
Mount Vernon, Indiana
IND 006376362

The Indiana Department of Environmental Management (IDEM) has received your letter, dated February 11, 1993, regarding Permit Condition IV, Compliance Schedule. Your letter included an engineering drawing submitted to satisfy Permit Condition IV.1.a. and 1.b.

Upon review, the IDEM has determined that the drawing is adequate, and Permit Condition IV.1.a and IV.1.b have been satisfied.

If you have any questions concerning this matter, please contact Mr. Roger Letterman at 317/232-3404.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RWL

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Eric Schmidt, IDEM

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OCT 0 5 1993
Part B

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

February 11, 1993

RECEIVED
FEB 17 1993
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Timothy J. Method
Assistant Commissioner
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46206-6015

B.1.8

Re: Hazardous Waste Management Permit
General Electric Company
Mt. Vernon, Indiana 47260
IND006376362

Dear Mr. Method:

This letter is submitted to fulfill the requirements of the Compliance Schedule, Section IV, Parts 1a and 1b of the aforementioned permit. The enclosed drawing illustrates the drainage patterns within the permitted storage building and an inventory, location, and repair status of any cracks or gaps in the concrete floor.

During the inspection of the floor, 24 cracks or surface depressions were identified that will require further action. Following this inspection, we have determined that the bonding agents and floor coatings specified in our permit application (D-1a(3)(a)) have not performed satisfactorily when subjected to the high abrasion and traffic that this building receives. We are currently evaluating alternative concrete bonding resins and coatings to upgrade and repair the floor of the Storage building during the second quarter of 1993.

If you have any questions or require any additional information, please contact met at (812) 831-7965.

Sincerely,

G K Behrens

Gary K. Behrens, CHMM
Advanced Environmental Engineer

GKB/jt

Enclosure

cc: Mr. Hak Cho, USEPA, Region V
Mr. Eric Schmidt, IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

RECEIVED
JAN 7 1993
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

VIA CERTIFIED MAIL - P255-207-390

December 31, 1992

Mr. Hak Cho
Technical Programs Section
U.S. EPA, Region V
230 South Dearborn Street
Chicago, Illinois 60604

Dear Mr. Cho:

Re: Final Hazardous Waste Management Permit
General Electric Company
Mount Vernon, Indiana
IND 006376362

Enclosed is a copy of the final Hazardous Waste Management permit for the above referenced facility. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is five (5) years. The Indiana Department of Environmental Management (IDEM) may modify, revoke and reissue, or terminate this permit based on causes specified in 329 IAC 3.1-13-7.

Also, please find enclosed the Response to Comments generated as a result of the Public Notice for the Draft Permit for General Electric Company. This response was prepared in accordance with 329 IAC 3.1-13-13 which requires the Indiana Department of Environmental Management to issue a response to comments at the time that any final permit decision is issued.

If you have any questions regarding this correspondence, please contact Mr. Roger Letterman at 317/232-3404.

Sincerely,

Paula Bawel (for)

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RWL/go

Enclosures

cc: Ms. Fayola Wright, U.S. EPA, Region V

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Evan Bayh
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105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL - P846-724-008

Mr. Dave Perkins
General Electric
1 Lexan Lane
Mount Vernon, Indiana 47620-9364

December 31, 1992

Dear Mr. Perkins:

Re: Final Hazardous Waste Management Permit
General Electric Company
Mount Vernon, Indiana
IND 006376362

Enclosed is a copy of the final Hazardous Waste Management Permit for your facility at the above-referenced location. The effective date of the permit, as issued, is the date indicated on the cover page of the permit.

The duration of the permit is five (5) years. The Indiana Department of Environmental Management (IDEM) may modify, revoke and reissue, or terminate this permit based on causes specified in 329 IAC 3.1-13-7.

You have the right to appeal any condition of the permit pursuant to IC 4-21.5-3-7. The failure of your company to meet any portion of the permit could result in civil and/or criminal penalties.

You will also find enclosed the IDEM Response to Comments generated as a result of the Public Notice of the Draft Permit for General Electric Company. This response was prepared in accordance with 329 IAC 3.1-13-13, which requires the IDEM to issue a Response to Comments at the time that any final permit decision is issued.

If you have any questions regarding this correspondence, please call Mr. Roger Letterman at 317/232-3404.

Sincerely,

for TJM

Timothy J. Method
Assistant Commissioner
Solid and Hazardous Waste Management

RWL/go
Enclosures
cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Ms. Glynda Oakes

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

NOTICE OF DECISION

December 31, 1992

Please be advised that on December 31, 1992, the Commissioner of the Indiana Department of Environmental Management (IDEM) issued a Hazardous Waste Management Permit requested under Indiana Code 13-7-8.5 (IC 13-7-8.5) and Rule 329 IAC 3.1 to General Electric Company, located in Mount Vernon, Indiana. The Permit will allow General Electric Company to operate a container storage facility.

If you wish to challenge this decision, IC 13-7-10-2.5 and IC 4-21.5-3-7 require that you file a Petition for Administrative Review. If you seek to have the effectiveness of the permit stayed during the Administrative Review, you must also file a Petition for Stay. The Petition(s) must be submitted to the Technical Secretary of the Solid Waste Management Board at the following address within fifteen (15) days of your receipt of this notice:

Technical Secretary of the Solid Waste Management Board
105 South Meridian Street
P.O. Box 6167
Indianapolis, Indiana 46206-6167

The Petition(s) must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision, or otherwise entitled to review by law. Additionally, IC 13-7-10-2.5 requires that your Petition include:

1. The name and address of the person making the request.

2. The interest of the person making the request.

3. Identification of any persons represented by the person making the request.

4. The reasons, with particularity, for the request.

5. The issues, with particularity, for the request.

6. Identification of the permit terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing permits of the type granted or denied by the Commissioner's action.

Pursuant to IC 4-21.5-3-1(f), any document serving as a petition for review or review and stay must be filed with the Technical Secretary of the Solid Waste Management Board. Filing of such a document is complete on the earliest of the following dates:

1. The date on which the petition is delivered to the Office of the Technical Secretary of the Solid Waste Management Board, located at 105 South Meridian Street, Fifth Floor, Indianapolis, Indiana;

2. The date of the postmark on the envelope containing the petition, if the petition is mailed by United States mail; or
3. The date on which the petition is deposited with a private carrier, as shown by a receipt issued by the carrier, if the petition is sent by private carrier.

Pursuant to IC 4-21.5-3-3, the Commissioner will provide you with notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this decision if you submit a written request to the Commissioner at the address below within fifteen (15) days of receipt of this notice. If you do not provide a written request to the Commissioner, you will no longer be notified of any proceedings pertaining to this decision.

Commissioner
Indiana Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

A Response to Comments has been prepared for comments received during the forty-five (45) public comment period. The Response to Comments is enclosed for your information.

Please also be advised that on December 31, 1992, the Regional Administrator of the U.S. Environmental Protection Agency (U.S. EPA) also issued a Permit to General Electric Company regarding requirements of the Hazardous and Solid Waste Amendments of 1984 (HSWA) to the Resource Conservation and Recovery Act (RCRA). If you wish to appeal the U.S. EPA decision, you must petition the Administrator of the U.S. EPA within thirty (30) days of this decision. A petition must include a statement of the reasons supporting that review, including a demonstration that any issues being raised were raised during the public comment period to the extent required by 40 CFR 124.19, and when appropriate, a showing that the condition in question is based on:

1. A finding of fact or conclusion of law which is clearly erroneous.

2. An exercise of discretion or any important policy consideration which the Administrator should, in his or her discretion, review.

For further information regarding appeal of the Federal portion of this Permit, see 40 CFR 124.19.

For further information regarding this notice, please contact Mr. Roger Letterman at the IDEM at 317/232-3404, or Mr. Don Heller at the U.S. EPA at 312/353-1248.

Sincerely,

Timothy J. Method
Assistant Commissioner
Solid and Hazardous Waste Management

Enclosure

RWL/go

RESPONSE TO COMMENTS
RCRA DRAFT PERMIT
General Electric Company
Mount Vernon, Indiana
IND IND 006376362

INTRODUCTION

The public comment period for the General Electric Company Draft Permit began on March 31, 1992, with a public notice in the Mount Vernon Democrat and Evansville Courier newspaper, a radio announcement on radio station WPCO-AM, and a mass mailing to interested parties. The notice and announcement requested comments regarding the Draft RCRA Permit and also stated that a public hearing would be held on May 7, 1992, at City Hall Annex, Mount Vernon, Indiana. In addition to the comments presented at the hearing, written comments were accepted during the public comment period, which ended on May 15, 1992

This Response to Comments is issued pursuant to 329 IAC 3.1-13-13, which requires that the Indiana Department of Environmental Management (IDEM) shall:

1. briefly describe and respond to all significant comments on the Draft Permit;

2. specify which provisions, if any, of the Draft Permit have been changed, and the reasons for the change; and

3. explain the right to request an adjudicatory hearing on the permit as specified in IC 4-21.5.3.5 (see Notice of Decision).

RESPONSE TO PUBLIC COMMENTS

No Public Comments were received.

RESPONSE TO FACILITY COMMENTS

Pursuant to the issuance of the Draft IDEM RCRA Permit dated March 31, 1992, General Electric Company submitted the following comments in accordance with the public comment procedures. The comments on the State portion of the permit are described in the following sections along with the IDEM's response and any changes made as a result of the comments.

COMMENT #1

On page 19 of the draft Permit, the quantity 31,880 should include the units of gallons. This quantity is the maximum amount of waste container volume which is allowed to be stored in the container storage area at one time.

Response

The IDEM agrees.

Change

Page 19 has been revised to include the units of gallons.

COMMENT #2

Pages 35 through 42 of Attachment IV, Contingency Plan have been revised to include a description of the uses of the emergency equipment.

Response

The IDEM agrees.

Changes

Pages 35 through 42 of Attachment IV, Contingency Plan have been replaced with pages 35 through 42d.

IDEM COMMENTS

COMMENT #1

A revised drawing, Figure B-10, was submitted after the comment period.

Response

The revised drawing does not affect the location of the permitted unit.

Changes

Figure B-10 received October 27, 1992 shall replace the revision received February 7, 1992 located in Attachment VII.

COMMENT #2

Due to current court rulings, additional language must be incorporated concerning good character requirements and permit revocation.

Changes

Paragraph two, Condition I.B. is deleted and the following language has been added to Permit Condition I.B.:

> Because of a recent Indiana Court of Appeals dicision, the IDEM has not considered the requirements of IC 13.7.10.2 (Good Character Statute) in issuing this permit since this permit was pending at the time IC 13-7-10.2 was enacted. The IDEM is currently petitioning the Indiana Supreme Court to overrule the Court of Appeals decision. If the Indiana Supreme Court determines that IC 13-7-10.2 legally can be applied to applications pending on the effective date of the statute, the IDEM reserves the right to reconsider the issuance of this permit in light of the requirements of IC 13-7-10.2.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRP-8J

DEC 31 1992

CERTIFIED MAIL (P 049 652 833)
RETURN RECEIPT REQUESTED

Mr. Ronald Bowman
General Manager
General Electric Company
One LEXAN Lane
Mount Vernon, Indiana 47620-9364

RE: Final Federal Permit
General Electric Company
Mount Vernon, Indiana
IND 006 376 362

Dear Mr. Bowman:

Enclosed is a copy of the Federal portion of the Resource Conservation and Recovery Act (RCRA) permit for the above-referenced facility. The RCRA permit contains both Federal permit conditions (contained herein) and State permit conditions, which were issued separately by the State of Indiana RCRA program authorized under Title 40 Code of Federal Regulations (40 CFR) Part 271. Unless review is requested under 40 CFR 124.19, the Federal portion shall become effective on the date of issuance. When both this portion and the State permit are effective, the General Electric Company has an effective RCRA permit authorizing only those hazardous waste management activities specified in the RCRA permit.

The duration of the permit is 5 years. However, the United States Environmental Protection Agency (U.S. EPA) may modify, revoke and reissue, or terminate this permit based on causes as specified in 40 CFR 270.14 and 270.43.

This permit is effective on the date indicated on the signature page of the permit. Eligibility to appeal this permit is discussed further in 40 CFR 124.19. The original and one copy of the petition must be received by the U.S. EPA in Washington, D.C., at the addresses indicated below within 30 days of the date of this letter.

Printed on Recycled Paper

Submissions made by mail should be sent to the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board (MC-1103B)
401 M Street, SW
Washington, D.C. 20460

Submissions made by hand-delivery (including Federal Express) should be made at the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board
Westory Building
607 14th Street, NW
Suite 500
Washington, D.C. 20005

A copy of the petition should also be sent to:

U.S. Environmental Protection Agency, Region 5
RCRA Permitting Branch (HRP-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604
ATTN: Indiana Section

The procedure for filing an appeal are found
amended in Federal Register vol. 57, No. 30,
appeal procedures must be completed prior to
review.

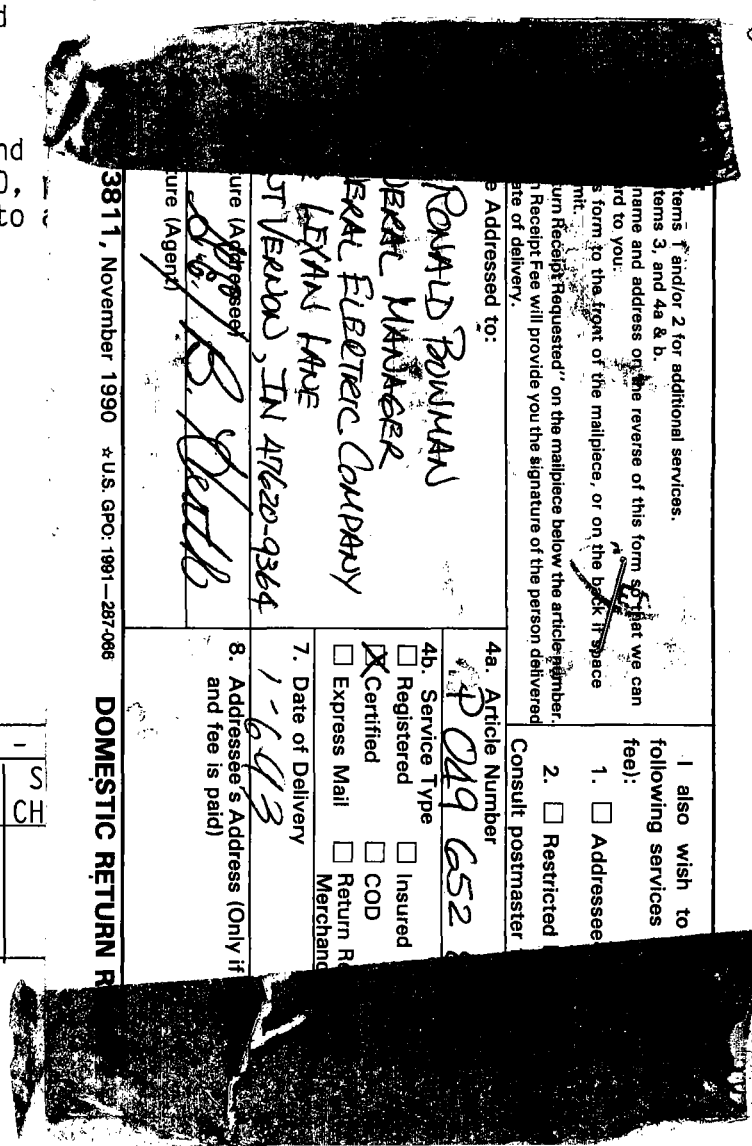
Sincerely yours,

Norman R. Niedergang
Acting Associate Division Director
Office of RCRA

Enclosure

cc: Tom Linson, IDEM

SIGNATURE/INITIAL CONCURRENCE REQUESTED -							
TYPIS	AUTH.	ILS CHIEF	INS CHIEF	MIS CHIEF	MN/WI CHIEF	OHS CHIEF	S CH
	DAH 12-21-92						



Submissions made by mail should be sent to the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board (MC-1103B)
401 M Street, SW
Washington, D.C. 20460

Submissions made by hand-delivery (including Federal Express) should be made at the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board
Westory Building
607 14th Street, NW
Suite 500
Washington, D.C. 20005

A copy of the petition should also be sent to:

U.S. Environmental Protection Agency, Region 5
RCRA Permitting Branch (HRP-8J)
77 West Jackson Boulevard
Chicago, Illinois 60604
ATTN: Indiana Section

The procedure for filing an appeal are found in 40 CFR 124.19 (enclosed) as amended in Federal Register vol. 57, No. 30, page 5320. The administrative appeal procedures must be completed prior to any action seeking judicial review.

Sincerely yours,

Karl E. Bremer

for Norman R. Niedergang
Acting Associate Division Director
Office of RCRA

Enclosure

cc: Tom Linson, IDEM

DEC 31 1992

HRP-8J

CERTIFIED MAIL: P 664 397 577
RETURN RECEIPT REQUESTED

Ms. Julia A. Watson
General Electric Company
1 LEXAN Lane
Mount Vernon, Indiana 47620-9364

RE: Final Federal Permit
General Electric Company
Mount Vernon, Indiana
IND 006 376 362

Dear Madam:

On December 31, 1992, the United States Environmental Protection Agency (U.S. EPA), Region 5, issued the Federal portion of a Resource Conservation and Recovery Act (RCRA) hazardous waste permit for the above-referenced facility. When both this portion of the permit and the State of Indiana's portion of the permit are effective, General Electric Company, Mount Vernon, Indiana, has an effective RCRA permit.

The Response of Comments, generated as a result of the public notice for the draft permit, is enclosed with this letter. The response was prepared under Title 40 Code of Federal Regulations (40 CFR) 124.17(a) which requires the U.S. EPA to issue a response to comments at the time any final permit decision is issued by the U.S. EPA, pursuant to 40 CFR 124.15.

I have made the final decision to issue a RCRA hazardous waste management facility permit to General Electric Company, for its facility in Mount Vernon, Indiana. Unless review is requested under 40 CFR 124.19, this permit shall become a final Agency action 30 days after service of this decision.

This permit is effective on the date indicated on the signature page of the permit. Eligibility to appeal this permit is discussed further in 40 CFR 124.19. The original and one copy of the petition must be received by the U.S. EPA in Washington, D.C., at the addresses indicated below within 30 days of the date of this letter.

Submissions made by mail should be sent to the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board (MC-1103B)
401 M Street, SW
Washington, D.C. 20460

Submissions made by hand-delivery (including Federal Express) should be made at the following address:

U.S. Environmental Protection Agency
Environmental Appeals Board
Westory Building
607 14th Street, NW
Suite 500
Washington, D.C. 20005

A copy of the petition should also be sent to:

U.S. Environmental Protection Agency, Region 5
RCRA Permitting Branch (HRP-8J)
77 West Jackson Boulevard
Chicago, Illinois 6060[illegible]
ATTN: Indiana Section

The procedure for filing an appeal are fou[illegible]
amended in Federal Register vol. 57, No. 3[illegible]
appeal procedures must be completed prior [illegible]
review.

Sincerely yours,

Norman R. Niedergang
Acting Associate Division Director
Office of RCRA

Enclosure

cc: Tom Linson, IDEM

SIGNATURE/INITIAL CONCURRENCE REQUESTED - R[illegible]							
TYPIS	AUTH.	ILS CHIEF	INS CHIEF	MIS CHIEF	MN/WI CHIEF	OHS CHIEF	SWS CHIE[illegible]
	DAH 12-21-92						

SENDER:
- Complete items 1 and/or 2 for additional services.
- Complete items 3, and 4a & b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt Fee will provide you the signature of the person delivered to and the date of delivery.

I also wish to receive the following services (for an extra fee):
1. ☐ Addressee's Address
2. ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:
Julia A. Watson
c/o General Electric Company
1 LEXAN Lane
Mt. Vernon, IN 47620-9364

4a. Article Number
P 664 397 577

4b. Service Type
☐ Registered ☐ Insured
☐ Certified ☐ COD
☒ Express Mail ☐ Return Receipt for Merchandise

5. Signature (Addressee)
6. Signature (Agent)

7. Date of Delivery
1/4/93

8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, November 1990 *U.S. GPO: 1991—287-066 DOMESTIC RETURN RECEIPT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: September 16, 1992

SUBJECT: Final RCRA permit for the General Electric Company, Mount Vernon, Indiana IND 006 376 362

FROM: Donald A. Heller, Environmental Scientist
Indiana Section, RCRA Permitting Branch

TO: Norman R. Niedergang, Acting Associate Director
Office of RCRA

The General Electric Company (GE) facility, Mount Vernon, Indiana, manufactures engineering plastic resins, and the hazardous wastes which are the subject of this permit are largely generated as a result of this manufacturing.

The interim status unit to be permitted by the Indiana Department of Environmental Management in the State portion of the RCRA permit is a container storage building. The containers in the storage building may also be used to manage wastes which are presently not hazardous under the State regulations, but are considered hazardous under Federal RCRA regulations. The Federal portion of this permit addresses these wastes. Because the State portion of the permit already contains detailed requirements for the container storage area, which meet or exceed all Federal standards that would be imposed, the Federal portion incorporates the State conditions by reference.

In addition to the container storage building, GE operates a storage tank which manages wastewater which exhibits the Toxicity Characteristic for benzene, which is presently only Federally regulated under RCRA. Therefore, only this Federal permit addresses this unit, and detailed technical requirements are specified herein.

The U.S. EPA has identified and evaluated all known SWMUs at the GE facility, and has determined that certain SWMUs require further study. The RFA indicates that releases to the soil and groundwater have occurred. Thus, an RFI will be required for the following SWMUs: Wastewater Impounding Basin 14A, Wastewater Effluent Lagoon 16G, Wastewater Retention Basin 3K, the Closed Landfill, and the Holler Road landfill. The need for further corrective action will be determined upon the completion of the RFI.

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

July 16, 1992

RECEIVED
JUL 17 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Don Heller
U.S. EPA, Region V
230 S. Dearborn
Chicago, IL 60604

Re: Resubmittal of 2/19/92 and 3/16/92 revisions to the GE RCRA Part B Permit application

Dear Mr. Heller,

Please find enclosed 2 copies of the 2/19/92 and 3/16/92 revisions to the RCRA Part B permit. These revisions were sent to Mr. Hak Cho and Ms. Fayola Wright of your office on 2/21/92 and 3/16/92.

Should you have any questions regarding the enclosed material, please contact me at (812) 831-7965.

Sincerely,

Julia A. Watson

Julia A. Watson
Advanced Environmental Engineer

cc: Mr. Eric Schmidt, IDEM
Mr. Roger Letterman, IDEM

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 16 1992

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Permit Assignment

FROM: James Morris JM
RCRA Permit Coordinator

TO: Catherine Garypie
SWERB Section IV

You have been assigned the following permit matter. Please contact the permit writer to obtain more detailed information about this case.

FACILITY	PERMIT TYPE	PERMIT WRITER
General Electric (IN)	Draft	Gary Victorine

cc: Section Chief
Permit Writer (HRP-8J)
Rita Jackson

Printed on Recycled Paper

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

May 14, 1992

RECEIVED
MAY 15 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

RCRA Permitting Branch HRP-8J
U.S. Environmental Protection Agency, Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590

Attn: Indiana Section

Dear Sir/Madame:

In reviewing the draft RCRA Part B permit for the General Electric Facility (IND 006 376 362) the following discrepancies have been found:

1. On Page 12, Section F.1., regarding RFI for the 5 SWMUs identified at the plantsite, the statement "This shall, at a minimum, include ground water monitoring for SWMUs 26, 27, 28, 61, and 77, and soil analysis for SWMUs 26 and 28" should read "This shall, at a minimum, include ground water monitoring for SWMUs 26, 27, 28, 61, and 77, and soil analysis for SWMUs 26, 27 and 28."

2. On Page 16, Section A, and Section C.1. should also include the following waste codes as submitted in the latest revision to the Part A and B Permit applications dated February 19, 1992:

Description of Hazardous Waste	EPA Hazardous Waste Number	Description of Unit(s)
TC for Chlorobenzene	D021	Container
TC for Chloroform	D022	Container
TC for Cresol	D026	Container
TC for Methyl Ethyl Ketone	D035	Container
TC for Tetra-Chloroethylene	D039	Container

The maximum quantity of all container wastes which may be stored in the container storage area at any one time, as per this latest revision, is 31,880 gallons.

Please find attached copies of the Part A and Table C-1 from the Part B permit that lists these waste codes.

Should you have any questions regarding these comments, please contact me at (812) 831-7965.

Sincerely,

Julia A. Watson

Julia A. Watson
Advanced Environmental Engineer

cc: Mr. Victor Windal, IDEM-OSHWM, w/ attachments
Mr. Mitch Mosier, IDEM-OSHWM, w/o attachments
Mr. Eric Schmidt, IDEM-OSHWM, w/o attachments
Mr. Jim Risch, IDEM-OSHWM, w/o attachments
Mr. Hak Cho, USEPA Region V, w/attachments
Ms. Fayola Wright, USEPA Region V, w/o attachments
Mr. Gary Victorine, USEPA Region V, w/o attachments

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

May 11, 1992

RECEIVED
MAY 13 1992
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Victor P. Windal, Chief
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46225

Re: RCRA Part B Permit Application
IND006376362
Revised Pages

Dear Mr. Windal:

Please find attached five copies of revised pages G-35 through G-48d to be inserted in the February 3, 1992 RCRA Part B Permit Application for the Mt. Vernon Plant Site.

If you should have any questions regarding this information please contact me at (812) 831-7965.

Sincerely,

Julia A. Watson

Julia A. Watson
Advanced Environmental Engineer

cc: Mr. Mitch Mosier, IDEM-OSHWM, w/o att.
Mr. Eric Schmidt, IDEM-OSHWM, w/o att.
Mr. Jim Risch, IDEM-OSHWM, w/o att.
Mr. Hak Cho, USEPA Region V, w/att. (2 copies)
Ms. Fayola Wright, USEPA Region V, w/o att.
Mr. Gary Victorine, USEPA Region V, w/o att.

GE Plastics

FILE

RECEIVED

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

February 6, 1992

FEB 07 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Victor P. Windal, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Office of Solid and Hazardous Waste Management
Indiana Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46225

Re: Part B Permit Application
Notice of Deficiency
IND 006376362

Dear Mr. Windal:

Please find attached 5 copies of the revised Figure B-10 to be inserted in the GE Mt. Vernon RCRA Part B Container Storage Area application.

If you should have any questions regarding the enclosed material, please contact me at (812) 831-7965.

Sincerely,

Julia A. Watson

Julia A. Watson
Advanced Environmental Engineer

JAW/jt

cc: Mr. Mitch Mosier, IDEM-OSHWM, w/o att.
Mr. Eric Schmidt, IDEM-OSHWM, w/o att.
Mr. Jim Risch, IDEM-OSHWM, w/o att.
Mr. Hak Cho, USEPA Region V, w/att. (2 copies)
Ms. Fayola Wright, USEPA Region V, w/o att.
Mr. Gary Victorine, USEPA Region V, w/o att.

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

January 31, 1992

Mr. Victor P. Windal, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Office of Solid and Hazardous Waste Management
Indiana Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46225

Re: Part B Permit Application
Notice of Deficiency
IND 006376362

Dear Mr. Windal:

In response to your December 31, 1991 Notice of Deficiency (NOD) letter, enclosed are five copies of the revised RCRA Part A and B permit application for General Electric Co.'s Mt. Vernon facility. The application has been revised to address the items as listed in the NOD and further clarified in our January 9 meeting with you, Mr. Mitch Mosier, Mr. Eric Schmidt, and Mr. James Risch of your staff. Attached is General Electric Co.'s item by item response to the NOD. The response is also included in the revised permit application in Section 1.

I may be contacted at (812) 831-7965 concerning any additional questions you or your staff may have.

Sincerely,

Julia A. Watson

Julia A. Watson
Advanced Environmental Engineer

JAW/jt

cc: Mr. Mitch Mosier, IDEM-OSHWM, w/att.,w/o encl.
Mr. Eric Schmidt, IDEM-OSHWM, w/att.,w/o encl.
Mr. James Risch, IDEM-OSHWM, w/att.,w/o encl.
Mr. Hak Cho, USEPA Region V, w/att.,w/encl. (2 copies)
Ms. Fayola Wright, USEPA Region V, w/att.,w/o encl.
Mr. Gary Victorine, USEPA Region V, w/att.,w/o encl.

RECEIVED
FEB 5 1992

REVISED 2/3/92

GENERAL ELECTRIC COMPANY RESPONSES TO
IDEM NOTICE OF DEFICIENCY
2ND TECHNICAL REVIEW
December 31, 1991

Item No.	Reference	Description of the Deficiencies and Reference No.
	GENERAL	

B. FACILITY DESCRIPTION

B-2a General Requirements: 329 IAC 3-34-5(b)(18)

1. *A facility topographic map must be submitted which has contour intervals sufficient to clearly show surface water flow in the vicinity of, and from, each operational unit of the facility as required by 329 IAC 3-34-5(b)(18).*

   Figure B-10 does not indicate the locations of all solid and hazardous waste management units. Identify on this drawing all proposed hazardous waste management units. Identify on this drawing all proposed and existing solid and hazardous waste management units. Clarify if the table in this figure is intended to list container accumulation areas only or is meant to include accumulation tanks as well. Off-site waste management units do not need to be shown.

Response

Site and grading plan drawings showing the elevations for the container storage building and contiguous areas are provided in the February 3, 1992 submittal in Appendix B-1.

Two permitted solid waste management units are located at the Mt. Vernon facility, the thermal oxidizer and incinerator. Figure B-10 has been revised to show the location of these units. The figure has also been revised to show the location of the ULTEM® less than 90 day storage tank. The legend of Figure B-10 has been revised to include two new lists of units, the solid waste management units and hazardous waste management units, in addition to the list of less than 90 day accumulation areas for containers provided in the December 5, 1991 submittal.

C. WASTE CHARACTERISTICS

C-1 Chemical and Physical Analyses: 329 IAC 3-34-5(b)(2), 3-41-4(a)

1. *Revise the analysis of each waste stream to include a determination of compatibility with other wastes so that the waste will be stored in an appropriate area of the container storage area.*

Response

A column has been added to Table C-1 to list a compatibility code for each wastestream stored in the Container Storage Area. The codes are organic (O), acid (A), base (B), and reactive (R). GE classifies each wastestream into one of these four groups based on process knowledge and analytical results, using the information provided in Table C-1 and Appendices C-2 through C-6. Each waste group is stored in segregated areas within the Container Storage Building.

2. *Revise the analysis of each waste stream to include a determination of compatibility with storage container materials of construction.*

Response

The Department of Transportation (DOT) has specified the materials that can be stored in specific containers. Using the information provided in Section C and the regulations specified by DOT, GE only stores wastes in the appropriate container. A table has been added to Section D (Table D-2) summarizing the DOT container specifications.

3. *Revise the analysis of each waste stream, which is managed as a waste not containing free liquids, to include a determination that the waste does not contain free liquids.*

Response

Table C-1 has been revised to include a notation of the wastes that are solids. This determination was made based on the information provided in the waste profiles found in Appendices C-2 and C-4. GE stores waste without free liquids in roll-offs and drums. GE feels that the nature of the Phenol Boiler refractory and residual salt are such that analysis for free liquids is not necessary. GE inspects drums stored in the Container Storage Building visually for the presence of free liquids.

4. *It was very difficult to match up waste characterization data from Appendices C-1, C-2, and C-3 with the listing of stored wastes found in Table C-1, "Summary of Hazardous Waste Descriptions." In order to facilitate review, GE should reorganize these Appendices to match the order of Table C-1. GE should also develop some notation so that items listed in Table C-1 can be easily and accurately matched with their appropriate waste characterizations.*

Note that characterization data for all hazardous waste streams stored in the CSA (Container Storage Area) must be present. Our review suggested that data was missing for several waste streams listed in Table C-1.

Response

This information has been evaluated for accuracy and re-organized. GE uses the waste profiles, waste analysis, and Material Safety Data Sheets (MSDSs) submitted in Appendices C-2 through C-6 to characterize the wastestreams.

The Appendices have been evaluated and a waste profile is provided for each wastestream. Additional waste analysis and MSDSs are provided for some of the wastestreams. An index of the appendices has been added as Appendix C-1 to aid matching the wastestreams listed in Table C-1 with the appendices.

5. *Our review noted that following apparent contradictions between waste characterization data found in Appendices C-1, C-2, and C-3 and the waste codes supplied for waste streams listed in Table C-1:*

   a. *Several waste streams, identified by the GE I.D. numbers: 5-D, 12-B1, 12-I, and 12-X, were apparently classified as D001 wastes by Safety-Kleen and yet classified as non-hazardous by GE.*
   b. *The waste stream identified by the GE I.D. Number 15-B was apparently classified a D002 waste by Chemical Waste Management and yet coded as non-hazardous by GE.*
   c. *Characterizations for waste streams 16-F and 16-G were unclear. These wastes were marked "Hazardous" on their profile sheets and then characterized as non-hazardous.*

Response

GE evaluated the waste profiles provided by the waste disposers and found several discrepancies. GE has recorded the discrepancy on these waste profiles with a note and initials. The following is a list of the discrepancies:

- 5-D: The flash at 140 °F was not reported on the waste profile and the volatile content is reported to be 0.0%. GE determined that this waste does not meet the definition of a RCRA hazardous waste and that the disposal facility has mislabeled the waste.

- 12-B1: The flash point for the major constituents is greater than 140 °F, as provided in the MSDSs found in Appendix C-6. GE determined that this waste does not meet the definition of a RCRA hazardous waste and that the disposal facility has mislabeled the waste.

- 12-I: The flash at 140 °F was not reported on the waste profile and the volatile content is reported to be 7.0%. GE determined that this waste does not meet the definition of a RCRA hazardous waste and that the disposal facility has mislabeled the waste.

- 12-X: The flash at 140 °F was not reported on the waste profile and the volatile content is reported to be 0.4%. The flash point for the major constituent is greater than 140 °F, as provided in the MSDS found in Appendix C-6. GE determined that this waste does not meet the definition of a RCRA hazardous waste and that the disposal facility has mislabeled the waste.

- 15-B: The classification of this wastestream has been corrected.

- 16-F: Based on additional analytical results provided in Appendix C-5, GE determined that this waste does not meet the definition of a RCRA hazardous waste and that the waste is not regulated.

- 16-G: The flash at 140 °F was not reported on the waste profile. The flash point for the major constituent is greater than 140 °F, as provided in the MSDS found in Appendix C-6. GE determined that this waste does not meet the definition of a RCRA hazardous waste and that the disposal facility has mislabeled the waste.

d. *The characterizations for waste streams 8-A and 17-A indicated that these wastes should also be coded as D003, since they are apparently water-reactive.*

Response

The text has been revised to include the D003 waste code for wastestream 8-A. However, wastestream 17-A hydrolyzes and does not meet the RCRA definition for reactivity. The waste code has not been amended for wastestream 17-A.

6. *D007 was listed in the waste analysis plan but was not listed on the Part A. Revise as necessary.*

   Other contradictions may have been missed due to the poor organization of the appendices. GE should provide explanations for the above contradictions and make any needed corrections or additions to Table C-1 and the Appendices.

Response

The Part A has been revised as a result of a re-evaluation of the wastestreams generated at the facility, including the addition of D007. The Section C Appendices have been reorganized to facilitate review and checked for accuracy and contradiction.

C-2 Waste Analysis Plan: 329 IAC 3-34-5(b)(3), 3-41-4(b) and (c)

Revise the waste analysis plan so that compatibility of waste streams, compatibility of waste streams with storage containers, and determination

of free liquid content are listed as parameters, and so that test methods or method of determination is identified for each parameter.

Response

GE characterizes the each hazardous waste as an acid, base, organic, or reactive using the waste profiles, waste analysis, MSDSs, and process knowledge in order to determine the compatibility of the waste with other wastes and with the containers. Table C-1 has been revised to show the compatibility group of each wastestream. The text has been revised to list the four groups as parameters in the Waste Analysis Plan.

A determination of whether a waste should be managed as a waste containing free liquids is made based on the way the waste is generated (for example, the Phenol Tar boiler refractory or contaminated soil) and a visual inspection. The text has been revised to include free liquid determination as a parameter.

C-2d Frequency of Analysis

GE should state that, at a minimum, all hazardous waste streams stored in the CSA will be recharacterized on an annual basis. In addition, stored wastes will be recharacterized whenever there is a process change or new process introduced which affects a stored waste stream.

Response

GE recharacterizes the wastestreams generated at the facility each year as part of the ongoing RCRA training program. Waste profiles, waste analytical results, MSDSs, and process knowledge are used to determine and characterize the hazardous and nonhazardous wastestreams. Stored wastes will be recharacterized whenever there is a process change or a new process is introduced which affects a stored wastestream. The text has been revised to include these statements.

D PROCESS INFORMATION:

D-1 Containers:

Revise this section to include only the practices which will be in effect after issuance of the final permit.

Response

The text has been revised to describe the practices which will be in effect after issuance of the final permit.

D-1a(1) Description of Containers: 329 IAC 3-4B-2, 3-48-3

1. *Include in Table D-1 a description of the 1.3 cubic yard polypack container referred to on page D-5.*

2. *In Table D-1 on page D-3 "Strainrite" is listed as the material of construction for the "Cubic yard container.*

   a. *What is "Strainrite"?*
   b. *Is the "Cubic yard container" the same as a polypack container?*

Response

The text and Table D-1 have been revised to clarify the description of polypack containers. The polypacks were chosen to expedite disposal of spent filters. The polypack containers currently used at the facility are constructed of a double layer of polyethylene and triple corrugate in between the layers. GE may use 1 or 1.3 yd^3 polypack containers.

3. *"Gauge" is misspelled throughout Table D-1. Revise as necessary.*

Response

GE has revised Table D-1 to reflect the correct spelling.

4. *If a leaking drum were to be placed in an overpack drum, the overpack drum would be considered primary containment for that waste. Provide specifications for overpack drums in Table D-1.*

Response

Specifications for the overpack drums have been added to Table D-1.

5. *Address waste/container compatibility in this section for each waste steam to be stored in the container storage area. The waste analyses may be referenced, after they are revised to include this information, to satisfy this requirement.*

Response

Each wastestream is assigned a compatibility code for acid, base, organic, or reactive, as shown in the revised Table C-1. Waste profiles, waste analysis, MSDSs, and process knowledge are used to characterize the wastestreams into one of these four groups. The text has been revised to include determination of waste compatibility.

D-1a(2) Container Management Practices:
329 IAC 3-34-6(2), 3-34-6(3), 3-48-4, 3-48-7, and 3-48-8

1. *On page D-5 it is stated that containers are inspected before use as described in Section F. If a procedure is described in section F for the*

inspection of drums before use, provide the page number of the description of this procedure.

Response

Drums are inspected following the same procedure described for filled drums and provided on Page F-7. The text has been revised to include the page number.

2. *Include in this section the list of incompatible wastes referred to on page D-6.*

Response

Incompatible wastes are determined from the compatibility code found on Table C-1. The list of incompatible wastes is referenced to Table C-1.

3. *Indicate on a plan view of the container storage area the storage location(s), aisle space, and stacking height for containers that will be stored in the areas for containers holding wastes which may contain free liquids.*

Response

The Container Storage Building design drawings are provided in Appendix D-2.

D-1a(3) Secondary Containment System Design and Operation:
329 IAC 3-34-6(1)(A), 3-48-6(a), 3-48-6(d)

1. *Provide profile drawings of each part of the container storage area which show the secondary containment system and drainage provisions.*

Response

Profile drawings of the Container Storage Building secondary containment system are provided in Appendix D-2.

2. *Indicate on a plan view, the areas in which compatible wastes are stored.*

Response

The areas in which compatible wastes are stored is provided in the design drawings found in Appendix D-2.

3. *Show that incompatible wastes stored in containers, if any, are provided with independent secondary containment.*

Response

The three storage areas within the Container Storage Building are provided with independent secondary containment as shown in the design drawings found in Appendix D-2.

D-1a(3)(a) Requirement for the Base or Liner to Contain Liquids: 329 IAC 3-48-6(b)(1)

1. *Provide manufacturer's specifications and recommendations for application and maintenance for the trench coating and floor sealant used on the base of the container storage area.*

2. *Describe how cracks and gaps in the base of the container storage area will be repaired. Include manufacturer's specifications for the repair material.*

Response

A description of the base coating and the crack filling and floor sealant is provided in Section D-1a(3)(a). The description includes the procedure, the materials used, and manufacturer's specifications.

D-1a(3)(b) Containment System Drainage: 329 IAC 3-34-6(1)(B)

In this section state that containers of waste will be stored on pallets to prevent contact with accumulated liquids.

Response

The text has been revised to state that containers of waste will be stored on pallets to prevent contact with accumulated liquids.

D-1a(3)(c) Containment System Capacity: 329 IAC 3-34-6(1)(C)

Provide calculations which show the available volume of the containment system. Deduct from the total containment volume the space occupied by pallets, drums, columns, walls, or any other object that displaces potential containment volume.

Response

Calculations demonstrating the available volume of the containment system are provided in Appendix D-2.

D-1b(2) Description of Containers: 329 IAC 3-48-2, 3-48-3

For each waste stream that has been compacted, describe how that waste stream will be managed when the compactor is no longer used. Note that there is no "de minimis" exemption or exclusion for these wastes.

Response

The waste stored in the compactor was a combination of regulated waste and nonregulated waste. GE will eliminate the use of the compactor as of March 1, 1992. At that time, regulated and nonregulated waste will be segregated.

D-b(3) Container Management Practices:
329 IAC 3-48-4, 3-34-6(c), 3-34-6(d), 3-48-7, and 3-48-8

Indicate on a plan view of the container storage areas for wastes not containing free liquids the storage location(s), aisle space, and stacking height for each type of container.

Response

Containers storing wastes not containing free liquids are stored in the Container Storage Building and the outside covered pad. A design drawings of the outside covered pad area and the Container Storage Building showing aisle space, stacking height, and storage areas is provided in Appendix D-2.

D-1b(4) Container Storage Area Drainage: 329 IAC 3-34-6(2)(B), 3-48-6(c)

Do the rain water collection inlets drain to a sump rather than directly to the waste water treatment system? Clearly describe how this drainage system is designed and operated.

Response

The rain water collection inlets drain to a sump equipped with a manual pump. Accumulated rain water is pumped from the sump to the wastewater treatment plant. The text has been revised to include a description of the sump operation.

F-2b(1) Container Inspection: 329 IAC 3-48-5

Revise the inspection schedule and checklist so that it is congruent to the revision of the container storage areas.

Response

The inspection checklist has been revised to reflect changes in the management of the Container Storage Area and is included in February 3, 1992 submittal.

F-4b Run-off: 329 IAC 3-34-5(b)(8)(b)

Describe how run-off from the drum loading area would be prevented from entering the waste water treatment system if a spill were to occur during loading operations.

Response

The rain water collection inlets located in the loading/unloading area drain to a sump equipped with a manual pump. If a spill were to occur during loading/unloading operations, samples of accumulated run-off will be collected from the sump. Accumulated run-off will be pumped from the sump to drums or other containers until the sample analytical results are received. If the run-off is contaminated, it is shipped off-site to a permitted disposal facility. If the run-off is not contaminated, it is pumped to the wastewater treatment plant. The text has been revised to include a description of the sump operation.

F-5b General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste: 329 IAC 3-34-5(b)(9), 3-41-8(b)

In this section it is stated that no liquid wastes are mixed. Is this true of the monomer and polymer waste streams in the Ultem plant? Should this statement be revised to refer to only those wastes stored in the container storage area?

Response

The monomer/polymer wastestream fed to the thermal oxidizer is non hazardous, as determined by analytical results of samples collected from the wastestream. The text has been revised to state that "no liquid hazardous wastes are mixed."

G-2 Emergency Coordinator: 329 IAC 3-43-3(d)

Where more than one (1) person is listed as emergency coordinator, one (1) person must be named as primary emergency coordinator and others listed in the order in which they will assume responsibility as alternates.

Response

The emergency coordinator description has been clarified in the text. The Staff Duty Officer (SDO) on duty at the time an emergency occurs is the primary emergency coordinator. The backup Staff Duty Officer is the secondary emergency coordinator. The list of SDOs has been updated and revised to include the names of the backup SDOs.

G-6 Coordination Agreements: 329 IAC 3-43-4(2)

State whether or not copies of the contingency plan have been submitted to all local police departments, fire departments and hospitals, shown in Appendix G-4.

Response

Appendix G-4 is the Mutual Aid Association Constitution. The list of mutual aid members is found in Appendix G-5. The text has been revised to state that copies of the contingency plan have been sent to all of the mutual aid members listed in Appendix G-5.

H-1a Job Titles and Duties: 329 IAC 3-41-7(d)(1)

The names of the RCRA Technicians and back-up RCRA Technicians were not provided in Appendix H-1. Please provide this information.

Response

This information is provided in Appendix H-1 in the revised submittal.

H-1b Training Content, Frequency and Technique:

Describe the training content and frequency of training given to the RCRA Technicians and back-up RCRA Technicians.

Response

Training content and frequency of training given to the RCRA Technicians and back-up RCRA Technicians is described in the revised submittal. Information on additional training for the RCRA Technician and Environmental Engineer is provided in Appendix H-2.

I-1(d)(1) Closure of Containers

1. *GE should state that all rinse waters, residues, and other wastes generated during CSA decontamination activities will be managed as hazardous waste until analysis can be made for proper disposal of the wastes. Revise as necessary.*

Response

The Closure Plan has been revised to include handling of the CSA rinse waters if the waters are TC hazardous. The TC hazardous rinse waters will be contained and shipped off-site for proper treatment and disposal.

2. *GE should state that the SW-846 methods for analysis of the final rinsate will be method 8240 for volatile organics, method 8250 for semivolatile organics and methods 6010 or 7000 for metals. GE should also provide a list of the specific volatile organics, semivolatile organics, and metals which will be analyzed for using these methods. Analysis method numbers should be added to the plan as needed. Revise as necessary.*

Response

The analytical methods, as per SW-846, are given in Tables I-A.1 and I-A.2. The extraction method is TCLP Method 1311 followed by either AA, ICAP, GC/MS, GC/FID, or GC/ECD analyses.

3. *GE should specify the number of duplicates, trip blanks, and background samples that will be included in the CSA rinsate analysis sampling. Note that a minimum of four (4) background samples must be analyzed for an adequate determination of background. Revise as necessary.*

Response

The QC duplicate samples will be prepared at a frequency of one per 10 rinse water samples and one per 20 soil samples. Trip blanks will be prepared by the contract laboratory and transported with the samples shuttles. If volatile organics are detected in the samples, the trip blanks will be analyzed for volatile organics. Equipment blanks will be prepared for non-dedicated equipment at the end of each day or sampling event. A minimum of 4 background samples will be analyzed. The text on Section I, Closure Plan, and Appendix I-1, Sampling and Analytical Program have been revised.

4. *The stated "clean" level for the final rinsate of the CSA decontamination should be revised to be the following. Samples of the final rinsate will be considered clean when:*

   a. *concentrations of analytes in the final rinsate are at or below the mean background concentrations AND;*

   b. *mean background sample analyte concentrations are at or below the maximum contaminant levels (MCLs) of the Safe Drinking Water Act or are below method detection limits, if MCLs for the analyte in questions are not listed.*

Response

The text has been changed to state that the background water will not be used if level of constituents are greater than the MCL. An alternate source of rinse water will be used. The final rinsate water will be considered "clean", if the results fall within one standard deviation of the background concentration.

5. *With regard to soil sampling, GE stated that "soil borings will be made at a depth of three (3) feet due to the presence of crushed rock and sand below the storage pad." If GE wishes to begin sampling at this depth, the top three (3) feet of soil beneath the pad must be considered contaminated and thus be handled and disposed of as a hazardous waste. Alternatively, GE may with to sample and analyze these soils to determine an alternate means of disposal.*

Response

The text has been revised to state that soil borings will be made to a depth of five feet at the following intervals: 0 ft to 1.5 ft, 1.5 ft to 2 ft, 2 ft to 3 ft, 3 ft to 4 ft, and 4 ft to 5 ft.

6. *GE should state that a minimum of two (2) soil samples, one from the 3-4 foot interval and one from the 4-5 foot interval, will be obtained and analyzed form each soil boring. Revise as necessary.*

Response

See Response to Number 5.

7. *A minimum of four (4) background soil sample borings are necessary for making a statistically acceptable background analyte concentration determination. Sampling intervals for background should parallel those listed for item 6, above. Revise as necessary.*

Response

A minimum of four background soil sample borings at the equivalent depths to the CSA borings will be taken.

8. *Soil sampling analysis methods should be revised to match the descriptions in item 2, above. Likewise, all quality assurance/quality control methods (trip blanks, duplicates, chain-of-custody, sample preservation, etc.) and equipment decontamination procedures should be described for the soil sampling event. Revise as necessary.*

Response

Appendix I-1 describes the Sampling and Analytical Program.

9. *GE should include a sample Quality Assurance Project Plan (QAPP) for any laboratory analyses that will be performed as part of closure.*

Response

Examples of ETC's Laboratory SOP's and ETC's Statement of Qualifications are given in Appendix 2 of the Sampling and Analytical Program.

THE **ADVENT** GROUP, INC.

January 29, 1992 3066

Ms. Julia Watson
Advanced Environmental Engineer
General Electric Company
One Lexan Lane
Mt. Vernon, IN 47260-9364

Subject: Revised RCRA Part B Permit Application for Container Storage and Responses to Comments Made by IDEM (December 31, 1991 Notice of Deficiency)

Dear Ms. Watson:

The **ADVENT** Group, Inc. has enclosed copies of the "Resource Conservation and Recovery Act (RCRA) Part B Permit Application for Container Storage" for the General Electric (GE) Mt. Vernon facility. GE has responded as completely as possible to the comments made by the Indiana Department of Environmental Management (IDEM) in the December 31, 1991 Notice of Defficiency (NOD) and has incorporated the revisions into this document. **ADVENT** will submit the responses to the comments (Section 1) and Table D-1 to GE on Friday January 31, 1992.

We appreciate the cooperation and time the Environmental Department staff and other plant staff gave to us in completing this project. We look foward to working with you again in the future. If you have any questions or comments, please do not hesitate to call us at 615/377-4775.

Sincerely,

The **ADVENT** Group, Inc.

Pamela A. Hoover

Pamela A. Hoover
Project Engineer

cc: R. Garibay
M. Corn

201 Summit View Drive • Suite 313 • Brentwood, TN 37027 • 615/377-4775 • Fax: 615/377-4976

FILE

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

VIA CERTIFIED MAIL - Over Night

December 31, 1991

Mr. Dave Perkins
Environmental Programs Manager
GE Plastics Business Group
Highway 69 South
Mount Vernon, Indiana 47260-9364

Re: Part B Permit Application
Notice of Deficiency
2nd Technical Review
General Electric
Mount Vernon, Indiana
IND 006376362

Dear Mr. Perkins:

The Indiana Department of Environmental Management (IDEM) has reviewed your Part B permit application for technical adequacy. The plan was found to be inadequate pursuant to 329 IAC 3.

The enclosed Notice of Deficiency (NOD) outlines the specific deficiencies in the permit application and provides discussion relevant to the revision. The information requested and the requirements contained in the NOD must be incorporated into the permit application and submitted in full as one (1) amended application. Failure to fully and adequately address each item in the NOD may result in the issuance of a draft denial.

Five (5) copies of the amended permit application must be received by this office within fifteen (15) days of your receipt of this letter. Two (2) additional copies must be received by the U.S. Environmental Protection Agency, Region V within the same time frame. Each page of the permit application must be uniquely numbered. A certification statement identical to the one stated in 329 IAC 3-34-2 must accompany all submissions.

If you have any questions concerning this matter, please contact Mr. Mitch Mosier of the Plan Review and Permit Section at 317/232-4534.

Very truly yours,

Victor P. Windle

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

MJM/go

Enclosure

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Ms. Fayola Wright, U.S. EPA, Region V

Notice of Deficiency
2nd Technical Review
General Electric Company
Mount Vernon, Indiana
IND 006376362

B. FACILITY DESCRIPTION

B-2a General Requirements: 329 IAC 3-34-5(b)(18)

1. A facility topographic map must be submitted which has contour intervals sufficient to clearly show surface water flow in the vicinity of, and from, each operational unit of the facility as required by 329 IAC 3-34-5(b)(18).

2. Figure B-10 does not indicate the locations of all solid and hazardous waste management units. Identify on this drawing all proposed hazardous waste management units. Identify on this drawing all proposed and existing solid and hazardous waste management units. Clarify if the table in this figure is intended to list container accumulation areas only or is meant to include accumulation tanks as well. Off-site waste management units do not need to be shown.

C. WASTE CHARACTERISTICS

C-1 Chemical and Physical Analyses: 329 IAC 3-34-5(b)(2), 3-41-4(a)

1. Revise the analysis of each waste stream to include a determination of compatibility with other wastes so that the waste will be stored in an appropriate area of the container storage area.

2. Revise the analysis of each waste stream to include a determination of compatibility with storage container materials of construction.

3. Revise the analysis of each waste stream, which is managed as a waste not containing free liquids, to include a determination that the waste does not contain free liquids.

4. It was very difficult to match up waste characterization data from Appendices C-1, C-2, and C-3 with the listing of stored wastes found in Table C-1, "Summary of Hazardous Waste Descriptions." In order to facilitate review, GE should reorganize these Appendices to match the order of Table C-1. GE should also develop some notation so that items listed in Table C-1 can be easily and accurately matched with their appropriate waste characterizations.

Note that characterization data for all hazardous waste streams stored in the CSA (Container Storage Area) must be present. Our review suggested that data was missing for several waste streams listed in table C-1.

5. Our review noted that following apparent contradictions between waste characterization data found in Appendices C-1, C-2, and C-3 and the waste codes supplied for waste streams listed in Table C-1:

   a. Several waste streams, identified by the GE I.D. numbers: 5-D, 12-B1, 12-I, and 12-X, were apparently classified as D001 wastes by Safety-Kleen and yet classified as non-hazardous by GE.

   b. The waste stream identified by the GE I.D. Number 15-B was apparently classified as D002 waste by Chemical Waste Management and yet coded as non-hazardous by GE.

   c. Characterizations for waste streams 16-F and 16-G were unclear. These wastes were marked "Hazardous" on their profile sheets and then characterized as non-hazardous.

   d. The characterizations for waste streams 8-A and 17-A indicated that these wastes should also be coded as D003, since they are apparently water-reactive.

6. D007 was listed in the waste analysis plan but was not listed on the Part A. Revise as necessary.

Other contradictions may have been missed due to the poor organization of the appendices. GE should provide explanations for the above contradictions and make any needed corrections or additions to Table C-1 and the Appendices.

C-2 Waste Analysis Plan: 329 IAC 3-34-5(b)(3), 3-41-4(b) and (c)

Revise the waste analysis plan so that compatibility of waste streams, compatibility of waste streams with storage containers, and determination of free liquid content are listed as parameters, and so that test methods or method of determination is identified for each parameter.

C-2d Frequency of Analysis

GE should state that, at a minimum, all hazardous waste streams stored in the CSA will be recharacterized on an annual basis. In addition, stored wastes will be recharacterized whenever there is a process change or new process introduced which affects a stored waste stream.

D PROCESS INFORMATION:

D-1 Containers:

Revise this section to include only the practices which will be in effect after issuance of the final permit.

D-1a(1) Description of Containers: 329 IAC 3-48-2, 3-48-3

1. Include in Table D-1 a description of the 1.3 cubic yard polypack container referred to on page D-5.

2. In Table D-1 on page D-3 "Strainrite" is listed as the material of construction for the "Cubic yard container."

   a. What is "Strainrite"?
   b. Is the "Cubic yard container" the same as a polypack container?

3. "Gauge" is misspelled throughout Table D-1. Revise as necessary.

4. If a leaking drum were to be placed in an overpack drum, the overpack drum would be considered primary containment for that waste. Provide specifications for overpack drums in Table D-1.

5. Address waste/container compatibility in this section for each waste stream to be stored in the container storage area. The waste analyses may be referenced, after they are revised to include this information, to satisfy this requirement.

D-1a(2) Container Management Practices:
329 IAC 3-34-6(2), 3-34-6(3), 3-48-4, 3-48-7, and 3-48-8

1. On page D-5 it is stated that containers are inspected before use as described in Section F. If a procedure is descirbed in Section F for the inspection of drums before use, provide the page number of the description of this procedure.

2. Include in this section the list of incompatible wastes referred to on page D-6.

3. Indicate on a plan view of the container storage area the storage location(s), aisle space, and stacking height for containers that will be stored in the areas for containers holding wastes which may contain free liquids.

D-1a(3) Secondary Containment System Design and Operation:
329 IAC 3-34-6(1)(A), 3-48-6(a), 3-48-6(d)

1. Provide profile drawings of each part of the container storage area which show the secondary containment system and drainage provisions.

2. Indicate, on a plan view, the areas in which compatible wastes are stored.

3. Show that incompatible wastes stored in containers, if any, are provided with independent secondary containment.

D-1a(3)(a) Requirement for the Base or Liner to Contain Liquids: 329 IAC 3-48-6(b)(1)

1. Provide manufacturer's specifications and recommendations for application and maintenance for the trench coating and floor sealant used on the base of the container storage area.

2. Describe how cracks and gaps in the base of the container storage area will be repaired. Include manufacturer's specifications for the repair material.

D-1a(3)(b) Containment System Drainage: 329 IAC 3-34-6(1)(B)

In this section state that containers of waste will be stored on pallets to prevent contact with accumulated liquids.

D-1a(3)(c) Containment System Capacity: 329 IAC 3-34-6(1)(C)

Provide calculations which show the available volume of the containment system. Deduct from the total containment volume the space occupied by pallets, drums, columns, walls, or any other object that displaces potential containment volume.

D-1b(2) Description of Containers: 329 IAC 3-48-2, 3-48-3

For each waste stream that has been compacted, describe how that waste stream will be managed when the compactor is no longer used. Note that there is no "de minimis" exemption or exclusion for these wastes.

D-1b(3) Container Management Practices: 329 IAC 3-48-4, 3-34-6(c), 3-34-6(d), 3-48-7, and 3-48-8

Indicate on a plan view of the container storage areas for wastes not containing free liquids the storage location(s), aisle space, and stacking height for each type of container.

D-1b(4) Container Storage Area Drainage: 329 IAC 3-34-6(2)(B), 3-48-6(c)

Do the rain water collection inlets drain to a sump rather than directly to the waste water treatment system? Clearly describe how this drainage system is designed and operated.

F-2b(1) Container Inspection: 329 iac 3-48-5

Revise the inspection schedule and checklist so that it is congruent to the revision of the container storage areas.

F-4b Run-off: 329 IAC 3-34-5(b)(8)(B)

Describe how run-off from the drum loading area would be prevented from entering the waste water treatment system if a spill were to occur during loading operations.

F-5b General Precautions for Handling Ignitable or Reactive Waste and Mixing of Incompatible Waste: 329 IAC 3-34-5(b)(9), 3-41-8(b)

In this section it is stated that no liquid wastes are mixed. Is this true of the monomer and polymer waste streams in the Ultem plant? Should this statement be revised to refer to only those wastes stored in the container storage area?

G-2 Emergency Coordinator: 329 IAC 3-43-3(d)

Where more than one (1) person is listed as emergency coordinator, one (1) person must be named as primary emergency coordinator and others listed in the order in which they will assume responsibility as alternates.

G-6 Coordination Agreements: 329 IAC 3-43-4(2)

State whether or not copies of the contingency plan have been submitted to all local police departments, fire departments and hospitals, shown in Appendix G-4.

H-1a Job Titles and Duties: 329 IAC 3-41-7(d)(1)

The names of the RCRA Technicians and back-up RCRA Technicians were not provided in Appendix H-1. Please provide this information.

H-1b Training Content, Frequency and Technique:

Describe the training content and frequency of training given to the RCRA Technicians and back-up RCRA Technicians.

I-1(d)(1) Closure of Containers

1. GE should state that all rinse waters, residues, and other wastes generated during CSA decontamination activities will be managed as hazardous wate until analysis can be made for proper disposal of the wastes. Revise as necessary.

2. GE should state that the SW-846 methods for analysis of the final rinsate will be method 8240 for volatile organics, method 8250 for semivolatile organics and methods 6010 or 7000 for metals. GE should also provide a list of the specific volatile organics, semivolatile organics, and metals which will be analyzed for using these methods. Analysis method numbers should be added to the plan as needed. Revise as necessary.

3. GE should specify the number of duplicates, trip blanks, and background samples that will be included in the CSA rinsate analysis sampling. Note that a minimum of four (4) background samples must be analyzed for an adequate determination of background. Revise as necessary.

4. The stated "clean" level for the final rinsate of the CSA decontamination should be revised to be the following. Samples of the final rinsate will be considered clean when:

   a. concentrations of analytes in the final rinsate are at or below the mean background concentrations AND;

   b. mean background sample analyte concentrations are at or below the maximum contaminant levels (MCLs) of the Safe Drinking Water Act or are below method detection limits, if MCLs for the analyte in questions are not listed.

5. With regard to soil sampling, GE stated that "soil borings will be made at a depth of three (3) feet due to the presence of crushed rock and sand below the storage pad." If GE wishes to begin sampling at this depth, the top three (3) feet of soil beneath the pad must be considered contaminated and thus be handled and disposed of as a hazardous waste. Alternatively, GE may wish to sample and analyze these soils to determine an alternate means of disposal.

6. GE should state that a minimum of two (2) soil samples, one from the 3 - 4 foot interval and one from the 4 - 5 foot interval, will be obtained and analyzed from each soil boring. Revise as necessary.

7. A minimum of four (4) background soil sample borings are necessary for making a statistically acceptable background analyte concentration determination. Sampling intervals for background should parallel those listed for item 6, above. Revise as necessary.

8. Soil sampling analysis methods should be revised to match the descriptions in item 2, above. Likewise, all quality assurance/quality control methods (trip blanks, duplicates, chain-of-custody, sample preservation, etc.) and equipment decontamination procedures should be described for the soil sampling event. Revise as necessary.

9. GE should include a sample Quality Assurance Project Plan (QAPP) for any laboratory analyses that will be performed as part of closure.

MJM/go

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

October 16, 1991

RECEIVED
OCT 21 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Mr. Victor P. Windal, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Office of Solid and Hazardous Waste Management
Indiana Department of Environmental Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46225

Re: Part B Permit Application
Notice of Deficiency
IND 006376362

Dear Mr. Windal:

As a result of an incorrect zip code on your October 3, 1991 Notice of Deficiency letter, General Electric did not receive the letter until October 15. Therefore, General Electric requests that an extension be granted thru November 14, 1991 to submit an amended Part B permit application. I discussed this situation verbally with Mr. Mitch Mosier on October 15 and 16.

I may be contacted at (812) 831-7307 concerning any additional questions you or your staff may have.

Sincerely,

David K. Perkins

David K. Perkins
Principle-Environmental Programs Mgr.

DKP/jt

cc: Mr. Mitch Mosier, IDEM-OSHWM
Mr. Hak Cho, USEPA Region V
Ms. Fayola Wright, USEPA Region V

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

May 17, 1991

RECEIVED
MAY 20 1991

Mr. Gary Victorine
Engineer
RCRA Permitting Branch (5HR-13)
U.S. Environmental Protection Agency
230 S. Dearborn Street
Chicago, IL 60604

Dear Mr. Victorine:

The General Electric Company (GE) is pleased to submit information on compliance with Resource Conservation and Recovery Act (RCRA) treatment, storage, and disposal facility air emission rules, 40 CFR 265 Subparts AA and BB, as requested in an Environmental Protection Agency (EPA) letter on April 22, 1991. GE has reviewed the hazardous waste management operations at the Mt. Vernon facility. GE has determined that the Subpart AA regulations do not apply to these operations. GE has determined that Subpart BB does not apply to the Phenol Tar Boiler feed stream and the Phenol Plant wastewater stream, but does apply to the VALOX hot oil burner feed. The rationale for this determination is provided in the following discussion.

40 CFR SUBPART AA - AIR EMISSION STANDARDS FOR PROCESS VENTS

GE Mt. Vernon submitted a revised RCRA Part B Permit Request on March 15, 1991 to store RCRA wastes in containers and tanks and use a waste as a fuel in a boiler. The facility operates the RCRA waste management activities under interim status. Subpart AA applies to "process vents associated with distillation fractionation, thin-film evaporation, solvent extraction, or air or steam stripping operations that manage hazardous wastes with organic concentrations of at least 10 ppmw" (40 CFR 265.1030). GE does not use any of these processes to manage hazardous wastes. Therefore, the requirements of 40 CFR 265 Subpart AA do not apply to this facility.

40 CFR 265 SUBPART BB - AIR EMISSION STANDARDS FOR EQUIPMENTS LEAKS

Subpart BB applies to "equipment that contains or contacts hazardous wastes with organic concentrations of at least 10 percent by weight" (40 CFR 265.1050). The regulations provide the following methods for determining the organic content of a waste stream (40 CFR 265.1063(d)):

"(1) Methods described in ASTM Methods D 2267-88, E 169-87, E 168-88, E 260-85 (incorporated by reference under paragraph 260.11);

(2) Method 9060 or 8240 of SW-846 (incorporated by reference under paragraph 260.11); or

(3) Application of the knowledge of the nature of the hazardous waste stream or the process by which it was produced."

GE manages three RCRA waste streams containing organic constituents that may be regulated by 40 CFR 265 Subpart BB. These waste streams are the Phenol Plant wastewater, Phenol Tar Boiler feed and the VALOX hot oil burner feed. GE has applied knowledge of the process to determine the total organic content of these streams. This includes evaluation of analyses conducted on samples collected from two of these waste streams.

Phenol Plant Wastewater

The Phenol Plant wastewater is treated in the API separator and then stored in Tank V-2720 before entering the wastewater treatment plant. The wastewater is a RCRA toxic characteristic waste due to the presence of benzene (D018) in the wastewater. A waste characterization for TC constituents conducted in September 1990 is presented in Table 1. The results indicate that, other than low concentrations of methyl ethyl ketone, chloroform, and benzene, organic constituents are not present in the wastewater. GE feels the wastewater composition is constant and the organic content is less than 10 percent by weight. The organic component is efficiently removed by treatment in the API separator. Therefore, 40 CFR 265 Subpart BB does not apply to the equipment in contact with this waste stream.

Phenol Tar Boiler Feed

Phenol tar is used as a fuel in the two phenol tar boilers. A flow diagram for the phenol tar boiler is provided in Figure 1. The major component of the phenol tar boiler feed is distillation bottom tar from the cumene process for the production of phenol and acetone. This waste is a RCRA-listed hazardous waste (K022). Another part of the phenol tar feed comes from the batch dephenolization process, which is toxic characteristic (TC) due to benzene concentration (D018). Other parts of the combined feed tar come from the API separator sludges, tank bottoms, and BPA tars.

As shown in Figure 1, the largest part of the phenol tar boiler feed is the distillation bottom tar from the cumene process. The flow rate of the cumene process bottom tar is 10 to 12 gpm. The BPA tars, intermittent 3 gpm, dephen tar, intermittent 0.1 gpm, and tank bottoms, intermittent 0.5 gpm, are minor components of the phenol tar boiler feed. Therefore, the phenol tar boiler feed samples collected and analyzed in April 1990 are representative of the RCRA waste stream and can be used to determine the organic content.

Two samples of phenol tar boiler feed (K022) were collected in April 1990. The samples were analyzed by International Technology Corporation (IT) for the Hazardous Substance List of Volatile and Semi-volatile organics. A library search was conducted for tentatively identified compounds. SW-846 Methods 8240 for volatile compounds and 8270 for semi-volatile compounds were followed. SW-846 Method 8240 is one of the methods the regulations recommend for determining percent organic content by weight (40 CFR 265.1063(d)(2)).

The percent organic content by weight of each sample was determined by adding the concentrations reported in mg/kg and converting to percent by weight, as provided in Table 2. Non-detect values (ND) were coded as zero (0) and estimated values (J) were coded as the value reported. The organic content of Sample #1 was 3.8 percent by weight and of Sample #2 was 5.3 percent by weight. The major organic constituent in the feed tar is phenol with a BTU value conducive to firing a boiler.

The requirements of 40 CFR 265 Subpart BB do not apply to equipment in contact with this waste stream, because the analytical results indicate that it is below the 10 percent organic content by weight that determines the applicability of the regulations to these operations.

Hot Oil Burner Feed

The VALOX hot oil burner feed is a RCRA ignitable waste (D001). GE has submitted a Notification of Regulated Waste Activity to EPA Region V, as required by the newly promulgated Burning of Hazardous waste in Boilers and Industrial Furnaces Final Rule (August 21, 1991 effective date), 40 CFR 266 Subpart H. The feed flow rate is 1 gpm. The composition of the oil burner feed, as determined by process knowledge, is:

Component	Volume (%) Minimum	Maximum	Typical
Tetrahydrofuran	50	75	65
Methanol	20	35	28
Butanediol	0	10	4
Water	1	7	3

GE has determined that the organic content of the hot oil burner feed is greater than 10 percent by weight and 40 CFR 265 Subpart BB applies to this waste stream. GE is in the process of developing a leak detection plan for the equipment that is in contact with this waste. As we discussed on the phone May 14, 1991, GE will submit the plan to EPA Region V by June 10, 1991.

40 CFR 265.1064 - RECORD KEEPING

In accordance with the requirements of 40 CFR 265.1064(k), GE will add the information on the exempted waste streams provided above to the RCRA files in the Environmental Department. GE will incorporate the requirements of 40 CFR 265.1046 into the leak detection plan that will be submitted to EPA Region V by June 10, 1991.

I may be contacted at (812) 831-7307 concerning any questions you may have.

Sincerely,

David K. Perkins
Principle-Environmental Programs Mgr.

DKP/jt

cc: M. Harmless III, IDEM-OSHWM

TABLE 1. PHENOL PLANT WASTEWATER TANK
WASTE CHARACTERIZATION, SEPTEMBER 1990

PARAMETER	UNITS	MDL	CONCENTRATION
TCLP Analysis			
Benzene	mg/L		2
Carbon tetrachloride	mg/L	0.025	ND
Chlorobenzene	mg/L	0.025	ND
Chloroform	mg/L		0.004
Tetrachloroethene	mg/L	0.025	ND
Trichloroethene	mg/L	0.025	ND
Vinyl chloride	mg/L	0.05	ND
1,1-Dichloroethene	mg/L	0.025	ND
1,2-Dichloroethane	mg/L	0.025	ND
2-Butanone	mg/L		39
Hexachlorobenzene	mg/L	0.02	ND
Hexachlorobutadiene	mg/L	0.02	ND
Hexachloroethane	mg/L	0.02	ND
m+ /or p-Cresol	mg/L	0.02	ND
Nitrobenzene	mg/L	0.02	ND
o-Cresol	mg/L	0.02	ND
Pentachlorophenol	mg/L	0.1	ND
Pyridine	mg/L	0.02	ND
1,4-Dichlorobenzene	mg/L	0.02	ND
2,4,5-Trichlorophenol	mg/L	0.02	ND
2,4,6-Trichlorophenol	mg/L	0.1	ND
2,4-Dinitrotoluene	mg/L	0.02	ND

NOTES:
(1) Samples collected at API Separator.
(2) Analyses conducted by IT.

TABLE 2. CALCULATION OF TOTAL ORGANIC CONTENT OF THE PHENOL TAR BOILER
PHENOL TAR ANALYSIS, APRIL 1990 (Continued)

PARAMETER	UNITS	MDL	WASTE SAMPLE #1	WASTE SAMPLE #2
Chloromethane	mg/kg	12.5	0	0
Bromomethane	mg/kg	12.5	0	0
Vinyl Chloride	mg/kg	12.5	0	0
Chloroethane	mg/kg	12.5	0	0
Methylene Chloride	mg/kg		4.6	4.1
Acetone	mg/kg		98	31
Carbon Disulfide	mg/kg	6.25	0	1.7
1,1-Dichloroethene	mg/kg	6.25	0	0
1,1-Dichloroethane	mg/kg	6.25	0	0
1,2-Dichloroethene (Total)	mg/kg	6.25	0	0
Chloroform	mg/kg	6.25	0	0
1,2-Dichloroethane	mg/kg	6.25	0	0
2-Butanone	mg/kg		18	4.3
1,1,1-Trichloroethane	mg/kg	6.25	0	0
Carbon Tetrachloride	mg/kg	6.25	0	0
Vinyl Acetate	mg/kg	6.25	0	0
Bromodichloromethane	mg/kg	6.25	0	0
1,2-Dichloropropane	mg/kg	6.25	0	0
trans-1,3-Dichloropropene	mg/kg	6.25	0	0
Trichloroethene	mg/kg	6.25	0	0
Dibromochloromethane	mg/kg	6.25	0	0
1,1,2-Trichloroethane	mg/kg	6.25	0	0
Benzene	mg/kg		76	52
cis-1,3-Dichloropropene	mg/kg	6.25	0	0
2-Chloroethylvinylether	mg/kg	12.5	0	0
Bromoform	mg/kg	6.25	0	0
4-Methyl-2-pentanone	mg/kg		53	19
2-Hexanone	mg/kg		30	9.2
Tetrachloroethene	mg/kg	6.25	0	0
1,1,2,2-Tetrachloroethane	mg/kg	6.25	0	0
Toluene	mg/kg	1300	1,300	800
Chlorobenzene	mg/kg	6.25	0	0
Ethylbenzene	mg/kg	6.25	0	0
Styrene	mg/kg		16	9.9
Total Xylenes	mg/kg		2,400	1,600
Phenol	mg/kg		22,000	21,000
bis(2-Chloroethyl)ether	mg/kg	20	0	0
2-Chlorophenol	mg/kg	20	0	0
1,3-Dichlorobenzene	mg/kg	20	0	0
1,4-Dichlorobenzene	mg/kg	20	0	0
Benzyl Alcohol	mg/kg	20	0	0
1,2-Dichlorobenzene	mg/kg	20	0	0
2-Methylphenol	mg/kg		110	88
bis(2-Chloroisopropyl)ether	mg/kg	20	0	0

TABLE 2. CALCULATION OF TOTAL ORGANIC CONTENT OF THE PHENOL TAR BOILER
PHENOL TAR ANALYSIS, APRIL 1990 (Continued)

PARAMETER	UNITS	MDL	WASTE SAMPLE #1	WASTE SAMPLE #2
4-Methylphenol	mg/kg	20	0	0
N-nitrosodi-n-propylamine	mg/kg	20	0	0
Hexachloroethane	mg/kg	20	0	0
Nitrobenzene	mg/kg	20	0	0
Isophorone	mg/kg	20	0	0
2-Nitrophenol	mg/kg	20	0	0
2,4-Dimethylphenol	mg/kg	20	0	160
Benzoic Acid	mg/kg		890	950
bis(2-Chloroethoxy)methane	mg/kg	20	0	0
2,4-Dichlorophenol	mg/kg	20	0	0
1,2,4-Trichlorobenzene	mg/kg	20	0	0
Naphthalene	mg/kg	20	0	0
4-Chloroaniline	mg/kg	20	0	0
Hexachlorobutadiene	mg/kg	20	0	0
4-Chloro-3-methylphenol	mg/kg	20	0	0
2-Methylnaphthalene	mg/kg	20	0	0
Hexachlorocyclopentadiene	mg/kg	20	0	0
2,4,6-Trichlorophenol	mg/kg	20	0	0
2,4,5-Trichlorophenol	mg/kg	100	0	0
2-Chloronaphthalene	mg/kg	20	0	0
2-Nitroaniline	mg/kg	100	0	0
Dimethyl Phthalate	mg/kg	20	0	0
Acenaphthylene	mg/kg	20	0	0
3-Nitroaniline	mg/kg	100	0	0
Acenaphthene	mg/kg	20	0	0
2,4-Dinitrophenol	mg/kg	100	0	0
4-Nitrophenol	mg/kg	100	0	0
Dibenzofuran	mg/kg	20	0	0
2,4-Dinitrotoluene	mg/kg	20	0	0
2,6-Dinitrotoluene	mg/kg	20	0	0
Diethyl Phthalate	mg/kg	20	0	0
4-Chlorophenylphenyl ether	mg/kg	20	0	0
Fluorene	mg/kg	20	0	0
4-Nitroaniline	mg/kg	100	0	0
4,6-Dinitro-2-methyl phenol	mg/kg	100	0	0
n-Nitrosodiphenylamine	mg/kg	20	0	0
4-Bromophenylphenylether	mg/kg	20	0	0
Hexachlorobenzene	mg/kg	20	0	0
Pentachlorophenol	mg/kg		170	41
Phenanthrene	mg/kg	20	0	0
Anthracene	mg/kg	20	0	0
Di-n-butyl phthalate	mg/kg	20	0	0
Fluoranthene	mg/kg	20	0	0
Pyrene	mg/kg		450	0

TABLE 2. CALCULATION OF TOTAL ORGANIC CONTENT OF THE PHENOL TAR BOILER
PHENOL TAR ANALYSIS, APRIL 1990 (Continued)

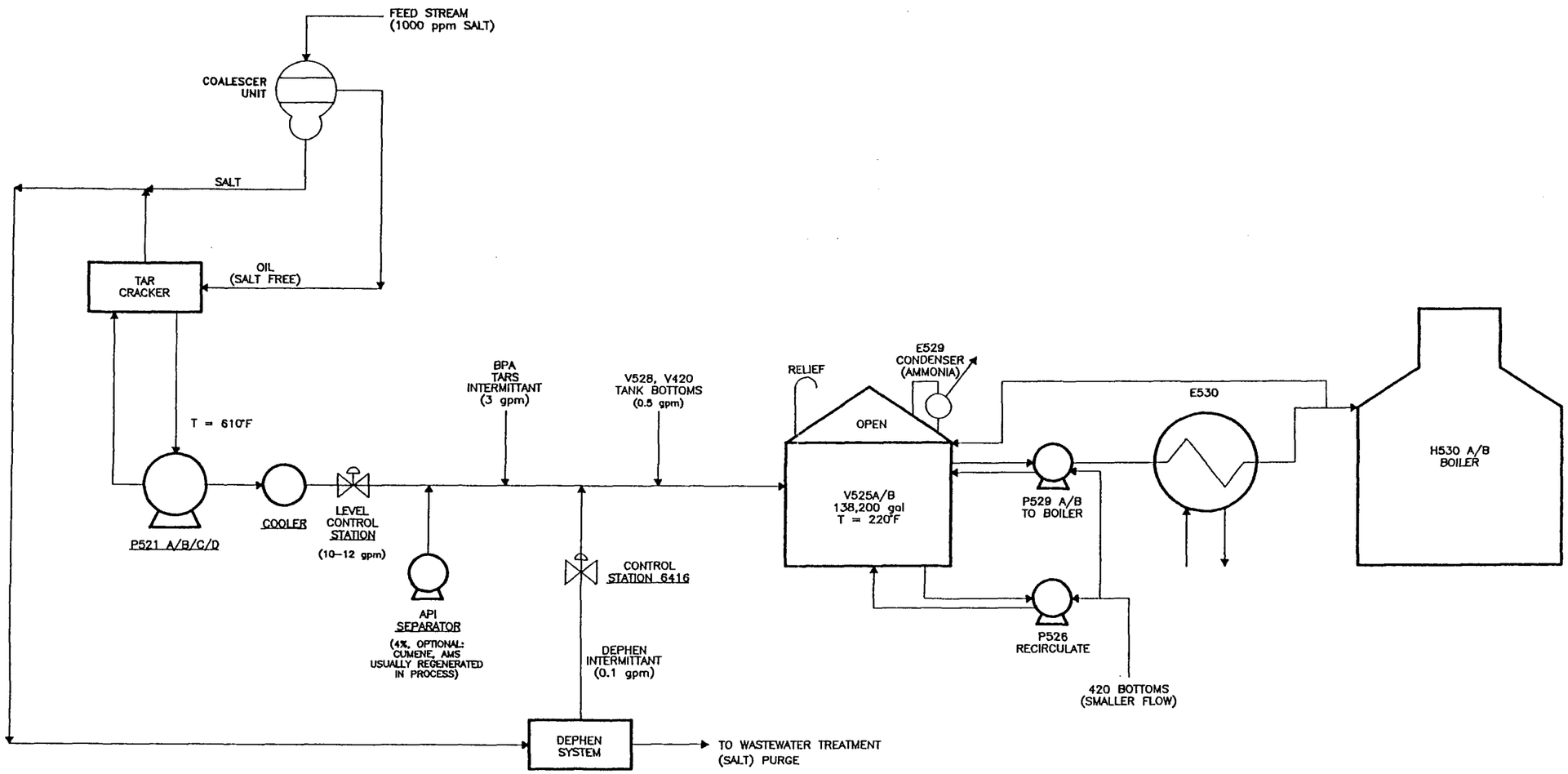
PARAMETER	UNITS	MDL	WASTE SAMPLE #1	WASTE SAMPLE #2
Butylbenzylphthalate	mg/kg	20	0	0
3,3'-Dichlorobenzidine	mg/kg	40	0	0
Benzo(a)anthracene	mg/kg	20	0	0
bis(2-Ethylhexyl)phthalate	mg/kg	20	0	0
Chrysene	mg/kg	20	0	0
Di-n-octyl phthalate	mg/kg	20	0	0
Benzo(b)fluoranthene	mg/kg	20	0	0
Benzo(k)fluoranthene	mg/kg	20	0	0
Benzo(a)pyrene	mg/kg	20	0	0
Indeno(1,2,3-cd)pyrene	mg/kg	20	0	0
Dibenzo(a,h)anthracene	mg/kg	20	0	0
Benzo(g,h,i) perylene	mg/kg	20	0	0
Aromatic hydrocarbon	mg/kg	500	500	300
Oxygenated hydrocarbon	mg/kg	600	600	600
Aromatic hydrocarbon	mg/kg	500	500	200
Aromatic hydrocarbon	mg/kg	200	200	
Alkyl phenol	mg/kg	800	800	400
Alkyl naphthalene	mg/kg	400	400	200
Aromatic amine	mg/kg	500	500	300
Oxygenated hydrocarbon	mg/kg	500	500	200
Oxygenated hydrocarbon	mg/kg			4,000
Alkyl phenol	mg/kg			6,000
Alkyl phenol	mg/kg			7,000
Oxygenated hydrocarbon	mg/kg			2,000
Polyaromatic hydrocarbon	mg/kg	6,000	6,000	7,000
SUM OF ORGANIC CONSTITUENTS	mg/kg		37,616	52,970
PERCENT ORGANIC CONTENT	% by weight		3.8% by wt	5.3% by wt

NOTES:

(1) Nondetects (ND) are entered as zero for the caluculation of organic content.

(2) The value reported by IT for estimated values (J) was used for the calculation of organic content.

7FL



THE *ADVENT* GROUP, INC.

FIGURE 1

FLOW DIAGRAM FOR
PHENOL TAR BOILER

APR 22 1991

CERTIFIED MAIL P 556 912 421
RETURN RECEIPT REQUESTED

5HR-13

David Perkins, Manager
Environmental Program
General Electric Company
Highway 69 South
Mount Vernon, Indiana 47620-9364

RE: Information Request for RCRA
Air Emission Regulations
IND 006 376 362

Dear Mr. Perkins:

On June 21, 1990, the United States Environmental Protection Agency (U.S. EPA) promulgated a rule in the Federal Register (55 Federal Register 25454 *et. seq.*), limiting organic air emissions from hazardous waste treatment, storage, and disposal facilities requiring a permit under Subtitle C of the Resource Conservation and Recovery Act (RCRA). The effective date for this rule was December 21, 1990.

The U.S. EPA is formally requesting that the General Electric Company submit information required by Title 40 of the Code of Federal Regulations ("40 CFR") Sections 270.14, 270.24, and 270.25 that will show compliance with the air emissions rules in Subparts AA and BB of 40 CFR Part 264, for the General Electric facility in Mount Vernon, Indiana. If you have determined that these regulations do not apply to your facility, please provide us with your rationale.

Enclosed is a checklist of Subparts AA and BB information requirements that you may use as a guideline in preparing your submittal. The Subparts AA and BB information requirements must be submitted to the following address by May 20, 1991:

Gary Victorine, Engineer
RCRA Permitting Branch (5HR-13)
U.S. Environmental Protection Agency
230 S. Dearborn
Chicago, Illinois 60604

Please be advised that the December 21, 1990, date is applicable to the requirements to develop and implement a monitoring plan for equipment leaks, to identify any process vents included in the process vent rules, to develop emission calculations for those affected vents, and the identification of control technology, if required. Records of the equipment leak monitoring plan and its

implementation, and process vent information must be kept in the operating file on the premises, available for inspection as of this date. These records may be submitted in partial fulfillment of the 40 CFR Parts 270.24 and 270.25 requirements.

Information you submit can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and will later request substantiation of any claims. Please review these rules carefully before making a claim.

We will coordinate review of your application with the Indiana Department of Environmental Management, and if your submittal is acceptable, will simultaneously issue Federal and State hazardous waste facility permits.

Thank you for your attention to this request. Please contact Mr. Gary Victorine of my staff, at (312) 886-1479, if you have any questions concerning this request or your submittal.

Sincerely yours,

ORIGINAL SIGNED BY/
KARL E. BREMER

Karl Bremer, Chief
RCRA Permitting Branch

Enclosure

cc: Thomas Linson, IDEM

4/17/91

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA PERMITTING BRANCH (RPB)										
TYPIS	AUTH.	ILS CHIEF	INS CHIEF	MIS CHIEF	MN/WI CHIEF	OHS CHIEF	SWS CHIEF	RPB CHIEF	RCRA ASOC.DR	WASTE MGMT. DIV.DIRECTOR
	4/16		4/17/91					4/19/91		

GARY DISK#1 A:\GE-AABB.LTR

GE Plastics

General Electric Company
1 LEXAN Lane, Mount Vernon, IN 47620-9364
812-831-7000

March 1, 1991

Victor P. Windal, Chief
Plan Review and Permit Section
Hazardous Waste Management Section
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46225

Re: Part B Permit Application
EPA ID No. IND006376362

Dear Mr. Windal:

Per your January 17, 1991 request enclosed are five copies of the revised RCRA Part A and B permit application for General Electric Co.'s Mt. Vernon facility. Included as Section M in this submittal is information submitted to fulfill IC 13-7-10.2 "Good Character Requirements for Solid Waste Management Board Permits".

To provide a background for your review of this revised application the following summarizes General Electric Co.'s proposed plans with respect to Tanks V-2720, V525A, V525B and the Phenol Tar Boilers as I have discussed with Ms. Cathy Grindstaff of your staff.

V-2720

Completion of secondary containment for this tank cannot be completed until closure of an adjacent out-of-service non-hazardous surface impoundment. A proposed closure plan for the surface impoundment was submitted to IDEM, the Office of Solid Waste (OSW) on May 11, 1990. Additional soil sampling and analysis was requested by OSW. This sampling program has been completed and analytical results will be submitted to OSW by the end of March.

V-525A

This tank is currently used to store K022 and D018 waste for less than 90 days and surrounded by a concrete containment dike. However, this single bottom tank is in contact with the ground. General Electric plans to retrofit this tank with a double bottom to fulfill secondary containment requirements and upgrade the air pollution control device on this tank.

In order to retrofit this tank it must be removed from service. To enable continued operation of the Phenol Plant during the retrofit of this tank General Electric proposes to place V-525B into RCRA hazardous waste service.

General Electric Co. is requesting a determination by your office as to what portions (if any) of the closure requirements must be met with respect to this tank prior to retrofitting and placing the tank back into service. General Electric Co. plans to utilize this tank for longer than 90 day storage upon approval of this application and completing the retrofit.

V-525B

This tank is similar in design to V-525A. However, it has not been used to store RCRA hazardous waste. General Electric Co. plans to also retrofit this tank with a double bottom and upgrade the air pollution control device on this tank. Upon completion of this work, V-525B will be placed into service storing K022 and D018 waste for less than 90 days. This tank has been included in the revised application at this time to enable longer than 90 day storage upon approval of the revised application.

Phenol Tar Boilers

As the final rule on Burning of Hazardous Waste in Boilers and Industrial Furnaces was just recently published this past February 21. Some information, such as the Certification of Precompliance, was unable to be included in this submittal. All required information will be submitted by June 31, 1991, the effective date of the rule.

I may be contacted at (812) 831-7307 concerning any questions you or your staff may have.

Sincerely,

David K. Perkins
Principle-Environmental Programs Mgr.

DKP/jt

cc: Mr. Hak Cho, U.S.EPA Region V, w/attachments (2 copies)

RECEIVED
3/5/91

THE **ADVENT** GROUP, INC.

February 28, 1991 2818

Mr. David Perkins
Environmental Programs Manager
GE Plastics Business Group
Highway 69 South
Mt. Vernon, IN 47260-9364

Subject: RCRA Part B Permit Application

Dear Mr. Perkins:

The **ADVENT** Group, Inc. has enclosed copies of the "RCRA Part B Permit Application." The application follows the IAC 329 regulations and 40 CFR 264 federal regulations for hazardous waste storage tanks and containers. The application for the boiler essentially follows the Final Rule published in the Federal Register on February 21, 1991.

The submittal includes the Part A Application for storing hazardous wastes in containers and tanks (Phenol tar boiler feed tanks and Phenol wastewater tank) and for using a hazardous waste as a fuel in a boiler. The Part B Permit Application includes information describing storage of hazardous wastes in tanks (Phenol tar boiler feed tanks and Phenol wastewater tank) and containers. The submittal only refers to the boiler, since the information necessary for the Certification of Precompliance will be submitted by June 31, 1991 (the effective date of the rule on Burning of Hazardous Waste in Boilers and Industrial Furnaces).

We appreciate General Electric's cooperation in completing this Permit Application in a timely fashion. If you have any questions or comments, please do not hesitate to call us at 615/377-4775.

Sincerely,

The **ADVENT** Group, Inc.

Pamela A. Hoova for
Robin L. Garibay
Project Manager

R J Lawing
Raymond J. Lawing, P.E.
Principal

201 Summit View Drive • Suite 313 • Brentwood, TN 37027 • 615/377-4775 • Fax: 615/377-4976

File 1C2C
Posey Co.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

January 17, 1991

VIA CERTIFIED MAIL- P404-637-541

Mr. David K. Perkins
Principle Environmental Programs Manager
General Electric Company
1 Lexan Lane
Mount Vernon, IN 47620-9364

Re: Part B Permit Application
General Electric Company
Mount Vernon, Indiana
EPA ID No. IND006376362

Dear Mr. Perkins:

The Indiana Department of Environmental Management (IDEM) is in the process of addressing your Part B Permit Application. The application in our possession is dated March 6, 1985, with a revision dated July 5, 1985. We are requesting that the application be updated pursuant to 329 IAC 3.

This update is necessary due to the age of the application, and the numerous changes that have been made to the Resource Conservation and Recovery Act (RCRA) regulations since the Part B Permit Application was prepared. A recent inspection by this agency (September 19 and 20, 1990), and changes that you have requested in your Part A Application also indicate that the 1985 Part B Application will require extensive revision.

Unless all necessary information is received by the deadline set forth in this letter, we will have no alternative, but to base our permit decision on the information already made available to us. The revised application must take into account all applicable regulations, as well as any changes in the facility or its operations.

The completed Part B Permit Application must be received by this office within forty-five (45) days from the date of this letter. Each page of the permit application must be uniquely numbered and must have the date of the submission. A certification statement identical to the one stated in 329 IAC 3-34-2 must accompany all submissions. Please submit five (5) copies of the amended application to IDEM at the address above, and two (2) copies to the U.S. EPA at the following address:

Mr. Hak Cho
U.S. Environmental Protection Agency, Region V
230 South Dearborn St.
Chicago, IL 60604

Also, on March 20, 1990, the General Assembly of the State of Indiana amended the Environmental Management act, Indiana Code, Title 13, Article 7 (IC 13-7) to include House Enrolled Act No. 1472. Section 1 added IC 13-7-10.2 as a new chapter, titled Good Character Requirements for Solid Waste Management Board Permits.

Before an application for the issuance, renewal, transfer, or major modification of a permit described in IC 13-7-10-1(e) may be granted, the following information in Section A or Section B must be submitted by the applicant and by each person who is a responsible party with respect to the applicant.

Section A. A disclosure statement that sets forth the following information:

1. The name, business address, and social security number of the applicant or responsible party. As defined in IC 13-7-10.2, "Responsible Party" means:

   (a) An officer, a corporation director, or a senior management official of a corporation, partnership, or business association that is an applicant; or

   (b) An individual, a corporation, a partnership, or a business association that owns, directly or indirectly, at least twenty percent (20%) interest in the applicant.

2. A description of the applicant's or responsible party's experience in managing the type of waste that will be managed under the permit.

3. A description of all civil and administrative complaints against the applicant or responsible party for the violation of any state or federal environmental protection law that:

   (a) have resulted in a fine or penalty of more than ten thousand dollars ($10,000) within five (5) years before the date of the submission of the application; or

   (b) allege an act or omission that constitutes a material violation of the state or federal environmental protection law and that presented a substantial endangerment to the public health or the environment.

4. A description of all pending criminal complaints alleging the violation of any state or federal environmental protection law that have been filed against the applicant or responsible party within five (5) years before the date of submission of the application.

5. A description of all judgments of criminal conviction entered against the applicant or responsible party within five (5) years before the date of the submission of the application for the violation of any state or federal environmental protection law.

6. A description of all judgments of criminal conviction of a felony constituting a crime of moral turpitude under the laws of any state or the United States that are entered against the applicant or responsible party within five (5) years before the date of submissions of the application.

7. The location of all facilities at which the applicant or responsible party manages the type of waste that would be managed under the permit to which the application refers.

The disclosure statement must be executed under oath or affirmation and is subject to the penalty for perjury under IC 35-44-2-1.

<u>Section B.</u> In lieu of a disclosure statement, the following information may be submitted:

1. The information concerning legal proceedings that is required under section 13 or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78a et seq.) and that the applicant or responsible party has reported under form 10-K;

2. A description of all judgments that have been entered against the applicant or responsible party in a proceeding described in subsection (A)(3) and that have imposed upon the applicant or responsible party a fine or penalty described in subsection (A)(3)(a); and

3. A description of all judgments of conviction entered against the applicant or responsible party within five (5) years before the date of submission of the application for the violation of any state or federal environmental protection law.

Before a final decision can be made, the information required under IC 13-7-10.2 must be submitted. The required information must be received within forty-five (45) days of the date of this letter.

The Commissioner may deny any application if you fail to submit the required information.

If you have any questions concerning this matter, please contact Ms. Cathy Grindstaff, at (317) 232-3227.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

CMG

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Mr. Gary Victorine, U.S. EPA, Region V

264A

GE Plastics

General Electric Company
Highway 69, Mount Vernon, IN 47620-9364
812 838-7000

AUG 10 12 17 PM '90

OFFICE OF SOLID AND HAZARDOUS WASTE MGMT DEPT

August 8, 1990

Ms. Elaine Gregg
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
105 South Meridian Street
P.O. Box 6015
Indianapolis, IN 46225

Re: Operating Permit 65-8

Dear Ms. Gregg:

In accordance with Condition 6, Operation Permit No. 65-8, attached is the operating report for July 1990. The unit was out-of-service for complete refractory replacement May 17 through July 19. Therefore no operating report was submitted for the month of June.

The unit was returned to service on July 20. Excessive salt build up necessitated removal of the unit from service on July 27 through July 31. Operating conditions 2.3. (min. 1800°F at 2 sec. residence time) and 2.f (max. 100 pmv CO 5 min. avg.) were met during all period of waste feed.

I may be reached at (812) 831-7307 concerning any questions you may have.

Sincerely,

David K. Perkins
Project Manager-Environmental Affairs

DKP/jt

TKH

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

JUN 0 3 1988

General Electric Company
State Road 69S
Mt. Vernon, Indiana 47620

Attention: Richard L. Monty,
Mgr., Environmental & Safety

Re: Amendment to Operation
Permit No. 65-01-90-0183

Gentlemen:

The above referenced operation permit is hereby amended to add a liquid waste incinerator with particulate matter emissions controlled by a venturi scrubber to Bldg. No. 58. The new emission point's will be vent Nos. 13-097 and 13-098.

The following conditions are hereby added to this permit:

13. That particulate matter emissions shall comply with Rule 326 IAC 4-2 (copy enclosed).

14. That the oxidation, reduction and reoxidation furnaces of the incinerator shall each operate at a minimum temperature of 1800 degrees Fahrenheit for a minimum retention time of one second.

15. That only liquid organic wastes from Bldg. Nos. 58 and 59 shall be burned in the incinerator.

Condition Nos. 14 and 15 are taken from construction permit No. PC (65) 1656.

All other conditions shall remain in force.

If you have any questions concerning this letter, please contact Mr. Terrence K. Hoya, a member of my staff, at the above address or via phone 317/ 232-8449.

Sincerely,

Thomas W. Rarick

Thomas W. Rarick
Assistant Commissioner
Office of Air Management

Enclosers
TKH
cc: Posey County Health Department

GE Plastics
Business Group

General Electric Company
Highway 69 S Mount Vernon, IN 47620-9364
812 838-7000

1C2C
Posey

Nov 16 3 07 PM '87

November 13, 1987

Indiana Department of Environmental Management
Office of Solid & Hazardous Waste Management
Hazardous Waste Management Branch
105 South Meridian St.
P. O. Box 6015
Indianapolis, Indiana 46225

ATTN: Mr. Terry F. Gray, Chief
Plan Review & Permit Section

Gentlemen:

This letter serves as preliminary comments from General Electric Company regarding the Indiana Department of Environmental Management's public Notice of Intent to Deny a RCRA permit for a container storage facility at the General Electric Mt. Vernon site. General Electric has presently and in the past met all necessary requirements for a Part B RCRA permit for container storage for the Mt. Vernon, Indiana facility and therefore believes that the decision to deny this permit is inappropriate. This letter also serves as a request for IDEM to delay final permit action to allow resolution of separate issues concerning the regulatory status of two surface impoundments at the site, or alternatively, to issue a container storage permit prior to the resolution of these issues. Finally, General Electric will provide herein a summary argument including technical interpretations and factual grounds in support of the position that the previously referenced surface impoundments are not hazardous waste management units.

General Electric is gratified that IDEM has consented to a sixty day extension of the public comment period. This extension will allow General Electric, IDEM, and the U. S. Environmental Protection Agency the opportunity to resolve the regulatory status of all waste management units at the Mt. Vernon facility. General Electric believes that further discussion in good faith will lead to resolution of the RCRA Part B permit and the regulatory status of the surface impoundments, without the need for formal legal proceedings.

Container Storage Permit

The only Part B permit application pending before IDEM with respect to General Electric Company's Mt. Vernon plant is for container storage. On March 27, 1986, IDEM determined that this permit application was "complete". Although IDEM issued a Notice of Deficiency in January, 1987, with respect to General Electric's failure to include two surface impoundments in the Part B permit application, General Electric contends for the reasons elaborated in these comments, that these impoundments are not hazardous waste management units. In any event, IDEM has authority to issue a container storage permit without first resolving the complex legal and technical issues regarding the status of the impoundments. Alternatively, IDEM can defer final disposition of the container storage permit pending resolution of the issues. There is no legal or practical necessity to deny the container storage permit.

Subsequent to the Notice of Deficiency issued in January, 1987, Mr. Terry Gray of IDEM wrote Mr. Hak Cho of EPA, on April 30, 1987, and supported General Electric Company's determination that the subject surface impoundments do not require a permit under RCRA. Before and after that time General Electric has cooperated fully in furnishing information regarding the nature of the dilute wastes sent to the impoundments. General Electric has conducted extensive sampling and analyses and submitted a great deal of correspondence explaining sampling procedures and rationale, chain of custody, and quality assurance to demonstrate that the impoundments do not receive hazardous wastes.

Only upon receipt of IDEM's proposal to deny its RCRA permit did General Electric learn that IDEM had not accepted General Electric's proof that the wastewaters to the impoundments are non-hazardous. Not only has IDEM not afforded General Electric fair notice of its change of heart, IDEM's reasoning for the reversal in position misconstrues General Electric's data and the relevant regulatory criteria. In light of this history, it would be fundamentally unfair for IDEM to deny the container storage permit. Instead, IDEM should

grant the permit, or, alternatively, it should continue the interim status of this facility pending orderly resolution of the impoundment issues.

In this letter, General Electric summarizes its reasons for concluding that the surface impoundments are not hazardous waste management units. In particular, General Electric will show that solvent lost to the wastewater treatment system is not "spent" solvent subject to the 25 ppm quantitative test that has been the focus of our previous dialogue. Moreover, General Electric will show that, even if it is assumed that the solvent is "spent", it has been adequately demonstrated that the Mt. Vernon facility meets the regulatory exclusion for wastewaters containing less than 25 ppm spent solvent waste.

Explanation of Previous Data Submitted

As was discussed during the recent meeting between General Electric and the Indiana Department of Environmental Management on September 23, 1987, an issue remains whether a satisfactory demonstration of qualification for exemption of surface impoundments 14A and 16G under 320 IAC 4.1-3-3(a)(2)(iv)(B) was achieved. We reaffirm that data submitted to IDEM in letters dated June 11, and July 13, 1987, demonstrate compliance with the above-referenced exclusion from the hazardous waste regulations for wastewater containing spent solvents in concentrations less than 25 ppm, as calculated by dividing the maximum total weekly usage of these solvents by the average weekly flow of wastewater to the headworks of the wastewater treatment plant. Additional clarification of the data previously submitted is provided herein.

A discussion of the background which led to the development of the data is beneficial to understanding the data. General Electric first examined estimated losses of solvent wastes at the GE Mt. Vernon facility using a process mass balance. Difficulties in accurately quantifying losses from equipment, fugitive process losses, and even permitted vent losses made it apparent that greater accuracy was critical in estimating total solvent losses to the wastewater. Accordingly, within the time constraints imposed by the January 26,

1987, Notice of Deficiency, General Electric initiated an extensive sampling program to accurately quantify methylene chloride usage at the Mt. Vernon site.

Maximum methylene chloride usage is defined as the total usage during a hypothetical week when the processes are running at peak, or maximum, capacity. Over a two week timespan, samples were collected at the process outlet points (i.e., where the material becomes waste) to determine the concentration and flow of methylene chloride to the wastewater from each process stream during periods of maximum usage. The resulting data were used to calculate maximum usages of methylene chloride in each process stream, which were submitted to IDEM on April 8, 1987.[1] The total maximum weekly usage for the plant site was then divided by the average weekly flow of wastewater to the headworks of the wastewater treatment plant to obtain a theoretical maximum "concentration" of solvents as specified by the regulations.[2] The maximum concentration of solvents was determined by General Electric to be 22.9 ppm, as explained in Table I, Methods of Calculation. Subsequent correspondence described procedures for sampling and analysis, protection of chain of custody, and quality assurance for the data submitted.[3]

To address directly the points IDEM raises in the September 22, 1987, Notice of Intent to Deny, the following discussion is offered:

- IDEM erroneously assumes that the data submitted represents average rather than maximum concentrations for the solvent constituent as required. In fact, GE performed the measurements of solvent concentrations at unit

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[1]Reference the letter to Mr. Terry F. Gray, IDEM from Richard L. Monty, GE, April 8, 1987. Data from that letter is presented in Table II, attached.

[2]The average annual flow of wastewater was used to determine average weekly flowrate.

[3]Reference the letters to Mr. Terry F. Gray, IDEM from Richard L. Monty, GE, June 11, and July 13, 1987.

maximum rates, therefore each data point was a representative maxima indicative of maximum usage. These maxima were then averaged to obtain a better estimate of the mean and the best estimate of maximum weekly usage as required by the exemption provision. The regulations do not require an estimate of the maximum concentration of solvent but rather an estimate of the maximum weekly usage of solvent. One must use the concentration during an entire week under maximum usage conditions to accurately predict maximum weekly usage. The alternative sampling and analysis performed on the individual contributing streams by General Electric is a valid representation of maximum weekly usage of solvent. The subsequent calculation of maximum concentration of 22.9 ppm therefore meets the requirements for the exemption.

- As a result of the erroneous assumption that the data submitted represented average usage, IDEM subjected the data to an analysis of variance, yielding a much higher estimate of "maximum" concentration. The conservative estimate of the maximum constituent using 80% confidence limits performed by the IDEM would provide only an estimate of the highest expected instantaneous solvent concentration and would not properly estimate the maximum weekly usage as required by the regulation. Using the maximum instantaneous concentration of methylene chloride at maximum flow conditions does not accurately predict maximum weekly usage of solvents at the Mt. Vernon facility.

- IDEM questioned the data set submitted by GE based on the fact that each day in the test period did not contain an analysis value and the reasons for data evaluation and invalidation were not provided. A totally annotated data sheet is attached as Table II which provides complete data information and background. A summary explanation of IDEM's data concerns can be addressed by the following:

  - The sample data for Lexan A and Lexan CC were supplied for only two days because those samples were the only taken which represent true

maximum rates under routine methylene chloride recovery control with a valid sample obtained during the test period.

- March 17 samples Lexan A,B,CC and Lexan II on March 18 were invalidated due to the cap liner collapsing into the sample bottle. (Difficulty was experienced in obtaining a hot sample at zero head space without aspiration or bottle cap failure as the sample cooled.)

- Samples were obtained on April 6 and 7 only at sample points Lexan A and CC.

- In all cases the maximum weekly usage was adjusted to be representative of a full 7-day week, i.e. the average concentration was multiplied by the average flow during this hypothetical maximum week to obtain maximum weekly usage.

o The Indiana Department of Environmental Management has expressed concern that methylene chloride was not the only constituent contained in wastewater and indicates that in the past toluene and ortho-dichlorobenzene (ODCB) were included in wastewater going to the impoundments. IDEM adds these estimates to methylene chloride measurements submitted on April 18, 1987, and concludes that the total level was over the regulatory threshold of 25 ppm.

These levels are <u>not</u> additive because the component of wastewater which contains toluene and ODCB does not flow through the impound basin under normal operations, but only overflows there during abnormal conditions of high loading to the wastewater treatment plant (usually stormwater surges), as illustrated in Figure 1. The infrequent and episodic natures of these overflow conditions do not lend themselves to computations of maximum "usage" as defined by the regulation. Furthermore, the solvent <u>concentration</u> of wastewater from the toluene/ODCB source cannot be added to the solvent <u>concentration</u> of wastewater from the methylene chloride source

to obtain a meaningful representation of the concentration of any stream since the two streams have different flow contributions.

- Note that the plastics manufacturing processes at the Mt. Vernon facility are continuous, non-cyclical processes with theoretically constant wastestreams. The plants run 24 hours per day on a seven day week. Variations in wastewater solvent concentrations would be due to process upsets or spills.

De minimis Solvent Losses

As explained in the previous portions of this document, General Electric believes that the wastewater at the Mt. Vernon plant meets the criteria for the 25 ppm spent solvent exemption. However, in light of the USEPA Complaint and Compliance Order received recently regarding these issues, and after further consideration of the processes involved and the applicable regulations, General Electric has determined that the 25 ppm test is not relevant to the Mt. Vernon plant. All solvent "usage" at the Mt. Vernon facility has, for the purposes of the above estimate, been previously assumed to be spent solvent for a conservative comparison with the exemption allowed for wastewater with low (less than 25 ppm) levels of spent solvent wastes. However, General Electric has determined that the portion of solvents lost to the wastewater are not "spent" solvents and therefore qualify for regulation under RCRA as de minimis losses of commercial chemical products as specified under 40 CFR 261.33 (f) for U listed wastes, including the solvents methylene chloride, toluene, and ortho-dichlorobenzene. Methylene chloride, toluene, and ortho-dichlorobenzene are each used at the Mt. Vernon site in various processes as solvents or synthesis media for the manufacturing of plastics. These materials are reclaimed, usable solvents when lost to the process wastewater, and as such are not defined to be spent solvents under the regulations.

The "solvents" are not used as "solvents" in the conventional degreaser or cleaner sense of the word, but rather to contain the plastic reaction components

until the reaction is complete. Accordingly, the solvents can be reclaimed for re-use by separating them from the plastic. The solvents are recovered and recycled in a closed loop manufacturing process, wherein the plastic product is separated from the solvent and the solvent is returned to the process after incidental processing to remove water.

Solvents are considered "spent" when a solvent is contaminated with a solute to the extent that it can no longer be used without being regenerated. Losses of solvents to the wastewater at the Mt. Vernon facility occur after the solute (the plastic) has already been removed from the solvent and while the solvent is being processed to remove residual water. In publishing exceptions to the "mixture rule", EPA has determined that, "where an unused material (such as toluene) which would be a listed spent solvent if discarded after use as a solvent is instead discarded to wastewater prior to use, the principle set out in this section applies, and the discharge does not count against the 1 or 25 ppm exclusion level for spent solvents mixed with wastewater. In this case, what is being discarded is not a spent solvent but an unused commercial product or intermediate". 46 Fed. Reg. 56582, 56587, n. 37 (Nov. 17, 1981).

General Electric's recovery step involves separation of solvent from a mixture that is approximately 99% water and 1% solvent. Following this process, a tiny fraction of the solvent remains diluted with water and cannot be captured. It is this loss of clean solvent that cannot be captured by the manufacturing process which makes up the major portion of solvent losses to the wastewater. The balance of the solvent losses are primarily solvents not used for their solvent properties, for example, losses of solvents used for cooling or leaks from pump packings and seals. The solvent losses to the wastewater are thus losses of clean, uncontaminated solvent, capable of being re-used in the process to dissolve plastics, but lost because it is technically infeasible to capture those de minimis losses. General Electric asserts that these solvent losses are correctly regulated as de minimis losses of discarded commercial chemical intermediates listed in 40 CFR 261.33 (f) as "U-listed" materials, and excluded from consideration as a hazardous waste in wastewater under 261.3 (a)(2)(iv)(D).

This issue was discussed at some length with Mr. Alan Corson of the USEPA during the preparation of the original RCRA Part A permit application for this facility (reference letter from Mr. Thomas E. Wills of General Electric to EPA Region V, dated November 20, 1980). The EPA apparently agreed at that time that the highly dilute solvent wastes from the General Electric methylene recovery systems should not be considered F002 hazardous wastes. Thus these solvent wastes in process wastewater are not included as spent solvent wastes on the site RCRA Part A application, although it is acknowledged that the pure solvent materials are lost to the wastewater as U-listed materials.

"Closed Loop" Manufacturing Processes

It is important to note that methylene chloride as a commercial chemical product can only be a hazardous waste when discarded or intended for discard. 40 CFR 261.33 (U080). In contrast, "spent" methylene chloride normally becomes a hazardous waste as soon as it is "spent." However, even "spent" methylene chloride is not a hazardous waste if it is being recovered and reused in certain "closed-loop" manufacturing processes. The process in which the plant uses, recovers and reuses the methylene chloride is a "closed process"; i.e., it is entirely connected by pipes or other comparable enclosed means of conveyance. It is clear that the EPA does not intend for these types of closed loop reclamation processes to be regulated as hazardous waste management facilities under RCRA. On July 14, 1986, EPA amended its regulations to exclude from the definitions of solid and hazardous waste secondary materials, including "spent solvents" that are reclaimed or returned to the original manufacturing process in which they were generated, with the reclamation taking place at the site of generation. To qualify for the exclusion, the material must be recycled in an essentially closed process -- although tank storage of the material prior to reclamation is allowed. 51 Fed. Reg. 25,422, 25,441-43, and 25,471-72. Thus, the plant's dilute methylene chloride, which is recycled, is not regulated as a solid or hazardous waste.

"In Process" Secondary Materials

This interpretation is strengthened through a recent decision by the U.S. Court of Appeals for the District of Columbia circuit, wherein "in process" secondary materials re-used at the site of generation in an ongoing production process are not subject to regulation as solid or hazardous waste under RCRA. American Mining Congress v. U.S. Environmental Protection Agency, 824 F.2d 1177 (D.C. Cir. 1987). Thus, under the court's ruling the solvents prior to discard are not solid or hazardous wastes. Therefore losses of such solvents from the reclamation process are considered to be de minimis losses of commercial chemical products, and are not appropriately applied to the exemption for spent solvents in wastewater under 40 CFR 261.3 (a)(2)(iv)(B). Those solvent losses would instead be covered under the exemption defined by 40 CFR 261.3 (a)(2)(iv)(D) specifically for de minimis losses of commercial chemical products or manufacturing process wastes.

Unrecovered Solvent Losses

There is at the Mt. Vernon site one way that a minute quantity of solvent waste is lost to the wastewater without subsequent reclamation in a "closed process" under normal operating conditions. Laboratory waste from the methylene chloride process is not presently incorporated into the recovery process, but is instead discharged directly to the wastewater. Laboratory waste from the Mt. Vernon facility qualifies for a separate exclusion from the RCRA regulations under 320 IAC 4.1-3-3(a)(2)(iv)(E), since "the annualized average flow of laboratory wastewater does not exceed one percent of total wastewater flow into the headworks of the facility's wastewater treatment system." All other solvents used at the Mt. Vernon manufacturing facility are recovered and re-used in the process as described in the previous paragraphs.

Impact on the Environment

The process wastewater at the Mt. Vernon facility is not a RCRA hazardous waste. Thus the surface impoundments 14A and 16G are not hazardous waste management facilities and would not be appropriately addressed in a RCRA Part B permit application. Those facilities will be managed as solid waste management facilities under Subtitle D of RCRA, subject to all administrative requirements and any minimum technological standards promulgated. It is important to note that at any event, total solvent losses from the process or the surface impoundments do not pose a substantial risk to human health or the environment. The minuscule concentrations calculated therein would have an undetectable effect on the environment. Furthermore, General Electric has pledged to continue the assessment of groundwater quality at the Mt. Vernon plant to an appropriate technical conclusion regardless of the regulatory status of these surface impoundments.

It is General Electric's contention that the Part B application filed on March 6, 1985 and deemed complete on March 27, 1986 for container storage units is indeed complete. General Electric is anxious to resolve any technical issues or questions outstanding during our upcoming informal meeting with the USEPA and the IDEM in Indianapolis. Final disposition of the Part B permit should be deferred to allow the resolution of these issues and a more detailed discussion of the process, as well as to insure a complete understanding of the RCRA regulations as appropriately applied to the Mt. Vernon facility.

Sincerely,

Richard L. Monty
Manager, Environmental Operations

RLM/JRR/jt

cc: Ms. Beverely Shorty, U.S. Environmental Protection Agency

TABLE I

METHOD OF CALCULATION

General Electric is providing the calculation herein for the purpose of demonstrating that the 25 ppm exclusion under IAC 4.1-3-3 (a)(2)(iv)(B) could apply to the Mt. Vernon site. However, as explained in the letter to which this Table is attached, General Electric believes that solvent losses to the wastewater at the Mt. Vernon facility are appropriately excluded from the regulations by IAC 4.1-3-3 (a)(2)(iv)(D) for de minimis losses of commercial chemical products or manufacturing process wastes.

For purposes of comparison to the 25 ppm exclusion for spent solvent as defined by 4.1-3-3 (a)(2)(iv)(B), maximum weekly usage of methylene chloride first is predicted using the database provided in Table II. Under conditions of maximum usage, i.e., peak capacity, the average concentration of each process stream is multiplied by the average flow of each process stream over a hypothetical one week period to result in the maximum weekly usage.

For example, for the Lexan A stream, the average concentration of solvent lost over a week of maximum usage is 111.5 ppm. The flowrate is 1,512,000 gallons per seven day week. The resulting loss of solvents is calculated as follows:

$$\text{Maximum weekly usage from the Lexan Resin I plant} = (A) \times (B) \times (8.34)$$

$$= \frac{(111.5)(1{,}512{,}000)(8.34)}{(1{,}000{,}000)}$$

$$= 1407 \text{ pounds.}$$

where	111.5	=	average solvent concentration in Lexan Resin I wastewater over a maximum usage week, ppm,
and	1,512,000	=	average wastewater flow from the Lexan Resin I plant, gal/wk,
and	8.34	=	density of water, lbs/gal,
and	1,000,000	=	ppm conversion factor.

The Table below gives, for a hypothetical maximum week, the average solvent concentration in each process stream containing methylene chloride, the average flow for that individual stream, and the resulting loss of methylene chloride to that stream.

SAMPLE#	CONCENTRATION DURING MAX. WEEK (ppm)	WASTEWATER FLOW DURING MAX. WEEK (gal/wk)	LOSS TO WASTEWATER DURING MAX. WEEK (pounds)
Lexan A	111.5	1,513,000	1407
Lexan B	133.0	3,029,000	3360
Lexan CC	85.5	756,000	539
Lexan DD	85.0	1,007,000	714
Lexan H	69.0	158,000	91
Lexan II	445.0	49,000	182
BPA A	14.0	1,680,000	196
BPA B	5960.0	5,100*	252
BPA C	8120.0	5,100*	343
		TOTAL	7084

* Wastewater flow was observed to be an extremely small stream at these two points and was conservativley estimated at the rate of 0.5 gal/min.

Next, to determine the "concentration" for comparison with the regulatory exclusion, it is necessary to divide the maximum weekly usage by the average weekly flow of wastewater to the headworks of the wastewater treatment plan, as follows:

$$\text{Solvent concentration for comparison to the regulatory exemption} = \frac{7084 \text{ lbs/wk}}{(37{,}100{,}000 \text{ gal wk})\ (8.34 \text{ lbs/gal})}$$

$$= 22.9 \text{ ppm}$$

where 7084 lbs/wk = maximum weekly usage of solvent in wastewater,

and 37,100,000 gal/wk = annualized average flow of wastewater into the headworks of the wastewater treatment plant

and 8.34 lbs/gal = density of water.

The concentration for comparison to the regulatory exemption is thus calculated to be 22.9 ppm.

TABLE II

DATA BASE

METHYLENE CHLORIDE CONCENTRATIONS IN PROCESS WASTEWATER
(All values in mg/l)

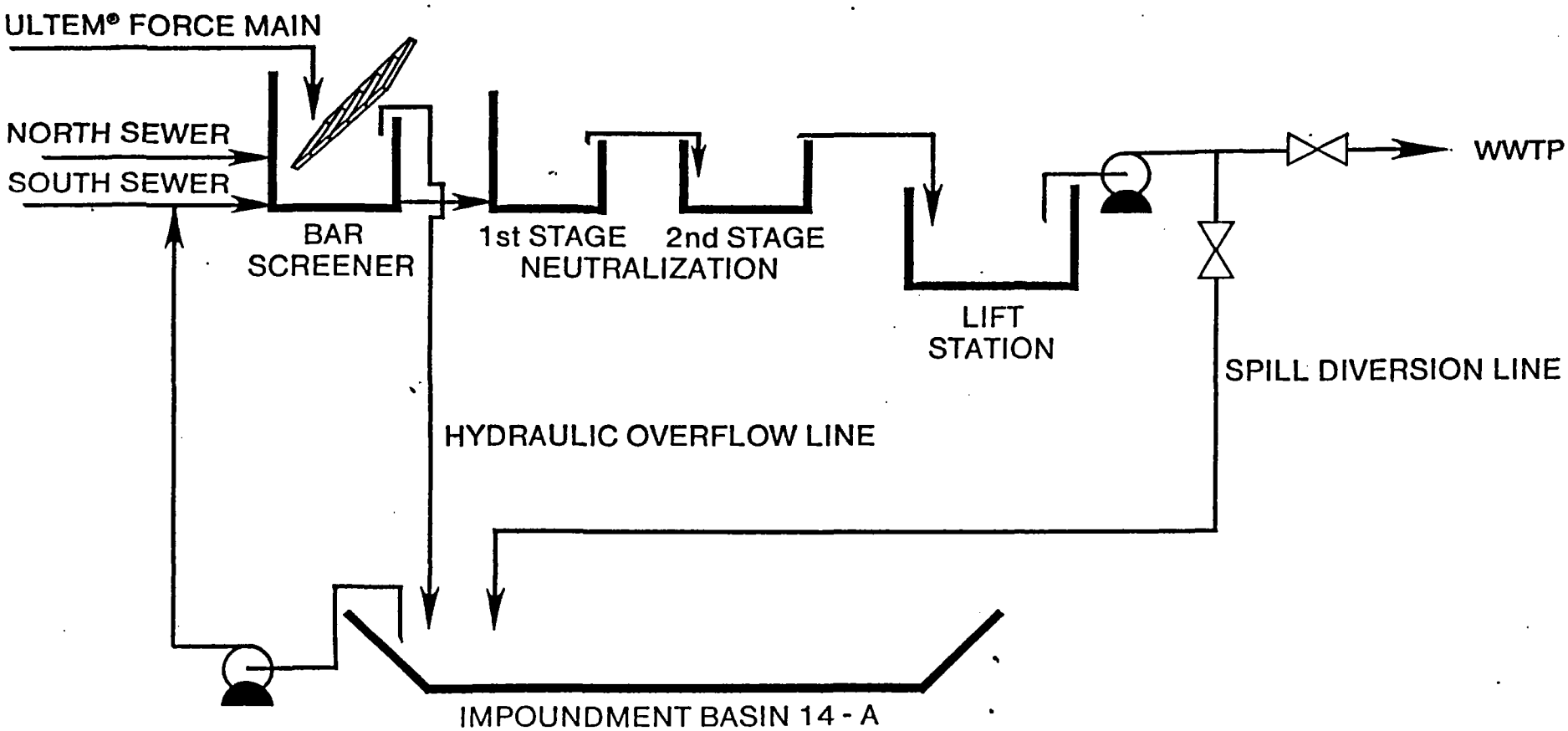
SAMPLE #	3/16	3/17	3/18	3/19	3/20	4/6	4/7	AVG.
Lexan A	*	**	*	*	*	210	13	111.5
Lexan B	120	**	290	100	20	NS	NS	133.0
Lexan CC	*	**	*	*	*	81	90	85.5
Lexan DD	110	45	48	130	93	NS	NS	85.0
Lexan H	54	82	77	59	71	NS	NS	69.0
Lexan II	550	440	**	200	590	NS	NS	445.0
BPA A	28	12	8	10	10	NS	NS	14.0
BPA B	5600	6000	8800	7800	1600	NS	NS	5960.0
BPA C	5400	7100	7100	10000	11000	NS	NS	8120.0

* - Unrepresentative samples
** - Sample bottle cap failure
NS - Not sampled

NOTE: Samples collected from points Lexan A and Lexan CC during March 16 through March 20 were invalid and discarded. Additional samples were obtained for those two sample points on April 6 and 7.

FIGURE 1

WWTP HEADWORKS FLOW DIAGRAM



FILE w/AR

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

January 17, 1991

VIA CERTIFIED MAIL- P404-637-541

Mr. David K. Perkins
Principle Environmental Programs Manager
General Electric Company
1 Lexan Lane
Mount Vernon, IN 47620-9364

Re: Part B Permit Application
General Electric Company
Mount Vernon, Indiana
EPA ID No. IND006376362

Dear Mr. Perkins:

The Indiana Department of Environmental Management (IDEM) is in the process of addressing your Part B Permit Application. The application in our possession is dated March 6, 1985, with a revision dated July 5, 1985. We are requesting that the application be updated pursuant to 329 IAC 3.

This update is necessary due to the age of the application, and the numerous changes that have been made to the Resource Conservation and Recovery Act (RCRA) regulations since the Part B Permit Application was prepared. A recent inspection by this agency (September 19 and 20, 1990), and changes that you have requested in your Part A Application also indicate that the 1985 Part B Application will require extensive revision.

Unless all necessary information is received by the deadline set forth in this letter, we will have no alternative, but to base our permit decision on the information already made available to us. The revised application must take into account all applicable regulations, as well as any changes in the facility or its operations.

The completed Part B Permit Application must be received by this office within forty-five (45) days from the date of this letter. Each page of the permit application must be uniquely numbered and must have the date of the submission. A certification statement identical to the one stated in 329 IAC 3-34-2 must accompany all submissions. Please submit five (5) copies of the amended application to IDEM at the address above, and two (2) copies to the U.S. EPA at the following address:

Mr. Hak Cho
U.S. Environmental Protection Agency, Region V
230 South Dearborn St.
Chicago, IL 60604

Also, on March 20, 1990, the General Assembly of the State of Indiana amended the Environmental Management act, Indiana Code, Title 13, Article 7 (IC 13-7) to include House Enrolled Act No. 1472. Section 1 added IC 13-7-10.2 as a new chapter, titled Good Character Requirements for Solid Waste Management Board Permits.

Before an application for the issuance, renewal, transfer, or major modification of a permit described in IC 13-7-10-1(e) may be granted, the following information in Section A or Section B must be submitted by the applicant and by each person who is a responsible party with respect to the applicant.

Section A. A disclosure statement that sets forth the following information:

1. The name, business address, and social security number of the applicant or responsible party. As defined in IC 13-7-10.2, "Responsible Party" means:

   (a) An officer, a corporation director, or a senior management official of a corporation, partnership, or business association that is an applicant; or

   (b) An individual, a corporation, a partnership, or a business association that owns, directly or indirectly, at least twenty percent (20%) interest in the applicant.

2. A description of the applicant's or responsible party's experience in managing the type of waste that will be managed under the permit.

3. A description of all civil and administrative complaints against the applicant or responsible party for the violation of any state or federal environmental protection law that:

   (a) have resulted in a fine or penalty of more than ten thousand dollars ($10,000) within five (5) years before the date of the submission of the application; or

   (b) allege an act or omission that constitutes a material violation of the state or federal environmental protection law and that presented a substantial endangerment to the public health or the environment.

4. A description of all pending criminal complaints alleging the violation of any state or federal environmental protection law that have been filed against the applicant or responsible party within five (5) years before the date of submission of the application.

5. A description of all judgments of criminal conviction entered against the applicant or responsible party within five (5) years before the date of the submission of the application for the violation of any state or federal environmental protection law.

6. A description of all judgments of criminal conviction of a felony constituting a crime of moral turpitude under the laws of any state or the United States that are entered against the applicant or responsible party within five (5) years before the date of submissions of the application.

7. The location of all facilities at which the applicant or responsible party manages the type of waste that would be managed under the permit to which the application refers.

The disclosure statement must be executed under oath or affirmation and is subject to the penalty for perjury under IC 35-44-2-1.

<u>Section B.</u> In lieu of a disclosure statement, the following information may be submitted:

1. The information concerning legal proceedings that is required under section 13 or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78a et seq.) and that the applicant or responsible party has reported under form 10-K;

2. A description of all judgments that have been entered against the applicant or responsible party in a proceeding described in subsection (A)(3) and that have imposed upon the applicant or responsible party a fine or penalty described in subsection (A)(3)(a); and

3. A description of all judgments of conviction entered against the applicant or responsible party within five (5) years before the date of submission of the application for the violation of any state or federal environmental protection law.

Before a final decision can be made, the information required under IC 13-7-10.2 must be submitted. The required information must be received within forty-five (45) days of the date of this letter.

The Commissioner may deny any application if you fail to submit the required information.

If you have any questions concerning this matter, please contact Ms. Cathy Grindstaff, at (317) 232-3227.

Sincerely,

Victor P. Windle

Victor P. Windle, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

CMG

cc: Mr. Hak Cho, U.S. EPA, Region V
Ms. Fayola Wright, U.S. EPA, Region V
Mr. Gary Victorine, U.S. EPA, Region V

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

RECEIVED
OCT 29 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
WASTEWATER WORK ENTERPRISE

October 23, 1987

Mr. Richard Monty, Manager
Environmental Operations
General Electric Company
Highway 69 South
Mount Vernon, IN 47620-9364

Re: General Electric Company
Mount Vernon, Indiana
IND 006376372

Dear Mr. Monty:

This letter is written to confirm discussions between the Indiana Department of Environmental Management (IDEM) and representatives of the General Electric Company (G.E.) on September 23, 1987, in Indianapolis. The subject of that meeting was the IDEM's Notice of Intent to deny G.E.'s RCRA Part B permit. The following summarizes events leading up to the decision and the meeting.

In March, 1985 G.E. submitted its Part B application for container storage of hazardous waste and incorrectly determined that the facility had no land disposal units. However, surface impoundments 14A and 16G were included on G.E.'s Part A application and the impoundments are considered to be in the system until the company receives final notification that the withdrawal request has been approved. On January 26, 1987, the IDEM notified G.E. that withdrawal of the impoundments, pursuant to the wastewater exemption in 320 IAC 4.1-3-3(a)(2)(iv)(B) was denied. This decision was made after a review of the November 12, 1986, submittal.

General Electric disagreed with that decision and developed an alternate sampling program to directly measure the solvents as they entered the wastewater. Documentation and sampling results of this effort were submitted by G.E. on April 8, June 11, and July 13, 1987. The preponderance of evidence did not support G.E.'s position that the impoundments are not hazardous waste management units.

The IDEM is required by the U.S. Environmental Protection Agency (U.S. EPA) to meet grant committments for permits and closures. The IDEM was committed to make a draft permit decision on this facility no later than September 30, 1987. Based on the evidence supplied by G.E., the impoundments did not qualify for the wastewater exemption. Hence, the RCRA Part B application was incomplete since it did not address the land disposal units. On that basis the draft decision to deny the permit was made.

G.E. will have an opportunity during the forty-five (45) day public comment period to submit further information which will be evaluated before a final permit decision is rendered. The documentation must show that the impoundments have never operated as hazardous waste management units and will include a sufficient explanation of sampling rationale. The documentation must also meet the requirements of the U.S. EPA RCRA Enforcement Section. Joint meetings will be coordinated between IDEM, U.S. EPA and G.E. to settle this matter.

Existing evidence indicates that prior to recent plant modifications, the contribution of toluene and ortho-dichlorobenzene, in addition to the methylene chloride, greatly exceeded the 25 part per million (ppm) regulatory threshold, therefore, the impoundments were operated as hazardous waste land disposal units in the past.

G.E. did not submit a Part B application for the land disposal units by November 8, 1985. Pursuant to section 3005(e)(2) of RCRA, interim status was automatically terminated on that date.

Please be advised that if the permit denial is the final agency decision, a closure plan is required within fifteen (15) days pursuant to 320 IAC 21-3(c)(1). Loss of interim status also subjects the facility to closure requirements.

If you have any questions concerning this matter, please contact Ms. Jayne E. Browning at AC 317/232-3397.

Very truly yours,

Thomas Russell

Thomas Russell, Chief
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

JEB/ram

cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Bill Buller, U.S. EPA, Region V
Mr. Gary Victorine, U.S. EPA, Region V
Posey County Health Department
Ms. Joy Reinecke, General Electric
Ms. Catherine Lynch, IDEM
Mr. Marc Herdrich, IDEM
Mr. Terry Gray

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
NANCY A. MALOLEY, Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317-232-8603

September 22, 1987

RECEIVED
SEP 28 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

Mr. Richard Monty, Manager
Environmental Operations
General Electric Company
Highway 69 South
Mount Vernon, IN 47620-9364

Re: Notice of Intent to Deny Permit
General Electric Company
Mount Vernon, Indiana
IND 006376362

Dear Mr. Monty:

This is to notify you that the Indiana Department of Environmental Management (IDEM) is preparing to deny your permit.

Pursuant to your conversation of September 18, 1987, with Mr. Terry Gray, the IDEM offers an apology for the miscommunication. You were originally intended to receive this letter, prior to the newspaper receiving the public notice.

General Electric Company (G.E.), Mt. Vernon, Indiana, submitted a RCRA Part B application on March 6, 1985, for container storage of hazardous waste. The Indiana Department of Environmental Management (IDEM) conducted a completeness review and issued a Notice of Deficiency (NOD) on July 5, 1985. On March 27, 1986, IDEM sent a notice of completeness of the Part B application regarding only the container storage units. On August 14, 1986, IDEM requested detailed documentation to substantiate G.E.'s claim that surface impoundments 14A and 16G are not, and have never been, RCRA units. General Electric responded on November 12, 1986, by submitting calculations to support the request for the exemption of the impoundments. On January 26, 1987, IDEM sent a NOD which denied the request for withdrawal of the impoundments, based on the exemption in 320 IAC 4.1-3-3(a)(2)(iv)(B) and served notice that a revised Part B was required to include the impoundments. General Electric disagreed with our determination and requested a meeting with the IDEM on February 27, 1987, to describe an alternate sampling program and request an extension of the NOD response date. On April 8, 1987, G.E. submitted a summary of the sampling results as a response to the January 26, 1987, NOD. Upon review, the information was found to be inadequate and additional supporting information was provided by G.E. on June 11, and July 13, 1987, as requested by the IDEM. The documentation failed to substantiate that the impoundments are not hazardous waste management units.

The information supplied by G.E. on April 18, June 11, and July 13, 1987, failed to show that the maximum concentration of methylene chloride at the headworks of the wastewater treatment unit is less than 25 ppm. The following reasons support this determination:

1. The data as supplied focuses on the average concentration for the hazardous waste constituent.

2. Regulations require the maximum concentration of solvent.

3. A conservative estimate of the maximum hazardous constituent concentration has been determined using an 80 percent confidence level. The results indicate that the true concentration level may be as high as 44.5 ppm of methylene chloride in the wastewater.

4. Sample data for Lexan A and Lexan CC were supplied for only two days of operation. This is not a representative weekly sample for these processes.

5. The rationale for invalidating and disregarding sample data for a week for Lexan A and Lexan CC were not provided.

6. Samples from Lexan B and Lexan II are missing data for one day during the weekly test period.

Methylene chloride is currently the only hazardous waste solvent entering the surface impoundments, however, information from previous company letters indicates that, in the past, toluene and ortho-dichlorobenzene were included in the wastewater going into the impoundments. The total solvents concentration, as well as the concentration of just methylene chloride, was well over the regulatory threshold of 25 ppm. Consequently, surface impoundments 14A and 16G do not qualify for the exemption in 320 IAC 4.1-3-3(a)(2)(iv)(B). The impoundments have operated, and continue to operate, as hazardous waste management units.

According to federal regulations, land disposal facilities had to certify compliance with groundwater and financial assurance requirements and submit a Part B application by November 8, 1985. If a facility could not or did not certify, they were to submit their closure plan by November 23, 1985. Therefore, G.E. is responsible for closing impoundments 14A and 16G in accordance with 320 IAC 4.1-21 closure requirements.

On the basis that the RCRA Part B application did not include the land disposal units, and that G.E. did not sufficiently substantiate that they were not hazardous waste management units, this office has made a decision to deny your permit for container storage of hazardous waste, pursuant to 320 IAC 4.1-34-1(e)(5). A public notice for intention to deny a permit is tentatively scheduled to be issued on or about September 30, 1987, (320 IAC 4.1-39-6). Enclosed for your information is a copy of the public notice for intent to deny a permit and the fact sheet prepared for this decision (320 IAC 4.1-39-5).

If you have any questions, please contact Ms. Jayne E. Browning of this office, at AC 317/232-3397.

Sincerely,

Jane Magee

Jane Magee
Assistant Commissioner for
Solid and Hazardous Waste Management

JEB/ram

Enclosures

cc: Mr. Hak Cho, U.S. EPA, Region V (with enclosure)
Mr. Bernie Orenstein, U.S. EPA, Region V
Mr. Bill Muno, U.S. EPA, Region V
Posey County Health Department (with enclosure)
Enforcement Section
Mr. David Harrison, Chemistry Section
Mr. Steve Pekera, Engineering Section
Mr. Harold Templin, Geology Section
Ms. Joy Reinecke, General Electric (with enclosure)
Ms. Sue Shadley, Office of Legal Counsel

Fact Sheet

Intent to Deny a Permit Under RCRA

Activity to be Permitted: Treatment, storage and disposal

Facility Name: General Electric Company, Lexan Product Division

U.S. EPA I.D. Number: IND 006376362

Location: Highway 69 South, Mt. Vernon, Indiana (Posey County)

Facility Owner: General Electric Company

Facility Description: General Electric, Mt. Vernon, Indiana, produces several high quality engineered plastics.

Comment Period: 45 days beginning September 30, 1987, and ending November 14, 1987.

All persons, including the applicant, who believe the decision to deny this permit is inappropriate, must raise all ascertainable issues and submit all available arguments and factual grounds supporting their position by the end of the comment period. Two copies of such comments should be sent to:

Mr. Terry F. Gray, Chief
Plan Review & Permit Section
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
Hazardous Waste Management Branch
105 South Meridian Street
Indianapolis, Indiana 46225

A public hearing on the proposed permit decision can be requested by written notice before the end of the comment period. Issues proposed to be raised in the hearing should be submitted to Mr. Thomas Russell, Hazardous Waste Management Branch Chief, at the above address.

Reasons Supporting Decision to Deny Permit Application

Chronology of Events:

March 6, 1985	G.E. submitted Part B application for container storage of hazardous waste.
April 18, 1985	IDEM mailed Notice of Deficiency (NOD) regarding completeness review.
July 5, 1985	G.E. submitted response to NOD.
March 27, 1986	Notice of completeness of Part B regarding only container storage units issued by IDEM.

August 14, 1986	IDEM requested detailed documentation to substantiate G.E.'s claim that surface impoundments are not, and have never been, RCRA units.
November 12, 1986	G.E. submitted calculations to support the request for the exemption of the surface impoundments as a response to IDEM's August 14, 1986, letter.
January 26, 1987	NOD issued by IDEM. Denied request for withdrawal of impoundment based on wastewater exemption. Served notice that revised Part B was required to include impoundments.
February 27, 1987	G.E. disagreed with IDEM determination and requested a meeting to describe an alternate sampling program and an extension of the NOD response date.
April 8, 1987	G.E. submitted summary of sampling program as a response to the January 26, 1987, NOD.
June 11, 1987 and July 13, 1987	G.E. provided supporting information to the April 8, 1987, submittal, as requested by IDEM.

The information submitted by General Electric failed to substantiate that the two surface impoundments labeled 14A and 16G are not receiving, nor have ever received, hazardous waste. Therefore, the surface impoundments are regulated under RCRA as land disposal units and must have been included in the Part B application by November 8, 1985. This is the basis for denying the permit.

JEB/ram

GENERAL ELECTRIC

LEXAN PRODUCTS DIVISION
GENERAL ELECTRIC COMPANY • HIGHWAY 69 S • MT. VERNON, INDIANA 47620-9364 • (812) 838-7000

March 4, 1987

RECEIVED
MAR 09 1987
U. S. EPA, REGION V
SWB — PMS

Mr. Karl E. Bremer, Chief
Technical Programs Section
U. S. Environmental Protection Agency
Region 5
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Bremer:

This letter is written in response to your Notice of Deficiency dated January 23, 1987 regarding the General Electric Mt. Vernon site RCRA Part B Permit Application. As you suggested in your January 23 letter, the concentration of F001-F005 solvent wastes in the wastewater stream feeding the 14A impoundment (reference the RCRA Part B permit application dated February 28, 1985) is indeed less than the 1% maximum allowed under 40 CFR 268.30(a)(3).

The wastewater influent stream consists of primarily stormwater and process water with solvent constituents in very low concentrations, as demonstrated by the attached analysis. The analysis has been derived from data which was previously submitted to Mr. Irvin J. Dzikowski of Region V of the U. S. Environmental Protection Agency (reference the November 14, 1983 letter from Mr. Frank J. Basile, Jr.).

A Notice of Deficiency has been received from the Indiana Department of Environmental Management regarding the above-referenced impoundment. A meeting with the IDEM Division of Solid Waste was held February 27 regarding the need for a response time extension to allow determination of either a) possible deminimus exclusion of the 14A impoundment, or b) definition of feasibility for closure or retrofit alternatives.

If a revision to the Part B application is indeed ultimately required, the preparation of the appropriate revisions will necessitate extensive engineering design work and commitment of significant investment capitol to either retrofit the impoundment or replace and close it. The decision-making process we must exercise prior to such a commitment of funds will of necessity require additional time for reasonable resonse.

COPY 2

GENERAL ELECTRIC

Accordingly, an extension of the time allowed for responding to the Notice of Deficiency is respectfully requested beyond the 45 days given in your letter of January 23, 1987. The meeting with the Indiana Department of Environmental Management has resulted in an immediate extension of thirty days with consideration of an extension to July 1, 1987 for the final Part B permit revision including a complete closure plan and appropriate financial assurance documents as required. These circumstances have been discussed to some extent with your Mr. Gary Victorine during his tour of the plant site on February 10, 1987. We are available to meet with you and Mr. Victorine at your convenience to explain in further detail the timing and constraints involved. Please contact Ms. Joy R. Reinecke of my staff, telephone (812) 838-7964, to schedule a meeting in Chicago.

Yours very truly,

Mr. R. L. Monty

C: Mr. Terry Gray, IDEM

GENERAL ELECTRIC MT. VERNON SITE
WASTEWATER INFLUENT

PARAMETER	MAXIMUM CONCENTRATION ppb	AVERAGE[1] CONCENTRATION ppb
Methylene chloride	19000	7100
Toluene	4989	1223
Ethylbenzene	500	120
2,4,6-Trichlorophenol	1095	68
Trichlorofluromethane	NDA	NDA(2)
Carbontetrachloride	4640	312
Tetrachloroethylene	NDA	NDA
1,2-dichlorobenzene	900	131
1,1,1-Trichloroethane	NDA	NDA
Trichloroethylene	NDA	NDA

1) Data represent maximum and average concentrations taken from 20 data points over a 20 month period.
2) NDA indicates the concentration is less than 10 ppb.
3) Recovery processes for some constituents have been added since this data was collected. The concentrations given are therefore conservative representations of the wastewater influent stream.

GENERAL ELECTRIC

LEXAN PRODUCTS DIVISION
GENERAL ELECTRIC COMPANY • HIGHWAY 69 S • MT. VERNON, INDIANA 47620-9364 • (812) 838-7000

RECEIVED
FEB 27 1987
U.S. EPA, REGION V

RECEIVED
FEB 27 1987
SOLID WASTE BRANCH
U.S. EPA, REGION V

February 20, 1987

Mr. Terry Gray
Indiana Department of Environmental Management
Office of Solid and Hazardous Waste Management
105 South Meridian
P. O. Box 6015
Indianapolis, Indiana 46225

Dear Mr. Gray:

We have received the Notice of Deficiency dated January 26, 1987 regarding a revision to the General Electric Mt. Vernon site RCRA Part B application. This letter serves as a request for an extension of the time allowed to revise the Part B, and also as a new request for withdrawal of various units from the Part A application.

The information requested for the nine additional tanks and impoundments is extensive and will require a longer period of time to prepare than the 45 days suggested in the letter from David D. Lamm of January 26, 1987. To accumulate and generate the data requested and publish an appropriate document will require a minimum of six months. Accordingly, we respectfully request that an extension of time be granted, with the revised Part B to be submitted no later than July 30, 1986.

In addition, we request that the units listed in the following Table be reconsidered for withdrawal from the RCRA Part A application, as suggested in the above-referenced letter.

UNITS TO BE WITHDRAWN FROM THE RCRA PART A APPLICATION

UNIT #	FACILITY
3K	Wastewater Retention Basin
3C	Drain Tank
3J	Railcar Sump
3I	Drain Vessel
4D	Recovery Storage Tank
11A	Waste Storage Tank
4A	Tar and Isomer Tank

GENERAL ELECTRIC

These facilities are not hazardous waste management units and should not be considered as such under the RCRA Part B application. Attachment I explains the basis for our request to withdraw the above facilities from the RCRA Part A application. A revised Part A application will be formally submitted in conjunction with a revised Part B application by May 30, 1987.

Mr. Gary Victorine of the USEPA, Region V, is aware of both the need for additional preparation time for the Part B and the potential withdrawal of the facilities listed herein. We discussed the justification for the delay and for the withdrawal of the facilities during Mr. Victorine's February 10, 1987, tour of the Mt. Vernon site.

I look forward to discussing with you further the justification for these requests during a meeting with Mr. Victorine to be held in Indianapolis on either Thursday, February 26, or Friday, February 27, 1987, at your convenience.

Please contact me at (812) 838-7964 if you have any questions regarding this correspondence, or to confirm the meeting date.

Yours very truly,

Joy R. Reinecke

Joy R. Reinecke
Process Engineer, Environmental

JRR/jt

cc: Richard Monty
Mr. Gary Victorine, USEPA

ATTACHMENT I

BASIS FOR REVISION TO ORIGINAL PART A APPLICATION

GENERAL ELECTRIC COMPANY MOUNT VERNON SITE

The facilities discussed herein are not hazardous waste management units as defined by regulations promulgated under the Resource Conservation and Recovery Act (RCRA). These facilities were, however, originally included in the March 31, 1983 Part A application as hazardous waste management units. For the reasons discussed in this Attachment, these units have been withdrawn from the Mt. Vernon site RCRA permit application and should not be considered as hazardous waste management units during the RCRA Part B permit applicaton review process. The references given are to the items of RCRA Form 3 in the March 31, 1983 Part A application (See Attachment II).

Container Storage (S01)

Reference: Item III. Processes - Codes and Design Capacities (Item C-1) and Item V. Facility Drawing - RCRA Hazardous Waste Management Facility: 14E - Drum Storage Area.

- 14E - Drum Storage Area: This drum storage area (14E) was used to accumulate hazardous waste for less than 90 days until the new Drum Storage Area (17A) was built; the old (14E) drum storage area is no longer being used. All inventory was either shipped to a permitted treatment, storage, and disposal facility or moved to the new Drum Storage Area (17A). Since the drum staging area (14E) was only an accumulation area under 40 CFR 262.34(a) and not required to have a permit or interim status, it is not a hazardous waste management unit.

Tank Storage (S02)

Reference: Item III. Processes - Codes and Design Capacities (Item C-2) and Item V. Facility Drawing - RCRA Hazardous Waste Management Facilities: 3C - Drain Tank; 3I - Drain Vessel; 3J - Rail Car Sump; 4D - Recovery Storage Tank; and 11A - Waste Storage Tank.

The hazardous wastes stored in two of these tanks (3C and 3J) is accumulated for less than 90 days and the tanks therefore do not need to be permitted under 40 CFR 262.34.

- 3C - Drain Tank: The liquid from the phenol sample points and from the phenol-containing drain flows to this drain tank through an underground collection system. This material is pumped to the neutralizer for recovery of phenol.

- 3J - Railcar Sump: Phenolic wash water drains to the railcar sump from an adjacent railcar loading area. The wastewater is then pumped to either the fractionation feed tank or the crude phenol storage tank for reprocessing to recover the phenol. This procedure occurs 12 to 15 times each year.

The liquids stored in the other three tanks (3I, 4D, and 11A) are not listed hazardous wastes but are process streams as described below.

- 3I - Drain Vessel: The liquid from the cumene hydroperoxide (CHP) sample points and from various CHP-containing aqueous process streams flows to this drain vessel through an underground collection system. This material is pumped to an oxidizer feed drum for the recovery of the CHP and cumene.

- 4D - Recovery Storage Tank: This tank collects process water from the bisphenol A production unit. The process water, which contains phenol and acetone in small quantities, is transferred to the phenol recovery process. The Recovery Storage Tank is therefore a part of the phenol recovery plant process equipment.

- 11A - Waste Storage Tank: The methylene chloride bottoms process stream flows to this tank and then to the methylene chloride recovery process. The tank is an important part of the process equipment for methylene chloride recovery, and is therefore not a hazardous waste management unit.

Tank Treatment (T01)

Reference: Item III. Processes - Codes and Design Capacities (Item C-4) and Item V. Facility Drawing - RCRA Hazardous Waste Facilities: 4A Tar and Isomer Tank.

- 4A - Tar and Isomer Tank: The tar and isomer tank was listed as a treatment tank in the March 1983 submittal but is actually a storage tank. This tank contains tars and isomers from the bisphenol A production unit which are burned in an on-site boiler. The tars and isomers are not listed hazardous wastes and do not exhibit any of the characteristics of hazardous wastes identified in 40 CFR Subpart C. In addition, this tank contains less than 90 days storage for the on-site boiler. Thus this tank is not a HWM unit.

Surface Impoundments (S04)

Reference: Item III. Processes - Codes and Design Capacities (Item C-3) and Item V. Facility Drawing - RCRA Hazardous Waste Management Facilities: 3K - Wastewater Retention Basin.

- 3K - Wastewater Retention Basin: This unit was listed as a surface impoundment in the March 1983 submittal but has been eliminated from the RCRA Part B application. The 1.8 million gallon surface impoundment is used to retain wastewater from the phenol plant prior to pumping to the wastewater treatment plant. Wastewater from the phenol plant is not a hazardous waste under 40 CFR 261.3(a)(2)(iv)(D) because it is regulated under Section 402 or Section 307(b) of the Clean Water Act. Wastewater Retention Basin (3K) contains wastes listed in 40 CFR 261.33 arising only from de minimis losses of phenol, acetone, and cumene. These de minimis losses are the only contaminants in Wastewater Retention Basin 3K; therefore this surface impoundment is not a hazardous waste managment unit.

ATTACHMENT II

Part A Permit Application

Submitted on March 31, 1983

SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

V. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
0 5 4	900	P	T 0 3 D 8 0	
D 0 0 2	400	P	T 0 3 D 8 0	
D 0 0 1	100	P	T 0 3 D 8 0	
D 0 0 2				included with above

FORM 3510-3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F I N D 0 0 6 3 7 6 3 6 2 — T/A C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*: C 8 — YR. MO. DAY

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN: YR. MO. DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.

2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR OR GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C — DUP — T/A C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	11,000	G		7				
2	S 0 2	1,410,425	G		8				
3	S 0 4	10,800,000	G		9				
4	T 0 1	9,005,520	U		10				

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): I N D 0 0 6 3 7 6 3 6 2 — F/A: . C: 1

FOR OFFICIAL USE ONLY: W — DUP — C: 2 — DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
1	F 0 0 2	4,398	T	S 0 1	S 0 2			
2	F 0 0 3	11	T	S 0 1				
3	F 0 0 5	375	T	S 0 1	T 0 1			
4	K 0 2 2	19,320	T	S 0 1				
5	D 0 0 6	10	T	T 0 1	S 0 1			
6	D 0 0 2	45,647	T	T 0 1	S 0 1			
7	D 0 0 3	64,310	T	S 0 2				
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

V. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

F I N T 0 0 6 3 7 6 3 6 2 T/A C 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
37 54 038	087 55 020

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code &*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

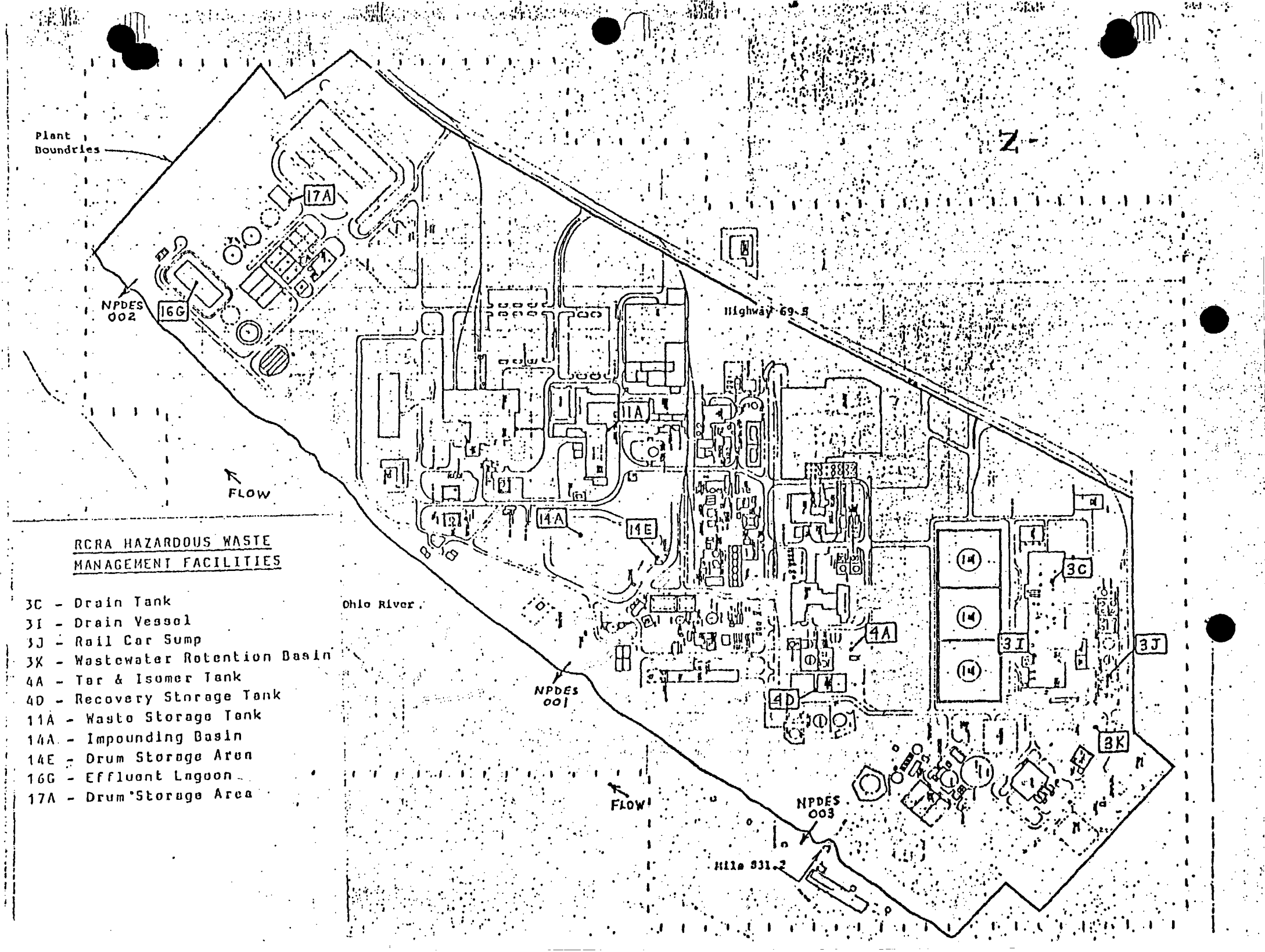
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Mr. D. Rex Blanchard, General Manager, Lexan Products Division	D. Rex Blanchard	4/5/83

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Mr. L. Donald Simpson Site Manager	L. Simpson	4/4/83

CONTINUE ON PA



RCRA HAZARDOUS WASTE MANAGEMENT FACILITIES

3C - Drain Tank
3I - Drain Vessel
3J - Rail Car Sump
3K - Wastewater Retention Basin
4A - Tar & Isomer Tank
4D - Recovery Storage Tank
11A - Waste Storage Tank
14A - Impounding Basin
14E - Drum Storage Area
16G - Effluent Lagoon
17A - Drum Storage Area

JAN 23 1987

5HS-13

Richard L. Monty, Manager
Environmental Operations
General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620

Re: Notice of Deficiency
RCRA Part B Permit Application
IND 006376362

Dear Mr. Monty:

Federal regulations promulgated November 7, 1986, as required by the 1984 Hazardous and Solid Waste Amendments (HSWA), prohibit the land disposal of certain solvent wastes. These land disposal regulations became effective on November 8, 1986. Land disposal, as defined in these regulations and in HSWA, includes any surface impoundment, landfill, land treatment unit, and waste pile, as well as other operations.

Our records show that the General Electric Company operates surface impoundments at its Mt. Vernon facility, for the storage of F001-F005 solvent wastes. This is now prohibited. If the concentration of such wastes is below 1% in the wastewater reaching these impoundments, 40 CFR §268.30(a)(3) may allow a time extension before the prohibition becomes effective. However, it appears that closure of these impoundments will be necessary after November 8, 1988.

As you are aware, the Indiana Department of Environmental Management (IDEM) is currently reviewing your application for a hazardous waste storage permit under the Resource Conservation and Recovery Act (RCRA). Closure of these impoundments and the related changes to the processes will need to be incorporated into that application. Therefore, you must alter the closure plan and other affected areas of your RCRA application to reflect your plans regarding the surface impoundments and process wastes at the Mt. Vernon facility. Please submit copies of the modified permit applications within 45 days of the date of this letter. Copies should be sent both to this agency and to the IDEM.

If you have any questions on this matter, please call Mr. Gary Victorine of my staff, at (312) 886-1479.

Sincerely,

Karl E. Bremer, Chief
Technical Programs Section

cc: Guinn Doyle, IDEM

5HS-13:G.Victorine:fr:1/12/87:Disk #1

5HS-13

Richard L. Monty, Manager
Environmental Operations
General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620

Re: Notice of Deficiency
RCRA Part B Permit Application
IND 006376362

Dear Mr. Monty:

Federal regulations promulgated November 7, 1986, as required by the 1984 Hazardous and Solid Waste Amendments (HSWA), prohibit the land disposal of certain solvent wastes. Land disposal, as defined in these regulations and in HSWA, includes any surface impoundment, landfill, land treatment unit, and waste pile, as well as other operations.

Our records show that the General Electric Company operates surface impoundments at its Mr. Vernon facility, for the storage of F001-F005 solvent wastes. This is now prohibited. If the concentration of such wates is below 1% in the wastewater reaching these impoundments, 40 CFR §268.30(a)(3) may allow a two years extension before the prohibition becomes effective. However, it appears that closure of these impoundments will be necessary after November 8, 1988.

As you are aware, the United States Environmental Protection Agency (U.S. EPA) and the Indiana Department of Environmental Management (IDEM) are currently reviewing your application for a permit under the Resource Conservation and Recovery Act (RCRA). Closure of these impoundments and the related changes to the processes will need to be incorporated into that application. Therefore, you must alter the closure plan and other affected areas of your RCRA application to reflect your plans regarding the surface impoundments and process wastes at the Mr. Vernon facility. Please submit copies of the modified permit applications within 45 days of the date of this letter. Copies should be sent both to this agency and to the IDEM.

If you have any questions on this matter, please call Mr. Gary Victorine of my staff, at (312) 886-1479.

Sincerely,

Karl E. Bremer, Chief
Technical Programs Section

cc: Guinn Doyle, IDEM

5HS-13:G.Victorine:fr:1/12/87:Disk #1

cm 1-22-87

TYP.	AUTH.	IL. CHIEF	IN. CHIEF	MI. CHIEF	MN/WI CHIEF	OH. CHIEF	TPS CHIEF	SWB CHIEF	W
1/12/87	1/12	/	1/21/87	/	/	/	1/22/87		

State Form 4336

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS

OFFICE MEMORANDUM

DATE: January 6, 1987

TO: General Electric File
IN0006376362, Posey County, 3B

THRU: Harry E. Atkinson HEA. 1/9

FROM: Dean J. Nygard DJN 1/8/87

SUBJECT: RCRA NPL Listing Policy

According to the RCRA NPL listing policy of June 10, 1986 (51 FR 21057-21062 and 21109-21112) facilities seeking a final RCRA permit will be addressed through RCRA corrective action authorities.

General Electric is listed as a TSD on the most recent RCRA Notifiers List and is therefore excluded from further NPL consideration at this time.

Posey County
General Electric

Facility name: General Electric Company Landfill

Location: Mount Vernon, Indiana

EPA Region: FIVE

Person(s) in charge of the facility: Frank Basile, Manager of Environmental Control

Name of Reviewer: Nick Longo Date:

General description of the facility:

(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)

This facility is a landfill located within the General Electric complex. The complex is very secure. Hazardous substances produced by the production of plastics are believed to have been disposed in the landfill but it is not known what exactly was disposed.

Scores: $S_M = 13.45$ $S_{gw} = 23.27$ $S_{sw} = 0$ $S_a = 0$

$S_{FE} = 0$

$S_{DC} = 0$

FIGURE 1
HRS COVER SHEET

MAR 2 1 1986

SHS-13

Guinn Doyle, Chief
Hazardous Waste Management Branch
Division of Land Pollution Control
Indiana State Board of Health
1330 West Michigan Street
Post Office Box 1964
Indianapolis, Indiana 46206-1964

RE: Part B Files and Information
General Electric, Mt. Vernon
IND 006376362

Dear Mr. Doyle:

We are herewith transmitting the following materials from our files as requested for the above referenced facility:

* Part B docket log
* Completeness checklist

Should you need additional material from Region V for your use in reviewing the Part B application or preparing a permit, please contact my office.

Sincerely,

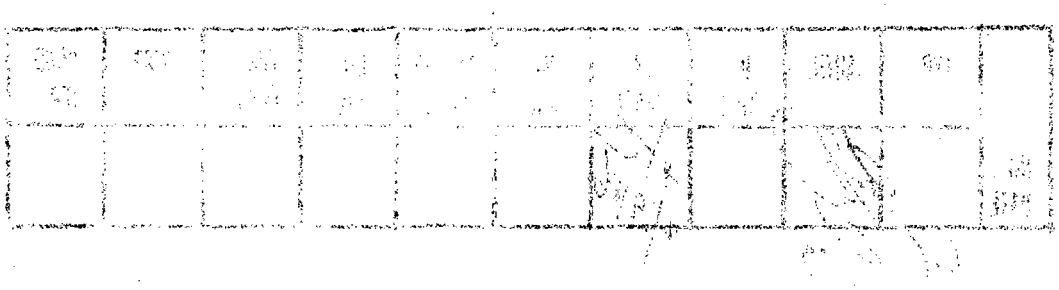
Dae K. Cho
Chief, Indiana Unit

Enclosures

hcc: Pat Vogtman
Part B Docket

SHS/Victorine:vc

	TVP	AUTH.	IL	JH	MI	Disk	JR	IPS	WMB	WMB
			CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	CHIEF	DIR
INIT.										
DATE	3/19			3/19/86						



FILE

MAY 1 7 1985

5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M. A. Miller, Process Engineer
General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620

Re: Additional New Requirements
Hazardous and Solid Waste
Amendments of 1984 (HSWA)

General Electric Company
IND 006376362

Dear Mr. Miller:

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (HSWA) were signed into law. These Amendments add a number of requirements for your facility which must be addressed before we can issue a permit. A formal request for the submittal of Part B of the Resource Conservation and Recovery Act (RCRA) permit application for treatment, storage, or disposal of hazardous waste had already been made for the above-referenced facility.

The purpose of this letter is to notify you that your RCRA Part B Permit Application must be revised to incorporate the requirements of the Hazardous and Solid Waste Amendments of 1984. The revisions to your Part B application should be submitted no later than August 8, 1985.

This request for a revision to your RCRA Part B permit application and the associated due date of August 8, 1985, for submitting your revisions are related only to the new requirements brought about by the 1984 Amendments. In the meantime, the review and processing of the Part B application you have already submitted will continue and you may be required to make corrections and revisions to your original Part B application that will need to be submitted prior to August 8, 1985.

Enclosed, for your information, is a fact sheet, a brief guidance document, and a copy of selected statute sections on the new requirements. I urge you to examine the enclosures as soon as possible, because target dates under HSWA begin as early as May 8, 1985. For two of the new requirements, exposure assessments and the double liner requirements, additional guidance being developed by EPA Headquarters will be provided to land disposal permit applicants as soon as they become available.

Please contact the previously identified permit writer with our Agency for additional information.

Sincerely yours,

David A. Stringham, Acting Chief
Solid Waste Branch

Enclosures

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	VG		VC				DAS	
DATE	5/17/85		5/17/85			5/22	5/24	

MAY 3 1985

5HS-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M.A. Miller, Process Engineer
General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620

RE: Corrective Action Requirements,
Hazardous and Solid Waste
Amendments of 1984
General Electric Company
IND 006376362

Dear Mr. Miller:

As you know, we are currently reviewing Part B of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the Amendments) were enacted to modify RCRA. Under Section 206 (copy enclosed) of the Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2.

Consequently, we must determine whether such releases have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken, pursuant to a RCRA permit. An important part of our determination includes your willingess (or unwillingness) to sign the enclosed certification statement. Please read it carefully and either sign it and return it, or return it to us unsigned with a cover letter of explanation, within three weeks of the date of this letter. Any information regarding releases of hazardous waste or hazardous constituents to the environment will be evaluated during the permit review process. Any tentative decision we make concerning your permit application will be public noticed in a newspaper of general circulation in the area of the facility.

Please contact the previously identified permit writer with our Agency for additional information.

Sincerely yours,

Karl J. Klepitsch, Jr.
Chief, Solid Waste Branch

5/3/85
Crp

Enclosures

	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMD DIRECTOR
INITIALS	5/1/85							
DATE		5/3	4/30/85			5/3/85		

Section II

MAY 6 1985

5HS-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

M.A. Miller, Process Engineer
General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620

RE: RCRA Permit Application
IND 006376362

Dear Mr. Miller:

Thank you for submitting Part B of your permit application for the hazardous waste activities at the Mt. Vernon facility. My staff has reviewed your application for completeness pursuant to the regulatory requirements given in 40 CFR Parts 122, 264, and 270.

Our review indicates that there are requirements which have not been addressed in your application. Enclosed is a list of the specific omissions and questions. This information must be submitted before the application can be considered to be complete. Upon receipt of this information we will continue review of your application. The submission is due 40 days from the date of this letter.

Please contact Mr. Gary Victorine of my staff at (312) 886-1479 if you have questions concerning this matter.

Sincerely yours,

Edith M. Ardiente, P.E.
Chief, Technical Programs Section

Enclosure

cc: Guinn Doyle, ISRM
Mr. Donald Simpson, GE

INITIALS	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	BRG CHIEF	CMB CHIEF	WMD DIRECTOR
DATE	4/29/85	4/30/85	4/30/85			5/3/85		

bcc: Victorine (2)

Sec X 3

STATE of INDIANA

STATE BOARD OF HEALTH

AN EQUAL OPPORTUNITY EMPLOYER

INDIANAPOLIS

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

RECEIVED
APR 25 1985
WMD-RAIU
EPA, REGION V

April 18, 1985

RECEIVED
APR 22 1985
HWEB

Mr. William Miner, Chief
Technical, Permits, and Compliance Section
U.S. EPA, Region V
230 South Dearborn Street
Chicago, IL 60604

Dear Mr. Miner:

Re: Part B Completeness Review
General Electric Company
Mount Vernon, Indiana
IND 006376362

The Part B completeness review has been conducted for the above-mentioned facility. The review was begun on March 18, 1985, and completed April 4, 1985. The time spent reviewing the application was approximately 20 hours. A total of 17 items were checked as not being provided or incomplete. Copies of both the checklist and the Notice of Deficiency are enclosed.

If you have any questions in regard to this matter, please contact Ms. Jenny Ranck at AC 317/243-5089.

Very truly yours,

Terry F. Gray

Terry F. Gray, Chief
Plan Review and Permit Section
Hazardous Waste Management Branch
Division of Land Pollution Control

JLR/tr
Enclosures
cc: Mr. Hak Cho, U.S. EPA, Region V
Mr. Ken Burch, U.S. EPA, Region V

COPY 2

General Electric-Mount Vernon
Notice of Deficiency
Completeness Review
IND 006376362

Part A Requirements

1. Provide photographs of the facility clearly delineating all existing treatment, storage, and disposal areas, and sites of future treatment, storage, and disposal areas (270.13(h)(2)).

Preparedness and Prevention Documentation

2. Document personnel access to a device, such as a telephone (immediately available at the scene of operation) capable of summoning external emergency assistance (264.34(b)).

3. Document arrangements agreed to by local police and fire departments and hospitals and describe steps taken to familiarize these agencies with the layout of the facility, properties of hazardous waste handled at the facility, places where facility personnel would normally be working, entrances to and roads inside the facility, and possible evacuation routes (264.37, 264.52(c)).

4. Provide documentation of agreements designating primary emergency authority to a specific police and a specific fire department, and agreements with any others to provide support to the primary emergency authority (264.37(a)(2)).

Contingency Plan

5. The contingency plan lists names, addresses, and phone numbers for a number of people called "Staff Duty Officers," however, the plan states that the people who actually coordinate actions in an emergency situation are the "Area Emergency Coordinators," for whom no names or addresses are given. The plan must list names, addresses, and phone numbers of all persons qualified to act as emergency coordinators. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates (264.52(d)).

6. The plan must include a list of all emergency equipment at the facility and the location and a physical description of each item on the list with a brief outline of its capabilities (264.52(e)).

7. Describe evacuation routes and alternate evacuation routes (in cases where the primary routes could be blocked by releases of hazardous waste or fires) to be used during an emergency (264.52(e)).

8. Describe the location of the facility's copy of the contingency plan and document the submittal of the plan to all local police departments, fire departments, hospitals, and local emergency response teams that may be called upon to provide emergency services (264.53).

9. Identify the person responsible and authorized to change or amend the contingency plan (264.54).

Traffic Documentation

10. Describe waste movement routes (270.14(b)(10).

Closure Plan

11. Identify the maximum extent of the operation which will be unclosed during the life of the facility (264.112).

12. Identify the person responsible for the updating of the facility copy of the closure plan (264.113).

13. Describe the procedure used to update all other copies of the closure plan (264.113).

Topographic Map

14. The topographic map should show a distance of 1,000 feet around the facility at a scale of not more than one inch equals 200 feet. The map provided does not have the proper scale (270.14(b)(19)).

15. The topographic map should show any surface waters and any intermittentstreams (270.14(b)(19)).

16. Areas designated for loading and unloading hazardous wastes need to be shown on the map (270.14(b)(19)).

17. Show barriers for drainage or flood control (270.14(b)(19)).

JLR/sk

sk 1858B 4/15/85

GENERAL ELECTRIC

LEXAN PRODUCTS DIVISION
GENERAL ELECTRIC COMPANY • HIGHWAY 69 S • MT. VERNON, INDIANA 47620-9364 • (812) 838-7000

February 28, 1985

RECEIVED
MAR 06 1985
WMD-RAIU
EPA, REGION V

RCRA Activities
Part B Permit Application
U. S. Environmental Protection Agency
Region V
Post Office Box A3587
Chicago, IL 60690-3587

Gentlemen:

SUBJECT: General Electric Company - IND006376362

Pursuant to 40 CFR 270.10, the General Electric Company hereby submits four (4) copies of Part B of the permit application for its Mt. Vernon, Indiana Facility.

If you should have any questions concerning this application, please contact Mike Miller at (812) 838-7964.

Very truly yours,

David K. Perkins

David K. Perkins

DKP/ddh

Enclosures

cc: David Lamm, Indiana State Board of Health
L. D. Simpson, General Manager

COPY

AUG 24 1984

5HW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Frank J. Basile, Jr., Manager
Environmental Control
General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620

Re: General Electric Company
One Lexan Lane
Mount Vernon, Indiana 47620
IND006376362

Dear Mr. Basile:

By now you should have received an acknowledgement of our receipt of the Part A permit application material for the above-referenced hazardous waste facility under the Resource Conservation and Recovery Act (RCRA) permit program. Accordingly, this letter constitutes the next step in the formal process leading toward issuance or denial of a RCRA permit. Under the authority of 40 CFR 270.10, this is a formal request for submittal of Part B of the permit application for the above-referenced facility.

Enclosed is a copy of 40 CFR 270.14, which lists the items required for submitting the Part B permit application for the facility. The Part B application must be submitted in quadruplicate and postmarked no later than February 28, 1985. The original and 3 copies of the application must be sent to the United States Environmental Protection Agency (U.S. EPA) at the address below. Please uniquely number each page of the application including all attachments (maps, specifications, etc.). A certification statement identical to the one stated in 40 CFR 270.11(d) must accompany the application and all additional submittals. Send your application to the following address:

RCRA ACTIVITIES
Part B Permit Application
U.S. EPA, Region V
P.O. Box A3587
Chicago, Illinois 60690-3587

We are committed to conducting the RCRA permitting process as efficiently as possible. Consequently, I suggest you contact Mr. Gary Victorine of my staff, at (312) 886-1479, as you begin preparing your application. Mr. Victorine will be available to discuss specific needs of your application or to meet with you in Chicago. These efforts are intended to generate complete applications, without requiring any information beyond that which is necessary to make RCRA permit decisions.

Failure to furnish the complete Part B permit application by the above date, and to provide in full all required information, is grounds for termination of interim status under 40 CFR 270.10.

Information in the Part B permit application can be disclosed to the public, according to the Freedom of Information Act and U.S. EPA Freedom of Information regulations. If you wish, however, you may assert a claim of business confidentiality by printing the word "Confidential" on each page of the application which you believe contains confidential business information. All incoming materials containing confidential business information should be sent in a double envelope--one envelope inside the other. The inner envelope is to be addressed to the Docket Control Officer (DCO) with the following instructions: "to be opened only by the DCO."

U.S. EPA will review business confidentiality claims under regulations in 40 CFR Part 2, and may later request substantiation of such claims. Please review these rules carefully before making a claim. If you claim parts of your application as confidential, please provide us with a public information copy of the application. The public information copy must be identical to the full application with the exclusion of the confidential information.

We have also enclosed a copy of 40 CFR Part 264, which includes technical standards for the operation of treatment, storage, and land disposal facilities. These standards will become applicable to your facility upon issuance of a RCRA permit by U.S. EPA. A copy of our "Guidance For Permit Application Preparation" and "Part B Completeness Checklist" are also enclosed, they will help you in preparing a comprehensive and complete permit application.

We will coordinate review of the application with the Indiana State Board of Health (ISBH), and will strive for the simultaneous issuance of Federal and State hazardous waste facility permits. It is possible that during the processing of the application, the State hazardous waste program may become authorized to issue RCRA permits for your type of facility. In that case, direct Federal processing will cease, and ISBH in lieu of U.S. EPA will make the final determination on your permit application.

We look forward to receiving your Part B permit application.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures: 40 CFR 270 (applicable parts)
40 CFR 264 (applicable parts)
Guidance For Permit Application Preparation
Part B Completeness Checklist

cc: David Lamm, ISBH
D. Rex Blanchard, General Manager
L. Donald Simpson, Site Manager

bcc: Part A file
Ken Burch, GMCU

5HW;Hamper/mg 7/19/84

	TYPIST 4	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	WMB DIRECTOR
INITIALS		7-19-84						
DATE	7-19-84		7/19/84			8/22/84		

JS 7-20-84

BMR 8/22/84 BR BS

16

MAR 24 1983

SHW-13

Mr. L. Donald Simpson
Site Manager
General Electric Company
Lexan Lane
Mount Vernon, Indiana 47620

RE: IND006376362

Dear Mr. Simpson:

Your letter of January 14, 1983, requested the removal of two hazardous waste management units from your Part A Hazardous Waste Permit Application. The letter stated that your deep well injection and deep well storage tank did not handle a listed hazardous waste or a characteristic hazardous waste. This change has been made and your file updated.

Please feel free to contact Dr. David Homer of my staff, at (312) 886-3790, if you need any further assistance. Thank you for your cooperation in this matter.

Sincerely,

DJB for

William H. Miner, Chief
Technical, Permits and Compliance Section

cc: Guinn Doyle - ISBH

bcc: Rich Shandross

INITIALS	TYPIST	AUTHOR	STU #1 CHIEF	STU #2 CHIEF	STU #3 CHIEF	TPS CHIEF	WMB CHIEF	D...
DATE	3/23/83	3/23/83			WEM 3/23/83	Act DJB 3-24-83 (DMR 3/24/83)		

5HW-13:DHomer:THaywood:3/23/83

GENERAL ELECTRIC

PLASTICS BUSINESS OPERATIONS

GENERAL ELECTRIC COMPANY, LEXAN LANE, MOUNT VERNON, INDIANA 47620
Phone (812) 838-4311

IN

1C1d

March 31, 1983

M

Mr. David H. Homer
U. S. Environmental Protection Agency
Region V
Waste Management Branch
230 South Dearborn
Chicago, IL 60604

Dear Mr. Homer:

SUBJECT: Removal of HWMF's from RCRA Part A Permit Application,
ID Number IND006376362 PA, G, TRS, TSD, UIC

The General Electric Company is requesting the removal of eleven (11) HWMF's (See Attachment A) from the present RCRA permit application for its Mt. Vernon, Indiana site. The eleven (11) facilities are various tanks and sumps which are part of the wastewater flow stream. These facilities handle neither a listed hazardous waste or a characteristic hazardous waste. Therefore, these facilities should not be included in our application.

Enclosed is a revised Form 3 and two (2) new site maps to reflect the changes which should be made to our application.

If you have any questions concerning this request, please contact Michael A. Miller at (812) 838-7964.

Sincerely,

L. Donald Simpson
Site Manager

LDS/ddh

cc: Guinn Doyle - ISBH
Frank J. Basile, Jr.
Michael A. Miller

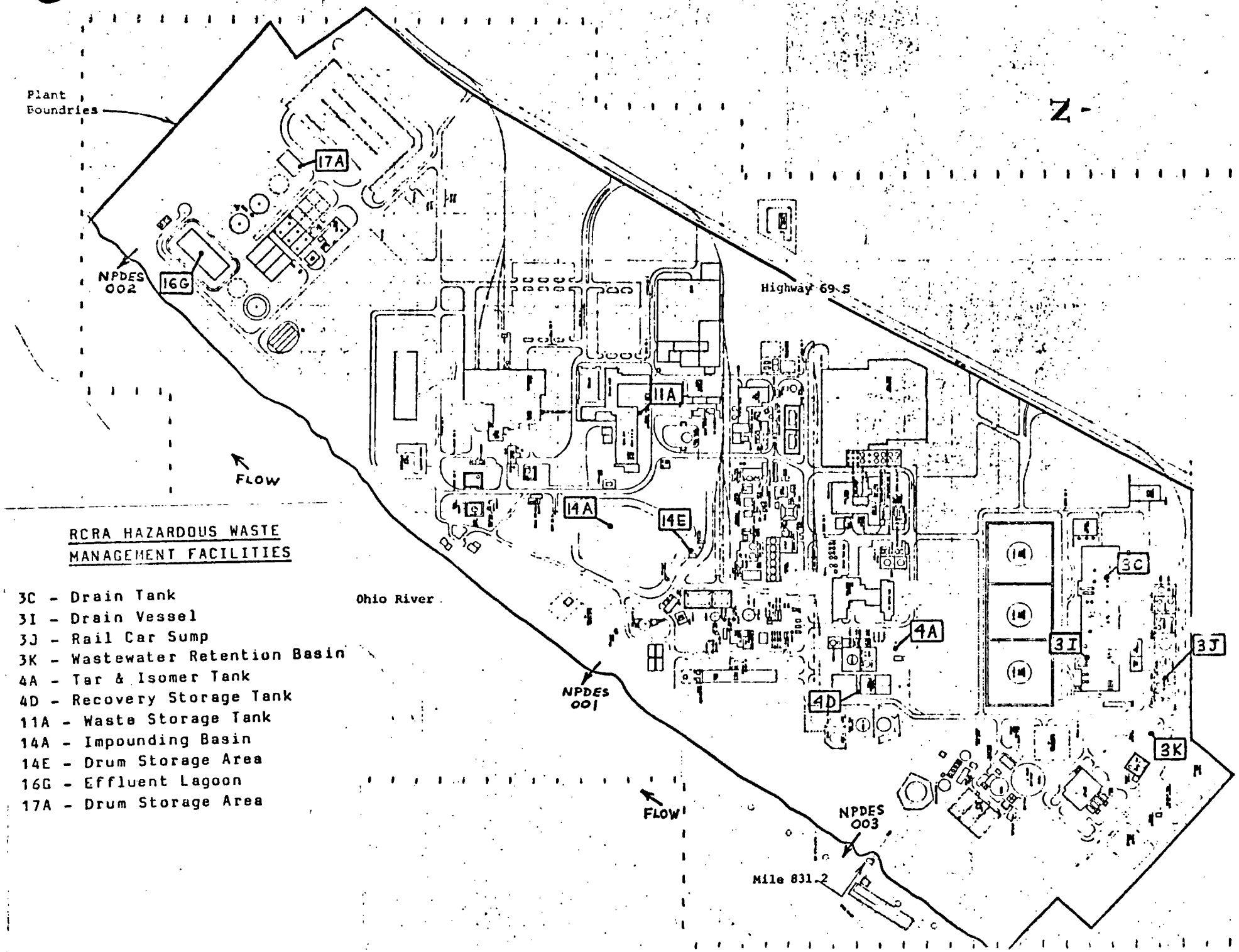
RECEIVED

RECEIVED
APR 08 1983
WASTE MANAGEMENT BRANCH

ATTACHMENT A

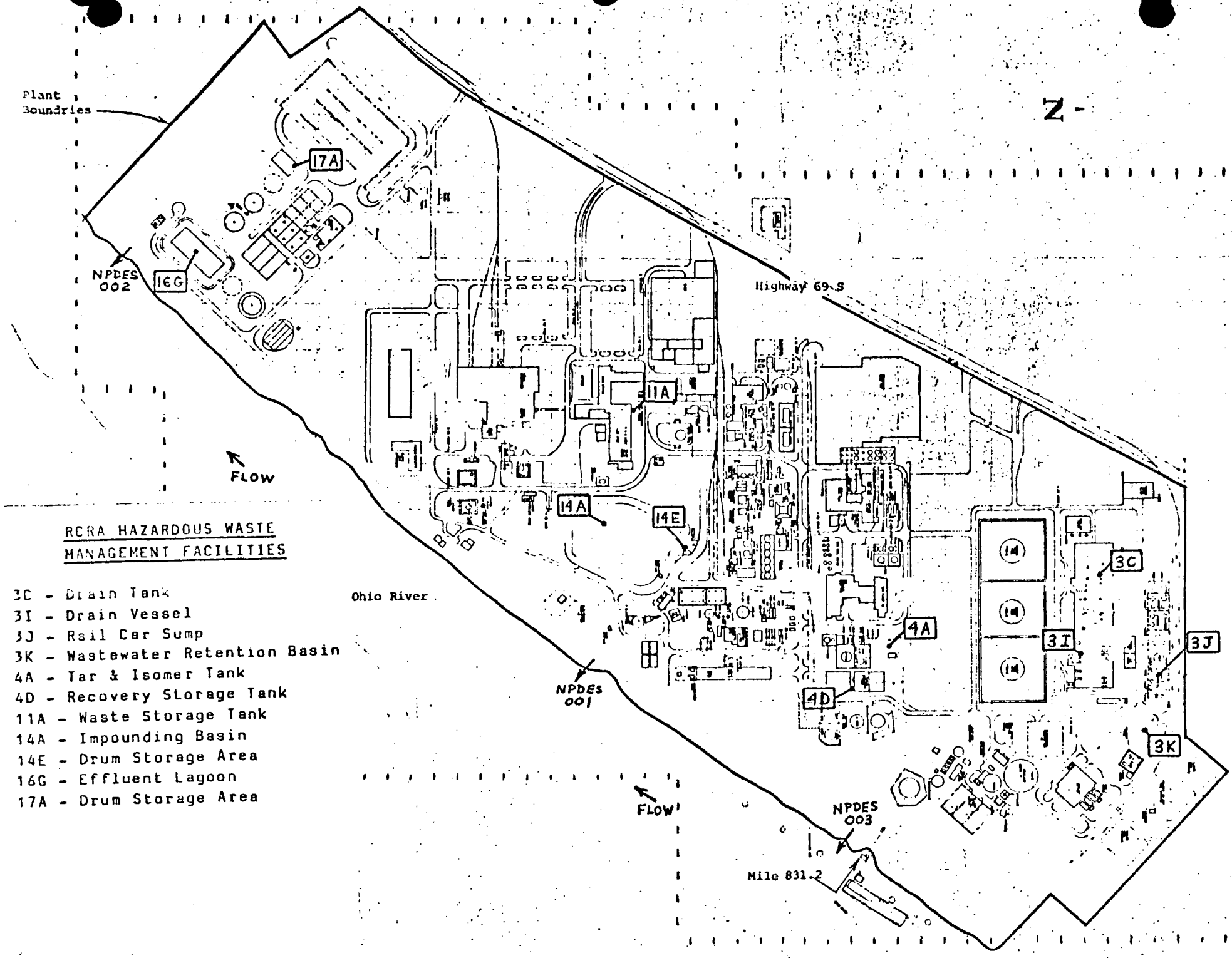
FACILITIES TO BE DELISTED

3A - Feed Tank
3B - pH Adjustment Tank
3E - Aqueous Sump
3F - Wastewater Impounding Tank
3G - API Separator
3H - Slop Oil Drum
4C - Recovery Feed Neutralization Sump
12D1 - East Sump
12D2 - South Sump
13A - Carbon Absorber
13C - Sump



RCRA HAZARDOUS WASTE MANAGEMENT FACILITIES

3C - Drain Tank
3I - Drain Vessel
3J - Rail Car Sump
3K - Wastewater Retention Basin
4A - Tar & Isomer Tank
4D - Recovery Storage Tank
11A - Waste Storage Tank
14A - Impounding Basin
14E - Drum Storage Area
16G - Effluent Lagoon
17A - Drum Storage Area


Plant Boundries
17A
NPDES 002
16G
Highway 69 S
11A
FLOW
14A
14E
RCRA HAZARDOUS WASTE MANAGEMENT FACILITIES
3C - Drain Tank
3I - Drain Vessel
3J - Rail Car Sump
3K - Wastewater Retention Basin
4A - Tar & Isomer Tank
4D - Recovery Storage Tank
11A - Waste Storage Tank
14A - Impounding Basin
14E - Drum Storage Area
16G - Effluent Lagoon
17A - Drum Storage Area
Ohio River
NPDES 001
4A
4D
3C
3I
3J
3K
FLOW
NPDES 003
Mile 831.2

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

☐ 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(enter boxes to the left)*

YR.	MO.	DAY

☐ 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

☒ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	11,000	G		7				
2	S 0 2	1,410,425	G		8				
3	S 0 4	10,800,000	G		9				
4	T 0 1	9,005,520	U		10				

IV. DESCRIPTION OF HAZARDOUS WASTES

A. **EPA HAZARDOUS WASTE NUMBER** – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. **ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. **UNIT OF MEASURE** – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. **PROCESSES**

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

CONTINUE ON PAGE 3

D. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 33	34	27 - 29	27 - 29	27 - 29	27 - 29	
1	F002	4,398	T	S01	S02			
2	F003	11	T	S01				
3	F005	375	T	S01	T01			
4	K022	19,320	T	S01				
5	D006	10	T	T01	S01			
6	D002	45,647	T	T01	S01			
7	D003	64,310	T	S02				
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
	23 - 26	27 - 33	34	27 - 29	27 - 29	27 - 29	27 - 29	

EPA Form 3510-3 (6-80)

CONTINUE ON REVE

EPA I.D. NO. *(enter from page 1)*

S													T	N	C
F	I	N	D	0	0	6	3	7	6	3	6	2			6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 3 a sketch or drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground-level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
37 54 038	087 55 020

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code &)*
E	

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Mr. D. Rex Blanchard, General Manager, Lexan Products Division	D. Rex Blanchard	4/5/83

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Mr. L. Donald Simpson Site Manager	L. Donald Simpson	4/4/83

CONTINUE ON PAGE

GENERAL ELECTRIC

GENERAL ELECTRIC COMPANY, LEXAN LANE, MOUNT VERNON, INDIANA 47620
Phone (812) 838-4311

PLASTICS
BUSINESS
OPERATIONS

March 4, 1981

RECEIVED
MAR - 9 1981
WASTE MANAGEMENT BRANCH
EPA, REGION V

Mr. Richard A. Shandross
USEPA Region V
Trans Union Building, 16th Floor
111 West Jackson Blvd.
Chicago, Illinois 60604

Subject: New Temporary Storage Facility RCRA Permit Requirements

Dear Mr. Shandross:

We are planning to construct a drum staging facility. This facility will be used for temporary storage of hazardous waste drums prior to disposal. It will also be used to store clean drums prior to use. We presently maintain two separate areas for these purposes. The new staging area will centralize our handling and provide upgraded facilities.

As per our conversation of February 4, 1981, we are requesting a determination, with appropriate justification, for the permit application requirements under RCRA. If you require additional information to make the determination, please contact me at (812) 838-7563.

Very truly yours,

Bennie L Underwood

Bennie L. Underwood
Process Engineer, Environmental Control

BLU/dk

spoke w/ M. Miller 4/1/81

mtg w/ MM BO 4/10/81
new letter forthcoming

104

Responsiveness Summary
Regarding Issuance of a Solid Waste Management Permit
for the
Proposed General Electric Building 61 Solid Waste Incinerator
Posey County, Indiana

This document contains the responses of the Indiana Department of Environmental Management (IDEM) staff to comments provided on the technical merits of the proposed General Electric Building 61 Solid Waste Incinerator. The application for the subject incinerator was submitted to the IDEM on January 25, 1988. Additional information was submitted to the IDEM on April 7, May 26, June 7, and June 30, 1988. A public hearing was held regarding the issuance of a permit for the incinerator on September 1, 1988.

General Electric Building 61 Solid Waste Incinerator

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Source Reduction/Waste Minimization	3
Dioxins	4
Ash/Residue	6
Future Use/Plans	7
Agencies' Responsibilities/Authority	8
Feedstream/Operation	9

Introduction

The Indiana Environmental Management Act (EMA) requires the Indiana Department of Environmental Management (IDEM) to develop standards and regulations to preserve, protect, and enhance the quality of the environment and to ensure compliance with its standards and regulations. The regulation which has been developed to manage solid waste disposal is Rule 329 IAC 1.5; the regulation to manage hazardous waste disposal is Rule 329 IAC 3.

Regulations and standards function not only to tell people what cannot be done, but also to tell businesses and the general public what can be done. Therefore, these regulations allow a business to plan and to invest money with some knowledge of what will be required.

Rule 329 IAC 1.5 requires that the IDEM make a determination on the acceptability of the proposed solid waste facility with regard to the protection of the public health and the environment. Rule 329 IAC 1.5 also sets forth standards and requirements for the construction and operation of incinerators. The IDEM is not given authority to consider other issues by law or regulation. Consequently, not all issues of concern to those who commented on the proposal are within the scope of the IDEM's authority to use as a basis for its permit decision.

All written comments submitted relative to the technical merits of the proposed facility's solid waste permits have been responded to in this document. Similar comments have been grouped together into one comment, and received a combined response.

Source Reduction/Waste Minimization

Comment #1. What is IDEM doing to require source reduction? Has General Electric (GE) or IDEM considered recycling? Recycling, waste reduction, waste exchanges, and substitution for less toxic alternatives should be encouraged by IDEM before any permits are granted. The State should require a waste audit from GE to ensure maximum waste reduction. We want to know specifically what GE has done to eliminate the need for this incinerator.

Response: The prevention of waste production as opposed to "end-of-pipe" treatment offers many advantages, and is being recommended at many levels (e.g., the Congressional Office of Technology Assessment). Nonetheless, details of the actual implementation of source reduction/waste minimization have not been developed, nor have laws and regulations. Staff, therefore, can only encourage applicants to consider waste prevention to the maximum extent possible before processing and disposal. The IDEM is currently looking at waste prevention and reduction practices in the context of the development of a State solid waste management plan.

Dioxins

Comment #2. Is there any difference between a hazardous waste incinerator and a municipal waste incinerator in terms of the amount of dioxins and furans emitted? We should be aware that these toxins will be emitted from the (GE) incinerators.

Response: The IDEM staff feels that due to the relatively recent emergence of dioxins as a worldwide concern, in response to this comment we must first try to put the dioxin situation into the global perspective. 2,3,7,8-Tetrachlorodibenzo-para-dioxin is the most toxic of the dioxin isomers, and is usually the isomer referred to simply as dioxin, or TCDD. According to Reference #1, TCDD is not produced anywhere as a pure material, but only as a contaminant in certain processes; for example, as a contaminant in some herbicides such as 2,4,5-T. Alkaline hydrolysis above 180° C can form TCDD, as can burning of coal (as in a coal-fired power plant) or municipal wastes (usually forming minute amounts of TCDD). The burning of wood preserved with chlorinated organics (common wood preservatives) is also thought to be a substantial source of Dioxins in the environment. According to another source (Reference #2), "The findings point to the existence of a more wide-spread source for the input of dioxins and furans into the environment than the effluents from municipal waste incineration (MWI) can provide." The same article also states that, "At the time being the environmental pattern of dioxins and furans can be correlated with both sources, MWI effluents as well as motor-vehicle effluents. However, the non-point source character of motor vehicles should strongly recommend this source for consideration as a major environmental input. Whether the dioxins and furans found in motor oil and muffler particulates are formed in reactions of additives, e.g. dichloroethane, pentachlorophenate or others, or are correlated with basic combustion chemistry of the hydrocarbons is still open to discussion. To what extent motor-car traffic contributes to the total input of dioxins/furans into the environment has yet to be determined." In the previous source (Reference #1), the authors also state that it has been theorized that TCDD (as well as other dioxins) can be produced in <u>any</u> combustion mixture containing carbon, hydrogen, oxygen, and chlorine above 400° C (725° F).

In response, therefore, to the first part of the question, the difference in the amount or presence of dioxins/furans in hazardous waste versus municipal waste incinerators would directly depend on what was being burned, its chlorine content, what type of supplemental fuel was being used, and operating conditions in the incinerators (such as temperature, residence time, and carbon monoxide content of the stack gas).

It is not the intent of the IDEM staff to divert attention from the issue of possible dioxin emissions from this incineration facility, but, as was previously mentioned, to put it into proper perspective. Motor vehicle engines, coal-fired power plants, and other combustion sources have no operating limits placed on them by regulators for the purpose of minimizing formation of these types of organics (also called "Products of Incomplete Combustion," or PICs). The IDEM is imposing just such conditions on this, and other solid waste incinerators in Indiana. The solid waste operating permit will require a minimum temperature of 1800° F, residence time of the combustion gas of at least two (2) seconds, and a maximum allowable carbon monoxide level of 100 ppm (an indicator of combustion efficiency) for the express purpose of minimizing the formation of PICs. Staff does not have reason to believe that, under these restrictions, the proposed incinerator will pose an unacceptable threat or a threat that is greater than that posed by many other sources in our environment. The issue of dioxins emission is under intense scrutiny nationally, and IDEM may impose further requirements if necessary.

References:

1. Scientific Review Committee of the American Academy of Clinical Toxicology Report, "Commentary on 2,3,7, 8-Tetrochlorodibenzo-para-dioxin (TCDD)," Clinical Toxicology, 23 (2-3), pp. 191-204, (1985).

2. Ballschmiter, Buchert, Niemczyk, Munder, Swerev, "Automobile Exhausts versus Municipal-Waste Incineration as Sources of the Polychloro-Dibenzodioxins (PCDD) and-Furans (PCDF) Found in the Environment," Chemosphere, 15(7), pp. 901-915, (1986).

Comment #3. Will GE be willing to test for dioxins and furans at their own expense? How often will these tests be made public? Who will test for heavy metals, and how often?

Response: GE has offered to stack test the units for dioxins and furans during their stack tests required for compliance with their State air permits. The results of all tests will be reported to the IDEM, and will be available to the public.

Comment #4. IDEM should guarantee the kind of monitoring done during the test burn and afterwards for dioxins, and check if dioxins enter the waste stream before burning.

Response: As stated in the response to Comment #3 above, GE will stack test for dioxins and furans during their compliance tests. Since a continuous in-line dioxin/furan monitor has not yet been invented, the IDEM feels that the monitoring of (and permit limits set on) temperature, residence time of the combustion gases, and carbon monoxide concentration are the surest way to check the incinerator operation. The operating conditions, stated in the response to Comment #2, were set using the most recent experimental and operating data available. The IDEM staff believes that meeting these conditions will necessitate an operating environment that is not conducive to the formation of dioxins and furans in the incinerator. As stated in the response to Comment #17, IDEM staff chemists and engineers have studied the complete list of feed materials, and have determined that none are hazardous, as defined in 329 IAC 3.

Comment #5. We want IDEM to monitor and regulate dioxins and furans that come from this unit.

Response: As previously mentioned, the stack emissions will be sampled and analyzed for dioxins and furans. IDEM has no direct emission standards yet for dioxins and furans; however, operating parameters and indicators of combustion efficiency will be set by the permit and monitored.

Ash/Residue

Comment #6. It has been reported that incinerator ash contains dangerous levels of cadmium, lead, and dioxins. Despite tests, EPA says it is planning to recommend that ash not be treated as hazardous (waste). Neither the dioxins nor the toxicity of the ash were considered, and, therefore, the permit should be denied. Ash and residues exiting the incinerator will almost certainly be toxic, so IDEM must develop a procedure to test and monitor residue disposal.

Response: The EPA position referred to above pertains to an incinerator that may have its ash exempted from hazardous regulation only if two conditions are met: first, it must burn only household refuse (no industrial or commercial); and second, it must have resource recovery (steam or electricity generation). Since the GE incinerator burns only industrial and commercial refuse, and has no resource recovery, its ash must be tested prior to disposal for RCRA characteristics, and handled accordingly.

Comment #7. Is ash more dangerous than the raw waste from which it came?

Response: The EPA has so far developed only a single method to characterize how "dangerous" a material is, and that is to classify it as "hazardous" or "non-hazardous." A material will be declared "hazardous" and subject to the Resource Conservation and Recovery Act (RCRA) if it either appears on the hazardous materials list in the RCRA regulations ("listed waste") or if it meets certain chemical criteria ("characteristic waste"). If a material meets neither of these conditions, it is deemed "non-hazardous." There exists no regulatory methodology at this time to assess relative "danger" between two "non-hazardous" or even two "hazardous" materials. IDEM staff have studied all the materials that GE proposes to incinerate, and have determined that none are "hazardous." Due to the reasons stated in the response to Comment #6 above, GE will have to test their ash to determine if it will be "hazardous" (as a characteristic waste) or "non-hazardous." The ash must then be handled according to the appropriate regulation.

Comment #8. Where will GE dispose of the ash, and who will be responsible for monitoring (the disposal site)? Where will the wastewater be disposed of?

Response: If the ash tests out as hazardous, it must be disposed of at a RCRA-permitted facility, subject to federal and State design, operation, and inspection standards. If the ash tests as non-hazardous, the GE application states that they intend to dispose of the ash at the McCarty Landfill, which is subject to State permitting, operation, inspection, and special waste approval standards. The actual disposal of the ash at the McCarty Landfill would be subject to review of the ash characteristics by IDEM. The wastewater from the incinerator will be directed to GE's wastewater treatment facility.

Future Use/Plans

Comment #9. What are GE's long range plans? Does GE plan to burn hazardous waste in the future? Can GE be prohibited from burning hazardous wastes in the future?

Response: An applicant's future plans are not within IDEM's jurisdiction with respect to review for a solid waste processing facility permit. If GE were to desire to process hazardous waste in the future, they would have to submit an application and be granted the permit before they would be allowed to accept the waste. This includes going through the full permit process, including public participation.

Agencies' Responsibilities/Authority

Comment #10. If these permits are granted, who will monitor the air, water, and soil for contamination? Will they have proper equipment and expertise?

Response: The permittee is responsible for monitoring some parameters while the agencies monitor and inspect others. Equipment and expertise are evaluated during permit application review and subsequent inspections.

Comment #11. (I was) never once notified that the solid waste permit hearing was going to take place after petitioning for the air permit hearing.

Response: It has been IDEM's practice to issue a public notice of any hearing in the daily newspaper of greatest circulation in the immediate area of the proposed facility. This practice is followed since the most practical assumption in the past has been that residents in the most immediate vicinity have the greatest concerns. On August 10, 1988, notice appeared in the Mount Vernon Democrat that stated as the first sentence, "Notice is hereby given that the Indiana Department of Environmental Management, Office of Air Management and Office of Solid and Hazardous Waste Management will conduct a public hearing on proposed permits . . ." The notice continues for six (6) additional paragraphs identifying the location and time of the hearing, summarizing the purpose of both air and solid waste permits, and giving information on who to contact for comments, transcripts, additional information, and copies of the proposed permits.

The IDEM has absolutely no control over where in the newspaper the notice is published--that is strictly the decision of the newspaper. The IDEM is under no obligation (and has not had as past practice) to send such public notices to individual petitioners. Staff considers the information given in the notice, and the manner in which the notice was disseminated, to be conscientious and supportive of the public participation process.

Comment #12. IDEM apparently interprets a proposed (solid waste) construction permit to mean that it can be issued sometime after construction has begun, since construction has already begun on this facility.

Response: Following the prescribed application and public participation procedures, a construction permit was issued to GE on March 27, 1985, for this facility. Since that time, GE revised the design of the unit, and therefore was required to obtain a construction permit modification (one of the subjects of the hearing) to address the design changes. The majority of the site preparation and concrete/foundation work was not affected by the design changes. This work, if not altered by the new design, is still authorized by the original construction permit. No work is authorized to begin on items covered by the new design (e.g., electrical and mechanical equipment) until this construction permit modification becomes effective.

Comment #13. We want GE, IDEM, or EPA to test the chemicals to be burned to see if any meet the criteria for characteristic RCRA waste, and then to declare this unit to be a hazardous waste incinerator.

Response: As stated in the response to Comment #17, IDEM staff has had access (as has the public) to a complete listing of material to be fed to the incinerator. After careful evaluation, staff has determined that none of the materials are hazardous under RCRA Subtitle C (hazardous waste rules). Neither IDEM nor the EPA can arbitrarily declare a facilty to be hazardous if it does not meet the classifying criteria spelled out in the existing hazardous waste regulations.

Feedstream/Operation

Comment #14. Can GE shift waste between their plant sites, making Mount Vernon the "corporate incinerator?" Can GE be restricted to treating only waste produced at the Mount Vernon site?

Response: The quantities, types, and sources of the waste to be burned are specified in the permit application. Any deviation from these quantities, sources, or types will constitute a violation of GE's solid waste permits, and subject them to an enforcement action. GE would be required to apply for a permit modification to change anything concerning their feed stream.

Comment #15. It should be made clear at what destruction level the incinerator will be operating.

Response: GE estimates that the incinerator will operate with a burnout of 85 to 88 percent. The percent burnout reflects the fraction of carbonaceous material vaporized from the original feed.

Comment #16. Despite the non-hazardous nature of the waste to be incinerated and the presence of control devices, we believe that the emissions will pose a health threat.

Response: Stack tests will be performed to ensure compliance with all applicable standards for all applicable regulated substances. GE will also voluntarily stack test for dioxins and furans.

Comment #17. The feed materials should be tested to see if they meet criteria as characteristic hazardous wastes, since they are not listed. A complete list of substances in the waste stream should be made available to the public. If some are confidential, the generic identity should be revealed. (We) suspect IDEM doesn't know what's in the waste. We want to know what chemicals are going to be burned.

Response: A complete list of feed materials is included in the GE solid waste permit application. None of this information has been classified as "Confidential" for this facility, allowing public access to the entire application. The application is available for public inspection at this office. IDEM staff chemists and engineers have studied the complete list of materials to be fed, and have determined that none are hazardous.

Comment #18 IDEM should examine the plastics and other wastes for Cadmium, Chromium, and 4-Nitrothalimid (used in plastic production and linked to birth defects).

Response: As stated in the response to Comment #17 above, a complete list of all feed materials is included in the permit application. GE reportedly performed an EP Toxicity test on the plastic resins and dust, and had results showing zero leaching of any material from the plastic, thereby passing that test. The plastics are FDA-approved (people can eat or drink from them) and so, therefore, non-toxic, reactive, etc. Since none of the plastics are listed in RCRA as hazardous, and because of the EP Toxicity and FDA information, staff views this material as non-hazardous. Due to the possible presence of metal-based pigments, IDEM will ask GE to stack test for metals used in any pigments which may be present, such as Cadmium.

Questions have also been raised concerning the burning of the spent lube oil. Although this oil is spent lube oil (not spent engine oil) and, therefore, less likely to contain an engine oil's level of contaminants, staff will require GE to test their spent lube oil before feeding it to the incinerator. RCRA sets maximum halogen and metals levels that a waste oil may contain before being considered hazardous in 40 CFR Part 266.40.

IDEM staff knows of no compound "4-Nitrothalimid," and has been unable to locate any reference to such a compound.

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