

**NEW YORK STATE
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

**DRAFT MODIFICATIONS
OF THE
HAZARDOUS WASTE MANAGEMENT FACILITY
PART 373 PERMIT**

FOR THE

**CWM CHEMICAL SERVICES, L.L.C.
MODEL CITY, NEW YORK FACILITY**

**Addition of Tanks T-165 & T-220
and
Replacement of PCB Warehouse Drum Storage Containment**

**Draft Modifications
to
Specific Permit Attachments**

TABLE OF CONTENTS

Draft Modifications to Permit Attachments

- Attachment A, Part A Application
- Attachment D, Appendix D-1, Containers

PERMIT ATTACHMENT:

Attachment A - Part A Application

AFFECTED PAGES:

Replace Page 3 of 6 with the following draft Page 3 of 6 from the Permit modification application.

**PURPOSE OF
MODIFICATIONS:**

- To reflect site-wide tank capacity changes associated with allowing some existing tanks to be used for treatment & storage.

8. Process Codes and Design Capacities (Continued)

EXAMPLE FOR COMPLETING Item 8 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.

Line Number	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	For Official Use Only	
	(1) Amount (Specify)				(2) Unit of Measure (Enter code)				
X 1	S	0	2	5	3	3 . 7 8 8	G	0 0 1	
1	D	8	0	2233 .		A		001	
2	S	0	2	993,426 .		G		026	
3	S	0	1	1390816 .		G		033	
4	S	0	4	117270000 .		G		004	
5	T	0	1	259180 .		U		031	
6	T	0	4	100 .		D		002	
7				.					
8				.					
9				.					
1 0				.					
1 1				.					
1 2				.					
1 3				.					
1 4				.					
1 5				.					

NOTE: If you need to list more than 15 process codes, attach an additional sheet(s) with the information in the same format as above. Number the lines sequentially, taking into account any lines that will be used for "other" processes (i.e., D99, S99, T04 and X99) in Item 9.

9. Other Processes (See instructions on page 25 and follow instructions from Item 8 for D99, S99, T04 and X99 process codes)

Line Number (Enter its in sequence with Item 8)	A. Process Code (From list above)				B. PROCESS DESIGN CAPACITY		C. Process Total Number of Units	D. Description of Process
	(1) Amount (Specify)				(2) Unit of Measure (Enter code)			
X 2	T	0	4	1 0 0 . 0 0 0		U	0 0 1	In-situ Vitrification
6	T	0	4	100 .		D	2	Stabilization, microencapsulation, and macroencapsulation of waste and debris for landfill disposal.
				.				
				.				
				.				
				.				
				.				
				.				
				.				

PERMIT ATTACHMENT:

Attachment D, Appendix D-1 - Containers,
Surface Impoundments & Tanks -
Containers

AFFECTED PAGES:

Replace Pages 1, 4, 5, 13 & 14 with the
following draft Pages 1, 4, 5, 13 & 14 from
the Permit modification application.

**PURPOSE OF
MODIFICATIONS:**

- To reflect the decrease in PCB Warehouse Area 3/6 container storage capacity (2338 drums to 1358 drums) and to reduce the maximum number of liquid waste containers to 160 drums.

- To reflect the replacement of the coated concrete secondary containment in PCB Warehouse Area 3/6 with coated steel pans.

CONTAINERS

This section contains a description of the container storage areas and operations utilized to store and process solid and liquid hazardous wastes received at the CWM Chemical Services, LLC. (CWM) Model City, New York facility (site). In addition, CWM utilizes these areas to store and process non-hazardous waste.

A. CONTAINER STORAGE AREAS

The site currently maintains the following areas for the permanent storage and handling of containerized solid and liquid hazardous wastes.

LOCATION	WASTE TYPE	CONTAINER TYPE	STORAGE CAPACITY	AVAILABLE VOLUME (gallons)	REQUIRED VOLUME (gallons)
Drum Management Building					
Area I	Liquid/Solid	drums	688 55-gal drums	4,675	3,784
Area II	Liquid/Solid	drums	320 55-gal drums	1,989	1,760
Area III	Liquid/Solid	drums	36 55-gal drums	251	198
Area IV	Liquid/Solid	drums	36 55-gal drums	251	198
Area V (Floor Trench System)	Liquid	drums	117 55-gal drums	648	644
	Solid	drums	1,376 55-gal drums	NA	NA
Drum Building West Ramp	Liquid	tankers	2-5,500-gal tankers	22,118	10,104
Truck Loading/Unloading Area & Ramp	Solid	drums	1,040 55-gal drums	NA	NA
Area VI, Sections 1, 2 & 3	Solid	drums	956 55-gal drums	NA	NA
PCB Warehouse Building					
Area 1	Solid	drums	1,368 55-gal drums	NA	NA
Area 3/6	Liquid	drums	160 55-gal drums	409 (per pan)	220 (per pan)
	Solid	drums	1,358 55-gal drums	NA	NA
South Trailer Parking Area	Liquid/Solid	tankers/rolloffs	58 tankers/rolloffs	82,481	Not defined
Stabilization Facility					
Trailer Parking Area I	Solid	rolloffs	6 rolloffs	NA	NA
Trailer Parking Area II	Solid	rolloffs	14 rolloffs	NA	NA
Trailer Parking Area III	Liquid/Solid	rolloffs	19 rolloffs	39,273	Not defined
Trailer Parking Area IV	Liquid/Solid	rolloffs	9 rolloffs	19,636	Not defined
Waste Ash Tanker Unloading Area	Liquid	tankers	1- 941-gal container	2,042	Not defined
	Solid	tanker/rolloff	1 tanker/rolloff	NA	NA
Special Client Treatment Room	Solid	rolloffs	4 rolloffs	NA	NA
Macro Room	Solid	rolloffs	18 rolloffs	NA	NA
Lower Drum Shedder Area	Liquid/Solid	rolloffs	2 rolloffs	3,019	NA
Upper Drum Shredder	Solid	drums	300 55-gal drums	NA	NA
North Expansion Building	Solid	rolloffs	15 rolloffs	NA	NA
Aqueous Treatment Building					
AT Drum Dock	Liquid	drums	128 55-gal drums	1,303	704
	Solid	drums	128 55-gal drums	NA	NA
AT Tanker Unloading Area	Liquid/Solid	tankers	2-6,000-gal tankers	14,851	9,916
AT Filter Press Room	Solid	rolloffs	1 rolloff	NA	NA
T. O. Building					
Transformer Containment Pan	Liquid/Solid	transformer/drums	11 pans	386-gal (per pan)	Not defined
T.O. Building Loading Ramp	Liquid/Solid	tanker	2-6,000-gal tankers	18,269	17,515

(4). General Container Storage Procedures

(a). Packaging Requirements

The waste generator must conform to the container packaging requirements as follows:

- 49 CFR Subpart B - Table of Hazardous Materials and Special Provisions; specifically Part 172.101(i) Packaging Authorizations;
- 49 CFR Part 173 - Shippers - General Requirements for Shipments and Packagings; and
- 49 CFR Part 178 - Specifications for Packagings.

Containers that arrive at the site which do not meet the United States Department of Transportation (USDOT) specifications will not be shipped off the site unless the contents of the container are placed into a container which meets USDOT specifications. Containers that arrive at the site which appear to have obvious signs of structural damage or deterioration, or which are found to be leaking shall either be overpacked into containers meeting the Resource Conservation and Recovery Act (RCRA) container standards or will be emptied and their contents placed into containers meeting RCRA container standards or processed immediately.

Per 49 CFR, all containers that contain hazardous materials and leave the site for transportation by public highway must meet USDOT standards.

(b). Containment

Secondary containment systems as described below are utilized by CWM to store containerized (i.e., drums, rolloffs, etc.) liquid hazardous waste throughout the site. In the areas that only store hazardous waste solids, secondary containment is not required, but the area will be designed and operated to remove liquid resulting from precipitation and containers will be elevated above any accumulated liquids.

(1). Modular Units

Modular units are currently used by CWM to store drummed liquid hazardous waste within the Aqueous Treatment Building (AT Drum dock). The modular units are constructed of a rectangular steel frame with a corrosion resistant steel grating over the frame which is bonded to the concrete floor using a solid layer of sealant (i.e., butanol caulk). Containers are positioned on these gratings. Containers holding

packaged laboratory chemicals may be stored on floors since the packaging requirements listed under 49 CFR provide adequate primary, secondary and tertiary containment.

(2). Concrete Curbing

Concrete curbing is currently being used as secondary containment by CWM to store containerized liquid hazardous waste throughout the site. In several of the areas, CWM currently utilizes a coating system (e.g., epoxy) to improve the impervious quality of the concrete. In areas where existing coatings exist, CWM will either maintain the existing coating system or replace it with an approved sealant (i.e., CHEMTEC One manufactured by CHEMTEC INTL). In liquid container storage areas that currently do not have an existing coating system, CWM will apply a sealant to the entire secondary containment system after obtaining NYSDEC approval of the proposed sealant. The following table lists all container storage areas and CWM's plans to provide coatings or sealants.

LOCATION	CWM's PROPOSED PLAN
Drum Management Building	
Building Interior	Install new sealant
West Ramp	Install new sealant
Truck Loading/Unloading Area & Ramp	No coatings or sealants required
PCB Warehouse Building	
Area 3/6	No coatings or sealants required (use pans for liquid storage)
All other areas	No coatings or sealants required
South Trailer Parking Area	Install new sealant
Stabilization Facility	
Trailer Parking Area I & II	No coatings or sealants required
Trailer Parking Area III & IV	Install new sealant
Waste Ash Tanker Unloading Area	Maintain existing coating
Special Client Treatment Room	No coatings or sealants required
Macro Room	No coatings or sealants required
Lower Drum Shedder Area	Maintain existing coating
Upper Drum Shredder	No coatings or sealants required
North Expansion Building	No coatings or sealants required
Aqueous Treatment Building	
AT Drum Dock	Install new coating
AT Tanker Unloading Area	Install new sealant
AT Filter Press Room	Maintain existing coating
T. O. Building	No coatings or sealants required (use pans for liquid storage)
T.O. Building Loading Ramp	Install new sealant
Truck Wash Facility	No coatings or sealants required
T-130 Loading/Unloading Area	Install new sealant
T-108 Loading/Unloading Area	Install new sealant
T-109 Loading/Unloading Area	Install new sealant
T-158 Loading/Unloading Area	Install new sealant

20-inch centers. The rafters are supported by wooden beams on vertical wood columns in Areas 3, 4, and 5 and by longer span wood trusses in Area 1. The roof is covered with tar paper and sealed with roofing tar.

(2). Operations

The PCB Warehouse Building is used for the container storage of solid and liquid materials. Liquid drums must be stored within containment pans. All containers stored in the PCB Warehouse are compatible. Figure D-2 presents the proposed PCB Warehouse Building layout. Figure D-2 presents the maximum liquid and/or solid storage capacity for the building based on the previously presented spacing requirements. Secondary containment calculations accompany Figure D-2. No secondary containment will be provided or is required in the areas used for storage of solid hazardous waste. Coatings or sealants are not required in these areas. As presented in Figure D-2, the storage of waste within the building will be as follows:

Areas 1, 3 and 6 are primarily used for container storage of PCBs, non-regulated wastes, and non-PCB repackable, transship and other wastes.

Area 3 will be used to store compatible liquid and solid waste materials. Areas 1 and 6 will be used for storage of solids only. Area 5 will be used to store empty drums and supplies. Areas 2 and 4 will be used to store facility supplies and equipment including clean overpack drums. As previously discussed, no secondary containment will be required in areas 1, 2, 4 and 5 based on only solid storage requirements.

(3). Containment

Containment within the liquid waste storage area (Area 3) is provided by containment pans. All building storage areas are provided with a one-foot high continuous perimeter curb and doors are equipped with elevated ramps to prevent liquids from exiting the building.

(a). Base Construction

The PCB Warehouse Building floor consists of a poured concrete slab and is inspected as defined within the Facility Inspection Plan. The base of the PCB Warehouse Building was designed by a certified professional engineer to support loads and structural stresses in excess of those provided by present operations.

(b). A Procedure for the Removal of Liquids from Secondary Containment

The PCB Warehouse Building is inspected daily on operating days for leaks or spills. Spilled materials will generally be absorbed with absorbent and placed into drums for disposal. Upon receipt of a shipment of drums and after offloading, a visual inspection is made for leaking drums.

If a small leak should occur, the contents of a leaking drum are transferred to another appropriate container or the drum is placed in an overpack drum. In the event of major leaks or spills, liquids will be removed by vacuum trucks or absorbed with a compatible absorbent material and placed into containers for disposal.

Spilled material is cleaned up with absorbent materials. Spill control procedures are described in the site's existing Hazardous Waste Contingency Plan.

(c). Control of Run-On and Run-Off

All container management operations will take place within the confines of the existing PCB Warehouse building. Therefore, no run-on and run-off is expected. Also, the base of the doorways consists of 8 inch high steps to prevent liquids from escaping and precipitation from entering.

E. SOUTH TRAILER PARKING AREA

(1). History and Design

The South Trailer Parking Area encompasses 15,000 square feet, was constructed in 1986, and is used to store full trailers containing solid or liquid materials. The area is 299 feet long and is designed to store liquid and solid materials in containers prior to disposal. The area is constructed of a reinforced concrete pad, curbed on three sides and sloped so that all precipitation or potential leakage from any unit will be contained.

(2). Operation

The South Trailer Parking Area may be used by CWM for storage of liquid and/or solid hazardous and non-hazardous waste. Containers are typically placed in this area for the following reasons:

- Trailer is delivered to the site after normal operating hours;
- The materials delivered are found to be off-specification;
- There is an operations holdup and the materials cannot be disposed or processed promptly;