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B&V WASTE SCIENCE AND TECHNOLOGY CORP.

MEMORANDUM

Hydrocarbon Recyclers, Inc.
RCRA Facility Assessment
List of Preliminary SWMUs and
Potential Areas of Concern

BVWST Project 45520.100
BVWST File 210.03
June 5, 1990

To: File

From: John P. Nett JPN

Per review of annual RCRA Compliance Inspection Reports prepared by KDHE, the following list of preliminary solid waste management units and potential areas of concern for the Hydrocarbon Recyclers, Inc. facility has been prepared.

Processing Area

Solid Waste Management Units - There are eight hazardous waste storage tanks located in a tank processing facility. The tank process area is equipped with secondary containment. The tanks are as follows:

Tank 1 - 1,000-gallon pressurized storage tank for hazardous and flammable wastewater (D001, D007, D008) for offsite deep well injection.

Tank 2 - 7,000-gallon ambient pressure storage tank for non-chlorinated solvents (D001, F003, F005) for offsite recycling.

Tank 3 - 7,000-gallon pressurized blending tank for waste paint solvents (D001, F003, F005) and sludges; unblendable solids are removed for offsite incineration.

Tank 4 - 1,000-gallon pressurized storage tank for waste lacquer thinner (F003) for offsite recycling

Tanks 5 & 6 - two 24,000-gallon ambient pressure storage tanks for blendable wastes (D001, F001; F002; F003; F005; U-listed solvents corresponding to F001, F002, F003 and F005; U044; U045; U077; D004-11) for onsite blending as kiln fuel for offsite incineration.

Tank 7 - 7,000-gallon storage tank for waste methyl ethyl ketone (F005) for offsite reclamation.

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Tank 8 - 7,000-gallon storage tank for nonblendable wastes (F001; F002; F003; F005; F024; U-listed solvents corresponding to F001, F002, F003, and F005; U044, U045; U077) for offsite incineration.

Areas of Concern - A 500-gallon storage tank for No. 2 diesel fuel tank is utilized for a "drum dumper" device in the process area.

Storage Building D

Solid Waste Management Units and Areas of Concern - There are eleven storage tanks located in Building D containing hazardous and nonhazardous waste; fuel oil; and machine coolant oils. Storage tanks are elevated 15 feet above ground level upon metal frame work. The tanks are as follows:

Tank 9 - storage tank for wastewater (F001, F002, F003, F005; total F-listed compounds less than one percent) for offsite deep well injection (under special land ban exemption as reported by HRI).

Tank 10 - storage tank for wastewater (F001, F002, F003, F005; total F-listed compounds greater than one percent) for offsite disposal (method unknown).

Tank 11 - storage tank for perchloroethylene (F002) sparged from filter cartridges and carbon for offsite reclamation.

Tank 12 - contents of tank and disposition of contents unknown.

Tank 13 - storage tank for waste trichloroethylene (F002) for offsite reclamation.

Tank 14- storage tank for No. 2 diesel fuel.

Tank 15 - series of four 9,000-gallon storage tanks piped together for waste oil storage for offsite reclamation.

Tank 16 - 9,000-gallon storage tank for water-soluble machine coolant oils (D001, D007, D008) for offsite deep well injection or offsite incineration (if BTU value meets the regional allowance of 8,000 BTU)

Sparging Room (Building D)

Solid Waste Management Units - Three steam-pressurized units are located in the south portion of Building D. Dry cleaning carbon and filter canisters are sparged to remove perchloroethylene. Two 80-gallon holding tanks are utilized, one to contain contaminated water and one to contain perchloroethylene. The contaminated water is pumped to Tank 9 on a daily basis. A drum is utilized for liquid collection under the steam condensate line at each sparging unit.

Area Adjacent and North of Processing Area

Areas of Concern - Located in this area is a drum emptier, a waste blender, a drum washer, and a drum solids removal device. Dispersing is performed in a blending tank which is drained on a daily basis. Blending of wastes is occasionally performed directly within a drum. (A second blender/disperser area may be located just outside the southeast corner of Building C). Empty drums which are to be crushed (except for corrosive waste drums) are first washed with Stoddard solvent. A sump located in this area collects water which is pumped out daily (as necessary). This liquid is handled as F-listed wastewater. Drums are crushed at the southeast corner of the tank processing facility.

Hot Room

Areas of Concern - An enclosed facility maintained at 150° F is utilized to lower the viscosity of certain wastes, such as paraffin, prior to blending.

Storage Building C

Areas of Concern - A maximum permitted storage capacity of 1,700 drums may be accumulated in Building C. Previous inspections have noted damaged and seeping drums stored in this warehouse. The building is equipped with collection sumps which may be pumped out following collection of spilled wastes. Within Building C, an area has been segregated for corrosive waste storage. As many as 300 drums have been noted as being accumulated in this area of the building. (Building B has additional storage capacity for 400-500 drums of corrosive wastes). In the truck unloading area outside Building C, as many as 2,400 drums may be staged, by permit.

Lab Building E

Areas of Concern - Waste samples are analyzed onsite and accumulated in a drum in this building following analysis.

Out-of-Service Distillation Unit

Areas of Concern - While no onsite reclamation or distilling processes are reported in current practice, a distillation unit was placed in a field south of Building C. It is unknown whether this unit is still located in this area.

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