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State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

Barbara J. Sabol, Secretary

Forbes Field
Topeka, Kansas 66620
913-862-9360

Notice of Deficiency/Letter of Warning

June 15, 1984

Mr. David Trombold
Hazardous Waste Coordinator
The Reid Supply Company
P.O. Box 11365
Wichita, Kansas 67202

Dear Mr. Trombold:

The U.S. Environmental Protection Agency (EPA) and our department have completed the review of the March 28, 1984 response to our February 3, 1984 letter. Outlined below are our comments and concerns:

Topographic Map

1. Is the canal shown on the aerial photo for flood control? Are there any barriers for drainage or flood control on-site?

2. Does the site legal boundary follow the fence shown on the layout map? If not, the boundary must be included on the drawing and labeled as appropriate.

Traffic Patterns

3. The facility layout drawing should show any traffic control signals.

Security

4. What type material is the six feet fence constructed of?

Required Equipment

5. Please provide the following information:

A. Date when alarm will be installed. Will the alarm be used only in case of fire or will the alarm be used to signal an evacuation resulting from other emergency situations?

B. The most recent submittal indicates that only one of two process technicians will carry a two-way radio. Are they the only employees working in the drum storage and tank storage areas?

C. The locations of telephones should be shown on the drawings titled "Location of Emergency Equipment"

R00001725
RCRA Records Center

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Aisle Space

6. Response 26 of the March 28, 1984 submittal indicates that compliance with NFPA requirements for aisle space allows for 400 drums to be stored in the containment area. We do not have a problem with this proposal. Where will the remaining 100 drums included on the Part A application be stored (500 drums total capacity of revised Part A)?

Ignitable, Reactive or Incompatible Waste Requirements

7. Response 15 of the March 28, 1984 submittal indicates that any waste determined to be incompatible or reactive will be stored in another small diked area. Where is this area located and why was this area not included in the Part B application?

8. We would recommend placing a "No Smoking" sign inside the storage building where the rows of ignitable waste will be located.

9. Do you have written concurrence from the Fire Department and your insurance carrier on your arrangements to meet the intent of the NFPA buffer zone requirements? Also, do you have a written agreement with Derby Refinery for their firefighting assistance?

Personnel Training

10. When will the new training program be developed and available for review by EPA and KDHE?

Closure

11. The March 28, 1984 response discusses revisions to the closure plan. The revised closure plan should be submitted with your response to this letter.

Container Standards

12. Response 26 of the March 28, 1984 submittal indicates that containers of waste without free liquids will be stored outside the diked area. Where will these containers be stored? This area must also be included in the permit application. The 264.175(c) requirements must be met for this area.

13. The drum storage area drawing shows a four inch by six inch concrete curb. Why wasn't this curb constructed? We are concerned about the integrity and adequacy of a dike constructed of a single row of bricks.

Tank Standards

14. How was the person operating the ultrasonic thickness meter trained?

15. The current thickness measurements must be taken and submitted prior to issuance of a draft permit for public notice. Results of the thickness measurements should be recorded for each point measured on drawings of the tanks. The attached document provides guidance on points on the tanks to be measured.

16. How often do you propose to conduct the detailed tank inspection? The permit will require internal inspections (entering the tank). If these tanks cannot be entered for inspection, we will be unable to issue a permit allowing use of the tanks. It may be possible to condition the permit to allow for a more frequent "internal" inspection when the tank is not entered and a less frequent internal inspection where the tank is entered. More detail must be provided on how/what the inspector will look for when conducting the "internal inspection" (tank not entered) and the inspector's qualifications.

17. Is any additional information available on the materials of construction of the storage tanks and appurtenances (piping, etc.) and any other diagrams of piping layout and overfilling control equipment?

Waste Analysis Plan/Waste Blending

18. As discussed with you before, we are concerned that the waste analysis plan be sufficient for storage of wastes generated by both Reid Supply and their customers. Since you now plan to blend waste streams for shipment to General Portland and have attempted to revise the waste analysis plan accordingly, we have the following comments on the waste analysis plan:

April 13, 1984 submittal

A. The analysis must be on each individual waste stream for all waste-streams to be blended, or potential candidates for blending. Compositing is unacceptable since each individual waste stream to be blended must be evaluated against the blending criteria.

B. The annual analysis should include analysis for chloride content (or total halogen content), since this is a factor of concern in the blending operation as will be discussed below. This requirement can be modified if the generator does not handle chlorinated organics.

C. The detailed annual analysis should be repeated annually for all waste streams, whether or not the waste stream has remained consistent throughout the year. Facilities generating their own waste and permitted as RCRA storage facilities are required to conduct an annual analysis of the waste in all but a few cases. Other permitted off-site facilities are also being required to conduct an annual detailed analysis of the waste streams received. We have agreed that small quantity generators could be subject to requirements less than these.

D. We do not have a problem with the use of a fingerprint analysis so long as the procedure is adequate, particularly for waste streams to be blended. In order to document that a waste stream can be legitimately blended, the fingerprint analysis for each individual waste stream should include BTU values and chloride contents (or total halogen content).

E. If you have questions about how to set up such a sampling and analysis scheme to meet the waste analysis requirements for the blending and distillation/storage operations, we strongly recommend that you hire a competent consultant to assist in development of this information. As we have advised you before,

we consider the waste analysis plan requirements to be of the utmost importance for off-site facilities. We cannot consider the waste analysis plan information submitted to date to be adequate.

19. Enclosed is a copy of the March 16, 1983 Federal Register which explains the EPA enforcement policy on burning low energy hazardous wastes for energy recovery. We strongly recommend that you read this policy in detail. Our office has been advising other facilities desiring to blend hazardous waste for fuels of the following:

A. Any individual waste stream not meeting the 8000 BTU/lb criteria cannot be blended into a fuel, this would include several of the F listed chlorinated solvents.

B. Blending of chlorinated wastes or other low energy wastes (less than 8000 BTU/lb) into a fuel would require that the fuel be handled as a hazardous waste including incineration at a RCRA permitted hazardous waste incinerator, i.e., not General Portland in Fredonia, Kansas. The blending operation would have to be covered under a RCRA permit (or interim status).

C. We recommend setting up detailed criteria, similar to but more indepth than the parameters you set up for the fingerprint analysis, for waste to be accepted at Reid Supply. If you plan to continue to accept waste which cannot be blended into fuel for shipment to General Portland, the application must address in detail how these wastes will be handled and procedures in place to insure that these wastes do not get blended into the fuel for General Portland.

Financial Requirements

20. Apparently a problem remains with Reid Supply obtaining correct financial documents. Please advise us if we need to provide any assistance.

General Comments

21. We have also reviewed the Reid Supply response to the Notice of Violation (NOV) left by the RCRA compliance inspectors as a result of the April 6, 1984 interim status compliance inspection. The NOV response included revised inspection logs, indicated that arrangements had been made with an emergency response equipment supplier and that the closure cost estimate will be revised. These documents should be included in the response to this letter and the revised Part B permit application.

22. The March 28, 1984 submittal ask how many copies of the final permit application would be needed. At a minimum, we will need a total of four copies. At this time, we would recommend that you respond to these comments in a letter and attach revised pages, tables, etc., and complete a final revision of the permit application when all comments have been resolved. All information responding to comments and included in letters should be incorporated into the revised permit application.

In conclusion, the Part B application requires significant effort on your part so that we can consider it complete and acceptable for preparation of a draft permit. In addition, the recent interim status inspection found your facility in significant noncompliance with interim status standards and regulations.

Neither the EPA nor our department will consider issuance of a hazardous waste facility permit to any facility not in compliance with interim status standards. Also the permit application must demonstrate that the facility can comply with the 40 CRF Part 264 permitting standards. If these two criteria cannot be met in a timely manner, we will issue a Notice of Intent to Deny the permit and terminate interim status.

Your response to these comments should be submitted no later than July 10, 1984.

If you have any questions, please contact Ms. Karen Flournoy (816-374-6531) or myself.

Sincerely,

DIVISION OF ENVIRONMENT

John Paul Goetz, P.E., Chief
Hazardous Waste Section
Bureau of Waste Management

JPG:kaa/5F
Attachments
cc: Dale Stuckey
Karen Flournoy

RECOMMENDED INSPECTION PROCEDURES

Ultrasonic Testing of Vertical, Cylindrical Metal Tanks

Testing must be done by an individual trained in the use of ultrasonic measuring equipment.

Measurements shall be concentrated at areas on the tank shell which are most likely to be in frequent contact with stored liquid.

At minimum, measurements shall be made as follows:

1. For the tank wall, take measurements along three vertical rows spaced 120° apart, at no less than two foot vertical intervals. At least one measurement in each row shall be taken within one foot of the bottom of the tank. Measurements shall be concentrated up to the most common liquid level of the tank.

2. For the tank bottom, take no fewer than four measurements, at least two feet from the center point of the tank bottom, spaced at 90° intervals.

3. At least 25% of all measurements must be taken within one inch of a seam ("heat affected zone"), if possible.

Ultrasonic Testing of Horizontal Cylindrical Metal Tanks

Same as above.

Same as above.

At a minimum, measurements shall be made as follows:

1. Take at least three measurements along a horizontal row located at the centerline of the bottom of the tank.

2. Take measurements along two vertical rows, which are equally spaced to divide the tank into thirds. On each row, at least one measurement must be taken within one foot of the bottom centerline of the tank, with all subsequent measurements taken no more than two vertical feet apart.

3. At least 25% of all measurements must be taken within one inch of a seam, if possible.