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STATE OF WASHINGTON

DEPARTMENT OF ECOLOGY

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CERTIFIED MAIL - RETURN RECEIPT REQUESTED

FILE COPY

October 4, 1990

Katherine Buller
Chemical Processors, Inc.
Park 90/5, Suite 400
2203 Airport Way South
Seattle, Washington 98134

Re: Chemical Processors, Inc. Pier 91 Part B Application - Notice of Deficiency - Warning Letter.

Dear Ms. Buller:

The Washington Department of Ecology (Ecology) has further reviewed the Part B Dangerous Waste Permit Application submitted by Chemical Processors Inc. (ChemPro) for the Pier 91 facility. Comments are provided in the enclosed Notice of Deficiency (NOD), issued under the authority of WAC 173-303-840 (1)(b). I am requesting that ChemPro respond to this NOD within 30 days of receipt of this letter. Failure to respond by this date may subject you to further enforcement action. The submission of revised pages, as you have done previously, would be the simplest for Ecology to process.

Ecology encourages you to meet with us at a mutually convenient time in order to discuss any questions you may have regarding these comments. Please contact Doug Brown at (206) 459-6993 to arrange such a meeting.

Sincerely,

Cindy J. Gilder

Cindy J. Gilder
Supervisor
Hazardous Waste Permits

USEPA RCRA
3012851

enclosure

cc: Carrie Sikorski, EPA
Julie Sellick, NWRO
Rich Mattrass, HWDS

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OCT 09 1990
WASTE MANAGEMENT BRANCH

NOTICE OF DEFICIENCY
PART B DANGEROUS WASTE PERMIT APPLICATION
CHEMICAL PROCESSORS, INC. (PIER 91)

October 4, 1990

1. Why does Figure B4-2, Facility Traffic Patterns and Control Signs, indicate a dangerous waste tank system outside of the proposed dangerous waste facility boundary?

2. In Figure B4-2, Facility Traffic Patterns and Control Signs, indicate which load/unload area(s) will be used for dangerous waste and which will not.

3. Section B6.0 cites WAC 173-303-440(1)(a), this should be WAC 173-303-640(9)(b). Please correct this citation.

4. The application fails to provide a diagram indicating which tanks may contain ignitable waste and how the buffer zones required by the Flammable and Combustible Liquids Code - 1981 are met. This information needs to be supplied.

5. Wastestreams 19 and 20 in Table C1-2, Waste Characteristics, both carry a D007 (chromium) waste code, yet the typical analyses in appendix C-1 do not indicate chromium is present. Please rectify this inconsistency.

6. Amend the last sentence on page C4 in order to remove the implication that waste could be stored in the centrifuge.

7. Clarify what wastes are stored in tank 2201? Tables B1-1, C2-1, and D1-1 indicate this tank as "non-phenolic oil/coolant storage." Tables C1-2 and I1-3 indicate "industrial wastewater storage." Figures C1-1, D1-2, and I1-2 indicate "phenolic wastewater." Table D1-4 indicates "phenolic wastewater with solvent." Figure D1-4 indicates "Industrial Wastewater Contaminated with Phenolics." Section D1.4, p. D46, indicates phenolic storage.

8. Section C2.4.1, p. C18, states that "sampling equipment is rinsed or disposed of between sampling of vessels." Clarify, what is the fate of rinsate and disposed sampling equipment?

9. In Table C2-2, Sampling Methods and Equipment, please indicate the SW 846 test number.

10. Section C2.4.1, p. C18, states "Chemical Processors, Inc. uses principles of sampling methods...as referenced in WAC 173-303-110(2)." However, Table C2-2 lists ASTM method D4057-81 which is not referenced in WAC 173-303-110(2). Please rectify this inconsistency.

11. The rational for the <u>Water Mix Screen</u> in section C2.4.4, p. 24, states, "This test does not apply to those wastes already in contact

with excess water or for which sufficient analytical data exist which indicate no potential reactivity with water." Indicate how it is determined if a waste is already in contact with excess water or how data can exist which indicate no reactivity with water?

12. The rational for the Radioactivity Test in section C2.4.4, p. C26, states, "This test applies to all tests that are suspected or have been potentially subjected to radioactivity." This sentence is confusing as written, suspected of what?

13. The rational for the Phenolics Total Recoverable test in section C2.4.4, p. C27, states, "The test applies to wastes that showed a positive response to the primary analysis and to final sewer discharge water." This sentence is confusing as written, please clarify.

14. What are the accept/reject values of the F-List Solvent Analysis (F-List Solvent) test, section C2.4.4, p. C29? What are the accept/reject values of all other tests?

15. Section C2.5.2, p. C36, states "The laboratory performs regular analyses of instrument check standards,..." What does **regular** mean? Please be specific.

16. Section C2.6.2, p. C43, step 5 states, "When all discrepancies, if any, are resolved, the shipment is off-loaded..." However, step 7 states, "Bulk wastes are sampled and analyzed prior to unloading." The order of these steps is confusing, rectify the apparent contradiction.

17. Section C2.6.2, p. C43, step 8 states, "If the analyses verify the waste is properly represented, the waste is accepted and stored or processed. No waste will be **processed** until this verification is complete." This implies that a waste may be accepted and stored prior to completion of the analysis. If wastes are to be stored prior to the completion of the analyses, indicate the steps that are taken to assure that incompatible wastes and waste residues are not mixed, otherwise eliminate this implication.

18. Section C2.6.2, p. C43, steps 8 and 9, indicate where waste is held while awaiting results from the corporate lab.

19. Section C2.7, p. C46, when tanks are double rinsed, what is the fate of the rinsate?

20. In the Physical Description test in Appendix C-2, how is the percentage of free liquids determined?

21. In the Ignitability Screen test in Appendix C-2, be more specific than "at a controlled rate" (what rate?) and "almost completely through the flame." Also, justify these flash point values.

22. In the radioactivity test in Appendix C-2, define the type of detector to be used, the sample container(s), the geometry of the detector and container (including distance), and what constitutes "above background."

23. In the primary PCB analysis test in Appendix C-2, does section 4.2 mean 50% of 100 watts or 50% = 100 watts?

24. Why doesn't Appendix C-4 have a form to record wastes shipped off site?

25. Typo under Section D1.1, p. D3, WAC 173-303-640(2)(a) cited twice.

26. Describe procedures and schedules for ancillary equipment (including piping) integrity assessments required by WAC 173-303-640(2)(c)(v)(B). Include the Structural Integrity Assessment Certifications for all existing ancillary equipment to be incorporated into the facility.

27. Section D1.1, p. D20, states, "All tanks at the Pier 91 facility generally include a corrosive allowance of 1/16'." Be specific, which tanks do and which do not. Also, is 1/16' intended to be 1/16 inch? If so, correct the notation.

28. Section D1.1, p. D24, states, "The coating will be Carboline's "Carbomastic 14" epoxy-coal tar interior coating (or equivalent)." Define equivalent, cite the standards used.

29. WAC 173-303-806(c)(iii), referenced in section D1.1, requires a description of feed systems, safety cutoff, bypass systems, and pressure controls (e.g., vents). Include such a description.

30. In section D1.2.1, p. D28, the cited code WAC 173-303-806(4)(c)(vii)(A) should be 806(4)(c)(viii)(A). Please correct this.

31. Section D1.2.1, p. D29, what concrete coating and sealing product is being proposed for use? Concresive 1305 and Semstone 145 are both not resistant to phenol solutions.

32. Section D1.3, p. 33, states, "If significant deterioration of coating or tank material is detected by coupon prior to the scheduled inspection under normal conditions, the tank may be inspected in between normally scheduled inspections." Be more specific, what is significant deterioration and will it or will it not be inspected?

33. With regard to section D1.4, p. D39, after the overflow monitoring system alarm sounds, how long does the operator have to shut off the feed pump before the tank overflows, assuming maximum fill rate?

34. Section D1.6, p. D51, states, "These emissions are discussed in Section C1.4, Wastes in Tank Systems." This should be Section C1.2., please correct this.

35. Regarding Appendix D-3, be more specific than "worst case situation," what does this entail?

36. Regarding Appendix D-3, 2.43 BTU/hr is a valid average, but wouldn't peak values be greater? Will the waste volume of 85% of the working volume ever be exceeded? If either of these values can be exceeded, demonstrate that the chosen condensers are still of sufficient capacity.

37. Regarding Appendix D-3, the bottom two numbers in the column under Cond. Cap. should be 8.1×10^5 and 4.05×10^5, not 8.1×10^6 and 4.05×10^6, please correct this.

38. Supply the schedule under which the tank vapor condensers will be inspected, also indicate that the condensers will be included in the tank corrosion assessments.

39. Section F2.2.1, p. F12, states, "Prior to unloading and storage at the facility, incoming containers are inspected for leaks, proper labeling and approved storage containers as described in Section C2.6.2." However, Section C2.6.2 does not address this subject and, Section B4.1, p. B46 states, "Containers of waste will not be received from off site." Also, the permit application has no provisions for container storage and handling. Rectify this discrepancy.

40. Indicate how the facility will comply with the yearly inspection of flammable areas as required by WAC 173-303-395(1)(d).

41. Change citation in Section G4.3.3, p. G28, under Procedures for tank repair: e., WAC 173-303-640(7)(F) to 640(7)(f), and indicate that compliance with this regulation requires certification by an independent, qualified, registered, professional engineer before a repaired tank can be put back into service.

42. In Section G4.3.3, p. G29, under Releases to Air either explain how a vapor cloud will be circumvented or contained, or delete this language.

43. Section I1.5.3, p. I36, states, "Background soil sampling and analysis will be completed before anticipated unit closure." Be more specific, background sampling should be completed as soon as possible after permit issuance.

44. In Table I3-2 (September 1990 revision), there is an addition error, the subtotal under Oil and Coolant Emulsions should be $22,135

not $11,439. Please correct this.

45. Section I3.3, p. I50, states, "It is assumed that all wastes will be treated on site, and that treatment costs will reflect current treatment costs using third party labor." Closure cost estimates must be based on off site, as well as third party, treatment. Revise closure cost estimates to include transportation costs in order to fulfill this requirement.

46. In Appendix I-2, Section B6, the first sentence reads, "Table I1-4, Decontamination Rinsate Treatment and Disposal." This should be "Table I1-3." Please correct this.

47. Submit a construction schedule indicating how the facility will be converted from its existing form to that described in the permit application. The dates in the schedule should be in the form of time from permit issuance.

48. Ecology realizes that Table B1-4 was submitted for information purposes only, however please explain why daily discharge limits are given with units of concentration, not mass or volume?