95

CERTIFIED MAIL
Return Receipt Requested

JAN 27 1984

Mr. J. C. Patterson
Section Manager
Environmental Pollution Control
McDonnell Douglas Corporation
Department 191C, Building 102, L-3
Box 516
St. Louis, Missouri 63166

Dear Mr. Patterson:

The U.S. Environmental Protection Agency (EPA) Region VII office is in the process of conducting a technical evaluation of your Resource Conservation and Recovery Act (RCRA) permit application. We intend to complete a draft of the RCRA permit for your facility in the near future. If you or a representative from your facility would be interested in discussing this draft document in our office, such arrangements can be made. If you do not wish to conduct such a conference, we will mail a draft copy of the permit to you as we initiate the public comment period. This will provide a minimum of 45 days for you to comment on the draft permit. If you are interested in a conference prior to the public comment period, please contact Stephen Busch of my staff at (816) 374-6531.

As mentioned in our July 25, 1983, letter to you, we do consider the McDonnell Douglas Corporation (MDC) Tract I permit application to be complete. Additional information to clarify, modify or supplement previously submitted information is necessary, however. Please respond to the following questions and/or comments within thirty (30) days of receipt of this letter.

On July 6, 1983, an EPA contractor conducted an unannounced inspection of MDC Tract I, RCRA regulated facilities. While RCRA compliance has been addressed previously with another Branch within the regional office, several permit related issues were also raised as a result of this inspection. The following questions and/or comments need to be addressed prior to the issuance of a RCRA permit.

1. Are all containers properly identified when placed in RCRA storage areas? In the waste analsis plan, a good deal of emphasis is placed on waste identification from the source of the waste. If containers are not uniquely identified, how is proper treatment insured after storage with a large number of other drums.

P 486 889 515
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NOT FOR INTERNATIONAL MAIL
Mr. J. C. Patterson
McDonnell Dou
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Box 516
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1/27/84

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Busch	Harrington	Morby	Spratlen	Darnell
Busch 1/23/84	L.H. 1-24/84	Morby 1/24/84		

R00144298
RCRA RECORDS CENTER

2. We would suggest that the inspection schedule for your RCRA facilities be incorporated into the inspection log. Thus, a record of all items inspected would be maintained.

3. Do the emergency coordinators have formal authority to commit resources necessary to carry out the contingency plan?

4. In the inspection report, it was specified there was evidence that the Storage Area 2 containment had been breached. According to your permit application the curb area and sump are designed to contain 174 gallons. Is this volume correct? What was the source of the material that overflowed? How often is the containment area inspected?

5. Do "poly tanks" have a cover? If not, what freeboard is maintained in these tanks? Why was the ruptured piping incident not recorded in the inspection log? Please describe the ruptured piping incident.

6. Are all necessary warning signs posted? Are the required signs posted in tank storage areas?

7. In your January 17, 1983, response to our request for engineering certification of design adequacy of RCRA regulated facilities, your referenced Missouri Department of Natural Resources Form SCI (sic). That form certifies the application has been prepared to comply with Missouri rules and regulations. This will not suffice as an engineering certification of technical adequacy of RCRA regulated facilities for EPA purposes. Please submit an adequate engineering certification.

In addition to the previous comments, we have some additional concerns which are not subject to EPA regulations at this time. In the process of coordinating permit activities with the Missouri Department of Natural Resources (MDNR), information regarding underground storage tanks has been made available to us. While these tanks are exempt from EPA regulation under 40 CFR 264.190(b), they are regulated by MDNR. The following comments have been brought to our attention by MDNR.

1. The revisions submitted with your letter to Mr. L. Harrington of September 12, 1983, indicate that some changes have been implemented in your tank storage capability. Particularly a 3,000 gallon carbon steel tank has been replaced by a 3,380 gallon fiberglass tank, an additional 2,000 gallon carbon steel tank has been activated, and a 4,380 gallon fiberglass tank has been placed into service.

a. EPA and MDNR have received information on various tanks, the overfill control, and leak detection systems; however, the information on the age of the various tanks is not complete. Please provide the following information in a tabular form: tank identification, capacity, contents, material of construction, overfill control, leak detection system, and date (month and year) that tank was placed into service. This information would be useful as a summary of the text found in sections C and D.

b. In your letter of October 12, 1983, to Mr. D. Wagoner in response to "EPA Statement 5," it is indicated that the hydrocarbon detection system is checked for functional operation every thirteen weeks. This information should be incorporated into the inspection procedures contained on revision pages F-6, 2 of 4, and 3 of 4.

c. Partial closure of the facility is discussed on page I-2 of the application. Is there any planned removal of the existing underground tanks and replacement with fiberglass tanks. If not, what criteria determines when these tanks are replaced?

d. The revised closure cost estimates contained on revision page I-8 still indicate five underground tanks, please revise this to show the additional two tanks, also revise the cost estimate if necessary. The maximum inventory indicated on revised page I-3 appears to be in error; the titanium etch storage tank volume of 37,620 appears excessive for six tanks at 750 gallons each which would result in 4,500 gallons. Likewise, is the maximum inventory of 100 pounds of storage in the explosive storage facility of building 10 accurate?

If you have any questions or comments with respect to this letter, please do not hesitate to contact Stephen Busch of my staff at (816) 374-6531. Again, your response to these questions and/or comments should be submitted to this office within 30 days after receipt of this letter. We request you copy Joe Jansen of MDNR with your response to this letter.

Sincerely yours,

David A. Wagoner
Director, Air and Waste Management Division

cc: Joe Jansen, MDNR

bcc: Bob Stewart, PMTS

SPB

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
324 EAST ELEVENTH STREET
KANSAS CITY, MISSOURI - 64106

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Sincerely yours,

William A. Spratlen

for David A. Wagoner
Director, Air and Waste Management Division

cc: Joe Jansen, MDNR