{In Archive} RE: Treatment Options in the Part 1 of the Permit
Akhter Hossain
to:
'Bley, Steven A', Mostafa Kamal
07/26/2011 04:31 PM
Cc:
Chris Jump, "Key, Brian", Jim Rudeen
Hide Details
From: Akhter Hossain <ahossain@kdheks.gov>

To: "'Bley, Steven A'" <bleys@cleanharbors.com>, Mostafa Kamal <MKamal@kdheks.gov>,

Cc: Chris Jump/R7/USEPA/US@EPA, "Key, Brian" <key.charles@cleanharbors.com>, Jim Rudeen <jrudeen@kdheks.gov>

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512601
RCRA

Steve,

Since you decided to keep the fuel blending (treatment) in the permit, at a minimum you need to submit the following:

Part A Application: First you need to identify which tank(s) from Tanks V-1 through V-8, you want to use for fuel blending. From Part A application, update no. 8 (page 3 of 6) by removing S02 process code and replacing with T01 (treatment in tank). You need to update only the tank(s) you want to do the treatment. Remaining tanks will have S02 process code. Your total storage volume in the tanks will also change.

Part B Application;

You need to explain in detail in the tank section (Section – E) how you will do your fuel blending in order to meet the requirements of 40 CFR 260.10, 264, 266, and 268. You explanation should include the procedure you will be following and the kind of fuel you are blending. You also need to meet the compatibility requirements and explain how you will meet those requirements. Your storage volume in the tank units will decrease. You need to update the page that explains the volume.
In Waste Analyses Plan (Section C), you need to explain that you will be performing pre-treatment

analysis, in -process analysis, and Post- treatment analysis. Please also explain what method (s) (such SW-----; EPA method ..... etc.) you will be using to for above analyses.
You need to explain what special safety measures you will take to perform the treatment
This will affect your Inspection Plan (Section F), Procedure to prevent hazard at treatment unit (Section G), Emergency Contingency Plan at the treatment unit (Section H)
You will also need to update the figures in section E and Section Y depicting the treatment tank(s).
If you are doing neutralization, please don't forget to explain in Part B Application in details where and how you will be doing neutralization.
Please let us know by tomorrow (7/27/11) when you will be able to submit above documents and additional documents (if any).

Akhter Hossain; P.E
KDHE/BWM

From: Bley, Steven A [mailto:bleys@cleanharbors.com]
Sent: Tuesday, July 26, 2011 12:46 PM
To: Mostafa Kamal; Akhter Hossain
Cc: 'Jump.Chris@epamail.epa.gov'; Key, Brian; Jim Rudeen
Subject: RE: Treatment Options in the Part 1 of the Permit

With this in mind we will need to keep the treatment information in the permit.

From: Mostafa Kamal [mailto:MKamal@kdheks.gov]
Sent: Friday, July 22, 2011 9:05 AM
To: Bley, Steven A; Akhter Hossain
Cc: 'Jump.Chris@epamail.epa.gov'; Key, Brian; Jim Rudeen
Subject: RE: Treatment Options in the Part 1 of the Permit

Fuel blending is treatment according to the definition of treatment in 40 CFR 260.10. The scenario you described will meet the definition of treatment and will be subject to 260.10, 264, 266 and 268 requirements. Depending on what other activities are performed to meet the fuel spec, you may require approval for additional Subpart X units. The wastes must meet compatibility requirements and the facility is responsible for waste determination prior to shipment to a cement plant.

Therefore, if you intend to perform fuel blending it must be explained in the Part B application with specific waste analyses requirements.

Mostafa Kamal, PE, CPM
Chief, Hazardous Waste Permits Section
Ph: 785-296-1609
Fax: 785-296-1592
Email: mkamal@kdheks.gov

From: Bley, Steven A [mailto:bleys@cleanharbors.com]
Sent: Thursday, July 21, 2011 3:24 PM
To: Mostafa Kamal; Akhter Hossain
Cc: 'Jump.Chris@epamail.epa.gov'; Key, Brian; Jim Rudeen
Subject: RE: Treatment Options in the Part 1 of the Permit

How does Kansas define Fuels blending?
For example if I have a waste stream with 5k Btu and place it into a tank with other waste stream with higher BTU's , and when I ship the contents of that tank out the resulting material has a average BTU of 9K. In this case if I did not do any physical processing other than pumping into a tank and then pumping out, would that be (treatment)fuels blending?

If it is, we are going to need to keep Fuels blending in the permit so we can use the tanks.

From: Mostafa Kamal [mailto:MKamal@kdheks.gov]
Sent: Thursday, July 21, 2011 4:15 PM
To: Bley, Steven A; Akhter Hossain
Cc: 'Jump.Chris@epamail.epa.gov'; Key, Brian; Jim Rudeen
Subject: RE: Treatment Options in the Part 1 of the Permit

Based on your explanation the neutralization unit appears to meet the definition of an ENU in accordance with 40 CFR 260.10 and therefore should be exempt under 264.1 (g)(6). Please make sure this is clearly explained in the Part B application for your facility.

On your second question regarding fuel blending, Kansas considers fuel blending as treatment. Therefore, the facility must secure a RCRA permit for treatment to run such an operation.

Let me know if you have any other questions.

Mostafa Kamal, PE, CPM
Chief, Hazardous Waste Permits Section
Ph: 785-296-1609
Fax: 785-296-1592
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From: Bley, Steven A [mailto:bleys@cleanharbors.com]
Sent: Thursday, July 21, 2011 12:40 PM
To: Mostafa Kamal; Akhter Hossain
Cc: 'Jump.Chris@epamail.epa.gov'; Key, Brian
Subject: RE: Treatment Options in the Part 1 of the Permit

See below

Also in the Kansas regulations, how does KDHE define fuels blending?

-----Original Message-----
From: Mostafa Kamal [mailto:MKamal@kdheks.gov]
Sent: Wednesday, July 20, 2011 11:33 AM
To: Bley, Steven A; Akhter Hossain
Cc: 'Jump.Chris@epamail.epa.gov'; Key, Brian
Subject: RE: Treatment Options in the Part 1 of the Permit

Steve,

Please explain your request based on the following:

1. Off-site or onsite waste.

   Offsite

2. Is D003 the only waste code applicable.

   D002 only

3. Does the treatment unit meet the definition of a neutralization unit?

It would meet the definition of elementary neutralization unit

4. How are the LDRs addressed following neutralization?

The D002 would be removed from the LDR.

Also, please identify the area of the Part B application where this waste is addressed.

I am still checking on this.

Thanks

Mostafa Kamal, PE, CPM
Chief, Hazardous Waste Permits Section
Ph: 785-296-1609
Fax: 785-296-1592
Email: mkamal@kdheks.gov

-----Original Message-----
From: Bley, Steven A [mailto:bleys@cleanharbors.com]
Sent: Wednesday, July 20, 2011 10:05 AM
To: Akhter Hossain
Cc: Mostafa Kamal; 'Jump.Chris@epamail.epa.gov'; Key, Brian
Subject: RE: Treatment Options in the Part 1 of the Permit

AKhter,
One question does Kansas consider Nuetralization treatment?

We would like to be permited to do Neutralization. If Kansas considers neutralization treatment, I can remove all refernce to other forms of treatment (i.e fuels blending, etc.). If Kansas does not consider Nue tralization as treatment, then I would remove all refences to treatment.

Also I am on the road this week with limited access to Email and the shared drive which contains to permit files.

Locating all sections that refer to treatment, correcting them , correcting the tables of contents, and to go through the review process will take at least till the end of the month.

From: Akhter Hossain [ahossain@kdheks.gov]
Sent: Monday, July 18, 2011 3:56 PM
To: Bley, Steven A
Cc: Mostafa Kamal; 'Jump.Chris@epamail.epa.gov'; Key, Brian
Subject: Treatment Options in the Part 1 of the Permit

Dear Mr. Bley,
This email is a follow up to our telephone conference call (few days ago) between KDHE (Mostafa Kamal, and Akhter Hossain) and Clean Harbors Kansas, LLC (Steve Bley, and Brian Key) regarding the treatment options at the facility. Your facility was permitted in 1995 for storage and treatment. The facility stopped treating waste a while ago by dismantling all miscellaneous subpart X units. The facility is scheduled to close building B, D, J, and all miscellaneous subpart X units. Mr. Brian Key (facility manager) clearly stated that the facility no longer treats any hazardous waste at the facility. However, your Part A and Part B applications have some wording such as treatment, fuel blending etc. (Most probably those words came from 1995 Part B Application submitted by HRI; the owner/operator of the facility at that time period). Based on current operating activities at the facility and

our conversation, KDHE will renew your Part 1 permit for storage only. In order to reflect your current operating activity at the facility in your Part B Application, please remove the words treatment, fuel blending and any words that represent treatment (you may consider the following suggestion: Use search criteria in MS Word for treatment, fuel blending etc. and correct them). Please remove everything from Section 7.2 , Appendix C-A of Section C of the Part B Application (you can also keep section 7.2 as 'reserved', that way your page numbering will not change). Please perform correction and send the corrected pages to KDHE (two copies) and EPA (one copy) by July 22, 2011. Your part B will then reflect the actual facility operating condition.
You also showed interest that in the future you want to have treatment options in the Tank(s)in the process Area. In the future when your facility will be ready to do the treatment in the Tank(s), please submit a permit modification request identifying which Tank(s) you want to use for treatment, and explain in details how you will be doing treatment ,etc. Once your modification request meets all the requirements of treatment, KDHE will modify your Part 1 permit and authorize your facility to perform treatment.
Your prompt response will be highly appreciated. If you have any question, please call me at (785) 296-1610. Thank you for understanding.

Akhter Hossain; P.E
KDHE/BWM

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