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BURLINGTON ENVIRONMENTAL

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January 24, 1992

CERTIFIED MAIL

Mr. David Croxton
EPA Project Coordinator
U.S. EPA
1200 Sixth Avenue, HW-106
Seattle, WA 98101

Mr. Croxton:

Per EPA's January 16, 1992 letter, enclosed is the requested information regarding Solid Waste Management Units (SWMUs) at the Burlington Environmental Inc., Pier 91 Facility.

If you have any questions, please contact me at 223-7596.

Sincerely,

John Stiller
Project Coordinator

USEPA RCRA
3012569

Burlington Environmental Inc.
2203 Airport Way South • Suite 400 • Seattle, WA 98134
(206) 223-0500 • FAX: (206) 223-7791

United States
Environmental Protection
Agency

Region 10
1200 Sixth Avenue
Seattle WA 98101

Alaska
Idaho
Oregon
Washington

EPA

Reply To
Attn. Of: HW-106

JAN 16 1992

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

JAN 17 1992

John Stiller
Chemical Processors, Inc.
2203 Airport Way, Suite 400
Seattle, WA 98134

Re: Chemical Processors, Inc., Pier 91 Facility
EPA Identification Number WAD 00081 2917

Dear Mr. Stiller:

Prior to any final determination regarding the Resource Conservation and Recovery Act (RCRA) permit for the Chempro Pier 91 facility, EPA must assess any past releases of hazardous waste or hazardous constituents from any active or closed solid or hazardous waste management units (SWMUs) at the facility. While EPA has obtained SWMU information from Chempro in a July 5, 1988 "Solid Waste Management Unit Report," it is necessary that this report be updated and clarified in order to insure that a complete and comprehensive list of solid waste activities at the Pier 91 facility is complied.

Per Section 3007 of RCRA and in accordance with 40 CFR 270.14(d), EPA is requesting the following information for Chempro's Pier 91 facility, including all leased and subleased property and appurtenances:

1) The identification, physical description, location, and period of operation of all SWMUs (e.g., units that have in the past or are currently managing solid waste such as tanks, pipelines, sumps, storage areas, loading and unloading areas, transfer facilities, and any other waste handling operations, etc.) that were not previously identified in the July 5, 1988 SWMU Report.

2) For those SWMUs identified in Item #1 above, specify all wastes managed at the unit and any information regarding releases of hazardous constituents from the unit. In addition, for all SWMUs, including those already identified in the July 5, 1988 SWMU Report, Chempro must indicate which SWMUs have managed hazardous waste.

EPA requests this information be certified in accordance with 40 CFR 270.11 and submitted within 14 days of receipt of this letter to David Croxton, RCRA Permits Section, HW-106, 1200 Sixth Ave, Seattle, Washington, 98101. If you have any questions, please contact David Croxton at 553-8582.

Sincerely,

Carrie Sikers

for Michael F. Gearheard, Chief
Waste Management Branch

cc: G. Tritt, Ecology-NWRO
D. Brown, Ecology
D. Hotchkiss, Port of Seattle

ADDENDUM TO

July 5, 1988
Solid Waste Management Unit Report
Chemical Processors, Inc.
Pier 91 Facility

This ADDENDUM is submitted by request of USEPA Region 10 (letter to J. Stiller 1/16/92, attached) in regards to final determination of the RCRA Part B Permit Application for the Burlington Environmental Inc., Pier 91 Facility. This ADDENDUM contains the following.

1. Certification statement per 40 CFR 270.11.
2. Identification of SWMUs closed after July 5, 1988.
3. Identification of known releases to the environment after July 5, 1988.
4. Identification of SWMUs noted in July 5, 1988 known to have managed hazardous/dangerous wastes.
5. Historical and current operation/use of tanks at Pier 91.

" 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 be 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." Reference 40 CFR 270.11.

Michael P. Keller

DATED 1/24/92

Michael P. Keller
Vice President, Operations
Burlington Environmental Inc.

SWMUs Closed
After July 5, 1988
Solid Waste Management Unit Report
Chemical Processors, Inc.
Pier 91 Facility

UNIT NO./DESCRIPTION

Pit Separator. Oil/water separator.

PROCESS USE/ACTIVE PERIODS

Oil/water separator for incoming oily wastewaters and oils prior to transfer to storage/treatment tanks. 1926 - 1990

PRODUCT OR DANGEROUS WASTE CONTAINED

Non-dangerous waste oil/water and oil (exempt for reuse or recycling). Residual sludges removed when unit was taken out of service were managed as a dangerous waste (metals) based on lab analysis.

CAPACITY

41,450 gallons

DIMENSIONS

38'L x 18'W x 8'D

MATERIAL OF CONSTRUCTION

Concrete vault.

STRUCTURE TYPE

Above and below grade tank.

COMMENTS

Unit was removed from service, decontaminated, covered and secured 2/90.

KNOWN RELEASES

Unknown

UNIT NO./DESCRIPTION

Below ground piping in "Small Yard."

PROCESS USE/ACTIVE PERIODS

Piping used to transfer product, and dangerous and non-dangerous wastes from tank to tank both within and outside of the small yard. 1930? - 1991

PRODUCT OR DANGEROUS WASTE CONTAINED

Non-dangerous waste waters, oil/water and oil (exempt as wastewater or for reuse or recycling). Residual sludges and flush water produced when piping was taken out of service were managed as a dangerous waste as necessary based on lab analysis.

CAPACITY

N/A

DIMENSIONS

Approximately 500 feet of 3" - 6" piping.

MATERIAL OF CONSTRUCTION

Steel.

STRUCTURE TYPE

Below grade piping.

COMMENTS

Piping was removed from service, decontaminated by flushing and filled with concrete, 3/91.

KNOWN RELEASES

Unknown

Known Releases to the Environment
After July 5, 1988
Solid Waste Management Unit Report
Chemical Processors, Inc.
Pier 91 Facility

UNIT

Railroad tracks, West of warehouse (Bldg 19).

DATE OF RELEASE

8/22/89

TYPE OF PRODUCT OR WASTE RELEASED

Asphalt product.

APPX. QTY/VOL RELEASED

500 gallons

MEDIA

Asphalt and soil.

NATURE OF RELEASE

Pump cavitation caused hose to separate from rail car during unloading.

HOW RELEASE DETECTED

Visual observation.

AGENCY NOTIFIED

Not applicable.

MIGRATION PATH

Product must be heated to unload. Once released, material cooled quickly confining release to tracks and immediate area.

ACTIONS TAKEN

Material recovered was used for intended purpose. Residuals and debris managed as non-regulated waste.

Identification of SWMUs Noted in July 5, 1988 SWMU Report
Known to Have Managed Hazardous/Dangerous Wastes

From Table 1 - Possible SWMUs Closed Prior to Chemical Processors, Inc. Operations

UNIT NO./DESCRIPTION	*PRODUCT OR DANGEROUS WASTE CONTAINED*
Bldg. 17	Unknown
Tanks 340 and 341	Unknown
Tank 1530	Unknown
Tanks 119-126	Unknown
Oil Barrel Drain Pit	Unknown
Oil Barrel Tumbler Pit	Unknown
Tanks 7 and 8	Lube oil, product

From Table 2 - SWMUs Closed During Chemical Processors, Inc. Operations

UNIT NO./DESCRIPTION	*PRODUCT OR DANGEROUS WASTE CONTAINED*
Tank 118	Waste lube oil, non-DW, exempt; and possibly DW corrosives
Wastewater treatment tanks (2)	Wastewaters, non-DW, exempt
Coolant treatment tank	DW (WT02), not HW
Treated wastewater tank	Wastewaters, non-DW, exempt

Historical and Current Operation/Use
Of Tanks at the Pier 91 Facility

I. Tanks Operated by Burlington Environmental

TANKS 90, 94, 96, 98, 100, 105 thru 112, 114 thru 118, 164 and 165

All Burlington Environmental tanks were emptied, decontaminated and inspected for possible certification for RCRA use in 1988-89. Residuals and debris from emptying/decon were managed as dangerous waste (WT02).

TANKS 90, 96, 98 and 100

Pre 1988-89; oil/water and oil, non-DW (exempt).
Current; asphalteen, non-DW (exempt).

TANK 94

Pre 1988-89; waste oil, non-DW (exempt).
Current; waste oil, non-DW (exempt).

TANK 105, 107 and 110

Pre 1988-89; oil/water and oil, non-DW (exempt).
Current; oily water, non-regulated. Tank 110 is certified for RCRA service

TANK 106

Pre 1988-89; sludge de-watering, DW.
Current; boiler condensate return water, non-regulated.

TANK 108

Pre 1988-89; sludge de-watering, DW.
Current; out-of-service.

TANK 109, 111, 112

Pre 1988-89; oil/water and oil treatment, DW.
Current; oil/water and oil treatment, DW. Tanks 109, 111 and 112 are certified for RCRA service.

TANK 114

Pre 1988-89; oil/water and oil, DW.
Current; emulsified oil, non-DW.

TANKS 115 - 118

Pre 1988-89; DW
Current; out-of-service

TANK 164

Pre 1988-89; DW
Current; DW. Tank 164 is certified for RCRA service.

TANK 165

Pre 1988-89; DW
Current; out-of service

II. Tanks Operated by Pacific Northern Oil Co. (PANOCO)

TANKS 91 thru 93, 95, 97, 99, 101 thru 104, and 113

PANOCO tanks are for product and DW-exempt waste oils, not RCRA regulated wastes. While the tanks are periodically emptied and cleaned, they were not inspected for possible certification for RCRA use in 1988-89 along with Burlington Environmental tanks.

TANKS 104, 113

Use; diesel and boiler fuel (product) storage, non-reg.

TANKS 91 thru 93, 95, 97, 99, 101 thru 103

Use; waste oils and lubricant storage/blending for marketing as marine boiler fuel and marine diesel, non-DW, exempt.