STATE OF NEBRASKA

1069063 - R8 SDMS

19

DEPARTMENT OF ENVIRONMENTAL QUALITY
Randolph Wood
Director
Suite 400, The Atrium
1200 'N' Street
P.O. Box 98922
Lincoln, Nebraska 68509-8922
Phone (402) 471-2186

E. Benjamin Nelson
Governor

JUN 3 1994

RECEIVED
JUN 06 1994
RCOM SECTION

Return Receipt Requested

C. Coffey
ASARCO Incorporated
Fifth and Douglas Streets
Omaha, NE 68102

RE: Hazardous Waste Compliance Evaluation Inspection
DEQ/EPA Identification Number: NED007257413

Dear Mr. Coffey:

Enclosed is a copy of the report for a hazardous waste compliance evaluation inspection conducted at the above referenced facility on April 27, 1994.

Please be advised that the Department is evaluating whether or not the refractory brick meets the definition of a by-product and the applicability of RCRA Subtitle C requirements to this material. If you have questions please contact Joseph Harris at (402) 471-4217.

Respectfully,

Bill Imig
RCRA Section Supervisor
Air and Waste Management Division

Enclosures
cc: L. Harrington, U.S. EPA Region VII

RCRA FILE COPY
NED007257413
DOCUMENT # 19

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NEBRASKA DEPARTMENT OF ENVIRONMENTAL QUALITY
Hazardous Waste Compliance Evaluation Inspection Report

ASARCO, Incorporated
Fifth and Douglas Streets
Omaha, NE 68102
DEQ/EPA Identification Number: NED007257413

Participating Personnel
ASARCO, Incorporated

Chuck Coffey	Environmental Engineer

Nebraska Department of Environmental Quality

Joseph Harris	Program Specialist
Kelly Danielson	Program Specialist

Introduction
On April 27, 1994, we inspected ASARCO, Incorporated (ASARCO). We arrived unannounced at the site at approximately 11:30 a.m. and met Chuck Coffey in the parking lot as he was leaving for lunch. Chuck escorted us through the gate located at the south end of the facility. I conducted a Compliance Evaluation Inspection (CEI) to confirm the generator status of the facility and ASARCO's compliance with Title 128-Rules and Regulations Governing Hazardous Waste Management in Nebraska. Kelly conducted an inspection to determine ASARCO's compliance with solid waste requirements and his findings are addressed in a separate report. Based on information provided by Mr. Coffey I determined ASARCO was a conditionally exempt small quantity generator at the time of the inspection. ASARCO has a Clean Air Act permit and Clean Water Act permit application on file with our agency.

Opening Conference
Upon our arrival at the site we met with Mr. Coffey. I presented my identification card then Kelly and I explained the purpose of the inspections. Mr. Coffey explained the handling of wastes generated at the facility. Mr. Coffey did not make a claim of confidentiality for the areas which we inspected and gave consent for us to conduct the inspection. At no time during the inspection was consent withdrawn. I reviewed hazardous waste manifests and land disposal restriction notices. I collected no samples. Mr. Coffey supplied a photo-copy of the document identified as Attachment I to this report.

Facility History and Process Description
The facility history and process description are discussed in detail in previous reports prepared by our agency and the EPA.

Waste Streams

1. Spent parts cleaning solvent

Source:	Four parts washer located in the Automotive Shop, Machine Shop, Construction Shop, and Pipe Fitter Shop.
Quantity:	According to manifests the facility generated between 4 and 36 gallons per month of this waste between January 1993 and the inspection date.
Disposal:	Safety-Kleen Corporation, Omaha, NE.

2. Used oil

Source:	Equipment maintenance.
Quantity:	Unspecified.
Disposal:	Capitol Oil, Omaha, NE.

3. Waste paint solvent

Source:	On site painting.
Quantity:	Approximately 18 gallons were umulated on-site at the time the inspection.
Disposal:	Safety-Kleen.

4. Batteries

Source:	Lift trucks.
Quantity:	Unspecified.
Disposal:	Exchanged for replacement batteries.

5. Laboratory wastewater

Source:	Wet laboratory processes.
Quantity:	Unspecified.
Disposal:	Discharged to the sanitary sewer via a tank which is packed with limestone.

6. Product samples

Source:	Quality assurance assays.
Quantity:	Unspecified.
Disposal:	Fed into the cupola furnace or the reverberatory furnace.

Observations

1. I asked Mr. Coffey how the refractory brick was currently being handled. He said that the facility produced two types of refractory brick; high silver and high lead. He said that the refractory brick was stored outside on a concrete slab and contained by highway barricades. Mr. Coffee said that both types of brick are currently being recycled through ASARCO's East Helena, Montana facility. He said that previously the silver brick was

recycled through their El Paso facility and the lead brick was previously recycled through their Glover, Missouri facility. Mr. Coffey said that the lead brick contained 3.8% lead and 50 ounces of silver per ton. He wasn't certain what the assay of the silver brick was. Mr. Coffey said that the brick is considered a recycled by-product and that it is shipped under a bill of lading. He said that the brick is stored on-site until they've accumulated a couple of railcars of the material (approximately 95 tons per railcar). He estimated generation at approximately 200 tons to 300 tons per year lead brick and approximately 200 tons per year silver brick, and that the last shipment was in February or March 1994.

2. We toured the Machine, Construction, and Pipe Fitter shops. There were small Safety-Kleen units locate in the Construction and Pipe Fitter shops. There was a larger unit (see photographs) located in the Machine Shop.

3. The Automotive Shop was locked at the time of the inspection. Mr. Coffey said that there was a parts washer similar to the one located in the Machine Shop and a 200 to 300 gallon used oil tank located in the Automotive Shop.

4. There was a 55-gallon drum located in the paint storage building. This drum was closed, labeled "Hazardous Waste" and marked with an accumulation start date of June 1, 1993. Mr. Coffey identified the contents of this drum as spent paint solvent from the small amount of painting that is done at the facility. I tapped the side of the drum and determined that the drum was approximately 1/3 full.

5. There were piles of material located east of the Smelting Department. Mr. Coffey identified these materials as calcium slag and reverberatory slag. He said that both slags are Beville excluded from RCRA Subtitle C and that the reverberatory slag is disposed of through USPCI.

6. The silver and lead refractory brick were stored side by side against the east side of the flood wall (outside the flood wall). Concrete barricades were used on the north and south sides of the piles of brick to contain the piles. Mr. Coffey said there were approximately 70 tons of silver brick and 10 to 15 tons of lead brick. According to Mr. Coffey front end loaders are used to move these materials.

7. There were piles of concrete and soil and some pallets located east of the materials identified in item 6. Mr. Coffey said that the concrete was from repairs to the road way. He said the concrete and pallets would be disposed of at the Douglas County landfill. Mr. Coffey said the soil was from excavating footings near the fume bin and that it was mixed with cupola slag which was struck during the excavation. He said the slag/soil mixture was not separable and it was Beville excluded. He said that it would be disposed of through USPCI.

8. Slag is no longer stored north of the facility on Union Pacific property.

9. There was a pile of yellow material located northwest of the Smelting Department. Mr. Coffey identified this material as caustic skims. A worker was directing a stream of water onto the pile. This material was being moved by a front end loader and the process was producing a visible yellow cloud of the material which was then carried by the wind (the wind was from the north). After viewing this operation I noticed a visible coating of yellow dust on the camera cover.

10. I reviewed manifests for the period of January 1993 through April 19, 1994. The information is summarized below:

Date	Quantity	Product
012593	5 gallons	Naphtha
021593	21 gallons	Naphtha
031593	9 gallons	Naphtha
041293	36 gallons	Naphtha
051093	31 gallons	Naphtha
060793	35 gallons	Naphtha
070693	30 gallons	Naphtha
080293	36 gallons	Naphtha
090293	30 gallons	Naphtha
100193	20 gallons	Naphtha
123093	4 gallons	Naphtha
012193	5 gallons	Naphtha
022293	4 gallons	Naphtha
031893	4 gallons	Naphtha
041993	4 gallons	Naphtha

Mr. Coffey said that the reduction in the quantity of naphtha generated was due to ASARCO changing to a new Safety-Kleen product which comes with a cyclone to remove contaminants from the solvent while it is used. He said that the product is nonhazardous; however, ASARCO considers the waste to be hazardous because of potential lead contamination.

11. There was a tank located in the basement of the laboratory building which Mr. Coffey said receives all the wastewater from the laboratory. He said that the tank is packed with limestone to treat the laboratory wastewater prior to being discharged to the sanitary sewer.

12. Mr. Coffey said he did not have copies of the assays for the lead and silver refractory brick available at the time of the inspection and he agreed to forward me a copy of these assays following the inspection.

Attachments

I. Capital Oil Corporation customer statement.
II. Site diagram.
III. Photographs.

Joseph J. Harris
Report Preparer

Program Specialist 5.2.94
Title and Date

CAPITAL OIL CORPORATION

1128 NORTH 11th STREET • 1-402-346-7441 • 1-800-336-8182
OMAHA, NEBRASKA 68102
EPA # - NED 020201075

CUSTOMER STATEMENT

No. B 099294

CUSTOMER ACCOUNT NO.	SHIP VIA	CAR NUMBER	TERMS	INVOICE DATE
		# Bill Davis	check	3-7-94

PO 14N-00010

ASARCO
500 Douglas
Omaha NE

9401162

14N-00270

QUANTITY	DESCRIPTION	PRICE	AMOUNT
325 gal	Used Oil Recycling Service charge 1.14 per gal		32.50

THE ABOVE GOODS RECEIVED IN GOOD ORDER

BY

THANKS FOR HELPING WITH THE POLLUTION PROGRAM!

CUSTOMER COPY

5	BBL	DIRECT	NON-TAXABLE	1	97.00

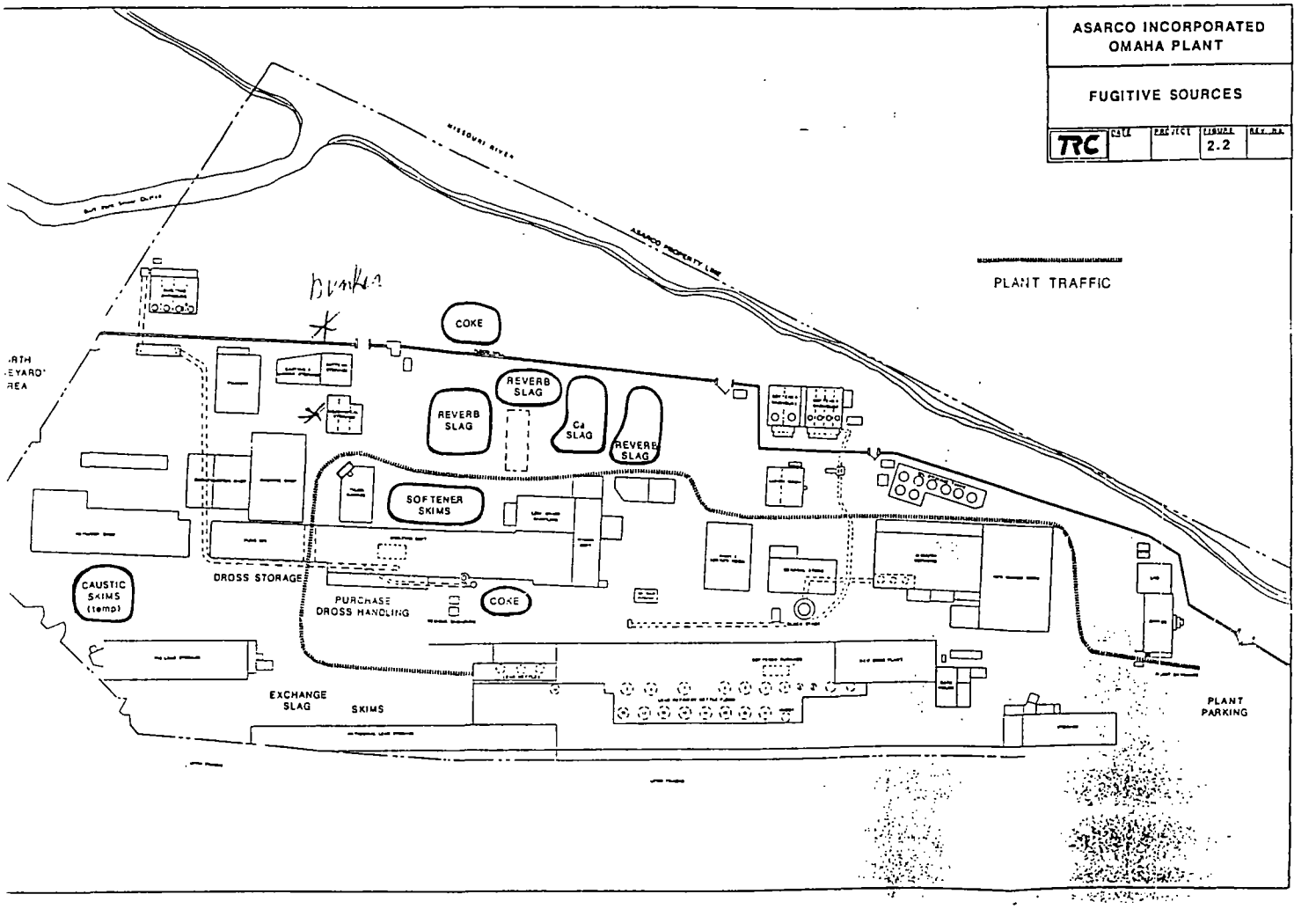
PICK-UP USED OIL
REQUESTED BY: R STUTZ OMN 99018 387

CAPITAL OIL COMPANY

PLEASE PICK UP ASAP, THANKS!!!

** END OF P.O. **

Joe H.


ASARCO INCORPORATED
OMAHA PLANT
FUGITIVE SOURCES
TRC
DATE
PROJECT
FIGURE
2.2
REV. NO.
MISSOURI RIVER
ASARCO PROPERTY LINE
PLANT TRAFFIC
COKE
REVERB SLAG
REVERB SLAG
C4 SLAG
REVERB SLAG
SOFTENER SKIMS
CAUSTIC SKIMS (temp)
DROSS STORAGE
PURCHASE DROSS HANDLING
COKE
EXCHANGE SLAG
SKIMS
PLANT PARKING

ASARCO, Incorporated (AI)
Fifth and Douglas Streets
Omaha, NE 68102
Photographs from the April 27, 1994 CEI

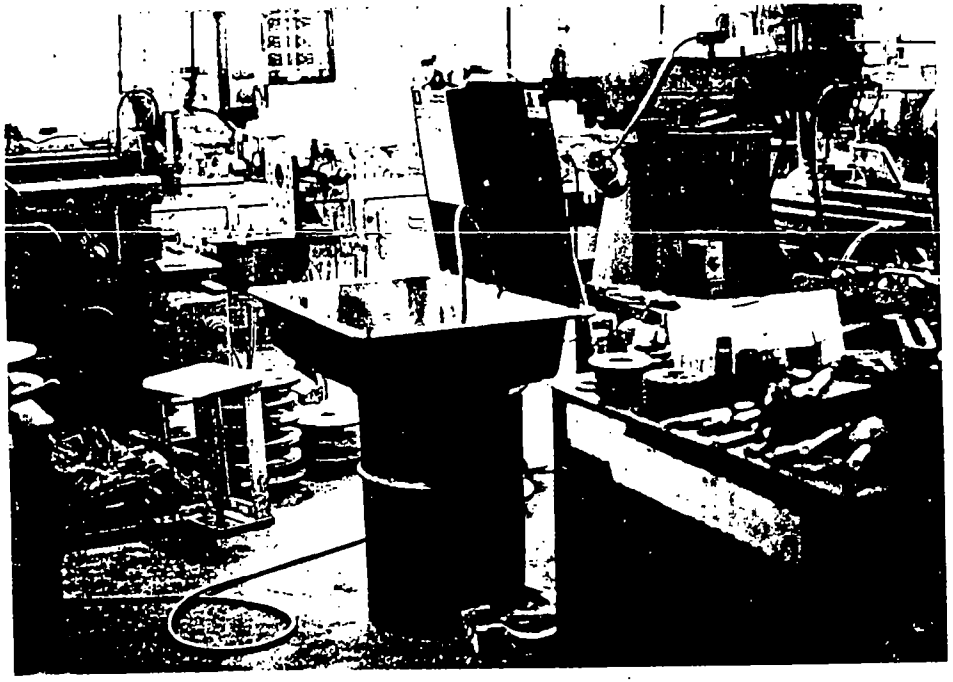
Photograph 1.
Date: April 27, 1994.
Photographer: J. Harris.
Camera: Canon EOS Rebel, 35mm.
Subject: AI site in Omaha. Two piles of materials located against the east side of the facility flood wall. Mr. Coffey identified the pile on the left as high lead refractory brick and the pile on the right as high silver refractory brick. Note the material on the ground trailing out of both of these piles.

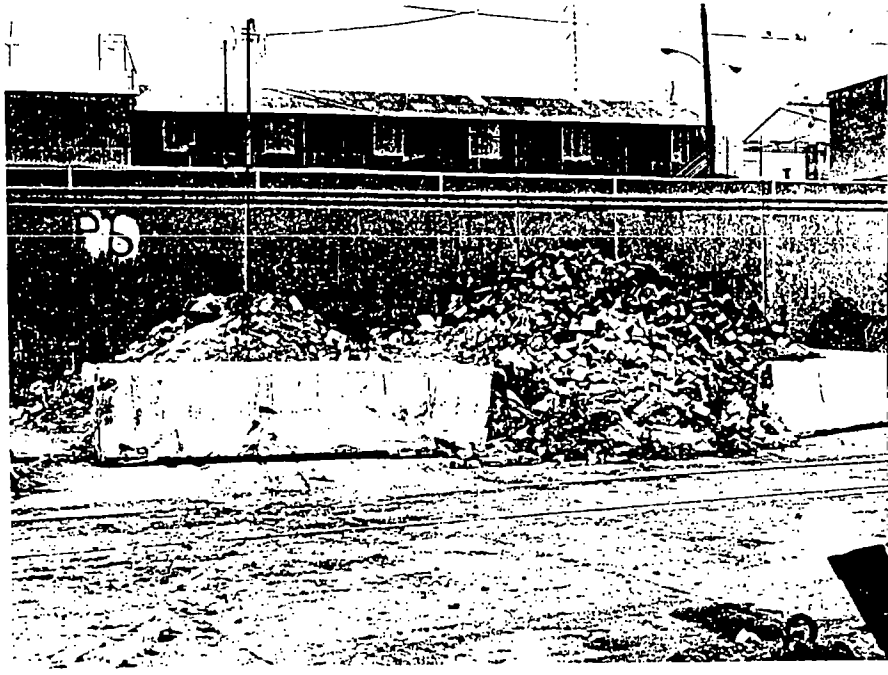
Photograph 2.
Date: April 27, 1994.
Photographer: J. Harris.
Camera: Canon EOS Rebel, 35mm.
Subject: AI site in Omaha. Pallets and piles which Mr. Coffey identified as concrete and soil/cupola slag. This photograph was taken outside the flood wall, facing east (toward the Missouri River).

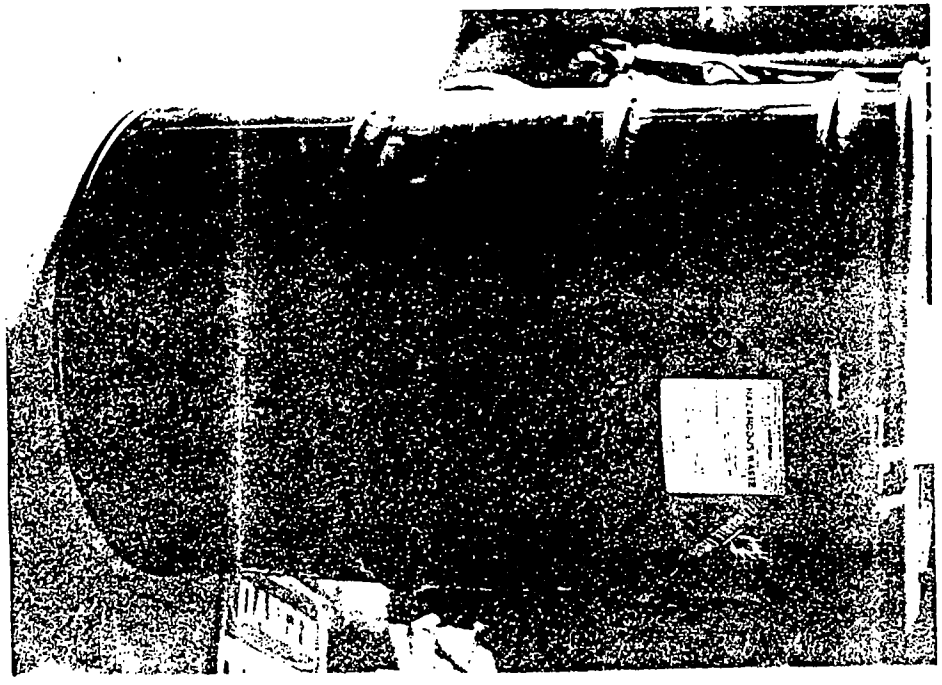
Photograph 3.
Date: April 27, 1994.
Photographer: J. Harris.
Camera: Canon EOS Rebel, 35mm.
Subject: AI site in Omaha. Safety-Kleen solvent sink located in the Machine Shop.

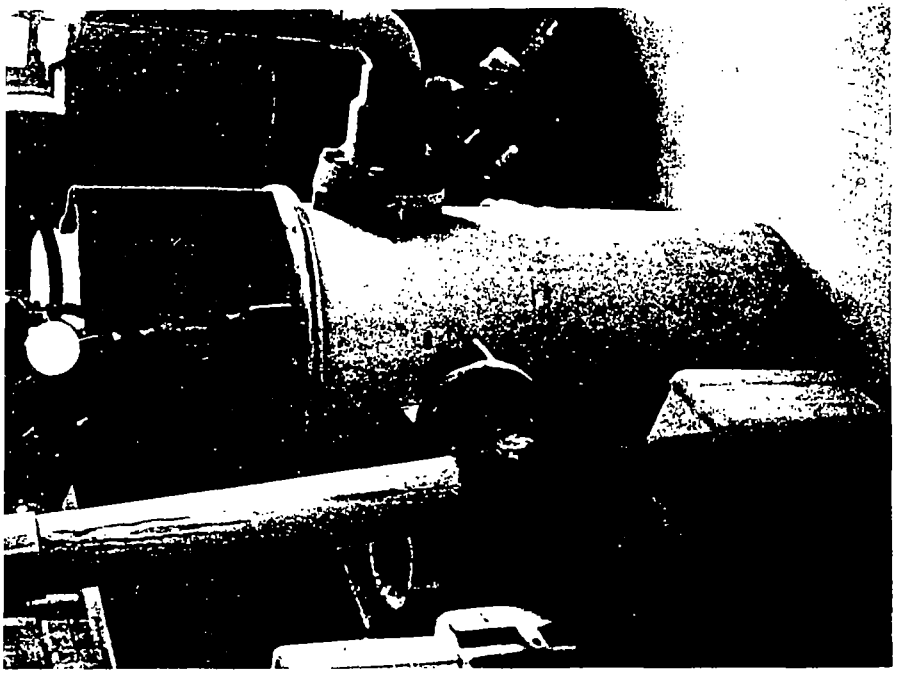
Photograph 4.
Date: April 27, 1994.
Photographer: J. Harris.
Camera: Canon EOS Rebel, 35mm.
Subject: AI site in Omaha. The 55-gallon drum located in the paint storage building. Mr. Coffey identified the contents as spent paint solvent.

Photograph 5.
Date: April 27, 1994.
Photographer: J. Harris.
Camera: Canon EOS Rebel, 35mm.
Subject: AI site in Omaha. The tank located in the basement beneath the laboratory. Mr. Coffey said that the tank contained limestone which treated laboratory wastewater prior to discharge to the Omaha sanitary sewer.









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