WA2917
7/15/84
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#9

FOIA EXEMPT

"Rite in the Rain"®
WEATHERPROOF

FIELD

NOTEBOOK NO. 351

7/15/86

Andrew Boyd ①
EPA - Region 10

RCRA Compliance Inspection

of Chem Pro
Chemical Processors, Inc
At
Pier 91 - Seattle

Inspectors

A. Boyd - EPA
Martha Rosenburg - EPA
Lawrence Ashley - WDOE - Redmond office

9:10 a.m.
We followed Chem Pro (D. Stefoni) in a car from Lucille St. office to Pier 91 gate, where checked by security guard - A 6' barbed wire fence surrounds the compound

(2)

Met w/ Chem Pro officials in office - sign up sheet passed around

I showed my credential to Chem Pro officials.

M. Rosesberg + L. Ashley showed their ~~credentia~~ ID cards

D. Stefani - Plant uses

Bob Moody

- drain oil -

Also receive ind. wastes, barge clean operations which may or may not contain heavy metals

Are pre-profiled - set a LAB data sheet -

do colorimetric test for
phenol & chrome

oxidize chrome

water soluble oil - machine cutting
oils - break those out -
separate oils - + discharge
water

A lot of isolate tankage -
removed tank - been out of
service about 6 or 8 years

if has metals isolate into metals
tank - precipitate -

Normally phenol comes in w/
hex chrome - oxidation reaction

(4)

After water clarified –
entire tank treated –

3 main water tanks – hold
Ballast + Bilge water –
oily waste water
tanks 96, 97, + 98

would not receive hazardous waste

Meho discharge permit –
do batch analysis prior to
discharge –
use 96, 97, 98 to
bulk water comes in –
pH adjustment to remove oil –
probably less than 1% oil

have 100 ppm discharge limit for
oil

tank 99 — waste oil —

Bottom sediment in water less than 10% — just sell it directly

(use centrifuge to measure —

— try to get below 6% before sell it

— Roughly 10% —

95 —

only have tanks 94 thru 99 & 100

other tanks are leased to Resco

tanks 94 & 100

oil water separation tanks — clean water off bottom — oil off top

not used to handle hazardous waste

(6)

tanks for haz. waste -

- 115, 116, & 117 & 165
  - capacity 10,000 gallons each

tank # 118 - was scrapped yesterday - wasn't used for 6-8 years

other tanks 106, 108, 109, & 111.
sludge holding tanks -

from tank bottoms from oil treatment

tanks 105, 107 & 110 -
oil treatment tanks -
have steam coils in them -

112 coolant holding + treatment tank - water soluble oils from machine coolants

114 good oil - for sale
holding tank -
as alt. to SS

113 Penoco tank - boiler fuel
tank -

Another tank not noted
pertansular tank - 14
Rec tank -
put coolant in it if it
has to be hot treatment
has steam coils - to heat for
treatment

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tank 80 - holds bad stuff
80-90% water & sediment
break oil & water out

(8)

— from perimeter in facility sloped
+ oil/water seperator in front
of facility
40,000 gallons —

faccility self contained —
drain out front — to oil/water seperator
w/ exception of rainfall-run-off —
goes into drain system — oil/water
seperator —

As Generator — just shipped 1st
load ~~80~~ 55, 55 gallon
drums of sludge bottoms —
designated as a hazardous waste
been shipped to Arlington —
from tank 111 —

plan to evaluate using
belt press — used a

centrifuge - but it was too
timely

Used Resource Recovery to
transport the waste

Storage of drums indicated on
map we were using to
describe facility

Record Keeping

If gone thru sales, Boeing -
or newly generated material - has
to be evaluated -
evaluate each waste that
comes thru - by sales Lucille
office
Profile sheet sent down to
Pier 91

(10).

On waste oil - doesn't apply (profile & sample) unless have reason to suspect

- every waste oil load that comes in is tested for chlorinated hydrocarbons - done right at Pica 91 facility

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if oil load = comp. sample, sampler that extends to bottom of tank & set a cross section

operator take sample to op. lab

centrifuges it for BS&W - then does sodium fusion for chlorinated hydrocarbons

need clean sample to detect. a color change / may use a diff. procedure in future a chlorine analyzer

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clean up of oil to read

is timely -

if pos. - run 2 tests on same sample -

if 2 or 3 pos. - goes to lab - for add. analysis or truck sits

At LAB run GC scan for PCBs det limit 2 ppm, if above 30ppm consider rejection - if much above rejection -

on flash point & viscosity tests on oil here at Rior 21 as well

if flash point is < 140° don't accept

tests performed by operations personnel at Rior 21 - no samples

(12)

r ANALYSIS

have 6 operators & a trainee

on a load accepted - noted on
a waste receipt -
filed by day & month —

— ~~have~~ are computerized in main
office on a monthly basis —

indexed by manifest #, generator,
waste type -

on D-Base 3

Any load, haz. waste or not
is tested at pier 91, & a
waste receipt generated.

have a homeowners program -
at Lucille St - — ~~too~~ bulked
up in drums & then subjected

to some waste profile process
before being shipped to Pier 91

Waste Profile Sheets
— go into a file by
date they are generated — about
earliest 2/85
10 or 14
At Georgetown — grouped
by generator

Profile Sheet is listed on a
waste receipt —
use
Log Book — daily input log
each one of waste receipts
is logged — lists waste
receipt no. or manifest #

use waste receipt # to track
information

(14)

TRACKING of locations of waste

waste receipt shows destination & operations loss show which tank —

wouldn't use 2 or more tanks to treat a haz. waste load —

unless — move water that's been treated to a water tank

Discharge permit - to metro 500 ppm.

Also have lab sheets — submit to metro — discharge to metro —

Drums they separated — started accumulating in Sept. —

D. Stefanik

WAP + Closure Plan

are being re-written pursuant to WDOE order —

on WAP — pulling scattered pieces together —

field insp

have oil water separator

oily water loads to oil water sep. — vacuum trucks involved in cleaning up

most waste oil to tank 59

have screener baskets — drum up material after dewatering —

(16)

400 ppm lead - other metals "hence" - in grit filtered out

HAVE 10 valve system for 2 manifolds - can go to any of the tanks in plant - can pump in 2 diff. directions

going to be burning waste oil in loading area -

Received hazardous waste

off loading of haz. waste - goes thru 4" manifold system -

hose from oil/water sep. area to pumps to 4" manifold. on 2" line

Don't use oil/water seperator -
may have spilled some haz. waste
in obtaining a sample

Operations office

LAB & PAPERWORK

Closed cup flash pt. APPARATUS
where colorimetric tests on
incoming loads

centrifuge -

have operations log book
there

descriptions of operations
& incoming loads - date
gen. - what tank it went
to -

(18)

waste receipts kept there - At end of month go to fire 91 office -

- has a telephone -

tank gaugings logs kept in the op. office - logs kept daily

USE tape & plum bob to gauge tanks

have 2 pumps use to load tankers - prevent overfill by gauging before & after -

Operators who load tanks are training to determine how much capacity available over the job training

looked at Daily Gages

also do weekly & monthly -
tank inspections -

TANK 106 - used to collect
& Bulk sludge -
covered tank - in covered
area concrete floor -
it's a rainy day - difficult to
detect leaks - but none apparent

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have sumps
w/ herringbone drain underneath
goes to rear of that goes to first
again - can go where with
but 1° goes to oil / water
separator

(20)

3" Line used for haz waste
own input line

Tank 165 - Black vertical
tank

tank w/ caustic sign -
Bob M. says sulfur caustic
in bottom -

Tank 105 sludge tank
covered.

& tank 111 - have overhead
feed

tanks 115, 116, & 117
vertical silver tanks -
in Berned Area - over 4'
B. Moody - walls should hold over
3 volumes of tanks

treatment tanks - takes less than a week - accumulate enough to make it cost effective -

when treatment complete goes to water tank

&

sludge - to sludge tanks -

Records on treatment -
in op. log book
or on work order -
if pump it - it's been treated -

Pipe Alleys - contained by 7 4' beam -
Cement bottom

(22)

liquid that collects goes to oil/water seperator

3" pipe used for haz waste - not in pipe alley

B. Moody - dont get reactive material - or incompatible

when finish treatment in tank empty tank completely & drain off bottom - may be a bit of sludge left - remove every 4 months -

tank that was removed - had been used to store acid - couldnt use

Drum of sludge covered
w/ wood frame - behind (to rear of
facility of tank 112

No labels

9 Drums behind tank 113
contains material could not process
that were removed from sludge tanks
- may consolidate it - make
another run of centrifuge - T
ship rather than OUT -

unlabeled -

fence not near of yard open

(24)

Large tanks - for oil & water

are diet Flour

Hydrogen Peroxide - oxidizer containers

when done drain them out

cut them up - goes to dumpster

take them out front & triple rinse

Rinsate to oil/water separator

other drums to Georgetown

to be crushed

Empty drums - used to process sludge out of - will refill them -

have discontinued use of water treating tank at N. long horizontal compartmentalized tank - have found only need to do pH adjustment

Rec tank - used to isolate coolant loads that need to be hot treated - has coils might hot treat phenols there too

(26)

The Rec tank is not in a bermed area - are drains next to it

~ 20 drums

- have some drums of old boiler chemicals from Penuco - caustic they're treating a little at a time

- empty drums - treatment chemicals go to Georgetown - from crushing -

4) warehouse area

West to Foam pump house

propane fuel feed

2500 barrells of water feed by city water - continuous feed

foam tanks

foam line system –

only used for tests –

have lines that allow for application to each tank

2 people w/ do tank treatments have full face resp.

fire extinguishers

for spill response have absorbent & 3 M pads – storage room in warehouse

(25)

End of field insp 11:35

12:50 pm
Reconvened at Pier 91 office
to do A review of records
w/ Bob Moody -

For Emergencies
have 3 two way radios -
- carries into tank area -
Also carry air horns -
No alarm system - except Boiler
Alarm - Pendro's

Arrangements for emers. response
with Fire Dept, Crowley Fire - got a copy of Arrangement

No written description of arrangements with other local response agencies

Have Day shift + swing shift - 16 hrs a day

Never had to implement the contingency plan -

had to call Crowley once - Barge - some oil on water at transfer -

Fire Cutting Plan -

Emergency Coordinators -

Contingency Plan I brought - same as one they're currently using -

(30)

Crowley Env — or Contract —
to address —

Emerg. Coord — has authority
to address emergency —

B. Moody — believes phone # are
current

— have at on-call person 24 hrs a
day — 7 days a week
or have answering service —

On call person may not be
one of listed emerg. coordinators

Training Plan — ACK to B.
Moody — mostly on the job training

Developing modules — for
particular parts of haz-waste

program - manifests

Some of modules have been done -

Mike Barnes - trainee

John Sweeney - maint. man -
will not be involved in haz waste.

other employees

qualification of operators

Basics
Cleanup - Orientation
- haz materials ident -
- test

Gassing trucks - will do w/ qualifying operator
1st a week

Front end - Assist operator in
unloading trucks &
tank lineups

After 6 months - do lineup themselves
& unload waste

HAVE 6 months under union
guidelines to accept.

(32)

have to be able to id. all the valves -
have to pass a operators test -

- after about 9 months - could move to second shift ..

Only operators or those working w/ qualified operators -

New training program currently been implemented

Also have safety consultant - that trains on safety practices
- slip, trip & fall
records in personnel file at Georgetown -

have conducted 2 of modules

- hazardous waste materials &
  waste shipping papers
  - Craig Parrot did not attend

&

- material safety data sheets

Copied attendance sheets & copy of tests

& copy of operator exam taken by Craig Parrot

no other training records —

Diff jobs — description in training program

Dock man =
Operators =
Maint man =

(34)

telephone - in unloading - area -
none in tank farm

No map of emers. equipment
locations

Inspection schedule - 3 pages
same as one already in EPA
resin 10 file

WAP - same as one in Resin
10 files
except have ADDED

Procedure for the Determ. of the
Compatability & Consolid. of wastes for
Blending 3 p.

Pier 91 Closure Plan 2 pages

+ latest cost est. 8/9/84

Name Matthews - transferred
to Tacoma Plant -

Reviewed Insp. Reports
weekly for TAPICS for 1986

No loss in Black Binder for
period between 1/6/86
& 4/24/86

Reviewed monthly reports for
1984

No los for 3/86
obtained a copy of 6/86
los

(36)

TANK GAUGING LOSS - reviewed for July '86

copied GAUGE loss for 7/10/86

On incoming loads - way determine what was received - by gauging tanks

if coolant, heavy metal water or phenol, or ind. trucker - gauge - tank before & after - recorded on waste receipt -

Many Generators use manifests for all their wastes - including Boeing & Lockheed -

looked at manifests for February '86

Transporters used to deliver to Chem Pro includes -

United Drain Oil WAD 069 552 586

Resource Recovery WAD 061 672 812

Copied 10 of the manifests from Feb. 86

On Boeing & Lockheed -

wastes - were on line before started profiling system which started 1/85

reliance on historical experience with the waste streams -

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planning to obtain profiles on these waste streams

(36)

in the near future —

Profile Sheet file

go thru sales 1st — then goes to lab — then to Rick — decide what plant — final approval

Generators fill it out — & A sample

A rep. sample must be submitted

generator must fill out waste profile sheet —

Copied profile sheet packages for Continental Can 5-17-85

& Bay City Marine 2-27-86

They searched for waste receipt # — though approved — may not have been shipped

track waste rec'd by waste receipt

II

fd. waste receipt for Cont-Can — checked for manifest - no manifest for

waste rec'd from Georgetown facility

waste water - solvent cont. - stripped out

water w/ phenol cont. —

No waste profile done —

go to Rec tank or tank 165 —

Asked to check which tank it went to —

waste receipt — shows to tank 165

to find out where it went to next - need to check OP-209. — got a copy of waste receipt —

Requested to be sent to EPA

— training program

— procedures for the det. of the compatability & consolidation of wastes for blending

— Hazardous Materials Info. Guide

(40)

On historical loads w/ no Profile sheets

B. Moody says does have some old analytical data -

requested waste receipt for Boens load rec'd 2-22-86 - manifest # 60404

tanks used to treat haz. waste made of low carbon - mild steel.

Boiler water - on drums of material any analytical data?

never been consigned to Chem Pro - Pier 91 - are treating it a little at a time

B. Moody - thinks they're may be at

Georgetown lab –

Also asked that they try & find that data & send it to us –

don't generate waste receipts for that when they treat it –

so no records of treatment / dark what tank –

would be gains to water tank 96, 97 or 98

Looked at manifests kept at facility – have them till at least July '83 in fact to 1981

(2/2)

will send a copy of manifest for shipment of sludge went out 7/14/86 —

55 - 55 gallon drums

Obtained copies of operations log — for April 28, 86

Closing Conf. —

No report will be sent from EPA

a product of

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