

MODULE III - STORAGE IN CONTAINERS

III.A. APPLICABILITY

- III.A.1. The requirements of this permit module pertain to the hazardous waste container storage operations at the Permittee's facility. The Permittee shall comply with UAC R315-8-9 and all conditions of this module. For the purposes of this permit, the hazardous waste container management areas are designated as: HS-1, ES-1, Resthouse 1 (RH-1), and Segment Storage.

III.B. WASTE IDENTIFICATION

- III.B.1 The Permittee shall only store hazardous waste with the following waste codes in containers at the HS-1 chemical storage facility, subject to the terms of this permit:

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D028, D029, D035, D039, D040, F001, F002, F003, F004, F005, K044, P022, P056, U002, U003, U031, U044, U075, U080, U112, U117, U147, U151, U154, U159, U161, U196, U201, U209, U210, U211, U213, U219, U220, U225, U226, U228, U239, U240, U244, U246, U328, U359.

- III.B.2 The Permittee shall only store hazardous waste with the following waste codes in containers at the ES-1 explosive storage facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, D001, D003, D005, D008, K044

- III.B.3 The Permittee shall only store hazardous waste with the following waste codes in containers at the RH-1 explosive storage facility, subject to the terms of this permit:

F001, F002, F003, F004, F005, D001, D003, D005, D008, K044

- III.B.4 The Permittee shall only store hazardous waste with the following waste codes in containers at the Segment Storage explosive storage pad, subject to the terms of this permit:

F001, F002, F003, F004, F005, D001, D003, D005, D008, K044

III.C. CONDITION OF CONTAINERS

- III.C.1. If a container holding hazardous waste is not in good condition (e.g., severe rusting, bulging, apparent structural defects) or it has begun to leak, the Permittee shall transfer the contents from this container, or the container itself, to a container in good condition or manage the waste in some other way that complies with UAC R315-8-9.2. This shall be completed as soon as possible, but no later than 24 hours from the time the problem was first discovered and noted in the inspection log.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

III.D.1. The Permittee shall assure that all wastes are compatible with the storage containers as required by UAC R315-8-9.3.

III.E. MANAGEMENT OF CONTAINERS

III.E.1. The Permittee shall manage containers in accordance with UAC R315-8-9.4. A container holding hazardous waste shall always be closed during storage except when the Permittee is adding or removing waste from the container. The Permittee shall not store containers in a manner which may cause the containers to leak. The Permittee shall manage containers in accordance with this module of the Permit and the procedures identified in Attachment 4.

III.E.2. The Permittee shall maintain aisle space in each container management area that complies with Condition II.J.6.

III.E.3. HS-1 is the chemical storage area where the Permittee accumulates and consolidates the wastes identified in Condition III.B.1. HS-1 has a combined storage capacity of 15,900 gallons and is constructed as described in Attachment 2. The Permittee shall not exceed the storage capacity of Buildings 8562, 8567, 8568, and Sheds A and B as identified in Attachment 2. The Permittee shall comply with the following conditions for wastes stored in HS-1:

III.E.3.a. Liquids may be stored in Buildings 8562, 8567, 8568, and Sheds A and B located south of the main structure. Buildings 8562 and 8567 have secondary containment as described in Attachment 2. All liquid hazardous wastes regulated under state and federal law stored in Building 8568 and Shed A shall be stored on a containment pallet except waste packaged as lab packs per 49 CFR 173.12. All liquids stored in Shed B shall be stored in the small container storage cabinets described in Attachment 2 or on a containment pallet. Whenever liquid wastes are stored on containment pallets, the Permittee shall maintain at least a 36-inch aisle space on two sides of the each containment pallet.

III.E.3.b. All non-hazardous waste stored in any of the HS-1 storage buildings shall count towards the total storage capacity of each building as identified in Attachment 2.

III.E.3.c. The largest liquid container containing hazardous waste that may be stored in Buildings 8567, 8568, and Sheds A and B shall be an 85-gallon over pack container. The largest liquid container that may be stored in Building 8562 shall be a 330-gallon tote bin provided that no incompatible waste issues exist and the Permittee maintains at least a 36-inch aisle space on two sides of the each tote bin.

III.E.3.d. The largest non-liquid container containing hazardous waste that may be stored in the storage buildings identified in Condition III.E.3. shall be a one-cubic yard box.

- III.E.3.e. The 55-gallon drums, 85-gallon over pack containers and one-cubic yard boxes stored in Buildings 8562, 8567 and 8568 shall not be stacked more than two high. Tote bins and non-lab pack containers larger than 10 gallons that are stored in Building 8562 and Sheds A and B shall not be stacked. Containment pallets shall not be stacked.
- III.E.3.f. Containers smaller than five gallons shall be stored in the small container storage cabinets, the refrigerator located in Building 8562 or a lab pack container.
- III.E.3.g. The small container storage cabinets have a maximum storage capacity of 130 gallons. The Permittee shall not store more than 130 gallons of waste in any small container storage cabinets at any time.
- III.E.3.h. Small containers received at HS-1 shall be processed within two business days as defined in Section 4.6 of Attachment 4.
- III.E.4. ES-1 is an explosive storage area where the Permittee may store, accumulate, and consolidate the wastes identified in Condition III.B.2. The Permittee shall comply with the following conditions for wastes stored in ES-1:
 - III.E.4.a. ES-1 has a hazardous waste storage capacity of 20,000 pounds. The Permittee shall not exceed the storage capacity of ES-1.
 - III.E.4.b. The 55-gallon containers and SLIDs (Slum-in-a-Drum) shall not be stacked. The 30-gallon fiber drums shall not be stacked more than two high. Slum bags, as defined in Section 4.2.1 of Attachment 4, may be accumulated and stacked inside empty SLIDs.
 - III.E.4.c. Wastes containing free liquids shall not be stored at ES-1.
 - III.E.4.d. Nitroglycerine (NG) remover shall not be stored at ES-1.
- III.E.5. RH-1 is an explosive storage area where the Permittee may store, accumulate, and consolidate the wastes identified in Condition III.B.3. The Permittee shall comply with the following conditions for wastes stored in RH-1:
 - III.E.5.a. RH-1 has a hazardous waste storage capacity of 150,000 pounds. The Permittee shall not exceed the hazardous waste storage capacity of RH-1.
 - III.E.5.b. RH-1 has a total storage limit of 250,000 pounds. The Permittee shall at all times maintain a detailed inventory for RH-1 that clearly identifies the type and quantity of waste and product stored in RH-1. The Permittee shall not exceed the total storage limit for RH-1.
 - III.E.5.c. The Permittee may store the following containers at RH-1: whole or sectioned rocket motors, drums manufactured from steel, plastic or fiber not to exceed 85-gallons in

capacity, SLIDs, anti-static or conductive plastic bags, slum pots, fiber, plastic or wooden boxes not to exceed 119 gallons in capacity and sling bags not to exceed 119 gallons in capacity. If the Permittee needs to store a container not listed above at RH-1, the Permittee shall modify the Permit in accordance with Condition I.D.

- III.E.5.d. The rocket motors, 55-gallon drums, SLIDs, and slum pots shall not be stacked. The 30-gallon fiber drums shall not be stacked more than two high. Slum bags may be stacked inside empty SLIDs.
- III.E.5.e. Wastes containing free liquids shall not be stored at RH-1.
- III.E.5.f. NG remover shall not be stored at RH-1.
- III.E.6. Segment Storage is an explosive storage area where the Permittee may store, accumulate, and consolidate the wastes identified in Condition III.B.4. The Permittee shall comply with the following conditions for wastes stored in Segment Storage:
 - III.E.6.a. Segment Storage has a hazardous waste storage capacity of 75,000 pounds of Class 1.3 explosive material. The Permittee shall not exceed the storage capacity for Segment Storage.
 - III.E.6.b. All products stored at Segment Storage shall count towards the total storage capacity of the unit (75,000 pounds).
 - III.E.6.c. Class 1.1 explosive materials shall not be stored at Segment Storage.
 - III.E.6.d. The Permittee may store Class 1.3 products at Segment Storage, but the Permittee shall not store product and waste on the pad at the same time.
 - III.E.6.e. The Permittee may store the following containers at Segment Storage: whole or sectioned rocket motors, drums manufactured from steel, plastic or fiber not to exceed 85-gallons in capacity, SLIDs, anti-static or conductive plastic bags, slum pots, fiber, plastic or wooden boxes not to exceed 119 gallons in capacity, and sling bags not to exceed 119 gallons in capacity. If the Permittee needs to store a container not listed above at Segment Storage, the Permittee shall modify the Permit in accordance with Condition I.D. Whole and sectioned rocket motors shall be stored on trailers or storage chocks. All other containers shall be stored inside enclosed locked trailers.
 - III.E.6.f. The rocket motors and SLIDs shall not be stacked. The 55-gallon drums and the 30-gallon fiber drums shall not be stacked more than two high.
 - III.E.6.g. Wastes containing free liquids shall not be stored at Segment Storage.
 - III.E.6.h. NG remover shall not be stored at Segment Storage.

III.E.6.i. Rocket motors and trailers holding containers that are stored at Segment Storage shall be grounded at all times.

III.F. CONTAINMENT UNITS

III.F.1. The Permittee shall construct, maintain, and operate the containment system in accordance with Attachments 2 and 4. The containment systems shall be free of cracks, gaps and sufficiently impervious to contain leaks, spills and precipitation.

III.F.2. The Permittee has two liquid storage areas at HS-1 where secondary containment has been constructed. Buildings 8562 and 8567 have a secondary containment capacity of 165 and 690 gallons respectively. The Permittee shall conduct a weekly inspection of the secondary containment systems in Building 8562 and 8567 to insure that the coating or sealant on the floor and containment basins, and that caulking in the concrete joints are in good condition. The inspection shall, at minimum, check for cracks, gaps, and chips in the concrete flooring, sumps and curbing, the condition of the coating or sealant, and caulking.

III.F.3. The Permittee has eight cabinets and a refrigerator for small container storage. Five are located in Building 8567 and three are located in Shed B. Each cabinet also has a built-in secondary containment capacity of 13 gallons. The refrigerator is located in Building 8562 and does not have secondary containment. The Permittee shall provide secondary containment for all liquid hazardous wastes regulated under state or federal law stored in the refrigerator and separate containment for incompatible wastes. The Permittee shall conduct a weekly inspection of the built-in secondary containment in each of the small container storage cabinets. The inspection shall, at minimum, check for cracks and gaps in the containment and the condition of the coating or sealant, and caulking of the containment basins.

III.F.4. The secondary containment systems in Buildings 8562 and 8567, the cabinets, and refrigerator identified in Conditions III.F.2. and III.F.3. shall be inspected at least weekly. Any liquids observed in any of the secondary containment systems during an inspection shall be removed within 24 hours of discovery.

III.F.5. Any time liquids are stored on a containment pallet in any of the HS-1 storage areas, the Permittee shall inspect the containment pallet, at least weekly for liquids. Any liquids observed in any of the secondary containment systems during an inspection shall be removed within 24 hours of discovery.

III.G. SPECIAL REQUIREMENTS FOR IGNITABLE AND REACTIVE WASTE

- III.G.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line.
- III.G.2. For ignitable and reactive wastes stored at HS-1, the Permittee shall comply with UAC R315-8-2.8 and the requirements specified in Attachment 4, Section 4.4.1.
- III.G.3. For the explosive storage units, the Permittee shall comply with UAC R315-8-2.8 and the quantity distance requirement specified in Attachment 2, Section 2.3.

III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE

- III.H.1. The Permittee shall not place incompatible waste or materials in the same container and shall comply with UAC R315-8-2.8.
- III.H.2. The Permittee shall not place hazardous waste or materials in an unwashed container that previously held an incompatible waste or material.
- III.H.3. Whenever incompatible wastes are stored in the same containment area, the containers shall be isolated from one another using a containment pallet. The incompatible wastes shall be separated by an aisle space of at least 36 inches. Alternatively, waste materials packaged as lab packs shall be segregated as per the requirements in 49 CFR 173.12(e).
- III.H.4. The Permittee shall document compliance with Conditions III.H.1., III.H.2 and III.H.3. as required by UAC R315-8-2.8(c) and place the documentation in the operating record.

III.I. IDENTIFICATION AND LOCATION OF CONTAINERS IN THE OPERATING RECORD

- III.I.1. The Permittee shall record in the operating record the location of each container of hazardous waste stored at any hazardous waste container storage area identified in Condition III.A. until the container is manifested off-site, or treated at the NIROP Burning Grounds. The Permittee shall track hazardous waste storage, treatment and off-site management of wastes using the waste tracking systems described in Attachment 4, Sections 4.3.

III.J. INSPECTIONS

- III.J.1. The Permittee shall conduct inspections of the storage areas identified in Condition III.A. of this Permit in accordance with the schedule outlined in Attachment 5.

III.K. STORAGE OF WASTES FOR LONGER THAN ONE YEAR

III.K.1. The Permittee may store hazardous waste for more than a year provided the Permittee submits written notification to the Director prior to exceeding the one year time limit. This provision applies only to the following hazardous wastes:

III.K.1.a. Waste explosives designated for disposal at Utah Test and Training Range (UTTR) where disposal arrangements and/or approvals cannot be completed within one year.

III.K.1.b. Waste rocket motors or motor sections that lack adequate approvals to ship off-site and/or lack sensitivity data to develop an appropriate disposal plan.

III.K.1.c. Small containers of off-specification commercial chemical products stored at HS-1 when there is not an adequate volume to fill a lab pack container or the Permittee has had difficulty in arranging disposal at a TSDF or been unable to find an approved TSDF.

III.K.2. Whenever the Permittee is storing any of the waste streams identified in Condition III.K.1.a, III.K.1.b, and III.K.1.c, the Permittee shall submit a written report to the Director on or before January 31st of each calendar year. This report shall provide a detailed description of the waste, where it is stored, and the Permittee's efforts to arrange treatment and/or disposal.

III.L. CLOSURE/POST CLOSURE

III.L.1. The Permittee shall close the storage areas in accordance with UAC R315-8-7, UAC R315-8-9.9, Condition II.N, and Attachment 8 of this permit.