



# WASTE PERMITS ROUTING/APPROVAL SLIP



|                                                                                                                                                                                                                                                                                                                                                                                                          |                                                  |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|----------------------------------------------------|---------------------------------------------------------|---------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|--------------------------|
| <b>SOLID</b>                                                                                                                                                                                                                                                                                                                                                                                             | <input type="checkbox"/>                         | <b>HAZARDOUS</b>                                   | <input checked="" type="checkbox"/>                     | <b>WASTE TIRES</b>                                | <input type="checkbox"/>                                                                                                                                                                                                                                                                                             | <b>FINANCIAL ASSURANCE</b> | <input type="checkbox"/> |
| <b>AI No.</b>                                                                                                                                                                                                                                                                                                                                                                                            | 742                                              | <b>Company/Facility</b>                            | Chemical Waste Management, Inc. – Lake Charles Facility | <b>Date Routed</b>                                | 3/21/2017                                                                                                                                                                                                                                                                                                            |                            |                          |
| <b>SW ID No.</b>                                                                                                                                                                                                                                                                                                                                                                                         | LAD000777                                        | <b>Parish</b>                                      | Calcasieu                                               | <b>Permit Type</b>                                | <input type="checkbox"/> I <input type="checkbox"/> I-A <input type="checkbox"/> II <input type="checkbox"/> II-A <input type="checkbox"/> III<br><b>HW:</b><br><input checked="" type="checkbox"/> Operating <input type="checkbox"/> Post-Closure<br><input type="checkbox"/> RDD <input type="checkbox"/> CA Only |                            |                          |
| <b>EPA ID No. (HW)</b>                                                                                                                                                                                                                                                                                                                                                                                   | 201                                              |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <b>Permit No.</b>                                                                                                                                                                                                                                                                                                                                                                                        | LAD000777<br>201-OP-RN-MO-2                      | <b>TEMPO Activity No.</b>                          | PER20140007                                             | <b>Originator</b>                                 | Lina Kruth Saale                                                                                                                                                                                                                                                                                                     |                            |                          |
| <input type="checkbox"/> Draft Permit                                                                                                                                                                                                                                                                                                                                                                    | <input checked="" type="checkbox"/> Final Permit | <input type="checkbox"/> Major Modification        | <input type="checkbox"/> Minor Modification             | <input type="checkbox"/> Approval of Construction | <input type="checkbox"/> Order to Close                                                                                                                                                                                                                                                                              |                            |                          |
|                                                                                                                                                                                                                                                                                                                                                                                                          |                                                  | <input type="checkbox"/> Class 1 <sup>1</sup> (HW) | <input checked="" type="checkbox"/> Class 2 (HW)        | <input type="checkbox"/> Miscellaneous Approval   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
|                                                                                                                                                                                                                                                                                                                                                                                                          |                                                  |                                                    | <input checked="" type="checkbox"/> Class 3 (HW)        |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <input type="checkbox"/> Closure Plan                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/> Extension               | <input type="checkbox"/> NOD/Technical Review      | <input type="checkbox"/> Correspondence/Letter          | <input type="checkbox"/> Other                    |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <b>Description of Document:</b> FINAL Modified Operating and Post-closure Permit, Class 3 Permit Modification                                                                                                                                                                                                                                                                                            |                                                  |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <b>1. Technical Review</b>                                                                                                                                                                                                                                                                                                                                                                               |                                                  | <b>Date Received</b>                               | <b>Date Returned to Originator, if done</b>             | <b>Comments</b>                                   | <b>Approved / Initials</b>                                                                                                                                                                                                                                                                                           | <b>Date Forwarded</b>      |                          |
| ES                                                                                                                                                                                                                                                                                                                                                                                                       | <input checked="" type="checkbox"/>              |                                                    |                                                         |                                                   | lks                                                                                                                                                                                                                                                                                                                  | 3/21/17                    |                          |
| Engineering                                                                                                                                                                                                                                                                                                                                                                                              | <input checked="" type="checkbox"/>              |                                                    |                                                         |                                                   | JB                                                                                                                                                                                                                                                                                                                   | 3/21/17                    |                          |
| Geology                                                                                                                                                                                                                                                                                                                                                                                                  | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| Fin. Assurance                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| Tech. Advisor                                                                                                                                                                                                                                                                                                                                                                                            | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| Legal                                                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| Other                                                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <b>2. Management Review</b>                                                                                                                                                                                                                                                                                                                                                                              |                                                  | <b>Date Received</b>                               | <b>Date Returned to Originator, if done</b>             | <b>Comments</b>                                   | <b>Approved / Initials</b>                                                                                                                                                                                                                                                                                           | <b>Date Forwarded</b>      |                          |
| Supervisor                                                                                                                                                                                                                                                                                                                                                                                               | <input checked="" type="checkbox"/>              | 3/21/17                                            |                                                         |                                                   | DBT                                                                                                                                                                                                                                                                                                                  | 3/21/17                    |                          |
| Manager                                                                                                                                                                                                                                                                                                                                                                                                  | <input checked="" type="checkbox"/>              | 3/21/17                                            |                                                         |                                                   | JB                                                                                                                                                                                                                                                                                                                   | 3/21/17                    |                          |
| Administrator                                                                                                                                                                                                                                                                                                                                                                                            | <input checked="" type="checkbox"/>              | 3/21/17                                            |                                                         |                                                   | JB                                                                                                                                                                                                                                                                                                                   | 3/21/17                    |                          |
| Asst. Secretary                                                                                                                                                                                                                                                                                                                                                                                          | <input type="checkbox"/>                         |                                                    |                                                         |                                                   | JB                                                                                                                                                                                                                                                                                                                   | 3/21/17                    |                          |
| Undersecretary                                                                                                                                                                                                                                                                                                                                                                                           | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| Secretary                                                                                                                                                                                                                                                                                                                                                                                                | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| Other                                                                                                                                                                                                                                                                                                                                                                                                    | <input type="checkbox"/>                         |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <b>3. Additional Comments.</b>                                                                                                                                                                                                                                                                                                                                                                           |                                                  |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |
| <p>The LDEQ is approving CWMLC's Class 3 Permit Modification to add two technologies to the existing permit. The technologies include Oil Recovery Units and Thermal Desorber Units with associated tanks. Attached is the final modified operating and post-closure permit for CWMLC. Public comments were received and are addressed in the attached Basis for Decision and Responsiveness Summary</p> |                                                  |                                                    |                                                         |                                                   |                                                                                                                                                                                                                                                                                                                      |                            |                          |



## WASTE PERMITS ROUTING/APPROVAL SLIP



|  |
|--|
|  |
|  |



**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**FINAL MODIFIED**

**HAZARDOUS WASTE OPERATING AND POST-CLOSURE PERMIT**

**CHEMICAL WASTE MANAGEMENT, INC.**

**LAKE CHARLES FACILITY**

**CARLYSS, LOUISIANA**

**Permit#LAD000777201-OP-RN-MO-1**  
**AI#742/PER20140007**

**Records Copy**

JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

March 21, 2017

Mr. Benjamin Dabadie  
Environmental Manager  
Chemical Waste Management, Inc. – Lake Charles Facility  
7170 John Brannon Road  
Sulphur, LA 70665

**RE: Final Modified Hazardous Waste Operating and Post-closure Permit  
Class 3 Permit Modification  
Chemical Waste Management, Inc. – Lake Charles Facility  
AI#742/LAD000777201/LAD000777201-OP-RN-MO-1/PER20140007**

Dear Mr. Dabadie:

Enclosed is your copy of Chemical Waste Management, Inc. – Lake Charles Facility (CWMLC) Final Modified Hazardous Waste Operating and Post-closure Permit, LAD000777201-OP-RN-MO-1, which incorporates language pertaining to the Class 3 Permit Modification Application, dated November 5, 2014. CWMLC has requested to add two new technologies to the existing permit, which will include two (2) Oil Recovery Units (ORUs) and two (2) Thermal Desorber Units (TDUs) with associated tanks under this Class 3 Permit Modification Application. Public comments were received during the public comment period and are addressed in the attached Basis for Decision and Responsiveness Summary.

This permit action shall become final and not subject to further administrative review unless, no later than thirty (30) days after the notice of the action is served by certified mail, you file a written request for a hearing. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024 (A) within thirty (30) days after the notice of the action is served by certified mail. A request must be directed to the following:

Louisiana Department of Environmental Quality  
Office of the Secretary  
Attention: Hearings Clerk, Legal Division  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302



Mr. Dabadie  
AI#742  
Page 2

A copy of this request should be sent to the Waste Permits Division.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Louisiana Department of Environmental Quality (LDEQ) may initiate review of a permit (including authorization under general permits; variances and other authorizations) during its term. However, before it takes any action to modify, suspend or revoke a permit, the LDEQ shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Please reference Agency Interest No. 742, Activity No. PER20140007, EPA ID No. LAD000777201, and Permit No. LAD000777201-OP-RN-MO-1 on all correspondence pertaining to this matter. Any questions concerning this action should be directed to Ms. Lina Kruth Saale at (225) 219-0029 of the Waste Permits Division.

Sincerely,

A handwritten signature in black ink, appearing to read 'E. Vega', is written over a horizontal line.

Elliott B. Vega  
Assistant Secretary

lks

Enclosure

c: Mr. Kishor Fruitwala, USEPA, Region 6

# **PUBLIC PARTICIPATION**



**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**CHEMICAL WASTE MANAGEMENT, INC. - LAKE CHARLES FACILITY**  
**FINAL MODIFIED HAZARDOUS WASTE OPERATING AND POST-CLOSURE PERMIT**

The LDEQ, Office of Environmental Services, has made the decision to issue the Final Modified Operating and Post-closure Permit (LAD000777201-OP-RN-MO-1) for Chemical Waste Management, Inc., 7170 John Brannon Road in Carlyss, Louisiana for the Lake Charles Facility. The facility is located at 7170 John Brannon Road, Carlyss, Calcasieu Parish.

Under this Modified Hazardous Waste Operating and Post-closure permit, Chemical Waste Management, Inc. - Lake Charles Facility will be permitted to operate two new technologies, including an oil recovery unit, thermal desorber unit, and associated tanks in accordance with the conditions prescribed in the permit.

**This permit was processed as an expedited permit in accordance with LAC 33:I.Chapter 18.**

The final permitting action and related documents are available for review and copying (all documents copied will be subject to a \$0.25 charge per copied page) at the LDEQ, Public Records Center, Room 128, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at [www.deq.louisiana.gov](http://www.deq.louisiana.gov).

An additional copy of this action may be reviewed at the Calcasieu Public Library, Sulphur Regional Branch, located at 1160 Cypress St., Sulphur, LA, 70663.

In accordance with Louisiana Revised Statutes (La R.S.) 30:2024, the Permittee may file with the secretary a request for a hearing no later than thirty (30) days after the notice of the action is served. Under La. R.S. 30:2050.21, any person aggrieved by a final permit action may appeal to the Nineteenth Judicial District Court within 30 days after the notice of the action has been given.

Previous notices have been published in The American Press and The Advocate on November 13, 2014, May 13, 2016, and October 14, 2016.

Inquiries or requests for additional information regarding this permit action, should be directed to Ms. Lina Kruth Saale, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-0029.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [DEQ.PUBLICNOTICES@LA.GOV](mailto:DEQ.PUBLICNOTICES@LA.GOV) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the issued permit and associated information can be viewed at the LDEQ permits public notice webpage at [www.deq.louisiana.gov/apps/pubNotice/default.asp](http://www.deq.louisiana.gov/apps/pubNotice/default.asp) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx).

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://louisiana.gov/Services/Email\\_Notifications\\_DEQ\\_PN/](http://louisiana.gov/Services/Email_Notifications_DEQ_PN/).

All correspondence should specify AI Number 742, Permit Number LAD000777201-OP-RN-MO-1, and Activity Number PER20140007.

Scheduled Publication Date: March 28, 2017



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, PH.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

March 21, 2017

Mr. Benjamin Dabadie  
Environmental Manager  
Chemical Waste Management, Inc. – Lake Charles Facility  
7170 John Brannon Road  
Sulphur, LA 70665

**RE: Final Modified Hazardous Waste Operating and Post-closure Permit  
Class 3 Permit Modification  
Chemical Waste Management, Inc. – Lake Charles Facility  
AI#742/LAD000777201/LAD000777201-OP-RN-MO-1/PER20140007**

Dear Mr. Dabadie:

Enclosed is your copy of Chemical Waste Management, Inc. – Lake Charles Facility (CWMLC) Final Modified Hazardous Waste Operating and Post-closure Permit, LAD000777201-OP-RN-MO-1, which incorporates language pertaining to the Class 3 Permit Modification Application, dated November 5, 2014. CWMLC has requested to add two new technologies to the existing permit, which will include two (2) Oil Recovery Units (ORUs) and two (2) Thermal Desorber Units (TDUs) with associated tanks under this Class 3 Permit Modification Application. Public comments were received during the public comment period and are addressed in the attached Basis for Decision and Responsiveness Summary.

This permit action shall become final and not subject to further administrative review unless, no later than thirty (30) days after the notice of the action is served by certified mail, you file a written request for a hearing. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024 (A) within thirty (30) days after the notice of the action is served by certified mail. A request must be directed to the following:

Louisiana Department of Environmental Quality  
Office of the Secretary  
Attention: Hearings Clerk, Legal Division  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302



Mr. Dabadie  
AI#742  
Page 2

A copy of this request should be sent to the Waste Permits Division.

Please be advised that pursuant to provisions of the Environmental Quality Act and the Administrative Procedure Act, the Louisiana Department of Environmental Quality (LDEQ) may initiate review of a permit (including authorization under general permits; variances and other authorizations) during its term. However, before it takes any action to modify, suspend or revoke a permit, the LDEQ shall, in accordance with applicable statutes and regulations, notify the permittee by mail of the facts or conduct that warrant the intended action and provide the permittee with the opportunity to demonstrate compliance with all lawful requirements for the retention of the effective permit.

Please reference Agency Interest No. 742, Activity No. PER20140007, EPA ID No. LAD000777201, and Permit No. LAD000777201-OP-RN-MO-1 on all correspondence pertaining to this matter. Any questions concerning this action should be directed to Ms. Lina Kruth Saale at (225) 219-0029 of the Waste Permits Division.

Sincerely,

A handwritten signature in black ink, appearing to read "Elliott B. Vega", is written over a horizontal line.

Elliott B. Vega  
Assistant Secretary

lks

Enclosure

c: Mr. Kishor Fruitwala, USEPA, Region 6

## VERIFICATION BY FACILITY

The undersigned verifies that Chemical Waste Management, INC, Lake Charles Facility has received a copy of the final modified hazardous waste operating and post closure permit and public notice regarding:

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

**Chemical Waste Management Inc., Lake Charles Facility**

By: \_\_\_\_\_ Date: \_\_\_\_\_

**Please complete and return this form promptly to the address listed below:**

Ms. Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Environmental Assistance Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
Phone (225) 219-3277  
FAX (225) 325-8157



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**ENVIRONMENTAL SERVICES**

3/22/2017

Telephone: (337) 491-2667  
Fax (337) 491-2682  
Email: [Billy.Eakin@LA.Gov](mailto:Billy.Eakin@LA.Gov)

Mr. Billy Eakin  
Southwest Regional Office Manager  
1301 Gadwall Street  
Lake Charles, LA 70615-

**RE: Request for Public Comments on a Final Hazardous Waste Permit Modification**  
**Chemical Waste Management Inc. - Lake Charles Facility**  
**AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1**  
**Sulphur, Calcasieu Parish, Louisiana**

Dear Mr. Eakin:

We have enclosed a copy of the Final Hazardous Waste Permit and public notice for the referenced facility for your reference .

Please complete the attached 'Verification by Regional Office' and fax to Laura Ambeau, at (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

*Laura Ambeau*

-Laura Ambeau  
Environmental Scientist, Public Participation Group

LA  
Attachments/

**VERIFICATION BY PARISH GOVERNMENT**

The undersigned verifies that Calcasieu Parish Police Jury, 1015 Pithon Street, Lake Charles, LA has received a copy of the Final Hazardous Waste Permit associated with the following public notice:

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

**Calcasieu Parish Police Jury:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

Please complete and return this form promptly to the address listed below:

Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Permit Support Services Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
PHONE (225) 219-3277  
FAX (225) 325-8157



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

3/22/2017

Telephone: (214) 665-6750  
Fax (214) 665-6762  
Email: [Fruitwala.Kishor@epamail.epa.gov](mailto:Fruitwala.Kishor@epamail.epa.gov)

Mr. Kishor Fruitwala  
EPA Region VI  
1445 Ross Avenue  
Dallas, TX 752022733

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

Dear Mr. Fruitwala:

The Louisiana Department of Environmental Quality (LDEQ) is enclosing for your review a copy of the permit and public notice for the above referenced facility.

The legal notice is scheduled to be published in/or announced on:

*American Press*  
*Advocate*

*Tuesday, March 28, 2017*  
*Tuesday, March 28, 2017*

The notice is also posted on the LDEQ Website, found at [www.deq.state.la.us](http://www.deq.state.la.us). Written comments on this permit action may be submitted to Public Participation Group, LDEQ-OES, Permit Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 742.

Should you have any questions, additional permit information may be obtained from Lina Saale, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact me at (225) 219-3277.

Please complete the attached 'Verification by EPA' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or fax to (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

*Laura Ambeau*

Laura Ambeau  
Environmental Scientist, Public Participation Group

VERIFICATION BY EPA

The undersigned verifies that Region VI, 1445 Ross Avenue, Dallas, TX has received a copy of the Final Hazardous Waste Permit associated with the following public notice:

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

EPA Region VI:

By: \_\_\_\_\_ Date: \_\_\_\_\_

Please complete and return this form promptly to the address listed below:

Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Permit Support Services Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
PHONE (225) 219-3277  
FAX (225) 325-8157



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

**State of Louisiana**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
ENVIRONMENTAL SERVICES

3/22/2017

Telephone: (337) 721-7141

Fax:

Email: [JSLaven@Calcasieu.Lib.LA.US](mailto:JSLaven@Calcasieu.Lib.LA.US)

Ms. Julie Slaven  
Information Services Dept.  
Calcasieu Parish Library - Sulphur Regional Branch  
1160 Cypress Street  
Sulphur, LA 70663-5111

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
A1742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

Dear Ms. Slaven:

The Louisiana Department of Environmental Quality (LDEQ) requests that the enclosed documents for the permitting action for the above-referenced company/facility be made available for public review upon receipt in the Calcasieu Parish Library - Sulphur Regional Branch.

It is imperative that these documents are available for review at all times; therefore, they cannot be checked out by anyone at any time.

The documents should be retained for the duration of the permitting process. The documents can be purged after the LDEQ issues a permit decision. You can view the status of the permit application at the following LDEQ website:  
<http://www.deq.louisiana.gov/portal/ONLINESERVICES/CheckPermitStatus.aspx>.

Please complete the attached 'Verification by Library' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, or fax to (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

*Laura Ambeau*

Laura Ambeau  
Environmental Scientist, Public Participation Group

LA  
Attachments/

**VERIFICATION BY LIBRARY**

The undersigned verifies that Calcasieu Parish Library - Sulphur Regional Branch, 1160 Cypress Street, Sulphur, LA has received a copy of the Final Hazardous Waste Permit associated with the following public notice:

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

**Calcasieu Parish Library - Sulphur Regional Branch:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

Please complete and return this form promptly to the address listed below:

Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Permit Support Services Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
PHONE (225) 219-3277  
FAX (225) 325-8157



JOHN BEL EDWARDS  
GOVERNOR



CHUCK CARR BROWN, Ph.D.  
SECRETARY

## State of Louisiana

### DEPARTMENT OF ENVIRONMENTAL QUALITY ENVIRONMENTAL SERVICES

3/22/2017

Telephone: (337) 721-3500  
Fax (337) 437-3399  
Email: [administration@cnpj.net](mailto:administration@cnpj.net)

Mr. Dennis Scott  
President Calcasieu Parish Police Jury  
1015 Pithon Street  
Lake Charles, LA 70601

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

Dear Mr. Scott:

The Louisiana Department of Environmental Quality (LDEQ) is sending a public notice regarding a permitting action for the Chemical Waste Management Inc. - Lake Charles Facility, 7170 John Brannon Rd, Sulphur, LA.

For your reference, attached is a copy of the public notice and Final Hazardous Waste Permit associated with this permit action. The legal notice is scheduled to be published in/or announced on:

*American Press  
Advocate*

*Tuesday, March 28, 2017  
Tuesday, March 28, 2017*

The notice is also posted on the LDEQ Website, found at [www.deq.state.la.us](http://www.deq.state.la.us). Written comments on the Final Hazardous Waste Permit may be submitted to Public Participation Group, LDEQ-OES, Permit Support Services Division, P.O. Box 4313, Baton Rouge, LA 70821-4313. All comments regarding the permit(s) should specify Agency Interest (AI) No. 742.

Should you have any questions, additional permit information may be obtained from Lina Saale, LDEQ, Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, telephone (225) 219-3181. Should you have any questions regarding the public notice, please contact Laura Ambeau, LDEQ, Permit Support Services Division, Permit Support Section, at (225) 219-3277.

Please complete the attached 'Verification by Parish Government' and mail to Laura Ambeau, LDEQ-OES, Permit Support Services Division, PO Box 4313, Baton Rouge, LA 70821-4313, or fax to (225) 325-8157. We appreciate your assistance in our efforts to serve the public. If you have any questions, please call me at (225) 219-3277.

Sincerely,

*Laura Ambeau*

Laura Ambeau  
Environmental Scientist, Public Participation Group

LA  
Attachments/

**VERIFICATION BY REGIONAL OFFICE**

The undersigned verifies that Southwest Regional Office, 1301 Gadwall Street, Lake Charles, LA has received a copy of the Final Hazardous Waste Permit associated with the following public notice:

RE: Request for Public Comments on a Final Hazardous Waste Permit Modification  
Chemical Waste Management Inc. - Lake Charles Facility  
AI742, PER20140007, Permit Number LAD00077201-OP-RN-MO-1  
Sulphur, Calcasieu Parish, Louisiana

**Southwest Regional Office:**

By: \_\_\_\_\_ Date: \_\_\_\_\_

Please complete and return this form promptly to the address listed below:

Laura Ambeau  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Permit Support Services Division  
PO Box 4313  
Baton Rouge, LA 70821-4313  
PHONE (225) 219-3277  
FAX (225) 325-8157



# **SIGNATURE PAGE**

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY**

**FINAL MODIFIED HAZARDOUS WASTE  
OPERATING AND POST-CLOSURE PERMIT**

**PERMITTEE:** CHEMICAL WASTE MANAGEMENT, INC.  
LAKE CHARLES FACILITY

**EPA ID NUMBER:** LAD000777201

**PERMIT NUMBER:** LAD000777201-OP-RN-MO-1  
Agency Interest#742/Permit Activity#PER20140007

**FACILITY LOCATION:** 7170 John Brannon Road  
Carlyss, Calcasieu Parish, Louisiana, 70665

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., the regulations adopted thereunder, and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to Chemical Waste Management, Inc. – Lake Charles Facility (hereafter called the Permittee), to operate a hazardous waste treatment, storage, and disposal facility located at 7170 John Brannon Road, Carlyss, Louisiana, Calcasieu Parish, at latitude 30° 07' 10" and longitude 93° 24' 10".

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations as specified in the permit. Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.



Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of April 27, 2017, and shall remain in effect until August 10, 2020, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

The post-closure care period for the permitted units, which are subject to the requirements of LAC 33:V.3519 through 3527, including monitoring and maintenance, will be in effect for at least thirty (30) years, unless extended by the Administrative Authority. The expiration of this permit does not relieve the Permittee of the responsibility to reapply for a permit for the remainder of the thirty (30) years post-closure period.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality  
Office of the Secretary  
Attention: Hearings Clerk, Legal Services Division  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

  
\_\_\_\_\_  
Elliott B. Vega, Assistant Secretary  
Louisiana Department of Environmental Quality

3/21/17  
\_\_\_\_\_  
Date

# **PART A APPLICATION**



OMB# 2050-0024; Expires 12/31/2014

|                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |                                                                                     |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|-------------------------------------------------------------------------------------|
| <b>SEND COMPLETED</b><br><b>FC TO:</b><br>The appropriate State or Regional Office. | United States Environmental Protection Agency<br><b>RCRA SUBTITLE C SITE IDENTIFICATION FORM</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |  |  |
| <b>1. Reason for Submittal</b><br><br>MARK ALL BOX(ES) THAT APPLY                   | <b>Reason for Submittal:</b><br><input type="checkbox"/> To provide an Initial Notification (first time submitting site identification information / to obtain an EPA ID number for this location)<br><input type="checkbox"/> To provide a Subsequent Notification (to update site identification information for this location)<br><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application<br><input checked="" type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # <u>LAD000777201</u> )<br><input type="checkbox"/> As a component of the Hazardous Waste Report (If marked, see sub-bullet below)<br><br><input type="checkbox"/> Site was a TSD facility and/or generator of $\geq 1,000$ kg of hazardous waste, $> 1$ kg of acute hazardous waste, or $> 100$ kg of acute hazardous waste spill cleanup in one or more months of the report year (or State equivalent LQG regulations)                       |  |                                                                                     |
| <b>2. Site EPA ID Number</b>                                                        | EPA ID Number <u>L A D   0   0   0   7   7   7   2   0   1</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                                                     |
| <b>3. Site Name</b>                                                                 | Name: Chemical Waste Management, Inc.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |                                                                                     |
| <b>4. Site Location Information</b>                                                 | Street Address: <u>7170 John Brannon Road</u><br>City, Town, or Village: <u>Sulphur</u> County: <u>Calcasieu</u><br>State: <u>Louisiana</u> Country: <u>USA</u> Zip Code: <u>70665</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |  |                                                                                     |
| <b>5. Site Land Type</b>                                                            | <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |  |                                                                                     |
| <b>6. RCRA Code(s) for the Site (at least 5-digit codes)</b>                        | A. <u>5   6   2   2   1   1</u> C. <u>                                         </u><br>B. <u>                                         </u> D. <u>                                         </u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |  |                                                                                     |
| <b>7. Site Mailing Address</b>                                                      | Street or P.O. Box: <u>7170 John Brannon Road</u><br>City, Town, or Village: <u>Sulphur</u><br>State: <u>Louisiana</u> Country: <u>USA</u> Zip Code: <u>70665</u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |  |                                                                                     |
| <b>8. Site Contact Person</b>                                                       | First Name: <u>Benjamin</u> MI: <u>      </u> Last: <u>Dabadie</u><br>Title: <u>Environmental Manager</u><br>Street or P.O. Box: <u>7170 John Brannon Road</u><br>City, Town or Village: <u>Sulphur</u><br>State: <u>Louisiana</u> Country: <u>USA</u> Zip Code: <u>70665</u><br>Email: <u>bdabadie@wm.com</u><br>Phone: <u>(337) 583-3676</u> Ext.: <u>      </u> Fax: <u>      </u>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |  |                                                                                     |
| <b>9. Legal Owner and Operator of the Site</b>                                      | A. Name of Site's Legal Owner: <u>Chemical Waste Management, Inc.</u> Date Became Owner: <u>11/01/1980</u><br>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other<br>Street or P.O. Box: <u>7170 John Brannon Road</u><br>City, Town, or Village: <u>Sulphur</u> Phone: <u>      </u><br>State: <u>Louisiana</u> Country: <u>USA</u> Zip Code: <u>70665</u><br>B. Name of Site's Operator: <u>Chemical Waste Management, Inc.</u> Date Became Operator: <u>11/01/1980</u><br>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Tribal <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other |  |                                                                                     |



EPA ID Number L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 12/31/2014

10 e of Regulated Waste Activity (at your site)  
 Mark "Yes" or "No" for all current activities (as of the date submitting the form); complete any additional boxes as instructed.

## A. Hazardous Waste Activities; Complete all parts 1-10.

- Y ☒ N ☐ 1. Generator of Hazardous Waste  
 If "Yes", mark only one of the following – a, b, or c.
- ☒ a. LQG: Generates, in any calendar month, 1,000 kg/mo (2,200 lbs./mo.) or more of hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 1 kg/mo (2.2 lbs./mo) of acute hazardous waste; or Generates, in any calendar month, or accumulates at any time, more than 100 kg/mo (220 lbs./mo) of acute hazardous spill cleanup material.
- ☐ b. SQG: 100 to 1,000 kg/mo (220 – 2,200 lbs./mo) of non-acute hazardous waste.
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo) of non-acute hazardous waste.
- If "Yes" above, indicate other generator activities in 2-4.
- Y ☐ N ☒ 2. Short-Term Generator (generate from a short-term or one-time event and not from on-going processes). If "Yes", provide an explanation in the Comments section.
- Y ☐ N ☒ 3. United States Importer of Hazardous Waste
- Y ☐ N ☒ 4. Mixed Waste (hazardous and radioactive) Generator
- Y ☐ N ☒ 5. Transporter of Hazardous Waste  
 If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)
- Y ☒ N ☐ 6. Treater, Storer, or Disposer of Hazardous Waste Note: A hazardous waste Part B permit is required for these activities.
- Y ☐ N ☒ 7. Recycler of Hazardous Waste
- Y ☐ N ☒ 8. Exempt Boiler and/or Industrial Furnace  
 If "Yes", mark all that apply.
- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace Exemption
- Y ☐ N ☒ 9. Underground Injection Control
- Y ☒ N ☐ 10. Receives Hazardous Waste from Off-site

## B. Universal Waste Activities; Complete all parts 1-2.

- Y ☒ N ☐ 1. Large Quantity Handler of Universal Waste (you accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste managed at your site. If "Yes", mark all that apply.
- a. Batteries ☒
- b. Pesticides ☒
- c. Mercury containing equipment ☒
- d. Lamps ☒
- e. Other (specify) ☐
- f. Other (specify) ☐
- g. Other (specify) ☐
- Y ☐ N ☒ 2. Destination Facility for Universal Waste  
 Note: A hazardous waste permit may be required for this activity.

## C. Used Oil Activities; Complete all parts 1-4.

- Y ☐ N ☒ 1. Used Oil Transporter  
 If "Yes", mark all that apply.
- ☐ a. Transporter
- ☐ b. Transfer Facility (at your site)
- Y ☐ N ☒ 2. Used Oil Processor and/or Re-refiner  
 If "Yes", mark all that apply.
- ☐ a. Processor
- ☐ b. Re-refiner
- Y ☐ N ☒ 3. Off-Specification Used Oil Burner
- Y ☐ N ☒ 4. Used Oil Fuel Marketer  
 If "Yes", mark all that apply.
- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications



## D. Eligible Academic Entities with Laboratories—Notification for opting into or withdrawing from managing laboratory hazardous wastes pursuant to 40 CFR Part 262 Subpart K

❖ You can ONLY Opt into Subpart K if:

- you are at least one of the following: a college or university; a teaching hospital that is owned by or has a formal affiliation agreement with a college or university; or a non-profit research institute that is owned by or has a formal affiliation agreement with a college or university; AND
- you have checked with your State to determine if 40 CFR Part 262 Subpart K is effective in your state

Y ☐ N ☐ 1. Opting into or currently operating under 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories  
See the item-by-item instructions for definitions of types of eligible academic entities. Mark all that apply:

- ☐ a. College or University
- ☐ b. Teaching Hospital that is owned by or has a formal written affiliation agreement with a college or university
- ☐ c. Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Y ☐ N ☐ 2. Withdrawing from 40 CFR Part 262 Subpart K for the management of hazardous wastes in laboratories

## 11. Description of Hazardous Waste

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

|      |      |      |      |       |      |      |
|------|------|------|------|-------|------|------|
| D001 | D002 | D003 | D004 | D005  | D006 | D007 |
| D008 | D009 | D010 | D011 | D012  | D013 | D014 |
| D015 | D016 | D017 | D018 | D019  | D020 | D021 |
| D022 | D023 | D024 | D025 | D026  | D027 | D028 |
| D029 | D030 | D031 | D032 | D033  | D034 | D035 |
| D036 | D037 | D038 | D039 | D040  | D041 | D042 |
| D043 | F001 | F002 | F003 | F004  | F005 | F006 |
| F007 | F008 | F009 | F010 | F011  | F012 | F019 |
| F024 | F025 | F032 | F034 | FQ035 | F037 | F038 |

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-Regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed.

|  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |

EPA ID Number

L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 12/31/2014

## 12. Notification of Hazardous Secondary Material (HSM) Activity

Y ☐ N ☐ Are you notifying under 40 CFR 260.42 that you will begin managing, are managing, or will stop managing hazardous secondary material under 40 CFR 261.2(a)(2)(ii), 40 CFR 261.4(a)(23), (24), or (25)?

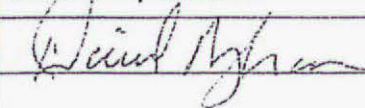
If "Yes", you must fill out the Addendum to the Site Identification Form: Notification for Managing Hazardous Secondary Material.

## 13. Comments

14. **Certification.** I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all owner(s) and operator(s) must sign (see 40 CFR 270.10(b) and 270.11).

Signature of legal owner, operator, or an authorized representative

Name and Official Title (type or print)

Date Signed  
(mm/dd/yyyy)

David Myhan - VP

10/23/14



EPA ID Number L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 12/31/2014

# ADDENDUM TO THE SITE IDENTIFICATION FORM: NOTIFICATION OF HAZARDOUS SECONDARY MATERIAL ACTIVITY

**ONLY fill out this form if:**

- ❖ You are located in a State that allows you to manage excluded hazardous secondary material (HSM) under 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent). See <http://www.epa.gov/epawaste/hazard/dsw/statesof.htm> for a list of eligible states; AND
- ❖ You are or will be managing excluded HSM in compliance with 40 CFR 261.2(a)(2)(ii), 261.4(a)(23), (24), or (25) (or state equivalent) or you have stopped managing excluded HSM in compliance with the exclusion(s) and do not expect to manage any amount of excluded HSM under the exclusion(s) for at least one year. Do not include any information regarding your hazardous waste activities in this section.

**1. Indicate reason for notification. Include dates where requested.**

- ☐ Facility will begin managing excluded HSM as of \_\_\_\_\_ (mm/dd/yyyy).
- ☐ Facility is still managing excluded HSM/re-notifying as required by March 1 of each even-numbered year.
- ☐ Facility has stopped managing excluded HSM as of \_\_\_\_\_ (mm/dd/yyyy) and is notifying as required.

**2. Description of excluded HSM activity.** Please list the appropriate codes and quantities in **short tons** to describe your excluded HSM activity ONLY (do not include any information regarding your hazardous wastes). Use additional pages if more space is needed.

| a. Facility code<br>(answer using<br>codes listed in the<br>Code List section of<br>the instructions) | b. Waste code(s) for HSM | c. Estimated short<br>tons of excluded HSM<br>to be managed<br>annually | d. Actual short tons<br>of excluded HSM<br>that was managed<br>during the most<br>recent odd-<br>numbered year | e. Land-based unit<br>code (answer using<br>codes listed in the<br>Code List section of<br>the instructions) |
|-------------------------------------------------------------------------------------------------------|--------------------------|-------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |
|                                                                                                       |                          |                                                                         |                                                                                                                |                                                                                                              |

**3. Facility has financial assurance pursuant to 40 CFR 261.4(a)(24)(vi).** (Financial assurance is required for reclaimers and intermediate facilities managing excluded HSM under 40 CFR 261.4(a)(24) and (25))

Y ☐ N ☐ Does this facility have financial assurance pursuant to 40 CFR 261.4(a)(24)(vi)?

**This page intentionally left blank**



EPA ID Number L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 12/31/2014

United States Environmental Protection Agency  
HAZARDOUS WASTE PERMIT INFORMATION FORM

|                                                         |                                                  |  |  |     |                       |  |                        |
|---------------------------------------------------------|--------------------------------------------------|--|--|-----|-----------------------|--|------------------------|
| <b>1. Facility Permit Contact</b>                       | First Name: Benjamin                             |  |  | MI: | Last Name: Dabadie    |  |                        |
|                                                         | Contact Title: Manager Environmental Protection  |  |  |     |                       |  |                        |
|                                                         | Phone: (337) 583-3676                            |  |  |     | Ext.:                 |  | Email: bdabadie@wm.com |
| <b>2. Facility Permit Contact Mailing Address</b>       | Street or P.O. Box: 7170 John Brannon Road       |  |  |     |                       |  |                        |
|                                                         | City, Town, or Village: Sulphur                  |  |  |     |                       |  |                        |
|                                                         | State: Louisiana                                 |  |  |     |                       |  |                        |
|                                                         | Country: USA                                     |  |  |     | Zip Code: 70665       |  |                        |
| <b>3. Operator Mailing Address and Telephone Number</b> | Street or P.O. Box: 7170 John Brannon Road       |  |  |     |                       |  |                        |
|                                                         | City, Town, or Village: Sulphur                  |  |  |     |                       |  |                        |
|                                                         | State: Louisiana                                 |  |  |     | Phone: (337) 583-2169 |  |                        |
|                                                         | Country:                                         |  |  |     | Zip Code: 70665       |  |                        |
| <b>4. Facility Existence Date</b>                       | Facility Existence Date (mm/dd/yyyy): 01/01/1980 |  |  |     |                       |  |                        |

| 5. Other Environmental Permits |                  |   |   |   |   |   |   |   |   |   |                |   |   |                            |
|--------------------------------|------------------|---|---|---|---|---|---|---|---|---|----------------|---|---|----------------------------|
| Facility Type<br>(Enter code)  | B. Permit Number |   |   |   |   |   |   |   |   |   | C. Description |   |   |                            |
|                                | L                | A | 0 | 0 | 5 | 4 | 8 | 2 | 8 |   |                |   |   | LPDES                      |
|                                | 0                | 5 | 2 | 0 | - | 0 | 0 | 0 | 8 | 1 | -              | 0 | 9 | Air Permit                 |
|                                | L                | A | D | 0 | 0 | 0 | 7 | 7 | 7 | 2 | 0              | 1 |   | HSWA Permit                |
|                                | L                | A | D | 0 | 0 | 0 | 7 | 7 | 7 | 2 | 0              | 1 |   | (-OP-1) RCRA Part B Permit |
|                                | 9                | 8 | - | 0 | 1 | C | F | A |   |   |                |   |   | NOW/E&P Authorization      |
|                                | M                | V | N | 2 | 0 | 0 | 3 | 4 | 1 | 5 | 6              |   |   | Section 404 CWA            |
|                                | L                | A | R | 1 | 0 | 0 | 0 | 0 | 0 |   |                |   |   | Stormwater Permit          |
|                                | L                | A | R | 1 | 0 | C | 5 | 3 | 7 |   |                |   |   | Stormwater Permit          |
|                                |                  |   |   |   |   |   |   |   |   |   |                |   |   |                            |
|                                |                  |   |   |   |   |   |   |   |   |   |                |   |   |                            |
|                                |                  |   |   |   |   |   |   |   |   |   |                |   |   |                            |
|                                |                  |   |   |   |   |   |   |   |   |   |                |   |   |                            |

|                               |                                                                                                  |
|-------------------------------|--------------------------------------------------------------------------------------------------|
| <b>6. Nature of Business:</b> | The Lake Charles site is a commercial hazardous waste treatment, storage, and disposal facility. |
|-------------------------------|--------------------------------------------------------------------------------------------------|



EPA ID Number L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 12/31/2014

**7. Process Codes and Design Capacities – Enter information in the Section on Form Page 3**

**A. PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. If more lines are needed, attach a separate sheet of paper with the additional information. For "other" processes (i.e., D99, S99, T04 and X99), describe the process (including its design capacity) in the space provided in Item 8.

**E. PROCESS DESIGN CAPACITY** – For each code entered in Item 7.A; enter the capacity of the process.

1. **AMOUNT** – Enter the amount. In a case where design capacity is not applicable (such as in a closure/post-closure or enforcement action) enter the total amount of waste for that process.

2. **UNIT OF MEASURE** – For each amount entered in Item 7.B(1), enter the code in Item 7.B(2) from the list of unit of measure codes below that describes the unit of measure used. Select only from the units of measure in this list.

**C. PROCESS TOTAL NUMBER OF UNITS** – Enter the total number of units for each corresponding process code.

| Process Code     | Process                             | Appropriate Unit of Measure for Process Design Capacity                                                                                                                                                             | Process Code                     | Process                                                                          | Appropriate Unit of Measure for Process Design Capacity                                                                                                                                                                                                       |
|------------------|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Disposal</b>  |                                     |                                                                                                                                                                                                                     | <b>Treatment (Continued)</b>     |                                                                                  |                                                                                                                                                                                                                                                               |
| D79              | Underground Injection Well Disposal | Gallons; Liters; Gallons Per Day; or Liters Per Day                                                                                                                                                                 | T81                              | Cement Kiln                                                                      | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Liters Per Hour; Kilograms Per Hour; or Million BTU Per Hour                          |
| D80              | Landfill                            | Acre-feet; Hectares-meter; Acres; Cubic Meters; Hectares; Cubic Yards                                                                                                                                               | T82                              | Lime Kiln                                                                        |                                                                                                                                                                                                                                                               |
| D81              | Land Treatment                      | Acres or Hectares                                                                                                                                                                                                   | T83                              | Aggregate Kiln                                                                   |                                                                                                                                                                                                                                                               |
| D82              | Ocean Disposal                      | Gallons Per Day or Liters Per Day                                                                                                                                                                                   | T84                              | Phosphate Kiln                                                                   |                                                                                                                                                                                                                                                               |
| D83              | Surface Impoundment Disposal        | Gallons; Liters; Cubic Meters; or Cubic Yards                                                                                                                                                                       | T85                              | Coke Oven                                                                        |                                                                                                                                                                                                                                                               |
| D99              | Other Disposal                      | Any Unit of Measure Listed Below                                                                                                                                                                                    | T86                              | Blast Furnace                                                                    |                                                                                                                                                                                                                                                               |
| <b>Storage</b>   |                                     |                                                                                                                                                                                                                     | T87                              | Smelting, Melting, or Refining Furnace                                           |                                                                                                                                                                                                                                                               |
| S01              | Container                           | Gallons; Liters; Cubic Meters; or Cubic Yards                                                                                                                                                                       | T88                              | Titanium Dioxide Chloride Oxidation Reactor                                      |                                                                                                                                                                                                                                                               |
| S02              | Tank Storage                        | Gallons; Liters; Cubic Meters; or Cubic Yards                                                                                                                                                                       | T89                              | Methane Reforming Furnace                                                        |                                                                                                                                                                                                                                                               |
| S03              | Waste Pile                          | Cubic Yards or Cubic Meters                                                                                                                                                                                         | T90                              | Pulping Liquor Recovery Furnace                                                  |                                                                                                                                                                                                                                                               |
| S04              | Surface Impoundment                 | Gallons; Liters; Cubic Meters; or Cubic Yards                                                                                                                                                                       | T91                              | Combustion Device Used in the Recovery of Sulfur Values from Spent Sulfuric Acid |                                                                                                                                                                                                                                                               |
| S05              | Drip Pad                            | Gallons; Liters; Cubic Meters; Hectares; or Cubic Yards                                                                                                                                                             | T92                              | Halogen Acid Furnaces                                                            |                                                                                                                                                                                                                                                               |
| S06              | Containment Building Storage        | Cubic Yards or Cubic Meters                                                                                                                                                                                         | T93                              | Other Industrial Furnaces Listed in 40 CFR 260.10                                |                                                                                                                                                                                                                                                               |
| S99              | Other Storage                       | Any Unit of Measure Listed Below                                                                                                                                                                                    | T94                              | Containment Building Treatment                                                   | Cubic Yards; Cubic Meters; Short Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTU Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Hour; or Million BTU Per Hour |
| <b>Treatment</b> |                                     |                                                                                                                                                                                                                     | <b>Miscellaneous (Subpart X)</b> |                                                                                  |                                                                                                                                                                                                                                                               |
| T01              | Tank Treatment                      | Gallons Per Day; Liters Per Day                                                                                                                                                                                     | X01                              | Open Burning/Open Detonation                                                     | Any Unit of Measure Listed Below                                                                                                                                                                                                                              |
| T02              | Surface Impoundment                 | Gallons Per Day; Liters Per Day                                                                                                                                                                                     | X02                              | Mechanical Processing                                                            | Short Tons Per Hour; Metric Tons Per Hour; Short Tons Per Day; Metric Tons Per Day; Gallons Per Day; Liters Per Day; Metric Tons Per Day; Gallons Per Hour; Liters Per Hour; or Million BTU Per Hour                                                          |
| T03              | Incinerator                         | Short Tons Per Hour; Metric Tons Per Hour; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; Pounds Per Hour; Short Tons Per Day; Kilograms Per Hour; Gallons Per Day; Metric Tons Per Day; or Million BTU Per Hour | X03                              | Thermal Unit                                                                     | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Metric Tons Per Hour; Short Tons Per Day; BTU Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour                             |
| T04              | Other Treatment                     | Gallons Per Day; Liters Per Day; Pounds Per Hour; Short Tons Per Hour; Kilograms Per Hour; Metric Tons Per Day; Short Tons Per Day; BTUs Per Hour; Gallons Per Day; Liters Per Hour; or Million BTU Per Hour        | X04                              | Geologic Repository                                                              | Cubic Yards; Cubic Meters; Acre-feet; Hectare-meter; Gallons; or Liters                                                                                                                                                                                       |
| T80              | Boiler                              | Gallons; Liters; Gallons Per Hour; Liters Per Hour; BTUs Per Hour; or Million BTU Per Hour                                                                                                                          | X99                              | Other Subpart X                                                                  | Any Unit of Measure Listed Below                                                                                                                                                                                                                              |

| Unit of Measure  | Unit of Measure Code | Unit of Measure      | Unit of Measure Code | Unit of Measure | Unit of Measure Code |
|------------------|----------------------|----------------------|----------------------|-----------------|----------------------|
| Gallons          | G                    | Short Tons Per Hour  | D                    | Cubic Yards     | Y                    |
| Gallons Per Hour | E                    | Short Tons Per Day   | N                    | Cubic Meters    | C                    |
| Gallons Per Day  | U                    | Metric Tons Per Hour | W                    | Acres           | B                    |
| Liters           | L                    | Metric Tons Per Day  | S                    | Acre-feet       | A                    |
| Liters Per Hour  | H                    | Pounds Per Hour      | J                    | Hectares        | Q                    |
| Liters Per Day   | V                    | Kilograms Per Hour   | X                    | Hectare-meter   | F                    |
|                  |                      | Million BTU Per Hour | X                    | BTU Per Hour    | I                    |



EPA ID Number L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 01-31-2017

**7. Process Codes and Design Capacities (Continued)****EXAMPLE FOR COMPLETING Item 7 (shown in line number X-1 below): A facility has a storage tank, which can hold 533.788 gallons.**

| Line Number |   | A. Process Code<br>(From list above) |   |   | B. PROCESS DESIGN CAPACITY |                     | C. Process Total<br>Number of Units | For Official Use Only |  |  |  |  |  |
|-------------|---|--------------------------------------|---|---|----------------------------|---------------------|-------------------------------------|-----------------------|--|--|--|--|--|
|             |   |                                      |   |   | (1) Amount (Specify)       | (2) Unit of Measure |                                     |                       |  |  |  |  |  |
| X           | 1 | S                                    | 0 | 2 | 533.788                    | G                   | 001                                 |                       |  |  |  |  |  |
|             | 1 | S                                    | 0 | 1 | 1,810,083.00               | G                   | 005                                 |                       |  |  |  |  |  |
|             | 2 | S                                    | 0 | 2 | 4,580,420.00               | G                   | 026                                 |                       |  |  |  |  |  |
|             | 3 | T                                    | 0 | 1 | 414,748.00                 | U                   | 014                                 |                       |  |  |  |  |  |
|             | 4 | D                                    | 8 | 0 | 8,507.00                   | A                   | 005                                 |                       |  |  |  |  |  |
|             | 5 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|             | 6 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|             | 7 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|             | 8 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|             | 9 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
| 1           | 0 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
| 1           | 1 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
| 1           | 2 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
| 1           | 3 |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |

**Note:** If you need to list more than 13 process codes, attach an additional sheet(s) with the information in the same format as above. Number the line sequentially, taking into account any lines that will be used for "other" process (i.e., D99, S99, T04, and X99) in Item 8.

**8. Other Processes (Follow instructions from Item 7 for D99, S99, T04, and X99 process codes)**

| Line Number<br>(Enter #s in sequence with Item 7) |   | A. Process Code<br>(From list above) |   |   | B. PROCESS DESIGN CAPACITY |                     | C. Process Total<br>Number of Units | For Official Use Only |  |  |  |  |  |
|---------------------------------------------------|---|--------------------------------------|---|---|----------------------------|---------------------|-------------------------------------|-----------------------|--|--|--|--|--|
|                                                   |   |                                      |   |   | (1) Amount (Specify)       | (2) Unit of Measure |                                     |                       |  |  |  |  |  |
| X                                                 | 2 | T                                    | 0 | 4 | 100.00                     | U                   | 001                                 |                       |  |  |  |  |  |
| X                                                 | 1 | T                                    | 0 | 4 | 105,600.00                 | U                   | 003                                 |                       |  |  |  |  |  |
| X                                                 | 2 | T                                    | 0 | 4 | 2,000.00                   | N                   | 008                                 |                       |  |  |  |  |  |
| X                                                 | 3 | T                                    | 0 | 4 | 685.00                     | N                   | 002                                 |                       |  |  |  |  |  |
| X                                                 | 4 | X                                    | 9 | 9 | 330                        | N                   | 002                                 |                       |  |  |  |  |  |
| X                                                 | 5 | X                                    | 0 | 3 | 252,000                    | U                   | 002                                 |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |
|                                                   |   |                                      |   |   |                            |                     |                                     |                       |  |  |  |  |  |



EPA ID Number **L A D 0 0 0 7 7 7 2 0 1**

OMB#: 2050-0024; Expires 12-31-2014

**9. Description of Hazardous Wastes - Enter Information in the Sections on Form Page 5**

- A. EPA HAZARDOUS WASTE NUMBER** – Enter the four-digit number from 40 CFR, Part 261 Subpart D of each listed hazardous waste you will handle. For hazardous wastes which are not listed in 40 CFR, Part 261 Subpart D, enter the four-digit number(s) from 40 CFR Part 261, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY** – For each listed waste entered in Item 9.A, estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in Item 9.A, estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE** – For each quantity entered in Item 9.B, enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

| ENGLISH UNIT OF MEASURE | CODE | METRIC UNIT OF MEASURE | CODE |
|-------------------------|------|------------------------|------|
| POUNDS                  | P    | KILOGRAMS              | K    |
| TONS                    | T    | METRIC TONS            | M    |

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure, taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all listed hazardous wastes.

**For non-listed waste:** For each characteristic or toxic contaminant entered in Item 9.A, select the code(s) from the list of process codes contained in Items 7.A and 8.A on page 3 to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**NOTE: THREE SPACES ARE PROVIDED FOR ENTERING PROCESS CODES. IF MORE ARE NEEDED:**

- Enter the first two as described above.
- Enter "000" in the extreme right box of Item 9.D(1).
- Use additional sheet, enter line number from previous sheet, and enter additional code(s) in Item 9.E.

**2. PROCESS DESCRIPTION:** If code is not listed for a process that will be used, describe the process in Item 9.D(2) or in Item 9.E(2).

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in Item 9.A. On the same line complete Items 9.B, 9.C, and 9.D by estimating the total annual quantity of the waste and describing all the processes to be used to store, treat, and/or dispose of the waste.
- In Item 9.A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In Item 9.D.2 on that line enter "included with above" and make no other entries on that line.
- Repeat step 2 for each EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING Item 9** (shown in line numbers X-1, X-2, X-3, and X-4 below) – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operations. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

| Line Number | A. EPA Hazardous Waste No. (Enter code) | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES                   |   |   |   |   |   |  |  |                                                            |  |
|-------------|-----------------------------------------|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|--|--|------------------------------------------------------------|--|
|             |                                         |                                  |                                 | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |  |  | (2) PROCESS DESCRIPTION (If code is not entered in 9.D(1)) |  |
| X 1         | K 0 5 4                                 | 900                              | P                               | T                              | 0 | 3 | D | 8 | 0 |  |  |                                                            |  |
| X 2         | D 0 0 2                                 | 400                              | P                               | T                              | 0 | 3 | D | 8 | 0 |  |  |                                                            |  |
| X 3         | D 0 0 1                                 | 100                              | P                               | T                              | 0 | 3 | D | 8 | 0 |  |  |                                                            |  |
| X 4         | D 0 0 2                                 |                                  |                                 |                                |   |   |   |   |   |  |  | Included With Above                                        |  |



EPA ID Number LAD000777201

OMB#: 2050-0024; Expires 12/31/2014

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

| D. PROCESSES |   |                                         |   |   |   |                                  |                                 |                                |   |   |   |   |   |   |   |   |   |                                                           |
|--------------|---|-----------------------------------------|---|---|---|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|---|---|---|---|-----------------------------------------------------------|
| Line Number  |   | A. EPA Hazardous Waste No. (Enter code) |   |   |   | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |   |   |   |   | (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1) |
|              | 3 | K                                       | 0 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 4 | K                                       | 0 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 5 | K                                       | 0 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 6 | K                                       | 0 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 7 | K                                       | 0 | 0 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 8 | K                                       | 0 | 0 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 9 | K                                       | 0 | 0 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 0 | K                                       | 0 | 0 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 1 | K                                       | 0 | 0 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 2 | K                                       | 0 | 1 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 3 | K                                       | 0 | 1 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 4 | K                                       | 0 | 1 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 5 | K                                       | 0 | 1 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 6 | K                                       | 0 | 1 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 7 | K                                       | 0 | 1 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 8 | K                                       | 0 | 1 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 9 | K                                       | 0 | 1 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 0 | K                                       | 0 | 1 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 1 | K                                       | 0 | 1 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 2 | K                                       | 0 | 2 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 3 | K                                       | 0 | 2 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 4 | K                                       | 0 | 2 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 5 | K                                       | 0 | 2 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 6 | K                                       | 0 | 2 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 7 | K                                       | 0 | 2 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 8 | K                                       | 0 | 2 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 9 | K                                       | 0 | 2 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
|              | 0 | K                                       | 0 | 2 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
| 1            | 0 | K                                       | 0 | 2 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
| 1            | 0 | 1                                       | K | 0 | 3 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 2                                       | K | 0 | 3 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 3                                       | K | 0 | 3 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 4                                       | K | 0 | 3 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 5                                       | K | 0 | 3 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 6                                       | K | 0 | 3 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 7                                       | K | 0 | 3 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 8                                       | K | 0 | 3 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 0 | 9                                       | K | 0 | 3 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 0                                       | K | 0 | 3 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 1                                       | K | 0 | 4 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 2                                       | K | 0 | 4 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 3                                       | K | 0 | 4 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 4                                       | K | 0 | 4 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 5                                       | K | 0 | 4 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 6                                       | K | 0 | 4 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 7                                       | K | 0 | 4 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 8                                       | K | 0 | 4 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 1 | 9                                       | K | 0 | 4 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 0                                       | K | 0 | 4 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 1                                       | K | 0 | 5 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 2                                       | K | 0 | 5 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 3                                       | K | 0 | 5 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 4                                       | K | 0 | 6 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 5                                       | K | 0 | 6 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 6                                       | K | 0 | 6 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 7                                       | K | 0 | 6 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 8                                       | K | 0 | 6 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 2 | 9                                       | K | 0 | 6 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 0                                       | K | 0 | 6 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 1                                       | K | 0 | 7 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 2                                       | K | 0 | 7 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 3                                       | K | 0 | 8 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 4                                       | K | 0 | 8 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 5                                       | K | 0 | 8 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 6                                       | K | 0 | 8 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 7                                       | K | 0 | 8 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 8                                       | K | 0 | 8 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 3 | 9                                       | K | 0 | 9 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 4 | 0                                       | K | 0 | 9 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 1            | 4 | 1                                       | K | 0 | 9 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |



EPA ID Number LAD000777201

OMB#: 2050-0024; Expires 12/31/2014

## 9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

| 8. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary. Number pages as 9a, etc.) |   |                                         |   |   |   |                                  | D. PROCESSES                    |                                |   |   |   |   |   |   |   |   |  |                                                           |
|----------------------------------------------------------------------------------------------------------------|---|-----------------------------------------|---|---|---|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|---|---|---|--|-----------------------------------------------------------|
| Line Number                                                                                                    |   | A. EPA Hazardous Waste No. (Enter code) |   |   |   | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |   |   |   |  | (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1) |
| 1                                                                                                              | 2 | K                                       | 0 | 9 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 3 | K                                       | 0 | 9 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 0 | 9 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 0 | 9 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 0 | 9 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 0 | 9 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 1 | 0 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 1 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 0 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 1 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 1 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 1 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 2 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 2 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 6 | K                                       | 1 | 2 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 2 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 3 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 3 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 3 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 4 | K                                       | 1 | 4 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 5 | K                                       | 1 | 4 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 4 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 4 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 4 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 7 | K                                       | 1 | 4 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 4 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 4 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 4 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 5 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 5 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 5 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 5 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 5 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 5 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 8 | K                                       | 1 | 6 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 6 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 6 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 1                                                                                                              | 9 | K                                       | 1 | 7 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 0 | K                                       | 1 | 8 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 0 | P                                       | 0 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 0 | P                                       | 0 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 0 | P                                       | 0 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 0 | P                                       | 0 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 5 | P                                       | 0 | 0 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 6 | P                                       | 0 | 0 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 7 | P                                       | 0 | 0 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 8 | P                                       | 0 | 0 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 9 | P                                       | 0 | 0 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2                                                                                                              | 1 | P                                       | 0 | 1 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |



EPA ID Number LAD000777201

OMB#: 2050-0024; Expires 12/31/2014

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

| Line Number |   | A. EPA Hazardous Waste No. (Enter code) |   |   |   | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES                   |   |   |   |   |   |   |   |   |  | (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1) |
|-------------|---|-----------------------------------------|---|---|---|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|---|---|---|--|-----------------------------------------------------------|
|             |   |                                         |   |   |   |                                  |                                 | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |   |   |   |  |                                                           |
| 2           | 1 | P                                       | 0 | 1 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 1 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 1 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 1 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 1 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 1 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 1 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 1 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 2 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 0 | P                                       | 0 | 2 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 1 | P                                       | 0 | 2 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 2 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 2 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 2 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 2 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 2 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 2 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 3 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 3 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 0 | P                                       | 0 | 3 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 1 | P                                       | 0 | 3 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 3 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 3 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 3 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 3 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 4 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 4 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 4 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 4 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 0 | P                                       | 0 | 4 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 1 | P                                       | 0 | 4 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 4 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 4 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 4 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 4 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 5 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 5 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 5 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 5 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 0 | P                                       | 0 | 5 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 1 | P                                       | 0 | 5 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 5 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 6 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 6 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 6 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 6 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 6 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 6 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 6 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 0 | P                                       | 0 | 6 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 1 | P                                       | 0 | 6 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 7 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 7 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 7 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 7 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 7 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 7 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 7 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 7 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 0 | P                                       | 0 | 7 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 1 | P                                       | 0 | 8 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 2 | P                                       | 0 | 8 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 3 | P                                       | 0 | 8 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 4 | P                                       | 0 | 8 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 5 | P                                       | 0 | 8 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 6 | P                                       | 0 | 8 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 7 | P                                       | 0 | 8 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 8 | P                                       | 0 | 9 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 2           | 9 | P                                       | 0 | 9 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |





EPA ID Number LAD000777201

OMB#: 2050-0024; Expires 12/31/2014

## 9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

| A. EPA Hazardous Waste No. (Enter code) |   |   |   |   |   | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES                   |   |   |   |   |   |   |   |   |  |  |  |  | (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1) |
|-----------------------------------------|---|---|---|---|---|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|---|---|---|--|--|--|--|-----------------------------------------------------------|
| Line Number                             |   |   |   |   |   |                                  |                                 | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |   |   |   |  |  |  |  |                                                           |
| 2                                       | 0 | P | 0 | 9 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 1 | P | 0 | 9 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 2 | P | 0 | 9 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 3 | P | 0 | 9 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 4 | P | 0 | 9 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 5 | P | 0 | 9 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 6 | P | 1 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 7 | P | 1 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 8 | P | 1 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 9 | P | 1 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 0 | P | 1 | 0 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 1 | P | 1 | 0 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 2 | P | 1 | 0 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 3 | P | 1 | 0 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 4 | P | 1 | 0 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 5 | P | 1 | 1 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 6 | P | 1 | 1 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 7 | P | 1 | 1 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 8 | P | 1 | 1 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 2                                       | 9 | P | 1 | 1 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 0 | P | 1 | 1 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 1 | P | 1 | 1 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 2 | P | 1 | 1 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 3 | P | 1 | 1 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 4 | P | 1 | 2 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 5 | P | 1 | 2 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 6 | P | 1 | 2 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 7 | P | 1 | 2 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 8 | P | 1 | 2 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 9 | P | 1 | 2 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 0 | P | 1 | 8 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 1 | P | 1 | 8 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 2 | P | 1 | 8 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 3 | P | 1 | 9 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 4 | P | 1 | 9 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 5 | P | 1 | 9 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 6 | P | 1 | 9 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 7 | P | 1 | 9 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 8 | P | 1 | 9 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 9 | P | 1 | 9 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 0 | P | 1 | 9 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 1 | P | 2 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 2 | P | 2 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 3 | P | 2 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 4 | P | 2 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 5 | P | 2 | 0 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 6 | U | 0 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 7 | U | 0 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 8 | U | 0 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 9 | U | 0 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 0 | U | 0 | 0 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 1 | U | 0 | 0 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 2 | U | 0 | 0 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 3 | U | 0 | 0 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 4 | U | 0 | 0 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 5 | U | 0 | 1 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 6 | U | 0 | 1 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 7 | U | 0 | 1 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 8 | U | 0 | 1 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 9 | U | 0 | 1 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 0 | U | 0 | 1 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 1 | U | 0 | 1 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 2 | U | 0 | 1 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 3 | U | 0 | 1 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 4 | U | 0 | 2 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 5 | U | 0 | 2 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 6 | U | 0 | 2 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 7 | U | 0 | 2 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |
| 3                                       | 8 | U | 0 | 2 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |  |  |  |                                                           |



## Page 5d of 6



EPA ID Number LAD000777201

OMB#: 2050-0024; Expires 12/31/2014

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

| Line Number |   | A. EPA Hazardous Waste No. (Enter code) |   |   |   | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | D. PROCESSES                   |   |   |   |   |   |   |   |   |   | (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1) |
|-------------|---|-----------------------------------------|---|---|---|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|---|---|---|---|-----------------------------------------------------------|
|             |   |                                         |   |   |   |                                  |                                 | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |   |   |   |   |                                                           |
| 4           | 7 | U                                       | 1 | 6 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
| 4           | 8 | U                                       | 1 | 6 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |   |                                                           |
| 4           | 9 | 0                                       | U | 1 | 7 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 0                                       | U | 1 | 7 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 1                                       | U | 1 | 7 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 2                                       | U | 1 | 7 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 3                                       | U | 1 | 7 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 4                                       | U | 1 | 7 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 5                                       | U | 1 | 7 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 6                                       | U | 1 | 7 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 7                                       | U | 1 | 7 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 8                                       | U | 1 | 8 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 4           | 9 | 9                                       | U | 1 | 8 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 0                                       | U | 1 | 8 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 1                                       | U | 1 | 8 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 2                                       | U | 1 | 8 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 3                                       | U | 1 | 8 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 4                                       | U | 1 | 8 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 5                                       | U | 1 | 8 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 6                                       | U | 1 | 8 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 7                                       | U | 1 | 8 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 8                                       | U | 1 | 9 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 0 | 9                                       | U | 1 | 9 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 0                                       | U | 1 | 9 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 1                                       | U | 1 | 9 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 2                                       | U | 1 | 9 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 3                                       | U | 1 | 9 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 4                                       | U | 1 | 9 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 5                                       | U | 2 | 0 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 6                                       | U | 2 | 0 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 7                                       | U | 2 | 0 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 8                                       | U | 2 | 0 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 1 | 9                                       | U | 2 | 0 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 0                                       | U | 2 | 0 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 1                                       | U | 2 | 0 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 2                                       | U | 2 | 0 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 3                                       | U | 2 | 0 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 4                                       | U | 2 | 0 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 5                                       | U | 2 | 1 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 6                                       | U | 2 | 1 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 7                                       | U | 2 | 1 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 8                                       | U | 2 | 1 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 2 | 9                                       | U | 2 | 1 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 0                                       | U | 2 | 1 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 1                                       | U | 2 | 1 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 2                                       | U | 2 | 1 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 3                                       | U | 2 | 1 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 4                                       | U | 2 | 2 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 5                                       | U | 2 | 2 | 1                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 6                                       | U | 2 | 2 | 2                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 7                                       | U | 2 | 2 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 8                                       | U | 2 | 2 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 3 | 9                                       | U | 2 | 2 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 0                                       | U | 2 | 2 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 1                                       | U | 2 | 2 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 2                                       | U | 2 | 3 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 3                                       | U | 2 | 3 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 4                                       | U | 2 | 3 | 5                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 5                                       | U | 2 | 3 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 6                                       | U | 2 | 3 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 7                                       | U | 2 | 3 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 8                                       | U | 2 | 3 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 4 | 9                                       | U | 2 | 4 | 0                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 5 | 0                                       | U | 2 | 4 | 3                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 5 | 1                                       | U | 2 | 4 | 4                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 5 | 2                                       | U | 2 | 4 | 6                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 5 | 3                                       | U | 2 | 4 | 7                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 5 | 4                                       | U | 2 | 4 | 8                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |
| 5           | 5 | 5                                       | U | 2 | 4 | 9                                | 250,000                         | T                              | S | 0 | 1 | S | 0 | 2 | T | 0 | 1 |                                                           |



EPA ID Number LAD000777201

OMB#: 2050-0024; Expires 12/31/2014

9. Description of Hazardous Wastes (Continued. Use additional sheet(s) as necessary; number pages as 5a, etc.)

| D. PROCESSES |   |                                         |   |   |   |                                  |                                 |                                |   |   |   |   |   |   |   |   |  |                                                           |
|--------------|---|-----------------------------------------|---|---|---|----------------------------------|---------------------------------|--------------------------------|---|---|---|---|---|---|---|---|--|-----------------------------------------------------------|
| Line Number  |   | A. EPA Hazardous Waste No. (Enter code) |   |   |   | B. Estimated Annual Qty of Waste | C. Unit of Measure (Enter code) | (1) PROCESS CODES (Enter Code) |   |   |   |   |   |   |   |   |  | (2) PROCESS DESCRIPTION (If code is not entered in 9.D.1) |
| 5            | 6 | U                                       | 2 | 7 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 7 | U                                       | 2 | 7 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 8 | U                                       | 2 | 7 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 9 | U                                       | 2 | 7 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 0 | U                                       | 2 | 8 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 1 | U                                       | 3 | 2 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 2 | U                                       | 3 | 5 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 3 | U                                       | 3 | 5 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 4 | U                                       | 3 | 6 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 5 | U                                       | 3 | 6 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 6 | U                                       | 3 | 6 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 7 | U                                       | 3 | 6 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 8 | U                                       | 3 | 7 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 9 | U                                       | 3 | 7 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 0 | U                                       | 3 | 7 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 1 | U                                       | 3 | 7 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 2 | U                                       | 3 | 7 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 3 | U                                       | 3 | 7 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 4 | U                                       | 3 | 7 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 5 | U                                       | 3 | 8 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 6 | U                                       | 3 | 8 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 7 | U                                       | 3 | 8 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 8 | U                                       | 3 | 8 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 9 | U                                       | 3 | 8 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 0 | U                                       | 3 | 8 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 1 | U                                       | 3 | 8 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 2 | U                                       | 3 | 8 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 3 | U                                       | 3 | 9 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 4 | U                                       | 3 | 9 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 5 | U                                       | 3 | 9 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 6 | U                                       | 3 | 9 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 7 | U                                       | 3 | 9 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 8 | U                                       | 3 | 9 | 5 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 9 | U                                       | 3 | 9 | 6 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 0 | U                                       | 4 | 0 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 1 | U                                       | 4 | 0 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 2 | U                                       | 4 | 0 | 2 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 3 | U                                       | 4 | 0 | 3 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 4 | U                                       | 4 | 0 | 4 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 5 | U                                       | 4 | 0 | 7 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 6 | U                                       | 4 | 0 | 8 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 7 | U                                       | 4 | 0 | 9 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 8 | U                                       | 4 | 1 | 0 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |
| 5            | 9 | U                                       | 4 | 1 | 1 | 250,000                          | T                               | S                              | 0 | 1 | S | 0 | 2 | T | 0 | 1 |  |                                                           |



EPA ID Number

L A D 0 0 0 7 7 7 2 0 1

OMB#: 2050-0024; Expires 12/31/2014

**10. Map**

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

**11. Facility Drawing**

All existing facilities must include a scale drawing of the facility (see instructions for more detail).

**12. Photographs**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas (see instructions for more detail).

**13. Comments**



# **TABLE OF CONTENTS**

## TABLE OF CONTENTS

|             |                                                                                |           |
|-------------|--------------------------------------------------------------------------------|-----------|
| <b>I.</b>   | <b>PERMIT PREAMBLE .....</b>                                                   | <b>2</b>  |
| <b>II.</b>  | <b>GENERAL PERMIT CONDITIONS .....</b>                                         | <b>7</b>  |
|             | A. DURATION OF PERMIT .....                                                    | 7         |
|             | B. EFFECT OF PERMIT .....                                                      | 7         |
|             | C. PERMIT ACTIONS.....                                                         | 7         |
|             | D. SEVERABILITY .....                                                          | 8         |
|             | E. DUTIES AND REQUIREMENTS .....                                               | 8         |
| <b>III.</b> | <b>GENERAL FACILITY CONDITIONS .....</b>                                       | <b>20</b> |
|             | A. DESIGN AND OPERATION OF ALL FACILITIES .....                                | 20        |
|             | B. REQUIRED NOTICE.....                                                        | 20        |
|             | C. GENERAL WASTE ANALYSIS .....                                                | 20        |
|             | D. SECURITY .....                                                              | 21        |
|             | E. GENERAL INSPECTION REQUIREMENTS.....                                        | 21        |
|             | F. PERSONNEL TRAINING .....                                                    | 21        |
|             | G. GENERAL REQUIREMENTS FOR IGNITABLE,<br>REACTIVE, OR INCOMPATIBLE WASTE..... | 21        |
|             | H. LOCATION STANDARDS .....                                                    | 22        |
|             | I. PRECIPITATION RUN-ON AND RUN-OFF .....                                      | 22        |
|             | J. HURRICANE EVENTS.....                                                       | 22        |
|             | K. PREPAREDNESS AND PREVENTION.....                                            | 22        |
|             | L. CONTINGENCY PLAN .....                                                      | 23        |
|             | M. MANIFEST SYSTEM.....                                                        | 23        |
|             | N. RECORDKEEPING AND REPORTING .....                                           | 24        |
|             | O. CLOSURE .....                                                               | 24        |
|             | P. POST-CLOSURE .....                                                          | 29        |
|             | Q. COST ESTIMATES FOR CLOSURE/POST-CLOSURE.....                                | 30        |
|             | R. FINANCIAL ASSURANCE FOR FACILITY CLOSURE .....                              | 31        |
|             | S. LIABILITY REQUIREMENTS.....                                                 | 32        |
|             | T. INCAPACITY OF PERMITTEE .....                                               | 32        |
| <b>IV.</b>  | <b>PERMITTED FACILITIES .....</b>                                              | <b>33</b> |
|             | A. TANKS .....                                                                 | 33        |



**TABLE OF CONTENTS**  
**(Continued)**

|            |                                                                                            |            |
|------------|--------------------------------------------------------------------------------------------|------------|
| B.         | CONTAINER STORAGE AREAS.....                                                               | 35         |
| C.         | CONTAINMENT BUILDING.....                                                                  | 36         |
| D.         | BIOPADS .....                                                                              | 37         |
| E.         | LANDFILL DISPOSAL.....                                                                     | 37         |
| F.         | POST-CLOSURE LANDFILLS .....                                                               | 37         |
| G.         | OIL RECOVERY UNITS.....                                                                    | 38         |
| H.         | THERMAL DESORBER UNITS.....                                                                | 38         |
| <br>       |                                                                                            |            |
| <b>V.</b>  | <b>PERMITTED CONDITIONS APPLICABLE TO PERMITTED FACILITIES .....</b>                       | <b>39</b>  |
| <br>       |                                                                                            |            |
| A.         | TANKS .....                                                                                | 39         |
| B.         | CONTAINER STORAGE AREAS.....                                                               | 60         |
| C.         | CONTAINMENT BUILDING.....                                                                  | 66         |
| D.         | BIOPADS .....                                                                              | 71         |
| E.         | LANDFILL .....                                                                             | 77         |
| F.         | OIL RECOVERY UNITS.....                                                                    | 87         |
| G.         | THERMAL DESORBER UNITS.....                                                                | 93         |
| H.         | AIR EMISSION STANDARDS.....                                                                | 106        |
| I.         | PERMIT CONDITIONS APPLICABLE TO THE PERMITTED<br>CLOSED POST-CLOSURE UNITS.....            | 109        |
| <br>       |                                                                                            |            |
| <b>VI.</b> | <b>GROUNDWATER PROTECTION.....</b>                                                         | <b>113</b> |
| A.         | APPLICABILITY.....                                                                         | 113        |
| B.         | REQUIRED PROGRAM.....                                                                      | 113        |
| C.         | GROUNDWATER PROGRAM .....                                                                  | 114        |
| D.         | HAZARDOUS CONSTITUENTS, PARAMETERS, ANALYTICAL<br>FREQUENCY, AND CONCENTRATION LIMITS..... | 116        |
| E.         | POINT OF COMPLIANCE.....                                                                   | 117        |
| F.         | COMPLIANCE PERIOD .....                                                                    | 117        |
| G.         | GENERAL REQUIREMENTS.....                                                                  | 117        |
| H.         | DETECTION MONITORING PROGRAM.....                                                          | 119        |
| I.         | COMPLIANCE PROGRAM.....                                                                    | 122        |
| J.         | CORRECTIVE ACTION PROGRAM.....                                                             | 122        |
| K.         | CONSTRUCTION AND ABANDONMENT OF MONITORING WELLS<br>AND GEOTECHNICAL BOREHOLES .....       | 122        |

**TABLE OF CONTENTS**  
**(Continued)**

|              |                                                                                                                              |            |
|--------------|------------------------------------------------------------------------------------------------------------------------------|------------|
| <b>VII.</b>  | <b>SPECIAL CONDITIONS PURSUANT TO THE 1984 HAZARDOUS AND SOLID WASTE AMMENDMENTS (HSWA) TO RCRA.....</b>                     | <b>128</b> |
| <b>VIII.</b> | <b>SPECIAL CONDITIONS PURSUANT TO THE 1984 HAZARDOUS AND SOLID WASTE AMENDMENTS (HSWA) – CORRECTIVE ACTION STRATEGY.....</b> | <b>134</b> |

**LIST OF ATTACHMENTS**

|                           |                                                                       |
|---------------------------|-----------------------------------------------------------------------|
| <b>ATTACHMENT 1 .....</b> | <b>LIST OF FACILITY DOCUMENTS INCORPORATED IN PERMIT BY REFERENCE</b> |
|---------------------------|-----------------------------------------------------------------------|



# **BODY OF PERMIT**

**FINAL  
MODIFIED HAZARDOUS WASTE OPERATING AND POST-CLOSURE PERMIT**

**CHEMICAL WASTE MANAGEMENT, INC.  
TREATMENT, STORAGE, AND DISPOSAL  
EPA ID NO. LAD000777201  
CARLYSS, LOUISIANA  
CALCASIEU PARISH**

**Agency Interest No. 742  
Activity No. PER20140007  
Permit No. LAD000777201-OP-RN-MO-1**

**For**

**CONTAINER STORAGE AREAS**

**Building 201  
Building 202  
Building 205  
Building 204  
Building 801  
Building 802**

**CONTAINMENT BUILDING**

**Building 301**

**BIOPAD**

**Phase I**

**Phase II**

**TANKS**

|              |              |               |              |              |
|--------------|--------------|---------------|--------------|--------------|
| <b>T-220</b> | <b>T-303</b> | <b>T-502</b>  | <b>T-505</b> | <b>T-905</b> |
| <b>T-221</b> | <b>T-304</b> | <b>T-503</b>  | <b>T-506</b> | <b>T-906</b> |
| <b>T-222</b> | <b>T-305</b> | <b>T-504A</b> | <b>T-903</b> | <b>T-907</b> |
| <b>T-223</b> | <b>T-306</b> | <b>T-504B</b> | <b>T-904</b> | <b>T-601</b> |
| <b>T-602</b> | <b>T-610</b> | <b>T-611</b>  | <b>T-612</b> | <b>T-613</b> |
| <b>T-630</b> | <b>T-631</b> | <b>T-632</b>  | <b>T-701</b> | <b>T-702</b> |
| <b>T-703</b> | <b>T-704</b> | <b>T-710</b>  | <b>T-711</b> | <b>T-712</b> |
| <b>T-713</b> | <b>T-740</b> | <b>T-741</b>  |              |              |



**LANDFILL CELLS**  
**Cell 5 (post-closure)**  
**Cell 6 (post-closure)**  
**Cell 7 (post-closure)**  
**Cell 8 (operating and post-closure)**  
**Cell 14 (post-closure)**

**OIL RECOVERY UNITS**  
**ORU-1**  
**ORU-2**

**THERMAL DESORBER UNITS**  
**TDU-1**  
**TDU-2**

## **I. PERMIT PREAMBLE**

This permit is issued to Chemical Waste Management, Inc., Lake Charles facility, Carlyss, Calcasieu Parish, Louisiana (hereinafter referred to as the "Permittee"), by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted thereunder, and by the United States Environmental Protection Agency (EPA) under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA).

For the purposes of this permit, "Administrative Authority" mean the Secretary of the LDEQ or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the Permittee's certification that such information is accurate and that all facilities will be constructed, operated and maintained as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, La. R.S. 30:2171 et seq., and the regulations adopted thereunder.

All definitions contained in this permit shall have the meaning as defined in the Louisiana Administrative Code (LAC), Title 33, Part V, Subpart 1 unless otherwise stated herein.

All regulating citations are defined as being the regulation in effect on the date of issuance of this permit. New and/or amended regulations are not included as permit requirements until permit

modification procedures, as specified in Condition II.C of this permit, are completed, except as provided by LAC 33:V.307.A.

## GLOSSARY OF TERMS

For the purpose of this permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the contexts of use in this permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

**"Administrative Authority"** means the secretary of the Louisiana Department of Environmental Quality (LDEQ) or his designee or the appropriate assistant secretary or his designee.

**"Application"** refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

**"Area of Concern" (AOC)** means any discernable unit or area, which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

**"Area of Investigation" (AOI)** is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

**"Biodegradation"** is the removal of hazardous contaminants from debris surfaces and surface pores in an aqueous solution and biodegradation of organic or nonmetallic inorganic compounds (i.e., inorganics that contain phosphorus, nitrogen, or sulfur) in units operated under either aerobic or anaerobic conditions.

**"Bioremediation"** is the treatment of organic chemicals with microorganisms to break them down into less toxic or non-toxic materials.

**"CAS"** means Corrective Action Strategy.

**"CFR"** means the Code of Federal Regulations.

**"CWA"** means Clean Water Act.



**“Conceptual Site Model” (CSM)** is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases mechanisms, containment fate and exposure pathways, potential receptors, and risks. The information for the CSM is documented into six (6) profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

**“Constituents of Concern” (COC)** means the COPC’s that pose a significant risk.

**“Constituents of Potential Concern” (COPC)** means chemicals from hazardous waste and hazardous waste constituents that are potentially site related and have data of quality for use in the Screen or site-specific risk assessment. The facility should compile a list of COPC’s for each release site based on existing sampling data, waste analysis reports, etc.

**“Continuous Monitoring System (CMS)”** is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for continuously sampling a parameter without interruption and evaluating the detector response as defined by this permit. The installation and operation of a CMS requires, at a minimum, to comply with the manufacturer’s written specifications or recommendations for installation, operation, and calibration of the system. The calibration of a CMS must be verified at a frequency and in a manner consistent with manufacturer specifications, but no less frequent than as specified in this permit.

**“Corrective Action”** is an activity conducted to protect human health and the environment.

**“Department”** means the Louisiana Department of Environmental Quality (LDEQ).

**“EPA”** means the United States Environmental Protection Agency.

**“HSWA”** means the 1984 Hazardous and Solid Waste Amendments to RCRA.

**“Hazardous constituent”** means any constituent identified in LAC 33:V.Chapter 31. Table 1, or any constituent identified in LAC 33:V.3325. Table 4.

**“LDEQ”** means the Louisiana Department of Environmental Quality.

**“LELAP”** means the Louisiana Environmental Laboratory Accreditation Program.

**“Macroencapsulation”** is the application of surface coating materials such as polymeric organics (e.g. resins and plastics) or use a jacket of inert inorganic materials to substantially

reduce surface exposure to potential leaching media.

**"Microencapsulation"** is the stabilization of the debris with the following reagents (or waste reagents) such that the leachability of the hazardous contaminants is reduced: (1) Portland cement; and/or (2) lime/pozzolons (e.g. fly ash and cement kiln dust). Reagents (e.g. iron salts, silicates, and clays) may be added to enhance the set/cure time and/or compressive strength or to reduce the leachability of the hazardous constituents.

**"Operating record"** means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing or other data as may be required--to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.b.

**"Permittee"** means Chemical Waste Management, Inc., 7170 John Brannon Road, Sulphur, Louisiana 70665 (mailing address), and 7170 John Brannon Road, Carlyss, Calcasieu Parish, Louisiana (physical location).

**"RCRA Permit"** means the full permit, with the Resource Conservation and Recovery Act (RCRA) and 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA portions.

**"RFA"** means RCRA Facility Assessment.

**"RFI"** means RCRA Facility Investigation.

**"Release"** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

**"SARA"** means Superfund Amendments and Reauthorization Act of 1985.

**"Solid Waste Management Unit" (SWMU)** mean any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

**"Stabilization"** refers to treatment processes that involve chemical reactions that reduce the leachability of a waste. Stabilization chemically immobilizes hazardous materials or reduces their solubility through a chemical reaction. The physical nature of the waste may or may not be changed by this process.



**“Thermal Treatment”** refers to the process of treating hazardous waste in a device that uses elevated temperatures as the primary means to change the chemical, physical, or biological character or composition of the hazardous waste.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

## **II. GENERAL PERMIT CONDITIONS**

### **II.A. DURATION OF PERMIT**

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

### **II.B. EFFECT OF PERMIT**

This permit authorizes the Permittee to treat, store and dispose of hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit during its term constitutes compliance for purposes of enforcement, with LAC 33:V.Subpart 1, except for those requirements not included in the permit under LAC 33:V.307.A.1-4, and with Subtitle C of RCRA, HSWA, and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Section 3013 or Section 7003 of RCRA, the Act (La. R.S.30:2001 et seq.) or under Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of state or local laws or regulations.

### **II.C. PERMIT ACTIONS**

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes in, or inaccuracies in the information in the permit application.

The Administrative Authority may suspend, modify, revoke and reissue, or terminate the permit for cause or when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or the LAC 33:V.309.F, 311.A, or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay the applicability or enforceability of any permit condition.



## **II.D. SEVERABILITY**

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

## **II.E. DUTIES AND REQUIREMENTS**

### **II.E.1. Duty to Comply**

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Act is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of a permit renewal application.

### **II.E.2. Duty to Reapply**

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

### **II.E.3. Permit Extension**

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in the LAC 33:V.309.B and 315.A.

### **II.E.4. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

### **II.E.5. Duty to Mitigate**

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with the conditions of this permit as required by the LAC 33:V.309.D.

## **II.E.6. Proper Operation and Maintenance**

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment and/or appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit and in accordance with LAC 33:V.309.E.

## **II.E.7. Duty to Provide Information**

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required to be kept by this permit and in accordance with LAC 33:V.309.H.

## **II.E.8. Inspection and Entry**

In accordance with LAC 33:V.309.I, the Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

**II.E.8.a.** enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

**II.E.8.b.** have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;

**II.E.8.c.** inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

**II.E.8.d.** sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.



## **II.E.9. Monitoring and Records**

**II.E.9.a.** Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity, in accordance with LAC 33:V.309.J.1. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest version; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method; or an equivalent method as specified in the attached Waste Analysis Plan as referenced in Attachment 1.

**II.E.9.b.** Records of monitoring information, in accordance with LAC 33:V.309.J.3, shall include, but are not limited to:

**II.E.9.b.i.** the date, exact place, and time of sampling or measurements;

**II.E.9.b.ii.** the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;

**II.E.9.b.iii.** the date(s) analyses were performed;

**II.E.9.b.iv.** the name(s) and signature(s) of the individual(s) who performed the analysis;

**II.E.9.b.v.** the analytical techniques or methods used; and

**II.E.9.b.vi.** the results of such analyses; and

**II.E.9.b.vii.** associated quality assurance performance data.

### **II.E.9.c. Laboratory Quality Assurance/Quality Control**

In order to ensure the accuracy, precision and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

**II.E.9.c.i.** Any commercial laboratory providing analytical results and test data to the LDEQ required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I.Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted

by the LDEQ.

LAC 33:I.Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulation and a list of labs that have applied for accreditation are available on the LDEQ website located at: <http://www.deq.louisiana.gov/portal/tabid/2412/Default.aspx>.

In accordance with LAC 33:I.4501, the requirements for LELAP accreditation apply whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the LDEQ;
- required to be included in a monitoring report submitted to the LDEQ;
- required to be submitted by contract; or
- otherwise required by the LDEQ regulations.

**II.E.9.c.ii.** If the Permittee decides to use its own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document quality assurance/quality control procedures onsite.

**II.E.9.c.iii.** For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I.Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

#### **II.E.10. Retention of Records**

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods), where applicable, as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C, and maintain records of all groundwater monitoring data and reports, boring logs, well completion data, associated potentiometric surface maps, and associated constituent isoconcentration maps from all sampling events covered by this permit, in accordance with LAC 33:V.3315.J. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.



The Permittee shall retain records of all other monitoring information required by this permit, including all calibration records, field log notes, and maintenance records for LDEQ inspection for a period of not less than three (3) years, as required by LAC 33:V.317.B, from the date of the sample, measurement, report, or record except where otherwise required by the permit, or by order of the Administrative Authority. These periods may be extended by request of the Administrative Authority at any time and are automatically extended during the course of any unresolved enforcement action regarding the closed units.

The Permittee shall, for the life of the facility, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (La. R.S. 30:2171 et seq.).

#### **II.E.11. Notices of Planned Physical Facility Changes**

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

#### **II.E.12. Physical Facility after Modification**

For any new or existing unit being modified, the Permittee may not treat, store, or dispose of hazardous waste in modified portion of the unit until the unit is complete and:

**II.E.12.a.** The Permittee has submitted to the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and a registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

**II.E.12.b.** The Administrative Authority has inspected the new or modified unit following a request to make a final inspection by the Permittee as required by LAC 33:V.303.I, and finds it is in compliance with the conditions of the permit and all applicable sections of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

#### **II.E.13. Anticipated Noncompliance**

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

#### **II.E.14. Transfer of Permits**

This permit may be transferred to a new owner or operator with written approval by the Administrative Authority and if it is modified or revoked and reissued pursuant to the



LAC 33:V.309.L.4, 321.B, 1531.D and LAC 33:I.Chapter 19.

The Permittee's failure to notify the new owner or operator of the requirements of LAC 33:V.Subpart 1 and LAC 33:I.Chapter 19 in no way relieves the new owner or operator of his obligation to comply with all applicable requirements.

Changes in the ownership or operational control of a facility shall be made with written notification to the Office of Environmental Services. The new owner or operator shall submit a Name/Ownership/Operator Change Form (NOC-1 Form) prior to or no later than forty-five (45) days after the change. The Administrative Authority may initiate action to terminate or revoke an existing media permit for a failure to disclose a change of ownership or operational control within forty-five (45) days after the change, in accordance with LAC 33:I.1909.B. The previous Permittee and the new Permittee must comply with all applicable requirements of LAC 33:I.1909.

#### **II.E.15. Compliance Schedules**

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

#### **II.E.16. Emergency Unauthorized Discharge Notification**

In accordance with LAC 33:I.3915, in the event of an unauthorized discharge that results in an emergency condition (an emergency condition is any condition which could be reasonably expected to endanger the health and safety of the public, cause significant adverse impact to the land, water, or air environment, or cause severe damage to property), the Permittee shall notify the DPS (Department of Public Safety) 24-hour Louisiana Emergency Hazardous Materials Hotline by telephone at (225) 925-6595 immediately, but in no case later than one (1) hour after learning of the discharge. The DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will subsequently notify the Department regarding the details of the discharge.

#### **II.E.17. Non-Emergency Unauthorized Discharge Notification**

In the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33:I.Chapter 39.Subchapter E but that does not cause an emergency condition, the Permittee shall promptly notify DPS by telephone at (225) 925-6595 (collect calls accepted 24 hours a day) within twenty-four (24) hours after learning of the discharge.

Compliance with LAC 33:I.3917 does not relieve the Permittee of the necessity of following any applicable written notification procedures in LAC 33:I.3925 or any terms and conditions of any applicable permit or license issued under the Louisiana Environmental Quality Act.



In the event of an unauthorized discharge that requires notification under LAC 33:I.3917.A, the DPS 24-hour Louisiana Emergency Hazardous Materials Hotline will notify the Department of Environmental Quality.

#### **II.E.18. Unauthorized Discharge to Groundwater Notification**

In the event that any unauthorized discharge results in the contamination of the groundwaters of the state or otherwise moves in, into, within, or on any saturated subsurface strata, the discharger (Permittee) shall notify the Office of Environmental Compliance, Emergency and Radiological Services Division, Single Point of Contact (SPOC) within seven (7) days.

#### **II.E.19. Written Notification Reports for Unauthorized Discharges**

The Permittee shall submit written reports for any unauthorized discharging that requires notification, under Conditions, II.E.16, II.E.17 and II.E.18 of this permit, to the SPOC within seven (7) calendar days after notification required by Conditions II.16 through II.18, in accordance with LAC 33:I.3925.

#### **II.E.20. Noncompliance Reporting**

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit not reported under Conditions II.E.16, II.E.17, and II.E.18 for confirmed releases to the groundwater that may endanger human health or the environment, in accordance with LAC 33:V.309.L.7. This report shall include the following:

**II.E.20.a.** information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

**II.E.20.b.** information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

**II.E.20.b.i.** the name, address, and telephone number of the owner or operator;

**II.E.20.b.ii.** the name, address, and telephone number of the facility;

**II.E.20.b.iii.** the date, time, and type of incident;

**II.E.20.b.iv.** the name and quantity of materials involved;

**II.E.20.b.v.** the extent of injuries, if any;

**II.E.20.b.vi.** an assessment of actual or potential hazards to the

environment and human health outside the facility, where this is applicable; and

**II.E.20.b.vii.** the estimated quantity and disposition of recovered material that resulted from the incident.

#### **II.E.21. Follow-up Written Report of Noncompliance**

The Permittee shall also provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment not reported under Condition II.E.20. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance including exact dates and times; whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee shall submit a written report within fifteen (15) calendar days after the time Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.d.

#### **II.E.22. Other Noncompliance**

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.20.

#### **II.E.23. Other Information**

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information, in accordance with LAC 33:V.309.L.12.

#### **II.E.24. Signatory Requirement**

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

#### **II.E.25. Schedule of Compliance**

**II.E.25.a.** One hundred and eighty (180) days before planned construction, the Permittee must submit information pertaining to the design and operations and certification (LAC 33:V.1802.C.2) of the proposed Containment Building 301 to the Administrative Authority for approval. The information submitted must comply with the requirements of LAC 33:V.Chapter 18, and all applicable regulations.



**II.E.25.b.** One hundred and eighty (180) days before planned construction, the Permittee must submit the tank assessment for the proposed tanks (T-220, T-221, T-223, T-305, T-601, T-602, T-610, T-611, T-612, T-613, T-630, T-631, T-632, T-701, T-702, T-703, T-704, T-710, T-711, T-712, T-713, T-740, and T-741), in accordance with LAC 33:V.1905.A. Once installed, in accordance with LAC 33:V.1905.B, the tank installation reports must be submitted to the Administrative Authority for approval. The information submitted must comply with the requirements of this permit and LAC 33:V.Chapter 19, and all applicable regulations.

**II.E.25.c.** One hundred and eighty (180) days before planned construction, the Permittee must submit finalized engineering specifications for the proposed container storage areas to the Administrative Authority for approval. The information submitted must comply with the requirements of this permit and LAC 33:V.Chapter 21, and all applicable regulations.

**II.E.25.d.** One hundred and eighty (180) days before planned construction, the Permittee must submit finalized engineering specifications and operating parameters for the proposed Oil Recovery Units to the Administrative Authority for approval. The information submitted must comply with the requirements of this permit and LAC 33:V.Chapter 32 and all applicable regulations.

**II.E.25.e.** One hundred and eighty (180) days before planned construction, the Permittee must submit finalized engineering specifications and operating parameters for the proposed Thermal Desorber Units to the Administrative Authority for approval. The information submitted must comply with the requirements of this permit and LAC 33:V.Chapter 32 and all applicable regulations.

**II.E.25.f.** Before placing the proposed Oil Recovery Units into service, the Permittee must submit to the Administrative Authority, a revised contingency plan, a revised personnel training plan, and a revised waste analysis plan for all proposed units. The Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

**II.E.25.g.** Before placing the proposed Thermal Desorber Units into service, the Permittee must submit to the Administrative Authority, a revised contingency plan, a revised personnel training plan, and a revised waste analysis plan for all proposed units. The Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

**II.E.25.h.** Before placing any proposed unit or units into service, the Permittee must submit to the Administrative Authority, a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units. The revised plans must be submitted as a permit modification, in accordance with LAC 33:V.321.C and 322.

## **II.E.26. Updated Documents to Be Submitted Prior to Operation**

**(RESERVED)**

## **II.E.27. Documents to Be Maintained at Facility Site**

**II.E.27.a.** The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report and in compliance with LAC 33:V.321, 322 and 323.

**II.E.27.a.i.** Waste Analysis Plan submitted in accordance with LAC 33:V.1519 (see Attachment 1);

**II.E.27.a.ii.** Contingency Plan submitted in accordance with LAC 33:V.1513 (see Attachment 1);

**II.E.27.a.iii.** Closure/Post-Closure Plan submitted in accordance with LAC 33:V.3511 and 3523 (see Attachment 1);

**II.E.27.a.iv.** Security Plan submitted in accordance with LAC 33:V.1507 and 1513 (see Attachment 1);

**II.E.27.a.v.** Closure/Post-Closure cost estimate for facility closure submitted in accordance with LAC 33:V.3705 and 3709 (see Attachment 1);

**II.E.27.a.vi.** Arrangements with the local authorities in accordance with LAC 33:V.1511.G;

**II.E.27.a.vii.** Personnel Training Plan and the training records required by LAC 33:V.1515 (see Attachment 1);

**II.E.27.a.viii.** Operating records required by LAC 33:V.1529, and

**II.E.27.a.ix.** Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

**II.E.27.b.** All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.



#### **II.E.28. Annual Report**

An annual report must be submitted by March 1 of each year covering all unit(s) listed in this permit and their activities during the previous calendar year as required by LAC 33:V.1529.D.

#### **II.E.29. Manifest**

The Permittee shall report manifest discrepancies and unmanifested waste as per LAC 33:V.309.L.8 and 9.

#### **II.E.30. Emissions**

Air emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

#### **II.E.31. Water Discharges**

Water discharges, if any, must be in conformity with effluent limitations established by the Clean Water Act operating under a National Pollutant Discharge Elimination Systems (NPDES) permit and reported as required by that permit in accordance with LAC 33:V.1505.A.1.

#### **II.E.32. Non-Listed Hazardous Waste Facilities**

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the Permittee determines that an unpermitted hazardous waste unit(s) exists, the Permittee must immediately notify the Administrative Authority in accordance with Condition II.E.23 of this permit.

#### **II.E.33. Compliance with Land Disposal Restrictions**

The Permittee shall comply with those land disposal restrictions set forth in La. R.S. 30:2193, and all regulations promulgated thereunder, and the HSWA portion of this permit (Condition VII and VIII).

#### **II.E.34. Establishing Permit Conditions**

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

#### **II.E.35. Obligation for Corrective Action**

Owners or operators of hazardous waste management units must have all necessary

permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VII and VIII of this permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

#### **II.E.36. Attachments and Documents Incorporated by Reference**

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. When applicable, the Permittee must modify the permit according to LAC 33:V.Chapter 3. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.



### **III. GENERAL FACILITY CONDITIONS**

#### **III.A. DESIGN AND OPERATION OF ALL FACILITIES**

**III.A.1.** The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.

#### **III.A.2. (RESERVED)**

**III.A.3.** The Permittee may receive only those off-site hazardous wastes which are listed in the Part A of this permit and approved off-site Corrective Action Management Unit (CAMU) waste, in accordance Condition V.E.2.g.

**III.A.4.** The Permittee must not manage new wastes in the units listed in Condition IV without submitting a permit modification, in accordance with LAC 33:V.321, and receiving approval from the Administrative Authority.

#### **III.B. REQUIRED NOTICE**

When the Permittee anticipates receipt of hazardous waste from an off-site source (except where the Permittee is also the generator), it must inform the generator in writing that the Permittee has the appropriate permits for, and will accept, the waste to be shipped by the generator. The Permittee must keep a copy of this written notice as part of the operating record as required by LAC 33:V.1527.E.

#### **III.C. GENERAL WASTE ANALYSIS**

The Permittee shall manage those wastes set forth in the Part A/I and Condition III.A.3 and follow the procedures described in the Waste Analysis Plan, referenced in Attachment 1, and in accordance with LAC 33:V.1519.

**III.C.1.** The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or state regulatory provisions.

**III.C.2.** Annually, the Permittee shall submit a certified statement that indicates that any laboratory that provides chemical analyses, analytical results, or other test data to the LDEQ, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:I.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services.

**III.C.3.** If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all potentially impacted hazardous waste streams generated by the Permittee on-site and treated, stored, and/or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses and/or process knowledge meeting the requirements of LAC 33:V.1519.A.2, which provide information needed to properly treat, store, and dispose of the hazardous waste, including, physical characteristics and chemical components of the waste. The results of this re-characterization for wastes that have exhibited change shall be summarized in the Permittee's Annual Report.

**III.C.4.** Annual review of the WAP must be certified in accordance with LAC 33:V.513. When revisions are made, the WAP must also be certified by a Louisiana licensed professional engineer (PE), in accordance with LAC 33:V.1519.

**III.C.5.** In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all the sampling and Quality Assurance/Quality Control (QA/QC) procedures and protocols contained in Condition II.E.9. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the Administrative Authority upon request.

### **III.D. SECURITY**

The Permittee shall comply with the security provisions of LAC 33:V.1507 and the Security Plan referenced in Attachment 1.

### **III.E. GENERAL INSPECTION REQUIREMENTS**

The Permittee shall follow the inspection schedule in the Inspection Plan referenced in Attachment 1 of this permit. The Permittee shall remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections shall be kept as required by LAC 33:V.1509.D. The inspection schedule shall address the regulatory requirements of LAC 33:V.517.G, 1509, 1802, 1911, 2109, 2307, 2309, and 2507.

### **III.F. PERSONNEL TRAINING**

The Permittee shall conduct personnel training as required by LAC 33:V.1515.A, B and C. This training plan shall follow the outline in the Training Plan referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

### **III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE**

The Permittee shall take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable, reactive, or incompatible wastes.



### **III.H. LOCATION STANDARDS**

**III.H.1.** The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

**III.H.2.** The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

### **III.I. PRECIPITATION RUN-ON AND RUN-OFF**

The Permittee must provide for the control and/or containment of run-on and run-off from the maximum rainfall occurring in twenty-four (24) hours from a 25-year storm as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.1503.B.2, 1907.E.1.b, 1802.A, 2111.B.4, B.5, B.6, 2309.B, 2503.C, D, and E, and 2521.

### **III.J. HURRICANE EVENTS**

The Permittee shall initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509, and 1511.

### **III.K. PREPAREDNESS AND PREVENTION**

#### **III.K.1. Required Equipment**

At a minimum, the Permittee shall install and maintain the equipment set forth in the Contingency Plan referenced in Attachment 1, as required by and which is in conformance with LAC 33:V.1511.C.

#### **III.K.2. Testing and Maintenance of Equipment**

The Permittee shall test and maintain the equipment specified in Condition III.K.1 to insure its proper operation in time of emergency.

#### **III.K.3. Access to Communications or Alarm Systems**

The Permittee shall maintain access to the communications or alarm system, as required by LAC 33:V.1511.E.1 and 1511.E.2.

#### **III.K.4. Required Aisle Space**

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F and 2109.B.

#### **III.K.5. Arrangements with Local Authorities**

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those State and Local agencies involved and those facilities and operations covered. Documentation of annual written renewal of arrangements with State and Local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

### **III.L. CONTINGENCY PLAN**

#### **III.L.1. Implementation of Plan**

The Permittee shall immediately carry out the provisions of the Contingency Plan referenced in Attachment 1 of this permit, which complies with the emergency procedures described by LAC 33:V.1513.F, whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment

#### **III.L.2. Copies of Plan**

The Permittee shall comply with the requirements of LAC 33:V.1513.C.

#### **III.L.3. Amendments to Plan**

The Permittee shall review and amend in a timely manner, if necessary, the Contingency Plan, as required by LAC 33:V.1513.D.

#### **III.L.4. Emergency Coordinator**

The Permittee shall comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

### **III.M. MANIFEST SYSTEM**

#### **III.M.1. Use of the Manifest System**

The Permittee shall comply with the applicable manifest requirements of LAC 33:V. Chapter 11.



### **III.N. RECORDKEEPING AND REPORTING**

#### **III.N.1. Operating Record**

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C.

#### **III.N.2. Annual Report**

The Permittee shall comply with the annual report requirements of LAC 33:V.1529.D.

#### **III.N.3. Operations Manual**

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's treatment, storage and disposal facilities.

### **III.O. CLOSURE**

The Closure/Post-closure Plan shall include the following responses by the Permittee to LAC 33:V.1915, 2117, 2315, 2521, 3503, 3505, 3507, 3509, 3511, 3513, 3515, and the approved TSCA closure plan.

#### **III.O.1. Closure Performance Standard**

The Permittee shall close the facility in accordance with the Closure Plan referenced in Attachment 1, and applicable requirements of LAC 33:V.3505, 3507, 3511, and the approved TSCA closure plan.

#### **III.O.2. Amendment to Closure Plan**

The Permittee shall amend the Closure Plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322, and 323, where applicable.

#### **III.O.3. Notification of Closure**

The Permittee shall notify the Administrative Authority at least forty-five (45) days prior to the date he expects to begin closure, in accordance with LAC 33:V.3511.D.

#### **III.O.4. Time Allowed for Closure**

After receiving the final volume of hazardous waste, the Permittee shall treat, dispose or remove from the site all hazardous waste in accordance with the schedule specified in the Closure Plan referenced in Attachment 1 and LAC 33:V.3513. After receiving the final volume of hazardous waste, the Permittee shall complete closure activities in accordance with the schedule specified in the Closure Plan referenced in Attachment 1.

### III.O.5. Disposal of Decontamination of Equipment

The Permittee shall decontaminate and/or dispose of all facility equipment in accordance with the Closure Plan referenced in Attachment 1, and LAC 33:V.3515.

### III.O.6. Certification of Closure

The Permittee shall certify that the facility has been closed in accordance with the specifications in the Closure Plan referenced in Attachment 1 and as required by LAC 33:V.3517.

### III.O.7. Inventory at Closure

The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories (including the less than ninety (90) day storage area and TSCA waste storage area) listed below in Tables 1, 3, 5, 7, and 8 (cost estimates for the proposed units in Tables 2, 4, 6, 9, 10, and 11 will be submitted before acceptance of initial waste):

**TABLE 1**  
**Existing Container Storage Areas**

| Container Storage Area          | Containment Capacity (Gallons) | Volume of Largest Container Allowed (Gallons) | Maximum Permitted Storage Capacity                                                                                                          |
|---------------------------------|--------------------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| Container Management Unit 1     |                                |                                               |                                                                                                                                             |
| Building 201 <sup>2</sup>       | 44,468                         | 6,000                                         | Liquid Storage: 2,457 drums (135,135 gallons) AND<br>Solid Storage: 1,956 drums (107,580 gallons)<br><b>Combined Total: 242,715 gallons</b> |
| Building 202                    | 13,367                         | 6,000                                         |                                                                                                                                             |
| Building 204                    | 17,809                         | 6,000                                         |                                                                                                                                             |
| Transportation Staging Building |                                |                                               |                                                                                                                                             |
| Building 801                    | 35,600                         | 6,000                                         | Liquid Storage: 240,000 gallons<br>OR<br>Solid Storage: 80 roll-off boxes (484,704 gallons)                                                 |
| Leachate Loading Building       |                                |                                               |                                                                                                                                             |
| Building 501 <sup>1</sup>       | 9,865                          | 6,000                                         | 38,610 gallons                                                                                                                              |

<sup>1</sup>Building 501 is not a permitted container storage area. Building 501 only stores hazardous waste for less than ninety (90) days.

<sup>2</sup>Building 201 stores TSCA waste in Area 2. At final closure, the Permittee must close Area 2 in accordance with the approved TSCA closure plan. Approved cost estimates for closure must be updated accordingly



**TABLE 2**  
**Proposed Container Storage Areas**

| <b>Container Storage Area</b>          | <b>Containment Capacity (Gallons)</b>  | <b>Volume of Largest Container Allowed (Gallons)</b> | <b>Maximum Permitted Storage Capacity</b>                                                                                     |
|----------------------------------------|----------------------------------------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| <b>Container Management Unit 2</b>     |                                        |                                                      |                                                                                                                               |
| Building 205                           | See Condition II.E.25.a of this Permit | 6,000                                                | Liquid Storage: 1,052 drums (57,860 gallons) AND<br>Solid Storage: 640 drums (35,200 gallons)<br><b>Total: 93,060 gallons</b> |
| <b>Transportation Staging Building</b> |                                        |                                                      |                                                                                                                               |
| Building 802                           | See Condition II.E.25.a of this Permit | 6,000                                                | Liquid Storage: 240,000 gallons OR<br>Solid Storage: 80 roll-off boxes (484,704 gallons)                                      |

**TABLE 3**  
**Existing Hazardous Waste Storage Tanks**

| <b>TANKS</b> | <b>SERVICE</b>                       | <b>DESIGN CAPACITY (GALLONS)</b> | <b>MAXIMUM OPERATING CAPACITY (GALLONS)</b> |
|--------------|--------------------------------------|----------------------------------|---------------------------------------------|
| T-502        | Wastewater Holding Tank Storage Only | 1,006,900                        | 956,555                                     |
| T-503        | Wastewater Holding Tank Storage Only | 1,006,900                        | 956,555                                     |
| T-504 A      | Wastewater Holding Tank Storage Only | 87,000                           | 75,000                                      |
| T-504 B      | Wastewater Holding Tank Storage Only | 87,000                           | 75,000                                      |
| T-505        | Wastewater Holding Tank              | 1,006,900                        | 956,555                                     |
| T-506        | Wastewater Holding Tank              | 1,006,900                        | 956,555                                     |
| T-903        | Leachate Collection Storage Only     | 17,000                           | 16,150                                      |
| T-904        | Leachate Collection Storage Only     | 16,990                           | 16,150                                      |
| T-905        | Leachate Collection Storage Only     | 13,000                           | 12,350                                      |
| T-906        | Leachate Collection Storage Only     | 33,874                           | 32,180                                      |
| T-907        | Leachate Collection Storage Only     | 33,874                           | 32,180                                      |

**TABLE 4**  
**Proposed Hazardous Waste Storage Tanks**

| <b>TANKS</b>                      | <b>SERVICE</b>             | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|-----------------------------------|----------------------------|------------------------------------------|---------------------------------------------------------|
| T-220                             | Receiving Tank             | 400                                      | 380                                                     |
| T-221                             | Solvent Flush Tank         | 400                                      | 380                                                     |
| T-222                             | Waste Holding Tank         | 14,500                                   | 13,775                                                  |
| T-223                             | Waste Holding Tank         | 14,500                                   | 13,775                                                  |
| <b>Oil Recovery Unit Area</b>     |                            |                                          |                                                         |
| T-630                             | Recovered Water Tank No. 1 | 21,000                                   | 19,950                                                  |
| T-631                             | Recovered Water Tank No. 2 | 21,000                                   | 19,950                                                  |
| T-632                             | Recovered Water Tank No. 3 | 21,000                                   | 19,950                                                  |
| <b>Thermal Desorber Unit Area</b> |                            |                                          |                                                         |
| T-710                             | Recovered Water Tank No. 1 | 21,000                                   | 19,950                                                  |
| T-711                             | Recovered Water Tank No. 2 | 21,000                                   | 19,950                                                  |
| T-712                             | Recovered Water Tank No. 3 | 21,000                                   | 19,950                                                  |
| T-713                             | Recovered Water Tank No. 4 | 21,000                                   | 19,950                                                  |
| T-740                             | Sludge Holding Tank        | 5,000                                    | 4,750                                                   |
| T-741                             | Sludge Holding Tank        | 5,000                                    | 4,750                                                   |

**TABLE 5**  
**Existing Hazardous Waste Treatment Tanks**

| <b>TANKS</b>                             | <b>SERVICE</b>                                       | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|------------------------------------------|------------------------------------------------------|------------------------------------------|---------------------------------------------------------|
| <b>Stabilization Unit (Building 302)</b> |                                                      |                                          |                                                         |
| T-303                                    | Stabilization Mixing Basin<br>Tank<br>Treatment Only | 17,309                                   | 16,440                                                  |
| T-304                                    | Stabilization Mixing Basin<br>Tank<br>Treatment Only | 17,309                                   | 16,440                                                  |
| T-306                                    | Pre-Treatment Tank<br>Treatment Only                 | 20,625                                   | 19,594                                                  |



**TABLE 6**  
**Proposed Hazardous Waste Treatment Tanks**

| <b>TANKS</b>                             | <b>SERVICE</b>                       | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|------------------------------------------|--------------------------------------|------------------------------------------|---------------------------------------------------------|
| <b>Stabilization Unit (Building 302)</b> |                                      |                                          |                                                         |
| T-305                                    | Pre-Treatment Tank<br>Treatment Only | 20,625                                   | 19,594                                                  |
| <b>Oil Recovery Unit Area</b>            |                                      |                                          |                                                         |
| T-601                                    | Off-loading Pit                      | 38,776                                   | 36,837                                                  |
| T-602                                    | Off-loading Pit                      | 38,776                                   | 36,837                                                  |
| T-610                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| T-611                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| T-612                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| T-613                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| <b>Thermal Desorber Unit Area</b>        |                                      |                                          |                                                         |
| T-701                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |
| T-702                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |
| T-703                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |
| T-704                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |

**TABLE 7**  
**Landfill Cell**

| <b>Landfill Cell</b> | <b>Maximum Permitted Storage Capacity</b> |
|----------------------|-------------------------------------------|
| Cell 8               | 6,270,000 cubic yards                     |

**TABLE 8**  
**Existing Biopads**

| <b>UNIT NAME</b> | <b>SERVICE</b>       | <b>CAPACITY</b> |
|------------------|----------------------|-----------------|
| Biopad Phase I   | Biological Treatment | 342.5 tons/day  |
| Biopad Phase II  | Biological Treatment | 342.5 tons/day  |

**TABLE 9**  
**Proposed Containment Building Storage**

| <b>CONTAINMENT BUILDING</b> | <b>DIMENSIONS</b>                      | <b>SERVICE</b>                                       | <b>MAXIMUM PERMITTED CAPACITY</b> |
|-----------------------------|----------------------------------------|------------------------------------------------------|-----------------------------------|
| Building 301                | See Condition II.E.25.a of this Permit | Solid Storage only and Treatment; Macroencapsulation | 504,900 gallons                   |

**TABLE 10**  
**Proposed Oil Recovery Units**

| <b>UNIT NAME</b>    | <b>SERVICE</b>                    | <b>MAXIMUM PERMITTED CAPACITY</b> |
|---------------------|-----------------------------------|-----------------------------------|
| Oil Recovery Unit-1 | Recoverable Liquid Oil Separation | <u>126,000 gallons/day</u>        |
| Oil Recovery Unit-2 | Recoverable Liquid Oil Separation | <u>126,000 gallons/day</u>        |

**TABLE 11**  
**Proposed Thermal Desorber Units**

| <b>UNIT NAME</b>        | <b>SERVICE</b>                        | <b>MAXIMUM PERMITTED CAPACITY</b> |
|-------------------------|---------------------------------------|-----------------------------------|
| Thermal Desorber Unit-1 | Organic Solid Constituents Separation | <u>165 tons/day</u>               |
| Thermal Desorber Unit-2 | Organic Solid Constituents Separation | <u>165 tons/day</u>               |

### **III.P. POST-CLOSURE**

The Permittee will attempt to clean close all hazardous waste units (except for closed landfill cells). If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527; including maintenance and monitoring throughout the post-closure care period (including the landfill cells).

#### **III.P.1. Inventory of Post-Closure**

The Permittee shall be responsible for post-closure care costs for the following permitted facilities:



**Table 12**  
**Post-Closure Landfill Cells**

| <b>Landfill Cell</b> | <b>Status</b>       | <b>Maximum Permitted Capacity</b>                 |
|----------------------|---------------------|---------------------------------------------------|
| Cell 5               | Post-Closure        | 309.9 Acre-Feet<br>or<br>500,000 cubic yards      |
| Cell 6               | Post-Closure        | 2,519.01 Acre-Feet<br>or<br>4,064,000 cubic yards |
| Cell 7               | Post-Closure        | 1,466.53 Acre-Feet<br>or<br>2,366,000 cubic yards |
| Cell 14              | Post-Closure        | 325.42 Acre-Feet<br>or<br>525,000 cubic yards     |
| Cell 8 <sup>1</sup>  | Currently operating | 3,886.36 Acre-Feet<br>or<br>6,270,000 cubic yards |

<sup>1</sup>Post-Closure care for Landfill Cell 8 will begin after final closure.

### **III.P.2. Amendments to the Post-Closure Plan**

The Permittee shall amend the Post-Closure Plan when necessary in accordance with LAC 33:V.3523.D. Any modifications shall be subject to the permit modification requirements in LAC 33:V.321.

### **III.Q. COST ESTIMATES FOR CLOSURE/POST-CLOSURE**

**III.Q.1.** The Permittee must maintain cost estimates for closure of all facilities in accordance with LAC 33:V.3705.B and 3707.

**III.Q.2.** The Permittee shall maintain and adjust the closure cost for inflation, as specified in LAC 33:V.3705.B, 3705.C, and for other circumstances that increase the cost of closure.

**III.Q.3.** The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and or process changes on the closure cost estimate.

**III.Q.4.** The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive in accordance with LAC 33:V.3705.A.1-4. The closure cost estimate shall be based on the maximum permitted inventory of each facility as specified in Tables

1, 3, 5, 7, and 8 (cost estimates for the proposed units in Tables 2, 4, 6, 9, 10, and 11 will be submitted before acceptance of initial waste). The closure cost must include allowance for decontaminating the Stabilization Building 302, any associated contaminated equipment, and the adjacent areas of Mixing Basins (Tanks T-303 and T304) in the stabilization building, listed in Table 5. The closure cost estimate must include an allowance for decontaminating the Oil Recovery Units, any associated contaminated equipment, and the adjacent areas of the Oil Recovery Area (Tanks T-601, T-602, T-610, T-611, T-612, T-613, T-630, T-631, and T-632), listed in Table 4, 6, and 10. The closure cost estimate must also include an allowance for decontaminating the Thermal Desorber Units, any associated contaminated equipment, and the adjacent areas of the Thermal Desorber Unit Area (Tanks T-701, T-702, T-703, T-704, T-711, T-712, T-713, T-740, and T-741), listed in Table 4, 6, and 11. Closure cost estimates must include less than ninety (90) day storage areas, loading and unloading areas (i.e., wastewater loading/unloading), and cost associated with the closure of the TSCA waste storage area.

**III.Q.5.** The Permittee's post-closure cost estimate of all facilities as specified in Table 12, and as required by LAC 33:V.3709.A shall be included in separate post-closure plan.

**III.Q.6.** The Permittee shall maintain and adjust the post-closure cost estimate for inflation in accordance with LAC 33:V.3709.B.

**III.Q.7.** The Permittee shall adjust the post-closure estimate within thirty (30) days after approval by the Administrative Authority of any request to modify the post-closure plan in accordance with LAC 33:V.3709.C. The Permittee shall consider the impact of any inventory and/or process changes on the post-closure cost estimate.

**III.Q.8.** The post-closure cost estimate must equal the annual post-closure cost multiplied by the number of years in the post-closure period as specified in LAC 33:V.3521.A.

**III.Q.9.** Any closure/post-closure modifications are subject to LAC 33:V.321.

**III.Q.10.** If the Permittee is unable to complete clean closure of all facilities specified in Tables 1-11 as per LAC 33:V.Chapter 35 and as acceptable by the Administrative Authority, a post-closure plan must be submitted for each facility unable to achieve clean closure (except for the closed landfill cells) within ninety (90) days from the date the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The post-closure plan must meet the requirements of LAC 33:V.3523.B (including the closed landfill cells).

### **III.R. FINANCIAL ASSURANCE FOR FACILITY CLOSURE AND POST-CLOSURE**

The Permittee shall have and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Tables 1, 3, 5, 7, and 8 (financial assurance for the proposed units in Tables 2, 4, 6, 9, 10, and 11 will be submitted before acceptance of initial waste):



The Permittee shall have and maintain financial assurance for post-closure in accordance with LAC 33:V.3711 for all units listed under Table 12.

### **III.S. LIABILITY REQUIREMENTS**

The Permittee shall have and maintain liability coverage for sudden accidental occurrences for treatment, storage, and disposal facilities or a group of such facilities in accordance with LAC 33:V.3715.A.

### **III.T. INCAPACITY OF THE PERMITTEE**

The Permittee shall comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee shall immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

#### IV. PERMITTED FACILITIES

##### IV.A. TANKS

Details of the existing and proposed hazardous waste storage and treatment tanks listed in Tables 13-16, including design and operational specifications, are contained in Condition V.A of this Permit.

**TABLE 13**  
**(11) Existing Hazardous Waste Storage Tanks**

| <b>TANKS</b> | <b>SERVICE</b>                          | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|--------------|-----------------------------------------|------------------------------------------|---------------------------------------------------------|
| T-502        | Wastewater Holding Tank<br>Storage Only | 1,006,900                                | 956,555                                                 |
| T-503        | Wastewater Holding Tank<br>Storage Only | 1,006,900                                | 956,555                                                 |
| T-504 A      | Wastewater Holding Tank<br>Storage Only | 87,000                                   | 75,000                                                  |
| T-504 B      | Wastewater Holding Tank<br>Storage Only | 87,000                                   | 75,000                                                  |
| T-505        | Wastewater Holding Tank                 | 1,006,900                                | 956,555                                                 |
| T-506        | Wastewater Holding Tank                 | 1,006,900                                | 956,555                                                 |
| T-903        | Leachate Collection<br>Storage Only     | 17,000                                   | 16,150                                                  |
| T-904        | Leachate Collection<br>Storage Only     | 17,000                                   | 16,150                                                  |
| T-905        | Leachate Collection<br>Storage Only     | 13,000                                   | 12,350                                                  |
| T-906        | Leachate Collection<br>Storage Only     | 33,874                                   | 32,180                                                  |
| T-907        | Leachate Collection<br>Storage Only     | 33,874                                   | 32,180                                                  |



**TABLE 14**  
**(13) Proposed Hazardous Waste Storage Tanks**

| <b>TANKS</b>                      | <b>SERVICE</b>             | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|-----------------------------------|----------------------------|------------------------------------------|---------------------------------------------------------|
| T-220                             | Receiving Tank             | 400                                      | 380                                                     |
| T-221                             | Solvent Flush Tank         | 400                                      | 380                                                     |
| T-222                             | Waste Holding Tank         | 14,500                                   | 13,775                                                  |
| T-223                             | Waste Holding Tank         | 14,500                                   | 13,775                                                  |
| <b>Oil Recovery Unit Area</b>     |                            |                                          |                                                         |
| T-630                             | Recovered Water Tank No. 1 | 21,000                                   | 19,950                                                  |
| T-631                             | Recovered Water Tank No. 2 | 21,000                                   | 19,950                                                  |
| T-632                             | Recovered Water Tank No. 3 | 21,000                                   | 19,950                                                  |
| <b>Thermal Desorber Unit Area</b> |                            |                                          |                                                         |
| T-710                             | Recovered Water Tank No. 1 | 21,000                                   | 19,950                                                  |
| T-711                             | Recovered Water Tank No. 2 | 21,000                                   | 19,950                                                  |
| T-712                             | Recovered Water Tank No. 3 | 21,000                                   | 19,950                                                  |
| T-713                             | Recovered Water Tank No. 4 | 21,000                                   | 19,950                                                  |
| T-740                             | Sludge Holding Tank        | 5,000                                    | 4,750                                                   |
| T-741                             | Sludge Holding Tank        | 5,000                                    | 4,750                                                   |

**TABLE 15**  
**(3) Existing Hazardous Waste Treatment Tanks**

| <b>TANKS</b>                             | <b>SERVICE</b>                                       | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|------------------------------------------|------------------------------------------------------|------------------------------------------|---------------------------------------------------------|
| <b>Stabilization Unit (Building 302)</b> |                                                      |                                          |                                                         |
| T-303                                    | Stabilization Mixing<br>Basin Tank<br>Treatment Only | 17,309                                   | 16,440                                                  |
| T-304                                    | Stabilization Mixing<br>Basin Tank<br>Treatment Only | 17,309                                   | 16,440                                                  |
| T-306                                    | Pre-Treatment Tank<br>Treatment Only                 | 20,625                                   | 19,594                                                  |

**TABLE 16**  
**(11) Proposed Hazardous Waste Treatment Tanks**

| <b>TANKS</b>                             | <b>SERVICE</b>                       | <b>DESIGN<br/>CAPACITY<br/>(GALLONS)</b> | <b>MAXIMUM<br/>OPERATING<br/>CAPACITY<br/>(GALLONS)</b> |
|------------------------------------------|--------------------------------------|------------------------------------------|---------------------------------------------------------|
| <b>Stabilization Unit (Building 302)</b> |                                      |                                          |                                                         |
| T-305                                    | Pre-Treatment Tank<br>Treatment Only | 20,625                                   | 19,594                                                  |
| <b>Oil Recovery Unit Area</b>            |                                      |                                          |                                                         |
| T-601                                    | Off-loading Pit                      | 38,776                                   | 36,837                                                  |
| T-602                                    | Off-loading Pit                      | 38,776                                   | 36,837                                                  |
| T-610                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| T-611                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| T-612                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| T-613                                    | Feed Mix Tank                        | 31,500                                   | 29,925                                                  |
| <b>Thermal Desorber Unit Area</b>        |                                      |                                          |                                                         |
| T-701                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |
| T-702                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |
| T-703                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |
| T-704                                    | Off-loading Pit                      | 53,020                                   | 50,369                                                  |

#### **IV.B. CONTAINER STORAGE AREAS**

Details of the existing and proposed container storage areas in Tables 17-18 including design and operational specifications, are contained in Permit Condition V.B of this Permit.

**TABLE 17**  
**(4) Existing Container Storage Areas**

| <b>CONTAINER<br/>STORAGE<br/>AREA</b> | <b>DIMENSIONS</b>                                              | <b>SERVICE</b>                                     | <b>MAXIMUM PERMITTED<br/>CAPACITY</b>                                                                                                                 |
|---------------------------------------|----------------------------------------------------------------|----------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Container Management Unit 1</b>    |                                                                |                                                    |                                                                                                                                                       |
| Building 201                          | 140' x 160'                                                    | Liquid and Solid<br>Storage;<br>Macroencapsulation | Liquid Storage: 2,457 drums<br>(135,135 gallons) AND<br>Solid Storage: 1,956 drums<br>(107,580 gallons)<br><b>Combined Total: 242,715<br/>gallons</b> |
| Building 202                          | 80' x 120'                                                     |                                                    |                                                                                                                                                       |
| Building 204                          | 50' x 50' and<br>southern quarter<br>extending<br>eastward 75' |                                                    |                                                                                                                                                       |



| Transportation Staging Building |            |                                                                  |                                                                                               |
|---------------------------------|------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| Building 801                    | 500' x 50' | Liquid and Solid Storage;<br>Macroencapsulation;<br>Biotreatment | Liquid Storage - 240,000 gallons<br>OR<br>Solid Storage - 80 roll-off boxes (484,704 gallons) |

**TABLE 18**  
**(2) Proposed Container Storage Areas**

| CONTAINER STORAGE AREA          | DIMENSIONS                             | SERVICE                                              | MAXIMUM PERMITTED CAPACITY                                                                                                    |
|---------------------------------|----------------------------------------|------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| Container Management Unit 2     |                                        |                                                      |                                                                                                                               |
| Building 205                    | See Condition II.E.25.d of this Permit | Liquid and Solid Storage;<br>Macroencapsulation      | Liquid Storage: 1,052 drums (57,860 gallons) AND<br>Solid Storage: 640 drums (35,200 gallons)<br><b>Total: 93,060 gallons</b> |
| Transportation Staging Building |                                        |                                                      |                                                                                                                               |
| Building 802                    | See Condition II.E.25.d of this Permit | Liquid and Solid Storage Only;<br>Macroencapsulation | 80 roll-off boxes (484,704 gallons)                                                                                           |

#### IV.C. CONTAINMENT BUILDING

Details of the proposed containment building storage and treatment in Table 19, including design and operational specifications, are contained in Permit Condition V.C of this Permit.

**TABLE 19**  
**(1) Proposed Containment Building**

| CONTAINMENT BUILDING | DIMENSIONS                             | SERVICE                                                 | MAXIMUM PERMITTED CAPACITY |
|----------------------|----------------------------------------|---------------------------------------------------------|----------------------------|
| Building 301         | See Condition II.E.25.a of this Permit | Solid Storage only and Treatment;<br>Macroencapsulation | 504,900 gallons            |

#### **IV.D. BIOPADS**

Details of the existing Biopads in Tables 20, including design and operational specifications, are contained in Permit Condition V.D of this Permit.

**TABLE 20**  
**(2) Existing Biopads**

| <b>UNIT NAME</b> | <b>SERVICE</b>       | <b>CAPACITY</b> |
|------------------|----------------------|-----------------|
| Biopad Phase I   | Biological Treatment | 342.5 tons/day  |
| Biopad Phase II  | Biological Treatment | 342.5 tons/day  |

#### **IV.E. LANDFILL DISPOSAL**

Details of the existing landfill listed in Table 21, including design and operational specifications, are contained in Condition V.E of this Permit.

**TABLE 21**  
**(1) Active Landfill**

| <b>UNIT NAME</b> | <b>SERVICE</b>                  | <b>CAPACITY</b>       |
|------------------|---------------------------------|-----------------------|
| Cell 8           | Active Hazardous Waste Landfill | 6,270,000 cubic yards |

#### **IV.F. POST-CLOSURE LANDFILLS**

Details of the existing post-closure landfills listed in Table 22, including design and operational specifications, are contained in Condition V.I of this Permit.

**TABLE 22**  
**(4) Closed Landfills**

| <b>UNIT NAME</b> | <b>SERVICE</b>                  | <b>CAPACITY</b>       |
|------------------|---------------------------------|-----------------------|
| Cell 5           | Closed Hazardous Waste Landfill | 500,000 cubic yards   |
| Cell 6           | Closed Hazardous Waste Landfill | 4,064,000 cubic yards |
| Cell 7           | Closed Hazardous Waste Landfill | 2,366,000 cubic yards |
| Cell 14          | Closed Hazardous Waste Landfill | 525,000 cubic yards   |



#### **IV.G. OIL RECOVERY UNITS**

Details of the proposed Oil Recovery Units listed in Table 23, including design and operational specifications, are contained in Condition V.F of this Permit.

**TABLE 23**  
**(2) Proposed Oil Recovery Units**

| <b>UNIT NAME</b>    | <b>SERVICE</b>                    | <b>MAXIMUM PERMITTED CAPACITY</b> |
|---------------------|-----------------------------------|-----------------------------------|
| Oil Recovery Unit-1 | Recoverable Liquid Oil Separation | 126,000 gal/day                   |
| Oil Recovery Unit-2 | Recoverable Liquid Oil Separation | 126,000 gal/day                   |

#### **IV.H. THERMAL DESORBER UNITS**

Details of the proposed Thermal Desorber Units listed in Table 24, including design and operational specifications, are contained in Condition V.G of this Permit.

**TABLE 24**  
**(2) Proposed Thermal Desorber Units**

| <b>UNIT NAME</b>        | <b>SERVICE</b>                        | <b>MAXIMUM PERMITTED CAPACITY</b> |
|-------------------------|---------------------------------------|-----------------------------------|
| Thermal Desorber Unit-1 | Organic Solid Constituents Separation | 165 tons/day                      |
| Thermal Desorber Unit-2 | Organic Solid Constituents Separation | 165 tons/day                      |

## **V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES**

### **V.A. TANKS**

#### **V.A.1. Description of Tank Systems**

The conditions set forth in Permit Condition V.A, shall apply, as applicable, to the permitted tank systems designated in Tables 13-16..

##### **V.A.1.a. Permitted Tanks**

**V.A.1.a.i.** The tanks listed in Table 27 are permitted for hazardous waste storage or treatment as designated in Tables 13-16. These tanks have been certified by an independent, professional engineer licensed in the State of Louisiana and have sufficient structural integrity for the storage of hazardous waste.

**V.A.1.a.ii.** The tanks listed in Table 27 must be clearly marked with the words "Hazardous Waste" in accordance with LAC 33:V.1109.E.1.d.

**V.A.1.a.iii.** The Permittee is prohibited from storing or treating hazardous waste in any tank storage system not listed in Table 27 for greater than ninety (90) days, unless an extension is granted by the Administrative Authority in accordance with LAC 33:V.1109.E.2.

#### **V.A.2. Permitted and Prohibited Wastes**

##### **V.A.2.a. Permitted Waste**

Subject to the terms of this permit, the Permittee is allowed to store or treat hazardous waste in the tanks as described in Condition V.A.1.a of this permit, and the hazardous wastes identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application).

##### **V.A.2.b. Prohibited Waste**

The Permittee is prohibited from storing or treating hazardous waste that is not identified in the most current RCRA Subtitle C Site Identification Form (Part A Permit Application) and as described in Condition V.A.2.a of this permit.

#### **V.A.3. Secondary Containment**

##### **V.A.3.a. Duty to Comply with LAC 33:V.1907**

The Permittee shall design, construct, operate, and maintain the secondary containment system, including Building 302 (as the secondary containment



system for Tanks T-303 and T-304), the Oil Recovery Building (as the secondary containment system for the off-loading pits T-601 and T602), and the Thermal Desorber Building (as the secondary containment system for the off-loading pits of T-701, T-702, T-703, and T-704) in accordance with LAC 33:V.1907, and Table 27.

#### **V.A.3.b. Prevention of Migration**

**V.A.3.b.i.** Secondary containment systems must be maintained and operated to prevent any migration of wastes or accumulated liquid out of the systems to the soil, groundwater, or surface water at any time during the use of the tank system, in accordance with LAC 33:V.1907.B.1.

If wastes or accumulated liquid is detected to migrate out of the secondary containment system to the soil or groundwater, or if groundwater is detected to migrate into the secondary containment system at any time, the entire tank system shall be considered unfit for use, and the procedures of LAC 33:V.1913 shall be followed.

**V.A.3.b.ii.** Ancillary equipment must be provided with secondary containment, except as excluded by LAC 33:V.1907.F.

**V.A.3.b.iii.** Secondary containment systems must be free of cracks or gaps and other surface defects that would allow liquid to migrate out of the containment system, in accordance with LAC 33:V.1907.E.

**V.A.3.b.iv.** Spilled or leaked waste and/or accumulated precipitation must be removed from the secondary containment system within twenty-four (24) hours or in as timely a manner as is possible to prevent harm to human health and the environment, if it can demonstrated to the Administrative Authority that removal of the spilled or leaked waste and/or accumulated precipitation cannot be accomplished within twenty-four (24) hours.

#### **V.A.4. Operating Requirements**

**V.A.4.a.** All permitted tanks and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 19 and the specification and design criteria provided in the Permit Application and Table 27.

**V.A.4.b.** The design temperature and pressure for each tank listed in Table 27 shall not change unless a permit modification is requested by the Permittee and subsequently approved by the Administrative Authority.

#### **V.A.4.c. Duty to Comply with LAC 33:V.1909.A**

The Permittee shall comply with LAC 33:V.1909.A. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.

#### **V.A.4.e. Duty to Comply with LAC 33:V.1909.B**

The Permittee shall comply with LAC 33:V.1909.B and Tables 13-16 and Table 27 of this permit. The Permittee must use appropriate controls and practices to prevent spills and overflows from tanks and containment systems.

#### **V.A.4.f. Tank Covers**

All hazardous waste storage tanks listed in Table 27 shall be covered, except for the stabilization mixing basins (Tanks T-303 and T-304), the Oil Recovery Unit off-loading pits (Tanks T-601 and T-602), and the Thermal Desorber Unit off-loading pits (T-701, T-702, T-703, and T-704). Tanks T-303 and T-304 shall remain enclosed within Building 302. The Oil Recovery Unit off-loading pits (Tanks T-601 and T-602) shall remain enclosed within the Oil Recovery Building. The Thermal Desorber Unit off-loading pits (Tanks T-701, T-702, T-703, and T-704) shall remain enclosed within the Thermal Desorber Unit Off-Loading Building. All tanks shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.

#### **V.A.4.g. Maintenance**

The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 27 and not exceed the listed operating conditions.

#### **V.A.4.h. Stabilization Unit**

The Stabilization Unit consists of two mixing basins, Tanks T-303 and T-304, and a pre-treatment tank, Tank T-306. Tanks T-303 and T-304 are both enclosed in Building 302. Tank T-306 is immediately adjacent to Building 302. The Stabilization Unit is permitted to conduct the following stabilization technologies:

**V.A.4.h.i. Macroencapsulation**

**V.A.4.h.ii. Microencapsulation**

**V.A.4.h.iii. Chemical oxidation for cyanide or sulfide-bearing wastes**



**V.A.4.h.iv.** Deactivation of corrosives and oxidizers

**V.A.4.h.v.** Any other stabilization technologies as discussed in the 2005 Permit Renewal Application and/or approved by the Department.

**V.A.4.i. Oil Recovery Unit Area**

The Oil Recovery Unit Area consists of the Oil Recovery Building that contains the two off-loading pits (Tanks T-601 and T-602); two carbon canister units; four feed mix tanks (Tanks T-610, T-611, T-612, and T-613); three recovery water tanks (Tanks T-630, T-631, and T-632); two centrifuge units; a thermal oxidizer; an area for roll-off boxes; and a truck loading area. The Oil Recovery Units technology will separate recoverable oils from drilling fluids, refinery tank bottoms, commercially exempt oil-bearing waste, and other hazardous and non-hazardous oil-bearing waste.

**V.A.4.j. Thermal Desorber Unit Area**

The Thermal Desorber Unit Area consists of the Thermal Desorber Unit Off-loading Building that contains the four off-loading pits (Tanks T-701, T-702, T-703, and T-704); four carbon canister units; two thermal desorber units; two vapor recovery units; two thermal oxidizers; two solids discharge areas that contain roll off boxes; four recovered water tanks (Tank T-710, T-711, T-712, and T-713); and two sludge holding tanks (Tank T-740 and T-741). The Thermal Desorber Units technology will treat contaminated tank bottoms, sludge, catalyst slurry oil, organic contaminated soils, and other organic hazardous waste requiring thermal treatment to meet Land Disposal Restrictions (LDR).

**V.A.5. Ignitable, Reactive, and Incompatible Wastes**

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.B, 1917 and 1919.

**V.A.6. Inspections**

**V.A.6.a. Inspection Schedule**

The Permittee shall comply with LAC 33:V.1911.A through C by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

**V.A.6.b. Daily Inspection**

**V.A.6.b.i.** At least once per day while the tank is operating in hazardous waste service, the Permittee shall inspect the following:

**V.A.6.b.i.(1)** Aboveground portions of the tank system, as applicable, including the tank, ancillary piping, valves, and vent controls, to detect corrosion, cracks or releases of waste.

**V.A.6.b.i.(2)** Data gathered from monitoring and leak detection equipment.

**V.A.6.b.i.(3)** The construction materials and area immediately surrounding the externally accessible portion of the tank system and ancillary equipment, e.g. secondary containment system, to detect erosion, cracks and signs of hazardous waste releases.

**V.A.6.b.i.(4)** For the control of leakage of defective internal heating coils, monitor the steam return and exhaust line to detect contamination from internal heating coils that are utilized in oil recovery tanks.

**V.A.6.b.ii.** All deficiencies noted during daily inspections must be recorded and remedied in a timely manner.

#### **V.A.6.c. External Inspection**

At a minimum, external inspection of each tank covered by this permit shall be performed annually. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 27. The inspection checklist shall be comparable to that in API Standard 510 or 653, as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

#### **V.A.6.d. Internal Inspection**

Internal inspection of each tank covered by this permit shall be performed at the frequencies specified in Table 25. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 27. The inspection checklist shall be comparable to that in API Standard 510 or 653, as applicable.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.



#### **V.A.6.e. Thickness Testing**

**V.A.6.e.i.** An authorized inspector shall take tank thickness measurements on tank roofs, as applicable, and shells and shall be taken at least on each tank quadrant at the frequencies specified in Table 26. Tank thickness readings shall be taken in the same place during each testing event in order to form a comparison of readings for corrosion rate determination.

**V.A.6.e.ii.** Tank thickness readings shall also be taken at any spot where visual corrosion or compromised integrity is evident.

**V.A.6.e.iii.** An authorized inspector shall perform tank thickness measurements on tank bottoms at the frequencies specified in Table 26.

**V.A.6.e.iv.** When any tank shell thickness measurement at a single point is less than that required in Table 27, the Permittee shall immediately comply with either Condition V.A.6.e.iv.(1) or (2) below. Condition V.A.6.e.iv.(2) shall not be used for any tank where the shell thickness measurement is less than 0.100 inches.

**V.A.6.e.iv.(1)** When a tank is deemed unfit for use, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The tank shall be repaired or replaced and the certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

**V.A.6.e.iv.(2)** An engineering evaluation shall be performed, conforming to the appropriate standard or standards, as allowed by the design or inspection standard in Table 27. If the evaluation determines that the tank is unfit for service, the Permittee shall comply with Condition V.A.6.e.iv.(1) immediately. The evaluation must be submitted to the Waste Permits Division for approval within forty-five (45) days of the initial measurement.

**V.A.6.e.v.** Tank thickness measurements shall not be averaged, unless allowed under the tank inspection standard in Table 27. Averaging of tank thickness measurements shall be reported to the Administrative Authority.

#### **V.A.6.f. Overfill Controls**

Tank levels shall be checked daily and overfill controls shall be visually inspected along with other aboveground portions of the tanks daily. Function of the overfill controls shall be tested annually.

## **V.A.7. Response to Leaks and Spills**

### **V.A.7.a. Duty to Comply with LAC 33:V.1913.A through E**

In the event of a leak or spill from a tank system, secondary containment system, or if a system becomes unfit for use, the Permittee shall comply with LAC 33:V.1913.A through E.

### **V.A.7.b. Leaks and Spills**

**V.A.7.b.i.** Upon discovering a leak or spill, the Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

**V.A.7.b.ii.** Within twenty-four (24) hours of detecting a leak from the tank system, or in as timely a manner as is practical if the Permittee demonstrates that it is not possible to remove the waste within twenty-four (24) hours, the Permittee must remove as much waste as necessary to prevent further release from the tank or secondary containment system and to allow inspection and repair of the tank system, in accordance with LAC 33:V.1913.B.1.

**V.A.7.b.iii.** Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste must be cleaned up in a timely manner, as required by LAC 33:V.1505.C.3.

**V.A.7.b.iii.(1)** If the collected material is discharged through a point source to United States waters or to a Publicly Owned Treatment Works, it is subject to the requirements of the Clean Water Act.

**V.A.7.b.iii.(2)** If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

**V.A.7.b.iv.** When a leak or spill occurs, the Permittee shall remove and properly dispose of any visible contamination of the soil or surface water, in accordance with LAC 33:V.1913.C.2.

**V.A.7.b.v.** A tank system from which a leak or spill has occurred must be closed in accordance with the approved Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2-3 are satisfied.

**V.A.7.b.v.(1)** For a release caused by a spill that has not damaged



the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service, in accordance with LAC 33:V.1913.E.2.

**V.A.7.b.v.(2)** For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning the tank to service, in accordance with LAC 33:V.1913.E.3.

**V.A.7.b.vi.** If the Permittee replaces a component of the tank system to eliminate a leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907. An engineer's certification shall not be required for such day-to-day routine maintenance or service practices as replacement or repair of worn portions of tank system components (e.g. valves, bearings, seals), adjustment or repairs to instruments, etc.

**V.A.7.b.vii.** All leaks and spills shall be documented in the daily inspection log.

#### **V.A.7.c. Major Repairs**

**V.A.7.c.i.** The Permittee shall comply with LAC 33:V.1913.F when performing major repairs to a tank system.

**V.A.7.c.ii.** Major repairs shall include, but not be limited to, installation of an internal liner, repair of a ruptured tank, repair of a ruptured secondary containment area, and removal of a tank from its foundation for any reason.

**V.A.7.c.iii.** The Permittee shall conform to the appropriate portion of the most recent inspection code listed in Table 27 for maintenance, inspection, re-rating, repair, and alteration of all tanks.

**V.A.7.c.iv.** The tank shall not be returned to service unless the Permittee has obtained a certification by an independent professional engineer licensed in the State of Louisiana that the system is capable of handling hazardous waste without release for the intended life of the system. The certification of repairs shall include an inspection in accordance with the requirements of any applicable codes, such as API 510 or API 653. The certification required in accordance with LAC 33:V.1913.F shall be submitted to the Administrative Authority within seven (7) days of returning the tank system to use. -

## **V.A.8. Air Emission Control Equipment Standards**

The Permittee shall comply with Condition V.H.2 of this Permit for air emission control equipment for all permitted hazardous waste tanks.

## **V.A.9. Recordkeeping**

### **V.A.9.a. New Tanks**

The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of new tank systems, in accordance with LAC 33:V.1905.G.

### **V.A.9.b. Written Assessment**

The Permittee shall keep on file at the facility, written assessments of the tank systems' integrity. Assessments shall be updated at the time of submittal of the Permit Renewal Application and at any other time deemed necessary by the Administrative Authority (i.e., permit modifications, tank replacements, tank repairs, etc.).

### **V.A.9.c. Inspections**

**V.A.9.c.i.** The Permittee shall document in the operating record for the facility inspection of those items in Conditions V.A.6.b-e of this Permit.

**V.A.9.c.i.(1)** The daily log sheets shall include all monitored parameters for the prevention of spills and overflows, which may include temperature, pressures, and either levels or pump flows into and out of the tanks.

**V.A.9.c.i.(2)** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

**V.A.9.c.i.(3)** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

**V.A.9.c.ii.** The Permittee shall document in the operating record all tests and inspections of overfilling controls.

**V.A.9.c.iii.** The Permittee shall keep on file at the facility the results of the internal and external inspections required by Conditions V.A.6.c-d of this Permit. The Permittee shall note all deficiencies discovered during the inspection in the inspection log. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.



**V.A.9.c.iv.** The Permittee shall keep on file all information related to tank thickness testing required under Condition V.A.6.e of this Permit.

**V.A.9.c.iv.(1)** This information shall include, at a minimum, the date(s) of assessment, the location where measurement readings are taken, the raw measurement data, comparison of actual reading to minimum thickness requirements, the corrosion rate, and calculation of remaining tank life.

**V.A.9.c.iv.(2)** If an engineering evaluation is performed in accordance with Condition V.A.6.e.iv.(2) of this Permit, the results of such an evaluation shall be kept in the operating record.

The engineering evaluation must include at a minimum, details on how the evaluation was performed, references to applicable tank codes, raw data, calculations performed, and an explanation of why the tank is or is not fit for continued service.

**V.A.9.c.iv.(3)** Any tank thickness measurements that are averaged under Condition V.A.6.e.iv. of this Permit must be supported by documentation with references to the applicable tank codes. The documentation shall include all raw measurement data, calculations, and results of averaging. This information shall be kept as a part of the operating record for the facility.

**V.A.9.c.v.** The Permittee shall keep on file at the facility the records of repairs required under Condition V.A.7.c of this Permit.

#### **V.A.9.d. Releases**

**V.A.9.d.i.** The Permittee shall keep on file at the facility, notification reports submitted under LAC 33:V.1913.D.

**V.A.9.d.ii.** Within twenty-four (24) hours of detecting a reportable leak or spill from a tank system or secondary containment system to the environment, the Permittee shall report the leak or spill in accordance with either Condition II.E.16 (Emergency Unauthorized Discharge) or Condition II.E.17 (Non-Emergency Unauthorized Discharge) of this Permit.

**V.A.9.d.iii.** Within thirty (30) days of detecting a reportable release to the environment from a tank system or secondary containment system, the Permittee shall report the following information to the Administrative Authority's Single Point of Contact (SPOC):

**V.A.9.d.iii.(1)** Likely route of migration of the release;

**V.A.9.d.iii.(2)** Characteristics of the surrounding soil, including soil composition, geology, hydrogeology, and climate;

**V.A.9.d.iii.(3)** Results of any monitoring or sampling conducted in connection with the release (if available). If the Permittee finds it will be impossible to meet this time schedule, the Permittee must provide the Administrative Authority with a schedule of when the results will be available. This schedule must be provided before the required thirty (30) day submittal period expires;

**V.A.9.d.iii.(4)** Proximity of downgradient drinking water, surface water, and populated areas; and

**V.A.9.d.iii.(5)** A description of response actions taken or planned.

**V.A.9.e. Repairs**

The Permittee shall keep on file at the facility all certifications required by Condition V.A.7.c of this Permit.

**V.A.10. Closure and Post-Closure Care**

**V.A.10.a. Duty to Comply with LAC 33:V.1915.A**

The Permittee shall comply with LAC 33:V.1915.A by following the procedures specified in the Closure Plan, Attachment 1.

**V.A.10.b. Duty to Comply with LAC 33:V.1915.B**

If the Permittee demonstrates that not all contaminated soils can be practicably removed or decontaminated in accordance with Condition V.A.10.a of this Permit, the Permittee shall comply with LAC33:V.1915.B.

**V.A.10.c. Post-Closure**

The Permittee shall attempt to clean close all tank systems. If a tank cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.



**TABLE 25**  
**Internal Inspection Frequencies**

| <b>Tank No.</b> | <b>Visual Internal Inspection Frequency</b> | <b>Complete Internal Inspection Frequency</b>                            |
|-----------------|---------------------------------------------|--------------------------------------------------------------------------|
| T-220           | See Condition II.E.25.b of this Permit      | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-221           | See Condition II.E.25.b of this Permit      | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-222           | See Condition II.E.25.b of this Permit      | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-223           | See Condition II.E.25.b of this Permit      | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-303           | Annually                                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-304           | Annually                                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-305           | See Condition II.E.25.b of this Permit      | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-306           | Every three (3) years                       | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-502           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-503           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-504 A         | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-504 B         | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-505           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-506           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-601           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-602           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-610           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-611           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-612           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-613           | Every two (2) years                         | As often as required by the inspection standard in Table 27 <sup>1</sup> |

|       |                     |                                                                          |
|-------|---------------------|--------------------------------------------------------------------------|
| T-630 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-631 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-632 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-701 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-702 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-703 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-704 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-710 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-711 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-712 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-713 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-740 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-741 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-903 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-904 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-905 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-906 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-907 | Every two (2) years | As often as required by the inspection standard in Table 27 <sup>1</sup> |

<sup>1</sup> The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request.



**TABLE 26**  
**Tank Thickness Measurements Frequencies**

| <b>TANK</b> | <b>ROOF AND SHELL</b>                  | <b>BOTTOM</b>                                                            |
|-------------|----------------------------------------|--------------------------------------------------------------------------|
| T-220       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-221       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-222       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-223       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-303       | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-304       | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-305       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-306       | Every three (3) years                  | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-502       | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-503       | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-504 A     | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-504 B     | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-505       | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-506       | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-601       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-602       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-610       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-611       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-612       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-613       | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |

|       |                                        |                                                                          |
|-------|----------------------------------------|--------------------------------------------------------------------------|
| T-630 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-631 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-632 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-701 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-702 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-703 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-704 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-710 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-711 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-712 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-713 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-740 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-741 | See Condition II.E.25.b of this Permit | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-903 | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-904 | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-905 | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-906 | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |
| T-907 | Every two (2) years                    | As often as required by the inspection standard in Table 27 <sup>1</sup> |

<sup>1</sup> The required frequency of inspection with reference to the applicable section of the standard shall be kept on site and available for review by the Administrative Authority upon request.



**TABLE 27**  
**Design and Operating Parameters for RCRA Tank Systems**

| Tank No. | Existing or Proposed <sup>1</sup> | Year Placed Into Service | Dimensions (D X H) | Design Capacity (gallons) | Maximum Operating Capacity (gallons) | Design Standard | Inspection Standard | Design Temperature (°F) | Design Pressure | Materials of Construction | Nominal Thickness (inches) | Minimum Thickness (inches) | Secondary Containment Type             |
|----------|-----------------------------------|--------------------------|--------------------|---------------------------|--------------------------------------|-----------------|---------------------|-------------------------|-----------------|---------------------------|----------------------------|----------------------------|----------------------------------------|
| T-220    | Proposed                          | N/A                      | 4' x 6'            | 400                       | 380                                  | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | 1/4                        | 1/8                        | See Condition II.E.25.b of this Permit |
| T-221    | Proposed                          | N/A                      | 4' x 6'            | 400                       | 380                                  | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | 1/4                        | 1/5                        | See Condition II.E.25.b of this Permit |
| T-222    | Proposed                          | N/A                      | 12' x 21'          | 14,500                    | 13,775                               | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | 3/8                        | 1/4                        | See Condition II.E.25.b of this Permit |
| T-223    | Proposed                          | N/A                      | 12' x 21'          | 14,500                    | 13,775                               | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | 3/8                        | 1/4                        | External Concrete Liner                |
| T-303    | Existing                          | 1995                     | 12' x 21' x 10'    | 17,309                    | 16,440                               | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | 1                          | 3/8                        | External Concrete Liner; Building 302  |
| T-304    | Existing                          | 1995                     | 12' x 21' x 10'    | 17,309                    | 16,440                               | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | 1                          | 3/8                        | External Concrete Liner; Building 302  |
| T-305    | Proposed                          | N/A                      | 12' x 21'          | 20,625                    | 19,594                               | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | 3/8                        | 1/4                        | See Condition II.E.25.b of this Permit |
| T-306    | Existing                          | 1993                     | 12' x 21'          | 20,625                    | 19,594                               | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | 3/8                        | 1/4                        | External Concrete Liner; Building 302  |

| Tank No. | Existing or Proposed <sup>1</sup> | Year Placed Into Service | Dimensions (D X H) | Design Capacity (gallons) | Maximum Operating Capacity (gallons) | Design Standard | Inspection Standard | Design Temperature (°F) | Design Pressure | Materials of Construction | Nominal Thickness (inches)                                                           | Minimum Thickness (inches)                                                               | Secondary Containment Type |
|----------|-----------------------------------|--------------------------|--------------------|---------------------------|--------------------------------------|-----------------|---------------------|-------------------------|-----------------|---------------------------|--------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|----------------------------|
| T-502    | Existing                          | 1993                     | 69' x 36'          | 1,006,900                 | 956,555                              | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | Top 4' - 3/16<br>Next 8' - 3/8<br>Next 8' - 3/8<br>Next 8' - 1/2<br>Bottom 8' - 1/2  | Top 4' - 3/16<br>Next 8' - 3/16<br>Next 8' - 3/16<br>Next 8' - 5/16<br>Bottom 8' - 5/16  | External Concrete Liner    |
| T-503    | Existing                          | 1999                     | 69' x 36'          | 1,006,900                 | 956,555                              | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | Top 4' - 3/16<br>Next 8' - 3/8<br>Next 8' - 3/8<br>Next 8' - 1/2<br>Bottom 8' - 1/2  | Top 4' - 3/16<br>Next 8' - 3/16<br>Next 8' - 3/16<br>Next 8' - 5/16<br>Bottom 8' - 5/16  | External Concrete Liner    |
| T-504 A  | Existing                          | 2001                     | 24' x 24'          | 87,000                    | 75,000                               | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | Roof - 5/16<br>Ring 1 - 5/16<br>Ring 2 - 1/4<br>Ring 3 - 1/4<br>Cone<br>Bottom - 3/8 | Roof - 5/16<br>Ring 1 - 3/16<br>Ring 2 - 9/64<br>Ring 3 - 9/64<br>Cone<br>Bottom - 19/64 | External Concrete Liner    |



| Tank No. | Existing or Proposed <sup>1</sup> | Year Placed Into Service | Dimensions (D X H) | Design Capacity (gallons) | Maximum Operating Capacity (gallons) | Design Standard | Inspection Standard | Design Temperature (°F) | Design Pressure | Materials of Construction | Nominal Thickness (inches)                                                          | Minimum Thickness (inches)                                                              | Secondary Containment Type |
|----------|-----------------------------------|--------------------------|--------------------|---------------------------|--------------------------------------|-----------------|---------------------|-------------------------|-----------------|---------------------------|-------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------|----------------------------|
| T-504 B  | Existing                          | 2001                     | 24' x 24'          | 87,000                    | 75,000                               | API-620         | API-653             | 150                     | ATM             | Carbon Steel              | Roof - 5/16<br>Ring 1 - 5/16<br>Ring 2 - 1/4<br>Ring 3 - 1/4<br>Cone Bottom - 3/8   | Roof - 5/16<br>Ring 1 - 3/16<br>Ring 2 - 9/64<br>Ring 3 - 9/64<br>Cone Bottom - 19/64   | External Concrete Liner    |
| T-505    | Existing                          | 2015                     | 69' x 36'          | 1,006,900                 | 956,955                              | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | Top 4' - 3/16<br>Next 8' - 3/8<br>Next 8' - 3/8<br>Next 8' - 1/2<br>Bottom 8' - 1/2 | Top 4' - 3/16<br>Next 8' - 3/16<br>Next 8' - 3/16<br>Next 8' - 5/16<br>Bottom 8' - 5/16 | External Concrete Liner    |
| T-506    | Existing                          | 2015                     | 69' x 36'          | 1,006,900                 | 956,955                              | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | Top 4' - 3/16<br>Next 8' - 3/8<br>Next 8' - 3/8<br>Next 8' - 1/2<br>Bottom 8' - 1/2 | Top 4' - 3/16<br>Next 8' - 3/16<br>Next 8' - 3/16<br>Next 8' - 5/16<br>Bottom 8' - 5/16 | External Concrete Liner    |

| Tank No.           | Existing or Proposed <sup>1</sup> | Year Placed Into Service | Dimensions (D X H)              | Design Capacity (gallons) | Maximum Operating Capacity (gallons) | Design Standard | Inspection Standard | Design Temperature (°F) | Design Pressure | Materials of Construction | Nominal Thickness (inches) | Minimum Thickness (inches) | Secondary Containment Type             |
|--------------------|-----------------------------------|--------------------------|---------------------------------|---------------------------|--------------------------------------|-----------------|---------------------|-------------------------|-----------------|---------------------------|----------------------------|----------------------------|----------------------------------------|
| T-601 <sup>2</sup> | Proposed                          | N/A                      | 30' x 18' x 12' (sloping floor) | 38,776                    | 36,837                               | N/A             | N/A                 | Ambient                 | ATM             | Carbon Steel              | 1                          | 3/8                        | See Condition II.E.25.b of this Permit |
| T-602 <sup>2</sup> | Proposed                          | N/A                      | 30' x 18' x 12' (sloping floor) | 38,776                    | 36,837                               | N/A             | N/A                 | Ambient                 | N/A             | Carbon Steel              | 1                          | 3/8                        | See Condition II.E.25.b of this Permit |
| T-610              | Proposed                          | N/A                      | 15.5' x 22.5'                   | 31,500                    | 29,925                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-611              | Proposed                          | N/A                      | 15.5' x 22.5'                   | 31,500                    | 29,925                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-612              | Proposed                          | N/A                      | 15.5' x 22.5'                   | 31,500                    | 29,925                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-613              | Proposed                          | N/A                      | 15.5' x 22.5'                   | 31,500                    | 29,925                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-630              | Proposed                          | N/A                      | 12' x 25'                       | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-631              | Proposed                          | N/A                      | 12' x 25'                       | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-632              | Proposed                          | N/A                      | 12' x 25'                       | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |



| Tank No.           | Existing or Proposed <sup>1</sup> | Year Placed Into Service | Dimensions (D X H)                  | Design Capacity (gallons) | Maximum Operating Capacity (gallons) | Design Standard | Inspection Standard | Design Temperature (°F) | Design Pressure | Materials of Construction | Nominal Thickness (inches) | Minimum Thickness (inches) | Secondary Containment Type             |
|--------------------|-----------------------------------|--------------------------|-------------------------------------|---------------------------|--------------------------------------|-----------------|---------------------|-------------------------|-----------------|---------------------------|----------------------------|----------------------------|----------------------------------------|
| T-701 <sup>3</sup> | Proposed                          | N/A                      | 27'L x 22'W x 11.9' (average depth) | 53,020                    | 50,369                               | N/A             | N/A                 | Ambient                 | ATM             | Carbon Steel              | 1                          | 3/8                        | See Condition II.E.25.b of this Permit |
| T-702 <sup>3</sup> | Proposed                          | N/A                      | 27'L x 22'W x 11.9' (average depth) | 53,020                    | 50,369                               | N/A             | N/A                 | Ambient                 | ATM             | Carbon Steel              | 1                          | 3/8                        | See Condition II.E.25.b of this Permit |
| T-703 <sup>3</sup> | Proposed                          | N/A                      | 27'L x 22'W x 11.9' (average depth) | 53,020                    | 50,369                               | N/A             | N/A                 | Ambient                 | ATM             | Carbon Steel              | 1                          | 3/8                        | See Condition II.E.25.b of this Permit |
| T-704 <sup>3</sup> | Proposed                          | N/A                      | 27'L x 22'W x 11.9' (average depth) | 53,020                    | 50,369                               | N/A             | N/A                 | Ambient                 | ATM             | Carbon Steel              | 1"                         | 3/8                        | See Condition II.E.25.b of this Permit |
| T-710              | Proposed                          | N/A                      | 12' x 25'                           | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-711              | Proposed                          | N/A                      | 12' x 25'                           | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-712              | Proposed                          | N/A                      | 12' x 25'                           | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-713              | Proposed                          | N/A                      | 12' x 25'                           | 21,000                    | 19,950                               | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |

| Tank No. | Existing or Proposed <sup>1</sup> | Year Placed Into Service | Dimensions (D X H) | Design Capacity (gallons) | Maximum Operating Capacity (gallons) | Design Standard | Inspection Standard | Design Temperature (°F) | Design Pressure | Materials of Construction | Nominal Thickness (inches) | Minimum Thickness (inches) | Secondary Containment Type             |
|----------|-----------------------------------|--------------------------|--------------------|---------------------------|--------------------------------------|-----------------|---------------------|-------------------------|-----------------|---------------------------|----------------------------|----------------------------|----------------------------------------|
| T-740    | Proposed                          | N/A                      | 96' x 160'         | 5,000                     | 4,750                                | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-741    | Proposed                          | N/A                      | 96' x 160'         | 5,000                     | 4,750                                | API-620         | API-653             | 200                     | ATM             | Carbon Steel              | 1/4                        | 3/16                       | See Condition II.E.25.b of this Permit |
| T-903    | Existing                          | 1991                     | 10' x 30'          | 17,000                    | 16,150                               | UL-142          | API-653             | 150                     | ATM             | Carbon Steel              | 1/4                        | 1/8                        | External Concrete Liner                |
| T-904    | Existing                          | 1993                     | 10' x 30'          | 17,000<br>16,990          | 16,150                               | UL-142          | API-653             | 150                     | ATM             | Carbon Steel              | 1/4                        | 1/8                        | External Concrete Liner                |
| T-905    | Existing                          | 1991                     | 8' x 30'           | 13,000                    | 12,350                               | UL-142          | API-653             | 150                     | ATM             | Carbon Steel              | 1/4                        | 1/8                        | External Concrete Liner                |
| T-906    | Existing                          | 2008                     | 15.5' x 24'        | 33,874                    | 32,180                               | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | 3/8                        | 3/16                       | External Concrete Liner                |
| T-907    | Existing                          | 2008                     | 15.5' x 24'        | 33,874                    | 32,180                               | API-650         | API-653             | 150                     | ATM             | Carbon Steel              | 3/8                        | 3/16                       | External Concrete Liner                |

<sup>1</sup>The proposed tanks are permitted for the capacities listed in Tables 14 and 16.

<sup>2</sup>The proposed pits are part of the Oil Recovery Units.

<sup>3</sup>The proposed pits are part of the Thermal Desorber Units.



## **V.B. CONTAINER STORAGE AREAS**

The permit conditions as set forth under this Condition shall apply where applicable, to the permitted container storage facilities as designated in Condition IV, Tables 17-18.

### **V.B.1. Conditions and Operations**

#### **V.B.1.a. Conditions of Containers**

**V.B.1.a.i.** The Permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.Chapter 21.

**V.B.1.a.ii.** The Permittee shall maintain the condition of all containers in accordance with LAC 33:V.2103. If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the owner or operator must transfer the hazardous waste to a container that is in good condition or manage the waste in some other way that complies with the requirements of LAC 33:V.Chapter 21.

**V.B.1.a.iii.** The Permittee shall maintain the integrity of all containers in accordance with LAC 33:V.2105. Hazardous wastes or treatment reagents must not be placed in containers if they could impair the ability of the container to contain the wastes or treatment reagents.

#### **V.B.1.b. Management of Containers**

**V.B.1.b.i.** The Permittee shall manage the containers in accordance with LAC 33:V.2107.A and B.

**V.B.1.b.ii.** The Permittee shall store all wastes in containers that are compatible with the hazardous wastes as required by LAC 33:V.2105. Hazardous wastes being transported offsite must be packaged and labeled in accordance with DOT standards listed in 49 CFR 173 and 178 as required by LAC 33:V.1109 and LAC 33:V.1759.F.

**V.B.1.b.iii.** The Permittee must place and store incompatible, ignitable, and reactive wastes only in accordance with LAC 33:V.1517, 2113, and 2115.

**V.B.1.b.iv.** If any hazardous waste is emptied from a container, the residue remaining in the container is not considered a hazardous waste if the container is "empty" as defined by RCRA and in accordance with LAC 33:V.109. In this event, management of the container is exempt from the requirements of LAC 33:V.Chapter 21.

**V.B.1.b.v.** Containers holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

**V.B.1.b.vi.** Containers holding hazardous waste must not be opened, handled, or stored in a manner which may rupture the container or cause it to leak.

**V.B.1.b.vii.** Pallets shall be placed in rows with a minimum of two (2) feet of access aisle space between the rows, or the width necessary to get emergency equipment to any area of the aisle, whichever is greater.

**V.B.1.b.viii.** All containers must be placed so that hazardous waste identification labels may be read from the access aisle.

**V.B.1.b.iv.** No drums or pallets may be stored directly over any sump area.

**V.B.1.b.x.** Containers holding thirty (30) gallons or more must be placed on pallets not more than two (2) containers high with no more than four (4) containers per tier on each pallet.

**V.B.1.b.xi.** If any hazardous waste is emptied from a container, the residue remaining in the container is not considered a hazardous waste if the container is "empty" as defined in LAC 33:V.109. In this event, management of the container is exempt from the requirements of LAC 33:V.Chapter 21.

#### **V.B.1.c. Operations**

**V.B.1.c.i.** All permitted container storage areas and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 21 and the specifications, design criteria, and design limits specified in the Permit Application.

#### **V.B.1.c.ii. Unloading, Loading and Receiving/Staging**

**V.B.1.c.ii.(1)** All trucks containing hazardous waste shall be managed in accordance with LAC 33:V.1527 and in accordance with the approved Waste Analysis Plan.

**V.B.1.c.ii.(2)** Sufficient pumping capacity such as portable pumps or vacuum trucks shall be provided to remove any spilled material from the sumps located in each of the unloading areas in a timely manner and to prevent any overflow from the contaminated area.



**V.B.1.c.ii.(3)** All loads that have entered the security gate will be inspected, prior to their leaving the sampling station(s), for leaks and any load found leaking will be responded to immediately, and moved to a contained area as soon as possible.

**V.B.1.c.ii.(4)** All hazardous waste trucks containing liquids that have been accepted for management, and are being held beyond the sampling station(s) for longer than twenty-four (24) hours, must be located in an area having the capability of holding the entire liquid contents of the trucks unless being transported to or from on-site treatment, storage or disposal.

**V.B.1.c.ii.(5)** A representative sample of the waste for each waste stream to be treated or disposed at the facility must be analyzed to verify the information on the manifest when required by, and in the manner specified by, the approved Waste Analysis Plan.

**V.B.1.c.ii.(6)** The quantity of waste received must be recorded and chemical and physical characteristics identified in accordance with the approved Waste Analysis Plan with regard to ignitability, reactivity or incompatibility. Only compatible wastes shall be stored in common containment or tanks.

#### **V.B.1.c.iii. Biotreatment in Containers**

Biotreatment in containers shall only be conducted in Building 801 and the proposed Building 802 in tarp-covered, twenty (20) to twenty-five (25) cubic yard roll-off boxes.

#### **V.B.1.c.iv. Macroencapsulation in Containers**

Macroencapsulation in containers shall only be conducted in existing Buildings 201, 202, 204, and 801, and the proposed Buildings 205 and 802 in one of the following:

**V.B.1.c.iv.(1)** specifically designed , one-piece, high-strength and high-density polyethylene (HDPE) containment units;

**V.B.1.c.iv.(2)** polyethylene bladder bags;

**V.B.1.c.iv.(3)** overlapped closure polyethylene box liners; or

**V.B.1.c.iv.(4)** other suitable technologies that are specifically formulated and designed to resist contaminants and leachate.

### **V.B.1.c.v. Container Decant/Filling/Processing**

**V.B.1.c.v.(1)** Container decant/filling/processing shall be conducted in the existing Building 204, and the proposed Building 205.

**V.B.1.c.v.(2)** The Permittee must use appropriate controls and practices to prevent spills and overflows from the vessels and containment systems.

**V.B.1.c.v.(3)** At a minimum, overflow prevention controls for hazards waste will include, where applicable; level sensing devices, high level alarm, automatic feed cutoff or bypass to a standby truck.

**V.B.1.c.v.(4)** The Permittee must inspect the container decant/filling/processing units according to the inspection schedules specified in the approved inspection plan, referenced in Attachment 1.

**V.B.1.c.v.(5)** At closure, the Permittee must remove or decontaminate all waste residues from the system, in accordance with the approved closure/post-closure plan, referenced in Attachment 1.

### **V.B.2. Permitted and Prohibited Wastes**

#### **V.B.2.a. Permitted Waste**

Subject to the terms of this Permit, the Permittee is allowed to store in the container storage areas as described in Condition V.B of this Permit, the hazardous waste described in the most current Part A permit application, in the containers as described in Condition IV, Tables 17-18.

#### **V.B.2.b. Prohibited Wastes**

The Permittee is prohibited from storing hazardous waste that is not identified in Condition V.B.2.a.

### **V.B.3. Secondary Containment**

**V.B.3.a.** The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater, in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.



**V.B.3.b.** Container storage systems must have a containment system that is designed and operated in accordance with LAC 33:V.2111.B. The containment system must be designed and operated as follows:

**V.B.3.b.i.** a base must underlie the containers which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed;

**V.B.3.b.ii.** the base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids;

**V.B.3.b.iii.** run-on into the containment system must be prevented unless the containment system has sufficient excess capacity in addition to that required in LAC 33:V.2111.B.3 to contain any run-on which might enter the system;

**V.B.3.b.iv.** spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in as timely a manner as is necessary to prevent overflow of the collection system; and

**V.B.3.b.v.** if the collected material is a hazardous waste, it must be managed in accordance with all applicable requirements.

#### **V.B.4. Requirements for Ignitable, Reactive, and Incompatible Waste**

**V.B.4.a.** The Permittee must store ignitable, incompatible, or reactive waste in accordance with LAC 33:V.1517 and LAC 33:V.2113, LAC 33:V.2115.A, B, C, and D.

**V.B.4.b.** Containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility property line.

**V.B.4.c.** Hazardous wastes must not be placed in an unwashed container that previously held an incompatible waste or material.

**V.B.4.d.** A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers must be separated from the other materials or protected from them by means of a dike, berm, wall, other device, or approved management technique.

**V.B.4.e.** The Permittee must place the results of each waste analysis and any documented information regarding compatibility testing in the operating record of the facility.

#### **V.B.5. Inspections**

**V.B.5.a.** The Permittee shall inspect the containers and containment area(s) in accordance with LAC 33:V.2109 and LAC 33:V.1509. Results of such inspections must be placed in the operating record (for a minimum of three years). All incidents involving leaking containers and spilled materials reportable under applicable regulations (the Clean Water Act [CWA], RCRA, and the Superfund Amendments and Reauthorization Act of 1986 [SARA]) shall be detailed in the annual report (due March 1 of each year).

**V.B.5.b.** At least weekly, the Permittee must inspect where containers are stored for leaking containers and for deterioration of containers and containment systems caused by corrosion or other factors (including sealants used to maintain a base free of cracks or gaps). Remedial action shall be taken in accordance with LAC 33:V.1509.C and LAC 33:V.1513, when applicable.

**V.B.5.c.** All containers shall be stacked in such a fashion that each container identification label can be read from the access aisle.

**V.B.5.d.** All inspection records shall be maintained according to the recordkeeping requirements of LAC 33:V.1529.

#### **V.B.6. Leaks and Spills**

**V.B.6.a.** The Permittee shall manage spilled or leaked waste and accumulated precipitation according to LAC 33:V.2111.B.5.

**V.B.6.b.** Storm water shall be managed and discharged through a properly permitted NPDES wastewater treatment system or other disposal method authorized by the Administrative Authority.

**V.B.6.c.** The Permittee shall manage any collected material as required by LAC 33:V.2111.B.6. Spilled or leaked material shall be handled in a timely manner as required by LAC 33:V.2111.B.5.

#### **V.B.7. Air Emission Control Equipment Standards**

The Permittee shall comply with Condition V.H.3 of this permit for air emission control equipment for all permitted container storage areas.

#### **V.B.8. Recordkeeping**

##### **V.B.8.a. Inspections**

The Permittee shall document in the operating record for the facility inspection of those items in Condition V.B.5 of this Permit.



**V.B.8.a.i.** The weekly log sheets shall include all inspected areas.

**V.B.8.a.ii.** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

**V.B.8.a.iii.** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

#### **V.B.9. Closure and Post-Closure Care**

**V.B.9.a.** At closure, the Permittee must remove all hazardous waste, residues, and containers from the container storage areas. All containers and liners must be handled as a hazardous waste (unless meeting the definition of “empty” container in accordance with LAC 33:V.109). All residuals and contaminated soils must be removed as required by the Closure Plan referenced in Attachment 1 of this permit, and as required by LAC 33:V.2117. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

**V.B.9.b.** At closure, the Permittee shall adhere to the procedures detailed in the approved closure plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117 and LAC 33:V.Chapter 35, Closure Requirements, and the closure requirements of the approved TSCA Closure Plan. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority.

**V.B.9.c.** A post-closure plan must be submitted for each container storage area failing to achieve clean closure (or an alternative closure standard approved under LAC 33:V.3501.D.2 or LAC 33:V.3507.B) within ninety (90) days from the date that the Permittee or the Administrative Authority determines that the unit must be closed as a landfill. The post-closure plan must meet the requirements of LAC 33:V.3523.B.

**V.B.9.d.** The Administrative Authority may re-evaluate the adequacy of the closure plan and/or the confirmatory sampling procedures prior to the commencement of closure, based upon the wastes historically managed by each unit during its lifetime.

#### **V.C. CONTAINMENT BUILDING**

##### **V.C.1. Description of Containment Building**

The permit conditions as set forth under this Condition shall apply to the permitted containment building designated in Table 19.

## **V.C.2. Permitted and Prohibited Wastes**

### **V.C.2.a. Permitted Waste**

Subject to the terms of this Permit, the Permittee is allowed to store hazardous waste identified in the most current Part A Permit Application in the containment building as described in Table 19.

### **V.C.2.b. Prohibited Waste**

The Permittee is prohibited from storing hazardous waste that is not identified in Condition V.C.2.a of this Permit.

## **V.C.3. Containment**

**V.C.3.a.** The Permittee must use controls and practices to ensure containment of the hazardous waste within the unit; and, at a minimum, must:

**V.C.3.a.i.** maintain the primary barrier to be free of significant cracks, gaps, corrosion, or other deterioration that could cause hazardous waste to be released from the primary barrier;

**V.C.3.a.ii.** maintain the level of the stored hazardous waste within the containment walls of the unit so that the height of any containment walls of the unit is not exceeded; and

**V.C.3.a.iii.** take measures to prevent the tracking of hazardous waste out of the unit by personnel or by equipment used in handling waste. An area must be designated to decontaminate equipment, and any rinsate must be collected and properly managed.

## **V.C.4. Operating Requirements**

**V.C.4.a.** The Permitted containment building and associated piping, pumps, instruments, containment, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 18 and the specifications, design criteria, and design limits in the Permit Application and Condition II.E.25.a of this Permit.

**V.C.4.b.** The Permittee must take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visual emissions (40 CFR Part 60, Appendix A, Visual Determination of Fugitive Emissions from Material Sources and Smoke Emissions from Flares). This state of no visible emissions must be maintained effectively at all times during normal operating and maintenance conditions, including when vehicles and personnel are entering and exiting the unit.



**V.C.4.c.** The Permittee shall operate and maintain all particulate collection devices in accordance with sound air pollution control practices as detailed in 40 CFR 60, Subpart 292.

**V.C.4.d.** Wash-down or decontamination areas shall be constructed and standard operating procedures developed for decontaminating equipment prior to removal from the containment building.

**V.C.4.e.** Decontamination pads or areas shall be constructed and standard operating procedures developed for the removal and containment of dust from personnel.

**V.C.4.f.** The Permittee shall evaluate the presence of free liquids using the paint filter test, a visual examination, or other appropriate means and document such evaluation.

**V.C.4.g.** Macroencapsulation shall only be conducted in one of the following:

**V.C.4.g.i.** specifically designed, one-piece, high-strength and high-density polyethylene (HDPE) containment units;

**V.C.4.g.ii.** polyethylene bladder bags;

**V.C.4.g.iii.** overlapped closure polyethylene box liners; or

**V.C.4.g.iv.** other suitable technologies that are specifically formulated and designed to resist contaminants and leachate.

**V.C.4.h.** Storage in containers shall be in accordance with Condition V.B.

#### **V.C.5. Ignitable, Reactive, and Incompatible Wastes**

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.

#### **V.C.6. Inspections**

##### **V.C.6.a. Inspection Schedule**

The Permittee shall comply with LAC 33:V.1802.C.4 by following the inspection schedule submitted in the Inspection Plan (see Attachment 1).

##### **V.C.6.b. Weekly Inspection**

**V.C.6.b.i.** At least once every seven (7) days, the Permittee must inspect data gathered from monitoring equipment and leak detection equipment as

well as the containment building and the area immediately surrounding the containment building to detect signs of releases of hazardous waste.

**V.C.6.b.ii.** All deficiencies noted during weekly inspections must be recorded and remedied in a timely manner. Remedial action as described in LAC 33:V.1513 shall be taken.

#### **V.C.7. Response to Leaks or Spills**

**V.C.7.a.** The Permittee shall manage spilled or leaked waste in accordance with LAC 33:V.1802.C.3.

**V.C.7.b.** The Permittee shall promptly repair any condition which the owner or operator detects throughout the active life of the containment building that could lead to or cause a release of hazardous waste in accordance with the following procedures:

**V.C.7.b.i.** upon detection of a condition that has led to a release of hazardous waste (e.g., upon detection of leakage from the primary barrier), the owner or operator must:

**V.C.7.b.i.(1)** enter a record of the discovery in the facility operating record;

**V.C.7.b.i.(2)** immediately remove the portion of the containment building affected by the condition from service; and

**V.C.7.b.i.(3)** determine what steps must be taken to repair the containment building, remove any leakage, and establish a schedule for accomplishing the cleanup and repairs.

#### **V.C.8. Air Emission Control Equipment Standards**

See Condition II.E.25.f of this Permit.

#### **V.C.9. Recordkeeping**

##### **V.C.9.a. Inspections**

**V.C.9.a.i.** The Permittee shall document in the operating record for the facility inspection of those items in Condition V.C.6.b of this Permit.

**V.C.9.a.i.(1)** The weekly log sheets shall include all inspected areas.

**V.C.9.a.i.(2)** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.



**V.C.9.a.i.(3)** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

**V.C.9.b. Releases**

**V.C.9.b.i.** The Permittee shall keep on file at the facility, notification reports submitted under LAC 33:V.1802.C.3.

**V.C.9.b.ii.** Within seven (7) days after discovery of a condition as described in Condition V.C.7. of this Permit, notify the Office of Environmental Services, Waste Permits Division of the condition.

**V.C.9.b.iii.** Within fourteen (14) working days after discovery of a condition as described in Condition V.C.7. of this Permit, provide a written notice to the Administrative Authority with a description of the steps taken to repair the containment building and the schedule for accomplishing the work.

**V.C.9.b.iv.** Upon completing all repairs and cleanup due to a condition discovered as described in Condition V.C.7 of this Permit, the owner or operator must notify the Office of Environmental Services, Waste Permits Division in writing and provide a verification, signed by a qualified, registered professional engineer, that the repairs and cleanup have been completed according to the written plan submitted in accordance with LAC 33:V.1802.C.3.a.iv.

**V.C.10. Closure and Post-Closure Care**

**V.C.10.a. Duty to Comply with LAC 33:V.1803.A**

The Permittee shall comply with LAC 33:V.1803.A by following the procedures specified in the Closure Plan, Attachment 1.

**V.C.10.b. Duty to Comply with LAC 33:V.1803.B**

If the Permittee demonstrates that not all contaminated components, subsoils, structures, and equipment can be practicably removed or decontaminated in accordance with Condition V.C.10.a of this Permit, the Permittee shall comply with LAC33:V.1803.B.

**V.C.10.c. Post-Closure**

The Permittee shall attempt to clean close the containment building. If the containment building cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health

and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527 and Condition V.B.9, including maintenance and monitoring throughout the post-closure care period.

## **V.D. BIOPADS**

### **V.D.1. Description of Biopads**

The permit conditions as set forth under this Condition shall apply to the permitted existing Biopads Phase I and II designated in Table 20.

### **V.D.2. Permitted and Prohibited Wastes**

#### **V.D.2.a. Permitted Waste**

Subject to the terms of this Permit, the Permittee is allowed to utilize the biopads to biologically treat hazardous waste identified in the most current Part A Permit Application that is categorized as one of the following wastes:

**V.D.2.a.i.** pesticides

**V.D.2.a.ii.** petroleum hydrocarbons

**V.D.2.a.iii.** nitroaromatics

**V.D.2.a.iv.** wood treating wastes

**V.D.2.a.v.** chlorinated hydrocarbons

**V.D.2.a.vi.** refinery-related materials

**V.D.2.a.vii.** other similar wastes that have been demonstrated in industry and/or literature to be amenable to biological treatment and/or scientifically evaluated to be amenable to biological treatment

#### **V.D.2.b. Prohibited Waste**

The Permittee is prohibited from treating the following hazardous wastes in the biopads:

**V.D.2.b.i.** hazardous wastes F020, F021, F022, F023, F026, and F027; and

**V.D.2.b.ii.** any hazardous waste that is not identified in Condition V.D.2.a of this Permit.



### **V.D.3. Design and Operating Requirements**

**V.D.3.a.** The permitted biopads and associated ancillary equipment shall be operated and maintained in accordance with all applicable sections of LAC 33:V.Chapter 23 and the specifications, design criteria, and design limits approved by the Administrative Authority.

#### **V.D.3.b. Liner Systems**

The following liner system components associated with the biopads, listed in order from the bottom to the top of the biopads, must be operated and maintained, in accordance with LAC 33:V.2303:

**V.D.3.b.i.** a minimum three (3) foot thick layer of compacted clay;

**V.D.3.b.ii.** a forty (40) mil textured HDPE secondary geomembrane, in accordance with LAC 2303.C.1.b;

**V.D.3.b.iii.** a sixteen (16) ounce per square yard nonwoven leachate detection geotextile;

**V.D.3.b.iv.** a forty (40) mil textured HDPE primary geomembrane;

**V.D.3.b.v.** a sixteen (16) ounce per square yard nonwoven leachate collection geotextile; and

**V.D.3.b.vi.** a 1.5 foot thick layer of lime-stabilized clay protective cover.

#### **V.D.3.c. Leachate Collection and Removal Systems**

The leachate collection and removal systems for the biopads must be maintained and operated to collect and remove leachate from the biopads, in accordance with LAC 33:V.2303.C.4.

#### **V.D.3.d. Leak Detection Systems**

The leak detection systems must be maintained and operated to detect any migration of liquids into the spaces between the liner systems, in accordance with LAC 33:V.2303.C.

#### **V.D.3.e. Run-on and Run-off Control Systems**

**V.D.3.e.i.** A run-on control system must be operated and maintained to prevent flow onto any active portion of the biopads.

**V.D.3.e.ii.** A run-off management system must be operated and maintained to collect and control any water volume collected.

**V.D.3.e.iii.** Collection and holding facilities (e.g., tanks or basins) associated with the run-on and run-off control systems must be emptied or otherwise managed expeditiously after storms to maintain the design capacity of the system.

**V.D.3.e.iv.** The run-on and run-off control systems must maintain a design capacity to control water volume resulting from a 24-hour, 25-year storm.

**V.D.3.f.** Liquids or materials containing free liquids shall not be placed directly on the biopad.

**V.D.3.g.** The biopiles must be covered or otherwise managed to control wind dispersal.

#### **V.D.4. Ignitable, Reactive, and Incompatible Wastes**

**V.D.4.a.** Ignitable or reactive waste must not be placed in the biopads unless the waste and the biopads satisfy all applicable requirements of LAC 33:V.Chapter 22, and:

**V.D.4.a.i.** the waste is treated, rendered, or mixed before or immediately after placement in the biopads so that:

**V.D.4.a.i.(1)** the resulting waste, mixture, or dissolution of material no longer meets the description of ignitable or reactive wastes under the characteristics of ignitability or reactivity in LAC 33:V.4903.B or D; and

**V.D.4.a.i.(2)** the general requirements for ignitable, reactive, or incompatible wastes as specified in LAC 33:V.1517.B are met; or

**V.D.4.a.ii.** the waste is managed in such a way that it is protected from any material or conditions which may cause it to ignite or react.

**V.D.4.b.** Incompatible wastes, or incompatible wastes and materials must not be placed in the same biopad, unless LAC 33:V.1517.B is complied with.

**V.D.4.c.** A pile of hazardous waste that is incompatible with any waste or waste stored nearby in containers, other piles, or open tanks must be separated from the other materials, or protected from them by means of a dike, berm, wall, or other device.

**V.D.4.d.** Hazardous waste must not be piled on the same base where incompatible



waste or materials were previously piled, unless the base has been decontaminated sufficiently to ensure compliance with LAC 33:V.1517.B.

## **V.D.5. Inspections**

### **V.D.5.a. Duty to Comply with LAC 33:V.2307.A**

The Permittee shall comply with LAC 33:V.2307.A. The facility must provide the Administrative Authority with thirty (30) days of advance notice of any synthetic liner installations to allow the Administrative Authority the opportunity to inspect the liner and its installation.

### **V.D.5.b. Duty to Comply with LAC 33:V.2307.B**

The Permittee is exempt from complying with LAC 33:V.2307.B. The biopad's synthetic liner system is located beneath a 1.5 foot thick layer of lime-stabilized clay protective cover.

**V.D.5.c.** During any biopad construction or installation, liners or cover systems must be inspected for uniformity, damage, imperfections, (e.g., holes, cracks, thin spots, or foreign materials). Immediately after any biopad construction or installation:

**V.D.5.c.i.** synthetic liners and covers must be inspected to ensure tight seams and joints and the absence of tears, punctures, or blisters; and

**V.D.5.c.ii.** soil-based and admixed liners and covers must be inspected for imperfections including lenses, cracks, channels, root holes, or other structural non-uniformities that may cause an increase in the permeability of the liner or cover.

### **V.D.5.d. Weekly Inspections**

**V.D.5.d.i.** While the biopad is in operation, it must be inspected weekly and after storms to detect the evidence of any of the following:

**V.D.5.d.i.(1)** deterioration, malfunctions, or improper operation of run-on and run-off control systems;

**V.D.5.d.i.(2)** proper functioning of wind dispersal control systems, where present;

**V.D.5.d.i.(3)** the presence of leachate in and proper functioning of leachate collection and removal systems, where present; and

**V.D.5.d.i.(4)** the presence of liquids in the leak detection system.

**V.D.5.d.ii.** All deficiencies noted during weekly inspections must be recorded and remedied in a timely manner.

**V.D.5.d.iii.** The facility must record the amount of liquids removed from the leak detection system sump at least once each week during the active life and closure period of the biopad.

#### **V.D.6. Response to Leaks**

**V.D.6.a.** If a tear is found in the liner systems of the biopads, the Permittee must:

**V.D.6.a.i.** notify the Administrative Authority of the tear within seven (7) days after detecting the tear; and

**V.D.6.a.ii.** remove accumulated liquid, repair or replace the damaged liner to prevent the migration of liquids through the liner, and obtain a certification from a qualified engineer that, to the best of his knowledge and opinion, the tear has been repaired.

**V.D.6.b.** If the flow rate into any leak detection system exceeds the action leakage rate (established by the approved Response Action Plan (RAP) for the biopads) for any sump, the Permittee must:

**V.D.6.b.i.** notify the Administrative Authority in writing of the exceedance within seven (7) days of the determination;

**V.D.6.b.ii.** determine to the extent practicable the location, size, and cause of any leak;

**V.D.6.b.iii.** determine whether waste receipt should cease or be curtailed, whether any waste should be removed from the biopad for inspection, repairs, or controls, and whether or not the biopad should be closed;

**V.D.6.b.iv.** determine any other short-term and long-term actions to be taken to mitigate or stop any leaks; and

**V.D.6.b.v.** Determinations made in accordance with Conditions V.D.7.b.ii of this Permit must meet the requirements with LAC 33:V.2306.C.

#### **V.D.7. Recordkeeping**

##### **V.D.7.a. Inspections**

**V.D.7.a.i.** The Permittee shall document in the operating record for the facility inspection of those items in Condition V.D.5.d. of this Permit.

**V.D.7.a.i.(1)** The weekly log sheets shall include all inspected



areas.

**V.D.7.a.i.(2)** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

**V.D.7.a.i.(3)** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

#### **V.D.7.b. Response Actions**

**V.D.7.b.i.** Within fourteen (14) days of determination that the action leakage rate has been exceeded, as discussed in Condition V.D.6.b, the owner or operator must submit a preliminary written assessment to the Administrative Authority as to the amount of liquids, likely sources of liquids, possible location, size, and cause of any leaks, and short-term actions taken and planned.

**V.D.7.b.ii.** Within thirty (30) days after the notification that the action leakage rate has been exceeded, as discussed in Condition V.D.6.b, the owner or operator must submit to the Administrative Authority the results of the analyses specified in LAC 33:V.2306.B.3-5, of actions taken, and of remedial actions planned. Monthly thereafter, as long as the flow rate in the leak detection system exceeds the action leakage rate, the owner or operator must submit to the Administrative Authority a report summarizing the results of any remedial actions taken and actions planned.

#### **V.D.8. Closure and Post-Closure Care**

##### **V.D.8.a. Duty to Comply with LAC 33:V.2315.A**

The Permittee shall comply with LAC 33:V.2315.A by following the procedures specified in the Closure Plan, Attachment 1.

##### **V.D.8.b. Duty to Comply with LAC 33:V.2315.B**

If the Permittee demonstrates that not all contaminated components, subsoils, structures, and equipment can be practicably removed or decontaminated in accordance with Condition V.D.8.a of this Permit, the Permittee shall comply with LAC33:V.2315.B.

##### **V.D.8.c. Post-Closure**

The Permittee shall attempt to clean close the biopads. If the biopad cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining

contaminant levels is protective of human health and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

## **V.E. LANDFILL**

### **V.E.1. General Design, Construction and Requirements**

**V.E.1.a.** The design, construction and operations of the hazardous waste landfill designated as Landfill Cell 8, in Table 21, must comply with this permit, the applicable regulatory requirements of LAC 33:V.517, 533 and LAC 33:V.Chapter 25, and shall be in accordance with the plans and specifications for design, construction and operations approved herein. All plans and specifications for the design, construction and operation of the hazardous waste landfill facility, approved at the time of construction of Landfill Cell 8 and attached hereto and made a permanent part of the permit, are approved subject to the terms of this permit and any other order of the Administrative Authority.

**V.E.1.b.** Any variance from or modification to the approved drawings, specifications or terms and conditions of this permit for the design or construction of the landfill unit that deviates from the design intent or performance standards is not allowed without prior written approval from the Administrative Authority.

**V.E.1.c.** At least twenty four (24) hours prior to effecting any variance from or modification to the approved plans and specifications for design, construction and operation of the landfill and the terms and conditions of the permit that do not constitute a deviation from the design intent or performance standards, the Permittee shall notify the Administrative Authority of the intended change via facsimile transmittal or email and follow-up with an official notification via registered mail, and a telephone call. This notification shall include a justification for the proposed action.

**V.E.1.d.** The Administrative Authority reserves the right to require the implementation of additional procedures if it is subsequently determined that a change effected without said approval was deemed by the Administrative Authority as being in deviation from the design intent or performance standards of the approved drawings, specifications or terms and conditions of this permit.

**V.E.1.e.** Prior to construction of the soil liner for a landfill, a test fill using materials characterized as the same as those to be used in the new landfill shall be required. The Permittee shall construct and test in accordance with procedures contained in the Chemical Waste Management, Inc. (CWMI) "Quality Assurance Document for the Installation of Lining Systems." Any modifications and/or latest revision must be submitted to the Department for review and approval. The



test fill will be identical in thickness and composite make-up as approved for the facility design.

Alternatively, soil liner construction records and test results from prior, similarly constructed cells, (i.e., Cell 14 and/or Cell 6 and/or Cell 7) can become the basis for test fill documentation and certification.

After the successful construction of the test fill(s), the Permittee shall provide written certification of proper construction and evaluation and said certification shall specifically address:

**V.E.1.e.i.** Results of all pre-construction, construction and post-construction QA/QC inspection and testing.

**V.E.1.e.ii.** Summary of materials and construction specification, methodology and equipment.

## **V.E.2. General Operating Conditions**

**V.E.2.a.** The Permittee shall operate and maintain the one (1) existing permitted operating Landfill Cell 8, listed in Table 21, to meet the following performance standards:

**V.E.2.a.i.** Operate and maintain a run-on control system capable of preventing flow onto the active portion of the landfill during peak discharge from a 24-hour, 25-year storm in accordance with LAC 33:V.2503.D. Any incidences of run-on entering the containment areas shall be reported and made a part of the annual report.

**V.E.2.a.ii.** Operate and maintain a run-off management system to collect and control at least the water volume resulting, from a 24-hour, 25-year storm in accordance with LAC 33:V.2503.E. Any incidences of run-off not collected and controlled shall be reported and made a part of the annual report.

**V.E.2.a.iii.** The Permittee may landfill only those wastes which, at a minimum, meet the criteria specified in LAC 33:V.2503, 2511, 2513, 2515, 2517 and 2519 and in compliance with Condition VII and VIII.

**V.E.2.a.iv.** The Permittee may not place bulk or non-containerized liquid hazardous waste or hazardous waste containing free liquids (whether or not absorbents have been added) in the landfill.

**V.E.2.a.v.** All collection and holding facilities (sumps and tanks) associated with the run-on and run-off control systems must be emptied expeditiously after storms to maintain the design capacity of the system.

Collected material must be disposed of properly as required by LAC 33:V.2503.F.

**V.E.2.a.vi.** Hazardous waste within the landfill must be covered or otherwise managed to insure minimum wind dispersal as required by LAC 33:V.2503.G.

**V.E.2.a.vii.** While in operation, the landfill must be inspected weekly and after storms to detect evidence of any of the following, as required by LAC 33:V.2507.C:

**V.E.2.a.vii.(1)** deterioration, malfunctions, or improper operation of run-on and run-off control systems;

**V.E.2.a.vii.(2)** the presence of liquids in leak detection systems;

**V.E.2.a.vii.(3)** proper functioning of wind dispersal control systems, where present; and

**V.E.2.a.vii.(4)** the presence of leachate in and proper functioning of leachate collection and removal systems, where present.

**V.E.2.a.viii.** Accumulated rainfall and groundwater must be removed from the active portions of the landfill in a timely manner.

**V.E.2.a.ix.** Closure and post-closure care shall conform with LAC 33:V.2521 and the closure/post-closure plan referenced in Attachment 1 of this permit, which is in compliance with the applicable rules and regulations.

**V.E.2.a.x.** The receiving and monitoring of wastes into the landfill must be performed according to LAC 33:V.1527 and the Waste Analysis Plan referenced in Attachment 1.

**V.E.2.a.xi.** The leachate detection and collection system must be properly maintained and inspected weekly and after storms to detect the presence of liquids and the proper functioning of the systems. If liquids are encountered at the level of greater than one (1) foot above the lip of the collection sump in a leachate collection system, it shall be removed to the lowest practical level. For both leachate collection and detection systems, records shall be maintained on the amount of fluid removed each week. The volume of fluid removed from each leachate collection and detection system must be reported quarterly.

No later than 180 days before planned waste disposal in disposal modules associated with Cell 8, the Permittee must propose, for review and



approval by the Administrative Authority, a Response Action Plan (RAP) for Cell 8, in accordance with Federal Register Vo. 57, No. 19, dated January 29, 1992 (or subsequent revisions) and with LAC 33:V.2504, that includes the proposed Action Leakage Rates for disposal modules associated with Cell 8, in accordance with LAC 33:V.2504. The RAP will describe the criteria used to evaluate the systems and the responses required to address liquids in the leachate detection collection, and removal systems for cells constructed at the site that meet minimum technology requirement having compacted clay and synthetic membrane liner systems. The RAP will also address potential sources of liquids. Responses to the detection of fluids in these systems may include no action, modifying operating procedures, repairing the liner system if possible, and when appropriate, notification to the Administrative Authority.

**V.E.2.a.xii.** The Permittee must maintain operating records as required by LAC 33:V.2509. At a minimum the accurate location of each waste load shall be recorded in the operating record within twenty-four (24) hours of being placed in the landfill. These records are to include a system of accurate tracking of each waste load throughout the facility. The tracking system must record: pre-acceptance information and analyses, the date of the pre-acceptance data, acceptance information and analyses, all internal transfers of wastes from receipt at the facility to treatment, storage, and final disposal; all internal waste transfers for on-site generated wastes such as contaminated rainwater, landfill leachate, truck washings, etc., and the results of all test analyses on the solidified wastes; the contents, date, weight or volume and location of wastes placed into and removed from storage; and the method, location and date of final disposal, treatment, or reclamation at the facility. Other than laboratory acceptance results which are recorded on a real time basis during the review of the shipment, all data shall be entered into the tracking system by the close of the next business day. The tracking system must provide a coordinate for the accurate location within the landfill of each day's disposal or each disposal event.

**V.E.2.a.xiii.** The Permittee will continue to operate and maintain the four (4) ambient air monitoring stations as outlined in the Louisiana Department of Environmental Quality – Air Quality Division Air Permit and/or subsequent modification, and as required by LAC 33:V.3305.E.

**V.E.2.b. Special Requirements for Ignitable or Reactive Waste**

**V.E.2.b.i.** Except as provided in LAC 33:V.2511.B and 2519, ignitable or reactive waste must not be placed in a landfill, unless the waste and landfill meet all applicable requirements of LAC 33:V.Chapter 22, and;



**V.E.2.b.i.(1)** The resulting waste, mixture, or dissolution of material no longer meets the definition of ignitable or reactive waste in LAC 33:V.4903.B or D; and

**V.E.2.b.ii.(2)** LAC 33:V.1517.B is complied with.

**V.E.2.b.ii.** Except for prohibited wastes subject to treatment standards in LAC 33:V.Chapter 22, ignitable wastes in containers may be landfilled without meeting the requirements of LAC 33:V.2511.A, provided that the wastes are disposed of in such a way that they are protected from any material or conditions which may cause them to ignite. At a minimum, ignitable wastes:

**V.E.2.b.ii.(1)** must be disposed of in non-leaking containers which are carefully handled and placed so as to avoid heat, sparks, rupture, or any other condition that might cause ignition of the wastes; and

**V.E.2.b.ii.(2)** must be covered daily with soil or other non-combustible material to minimize the potential for ignition of the wastes; and

**V.E.2.b.ii.(3)** must not be disposed of in cells that contain or will contain other wastes which may generate heat sufficient to cause ignition of the waste.

#### **V.E.2.c. Special Requirements for Incompatible Wastes**

Incompatible wastes, or incompatible wastes and materials, must not be placed in the same landfill cell, unless incompatible waste handling requirements of LAC 33:V.1517 are complied with as required by LAC 33:V.2515.

#### **V.E.2.d. Special Requirements for Containers**

Containers placed in the landfill must be either at least ninety (90) percent full in the landfill; or emptied and crushed flat, shredded, or similarly reduced in volume to the maximum practical extent before burial in the landfill as required by LAC 33:V.2517.

#### **V.E.2.e. Disposal of Small Containers of Hazardous Waste in Overpacked Drums (Lab Packs)**

The Permittee must comply with the requirements of LAC 33:V.2519 and the requirements of Louisiana Department of Public Safety (LDPS) hazardous materials/hazardous waste regulations, LAC 33:V.Subpart 2.Chapter 101.

#### **V.E.2.f. Monitoring and Inspection**



While the landfill is in operation, the Permittee must inspect it weekly and after storms in accordance with Condition V.E.2.a.vii. and as required by LAC 33:V.2507.C.

**V.E.2.f.i.** The Permittee is required to have a leak detection system under LAC 33:V.2503.L or M and must record the amount of liquids removed from each leak detection systems sump at least once each week during the active life and closure period as required by LAC 33:V.2507.D.

**V.E.2.f.ii.** After final cover is installed, the amount of liquids removed from each leak detection system sump must be recorded at least monthly. If the liquid level in the sump stays below the pump operating level for two (2) consecutive months, the amount of liquids in the sumps must be recorded at least quarterly. If the liquid level in the sump stays below the pump operating level for two (2) consecutive quarters, the amount of liquids in the sumps must be recorded at least semi-annually. If, at any time during the post-closure care period, the pump operating level is exceeded at units on quarterly or semi-annual recording schedules, the Permittee must return to monthly recording of amounts of liquids removed from each sump until the liquid level again stays below the pump operating level for two (2) consecutive months as required by LAC 33:V.2507.D.1.

**V.E.2.g. Special Requirements for Corrective Action Management Unit (CAMU) Wastes**

The Permittee shall notify the Administrative Authority and persons on the facility mailing list, in accordance with LAC 33:V.717.A.1.e, of the Permittee's intent to receive CAMU-eligible waste in accordance with LAC 33:V.2607. The notice must identify the source of the remediation waste, the principal hazardous constituents in the waste, and any treatment requirements.

Any comments from persons on the facility mailing list, including objections to the receipt of the CAMU-eligible waste, shall be provided to the Administrative Authority within fifteen (15) days of notification.

The Administrative Authority shall have the opportunity to object to the placement of the CAMU-eligible waste in the landfill for a period of thirty (30) days after notification. The Administrative Authority may extend the review period an additional thirty (30) days because of public concerns or insufficient information.

The CAMU-eligible wastes shall not be placed in the landfill until the Administrative Authority has notified the Permittee that Administrative Authority does not object to its placement.

If the Administrative Authority objects to the placement or does not notify the

Permittee that the Administrative Authority has chosen not to object, the facility shall not receive the waste, notwithstanding LAC 33:V.307.A, until the objection has been resolved or the Permittee obtains a permit modification in accordance with the procedures of LAC 33:V.321.C, specifically authorizing receipt of the waste.

Off-site facilities treating CAMU-eligible wastes complying with LAC 33:V.2607 must comply with the requirements of LAC 33:V.2247.C, except that the certification must be with respect to the treatment requirements of LAC 33:V.2607.A.2.

### **V.E.3. Landfill Design and Construction Requirements**

The Permittee shall comply with the following minimum requirements from the design and construction of the hazardous waste landfill as specified in LAC 33:V.517 and LAC 33:V.Chapter 25, and the referenced drawings (or subsequently approved design drawings).

**V.E.3.a.** The active hazardous waste landfill shall consist of one (1) disposal cell. This cell is designated as Cell 8. Cell 8 is subdivided into subunits designated as modules. All excavation depth, side slopes, final height (cell conformation) and other construction specifications shall conform to the approved design drawings.

**V.E.3.b.** Each module of the landfill shall have a composite liner system designed, constructed and maintained to prevent the discharge of any wastes or waste constituents from the landfill into the area groundwater. Landfill module excavation depths and contours shall conform to those displayed and detailed on the approved design drawings. The composite liner system shall consist of the following minimum requirements:

#### **V.E.3.b.i. Pressure Relief System**

Each excavated module shall be provided a pressure relief system placed upon the in-situ soils. This system shall cover the bottom and all side slopes of the module. The system on the slope shall consist of a high density polyethylene (HDPE) drainage net placed between the filter fabrics. The filter fabrics or geotextiles shall have the appropriate physical properties to prevent their clogging by the underlying and overlying clayey soils. The riser pipe for the pressure relief sump, shall be constructed parallel to the side slope of the module and exit the module in such a manner as not to penetrate any of the lining systems within the planned limits of waste disposal. The pressure relief system sump shall be overlain with clean (free of clay clods and deleterious materials) silicious gravel and the bottom of the module shall have the pressure relief system overlain by clean silicious sand. Details of the typical pressure relief system are displayed on the approved design drawings.



#### **V.E.3.b.ii. Secondary Liner System**

The secondary liner system shall consist of a three (3) foot recompacted clay liner overlain by a sixty (60) mil, HDPE geomembrane. This system is to cover the entire bottom and all side slopes of the module. The recompacted clay liner shall have a laboratory, hydraulic conductivity of  $1 \times 10^{-7}$  cm/sec or less. The synthetic, sixty (60) mil, HDPE liner shall be anchored in such a manner as to prevent movement of or pull out of the system due to daily waste placement operations and settlement forces generated from subsequent consolidation of subsurface soils. Details of the secondary liner system are displayed on the approved design drawings.

#### **V.E.3.b.iii. Leak Detection System**

The secondary liner system shall be overlain by a leak detection system. This system shall consist of an HDPE drainage net, placed upon the secondary sixty (60) mil, HDPE liner, and covered with an appropriate geotextile or filter fabric so as to prevent clogging of the drainage net by the overlying clay soils. The drainage net shall have the transmissivity equal to or greater than one (1) foot of gravel having a conductivity of permeability of  $1 \times 10^{-2}$  cm/se or greater. This system shall cover the entire bottom and all side slopes of the module. The drainage net and associated filter fabric shall be anchored outside of the module in such a manner as to prevent movement or pullout of the system due to operations or subsurface settlement forces. The riser pipe from the associated leak detection sump shall rise upward and parallel to the side slope of the module and exit the module in such a manner as not to penetrate any of the lining system within the planned limits of waste disposal.

#### **V.E.3.b.iv. Primary Liner System**

The primary lining system shall overlie the leak detection system and consist of a three (3) foot recompacted clay liner overlain by a sixty (60) mil, HDPE synthetic liner. The recompacted clay liner shall have a laboratory, hydraulic conductivity of  $1 \times 10^{-7}$  cm/sec or less and extend across the entire bottom of the module. The sixty (60) mil, HDPE liner shall cover the primary recompacted clay liner, and extend up all the side walls of the module. The synthetic liner shall be anchored in such a manner as to prevent movement of or pull out of the liner due to daily operations or subsurface settlement forces. The slope of the primary system on the floor of the landfill shall be at least 2%.

#### **V.E.3.b.v. Leachate Collection System**

The leachate collection system shall overlie the primary lining system and consist of one (1) foot of clean (free of clods and deleterious materials),

silicious gravel covering the bottom of the module. The underlying HDPE primary liner shall be protected by a geotextile. The gravel shall have an equivalent permeability of  $1 \times 10^{-2}$  cm/sec or greater. The gravel shall be covered with an appropriate filter fabric to prevent clogging of the gravel. A HDPE drainage net shall cover all the side slopes of the module and extend into the bottom gravel layer. The drainage net shall have the same covering filter fabric as used for the gravel layer. The riser pipe from the leachate collection sump shall rise upward parallel to the side slope of the module and exit the module in such a manner as not to penetrate any of the module lining system. The side slope drainage net and geotextile shall be anchored in such a manner as to prevent movement or pullout of the fabric and net due to daily operations and subsurface settlement forces. Details of the leak detection, primary lining and leachate collection systems are displayed on the approved design drawings.

#### **V.E.3.c. Materials Specifications Quality Assurance and Quality Control**

The Permittee must use laboratories appropriately accredited by the Administrative Authority for the testing associated with construction of new modules for Landfill Cell 8 in accordance with LAC 33:I.Subpart 3. This information must be provided to the Administrative Authority in the “as-built reports” for the individual modules of Cell 8.

The materials and the quality assurance/quality control procedures to be used in the construction of the hazardous waste landfill are as stated in the “Revised Guidance Documents for Quality Assurance for the Installation of the Lining Systems,” dated February 16, 2010. Any revisions hereafter must be submitted to the Administrative Authority for approval.

#### **V.E.4. Closure/Post-Closure**

Closure/post-closure of Landfill Cell 8 shall be in accordance with Conditions III.O and V.I of this permit and the closure/post-closure plan referenced in Attachment 1.

**V.E.4.a.** The final closure height for Landfill Cell 8 shall not exceed + 92.1 National Geodetic Vertical Datum (NGVD). The Permittee must cover the landfill with a final cover designed and constructed to:

**V.E.4.a.i.** provide long-term minimization of migration of liquids through the closed landfill;

**V.E.4.a.ii.** function with minimum maintenance;

**V.E.4.a.iii.** promote drainage and minimize erosion or abrasion of the cover;  
cont



**V.E.4.a.iv.** accommodate settling and subsidence so that the cover's integrity is maintained; and

**V.E.4.a.v.** have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present.

**V.E.4.b.** After final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period (specified in Condition V.I and LAC 33:V.3521.A.1). The Permittee must:

**V.E.4.b.i.** maintain the integrity and effectiveness of the final cover, including making repairs to the cap as necessary to correct the effects of settling, subsidence, erosion, or other events;

**V.E.4.b.ii.** maintain and monitor the leak detection system in accordance with LAC 33:V.2503.L.4.d, 2503.L.5, and 2507.D, where such a system is present between double liner systems and comply with all other applicable leak detection system requirements of LAC 33:V.Subpart 1;

**V.E.4.b.iii.** continue to operate the leachate collection and removal system until leachate is no longer detected;

**V.E.3.b.iv.** maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of LAC 33:V.Chapter 33;

**V.E.4.b.v.** prevent run-on and run-off from eroding or otherwise damaging the final cover; and

**V.E.4.b.vi.** protect and maintain surveyed benchmarks used in complying with LAC 33:V.Chapter 33.

**V.E.4.c.** Within sixty (60) days of completion of closure of each module for landfill Cell 8, and within sixty (60) days of completion of final closure, the Permittee shall submit a certification that the hazardous waste management unit or facility has been closed in accordance with specifications in the approved closure plan as required by LAC 33:V.3517. The certification must be signed by the Permittee and by an independent registered professional engineer. Documentation supporting the independent registered professional engineer's certification must be furnished to the Administrative Authority upon request until he releases the owner or operator from the financial assurance requirements for closure under LAC 33:V.3707.

**V.E.4.d.** A survey plot must be submitted to the local zoning authority or the

authority with jurisdiction over local land use, and the Administrative Authority no later than the submission of the certification of closure as required by LAC 33:V.3517.B.

**V.E.4.e.** During the post-closure care period, if liquid leaks into the leak detection system installed under LAC 33:V.3305, the Permittee must notify the Office of Environmental Services of the leak in writing within seven (7) days after detecting the leak.

## **V.F. OIL RECOVERY UNITS**

### **V.F.1. Description of Oil Recovery Units**

The permit conditions as set forth under this Condition shall apply to the Oil Recovery Units designated in Table 23.

### **V.F.2. Permitted and Prohibited Waste**

#### **V.F.2.a. Permitted Waste**

Subject to the terms of this Permit, the Permittee is allowed to utilize the Oil Recovery Units to separate recoverable oils listed in the Waste Analysis Plan (see Attachment 1) and identified in the most current Part A Permit Application that are categorized as one of the following wastes:

**V.F.2.a.i.** drilling fluids,

**V.F.2.a.ii.** refinery tank bottoms,

**V.F.2.a.iii.** commercially exempt oil-bearing waste, and

**V.F.2.a.iv.** other hazardous and non-hazardous waste oil-bearing waste

#### **V.F.2.b. Prohibited Waste**

The Permittee is prohibited from processing waste that is not identified in Condition V.F.2.a of this Permit and is specifically prohibited from processing the following wastes:

**V.F.2.b.i.** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901;

**V.F.2.b.ii.** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR 761.3;

**V.F.2.b.iii.** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt



pursuant to LAC 33:XV;

**V.F.2.b.iv.** Explosive material, as defined by the Department of Transportation under 49 CFR Part 173;

**V.F.2.b.v.** Municipal waste;

**V.F.2.b.vi.** Containerized gases;

**V.F.2.b.vii.** Medical/infectious wastes as defined in 40 CFR 60.51.c;

**V.F.2.b.viii.** Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 12, except as described in LAC 33:V.2207.C; and

**V.F.2.b.ix.** Waste displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

**V.F.2.c.** Before processing any wastes not authorized under this permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

### **V.F.3. General Design, Operating, and Maintenance Requirements**

**V.F.3.a.** The Oil Recovery Units, Oil Recovery Unit Area, and associated equipment, piping, pumps, instruments, containment, and vent controls must be operated and maintained in accordance with all applicable sections of LAC 33:V.Chapter 32 and the specifications, design criteria, and design limits approved by this permit and/or the Administrative Authority.

**V.F.3.b.** The Permittee must use controls and practices to maintain the containment areas for the Oil Recovery Unit Area to prevent run-on and run-off.

**V.F.3.c.** The Permittee must maintain the Oil Recovery Unit Area in a manner that minimizes the possibility of fire, explosion, or any unplanned, sudden or non-sudden releases of hazardous waste constituents to air, soil, or surface water that might threaten human health or the environment in accordance with LAC 33:V.1511.B.

**V.F.3.d.** The Permittee must take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visible emissions in accordance with the air permit. This state of no visible emissions shall be maintained effectively at all times during normal operating and maintenance conditions, including when vehicles and personnel are entering and exiting the unit.

**V.F.3.e.** The Permittee must take measures to monitor the performance of the

carbon beds consistent with the manufacturer's specifications and recommendations to ensure the carbon bed has not reached the end of its useful life. Document the monitoring procedures in the operation and maintenance plan and record results of the monitoring in the operating record. Replace the bed or bed segment before it has reached the end of its useful life.

**V.F.3.f.** The Permittee must operate and maintain all particulate collection devices in accordance with sound air pollution control practices, the facility's air permit, and applicable requirements of LAC 33:V.Chapter 17. Subpart B.

**V.F.3.g.** The Permittee shall not process more than 126,000 gallons per day of hazardous waste per unit.

#### **V.F.4. Specific Operating Conditions**

The Oil Recovery Unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit.

**V.F.4.a.** Whenever hazardous waste is in the Oil Recovery off-loading pits, the pressure differential gages at the pre-filter and final filter within the carbon bed must be monitored at all times as an indicator of efficiency operations.

**V.F.4.b.** The hazardous waste feed to the Oil Recovery Unit shall stop immediately under the following conditions:

**V.F.4.b.i.** There is a loss of power to the centrifuge.

**V.F.4.b.ii.** There is a loss of hydraulics to the automatic hydraulic back-drive of the system.

**V.F.4.b.iii.** There is a blockage to the discharge of the weir plates, oil, and light phase adjustable nozzles.

**V.F.4.c.** Whenever hazardous waste is in the Oil Recovery Unit, the bowl speed must maintain a minimum of ten (10) revolution per minute (RPM).

**V.F.4.d.** Whenever hazardous waste remains in the Oil Recovery Unit, exhaust gases must be vented to the air pollution control system, operated in accordance with the air permit requirements,

#### **V.F.5 Inspections**

##### **V.F.5.a. Requirements**

**V.F.5.a.i.** The Permittee shall inspect the Oil Recovery Units, the Oil Recovery Unit Area, and associated equipment in accordance with the



Inspection Plan (see Attachment 1). The Permittee shall complete the following as part of these inspections:

**V.F.5.a.i.(1)** The Oil Recovery Units, the Oil Recovery Unit Area, and associated equipment shall be subject to a daily thorough, visual inspection by the Permittee, whenever the unit contains hazardous waste. The purpose of these inspections shall be to identify leaks, spills, fugitive emissions, and signs of tampering.

**V.F.5.a.ii.** The automatic waste feed cut off system and associated alarms must be tested at least once every seven (7) calendar days when hazardous waste is treated to verify operability, unless the Permittee demonstrates to the Administrative Authority that weekly inspections will unduly restrict or upset operations and that less frequent inspections are adequate. Support for this demonstration shall be included in the operational record. At a minimum, operational testing of the automatic waste feed cut off system must be conducted at least monthly.

## **V.F.6 Recordkeeping**

### **V.F.6.a. Inspections**

**V.F.6.a.i.** Written inspection records shall be part of the operating record for this Permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection; (2) inspector's name; (3) any inspection observations; and (4) date and nature of corrective action. The inspection record shall be completed in accordance with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

**V.F.6.a.i.(1)** The daily and weekly log sheets shall include all inspected areas.

**V.F.6.a.i.(2).** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

**V.F.6.a.i.(3)** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

**V.F.6.a.ii.** A written record of the automatic waste feed cutoff system tests shall be part of the operating record for this permit and shall be available at all times to the Administrative Authority.

### **V.F.7. Response to Leaks and Spills**

**V.F.7.a.** The Permittee must properly manage all spilled or leaked waste and accumulated precipitation associated with the Oil Recovery Unit Area and all other associated equipment and structures.

**V.F.7.a.i.** Any collected spilled or leaked waste that is a hazardous waste must be managed as a hazardous waste in accordance with all applicable requirements. Spilled or leaked waste must be removed in as timely a manner as is necessary to prevent overflow of the spilled and leaked waste collection system.

**V.F.7.a.ii.** Contact storm water shall be managed and discharged through a properly permitted NPDES wastewater treatment system or other disposal method authorized by the Administrative Authority. Accumulated precipitation must be removed in a timely manner to prevent overflow of the accumulated precipitation collection system.

### **V.F.8. Monitoring and Calibration**

#### **V.F.8.a. Requirements**

**V.F.8.a.i.** The Permittee shall maintain, calibrate, and operate continuous monitoring equipment as specified in Table 28 that monitor and record the operating conditions specified in Condition V.F.4 of this Permit.

**V.F.8.a.ii.** The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

**V.F.8.a.iii.** Monitoring samples and measurements shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V.Chapter 49.Appendix D, 40 CFR 61 Subpart FF, or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised, or equivalent methods.

**V.F.8.a.iv.** The Permittee must calibrate all continuous monitoring equipment according to the manufacturer's specifications and any applicable state regulations. Calibration procedures shall be included in the operating record of the facility and available at all times for review by the Administrative Authority.



**TABLE 28****INSTRUMENTATION TO BE CALIBRATED TO MANUFACTURER'S SPECIFICATIONS  
FOR THE OIL RECOVERY UNITS**

| <b>CONTROL PARAMETER</b>       | <b>INSTRUMENT<br/>DESCRIPTION<sup>1</sup></b> | <b>LOCATION</b>                | <b>CALIBRATION<br/>FREQUENCY</b> |
|--------------------------------|-----------------------------------------------|--------------------------------|----------------------------------|
| Carbon Bed Pressure Gauge, psi | Differential Pressure Gauge                   | Carbon Bed Pre-filter          | Annually                         |
| Carbon Bed Pressure Gauge, psi | Differential Pressure Gauge                   | Carbon Bed Final Filter        | Annually                         |
| Hydraulic Pressure             | Pressure Gauge                                | Automatic Back-drive<br>System | Annually                         |
| Bowl Speed                     | RPM                                           | Drive System                   | Annually                         |

<sup>1</sup>Equipment identification numbers can change as new maintenance systems are incorporated; new tag ID #'s will be tracked with calibration records.

**V.F.9. Air Emission Control Equipment Standards**

See Conditions V.F.3.d, e, f and V.H.1 of this Permit and the air permit.

**V.F.10. Closure and Post-Closure**

**V.F.10.a.** The Permittee shall close the Oil Recovery Units, the Oil Recovery Unit Area, and all other associated equipment according to the requirements specified in LAC 33:V.Chapters 32 and 35 and in accordance with the Closure Plan (see Attachment 1).

**V.F.10.b.** At closure, the Permittee must attempt to clean close and remove all hazardous waste and residues from the Oil Recovery Units, the Oil Recovery Unit Area, and all other associated equipment. If the Oil Recovery Unit Area cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

**V.F.10.c.** If the facility cannot be clean closed, the Permittee shall submit a Post-Closure Plan that meets the requirements of LAC 33:V.3523.B, for approval by the Administrative Authority.

**V.F.10.d.** The Administrative Authority may re-evaluate the adequacy of the closure plan and/or the clean-closure confirmatory sampling procedures prior to the commencement of closure based upon the wastes historically managed at the unit.

## **V.G. THERMAL DESORBER UNITS**

### **V.G.1. Description of Thermal Desorber Units**

The permit conditions as set forth under this Condition shall apply to the Thermal Desorber Units designated in Table 24.

### **V.G.2. Permitted and Prohibited Waste**

#### **V.G.2.a. Permitted Waste**

Subject to the terms of this Permit, the Permittee is allowed to utilize the Thermal Desorber Units to separate organic constituents from a waste stream by volatilizing and condensing the organic components, which would allow for the recovery or disposal of the contaminants. The waste stream is listed in the Waste Analysis Plan (see Attachment 1) and identified in the most current Part A Permit Application that is categorized as one of the following wastes:

**V.G.2.a.i.** contaminated tank bottoms,

**V.G.2.a.ii.** sludge,

**V.G.2.a.iii.** catalyst slurry oil,

**V.G.2.a.iv.** organic contaminated soils, and

**V.G.2.a.iv.** other organic hazardous waste requiring thermal treatment to meet Land Disposal Restrictions (LDR).

#### **V.G.2.b. Prohibited Waste**

The Permittee is prohibited from processing waste that is not identified in Condition V.G.2.a of this Permit and is specifically prohibited from processing the following wastes:

**V.G.2.b.i.** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901;

**V.G.2.b.ii.** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR 761.3;

**V.G.2.b.iii.** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV;

**V.G.2.b.iv.** Explosive material, as defined by the Department of



Transportation under 49 CFR Part 173;

**V.G.2.b.v.** Municipal waste;

**V.G.2.b.vi.** Containerized gases;

**V.G.2.b.vii.** Medical/infectious wastes as defined in 40 CFR 60.51.c;

**V.G.2.b.viii.** Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 12, except as described in LAC 33:V.2207.C; and

**V.G.2.b.ix.** Waste displaying the characteristic of reactivity as defined in LAC 33:V.4903.D;

**V.G.2.c.** Before processing any wastes not authorized under this permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

### **V.G.3. General Design, Operating, and Maintenance Requirements**

**V.G.3.a.** The Thermal Desorber Units, Thermal Desorber Unit Area, and associated equipment shall be operated and maintained in accordance with all applicable sections of LAC 33:V.Chapter 32 and the specifications, design criteria, design limits approved by this permit and/or the Administrative Authority.

**V.G.3.b.** The Permittee must use controls and practices to maintain the containment areas for the Thermal Desorber Unit Area to prevent run-on and run-off.

**V.G.3.c.** The Permittee shall maintain the Thermal Desorber Unit Area in a manner that minimizes the possibility of fire, explosion, or any unplanned, sudden or non-sudden releases of hazardous waste constituents to air, soil, or surface water that might threaten human health or the environment in accordance with LAC 33:V.1511.B.

**V.G.3.d.** The Permittee must take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visual emissions in accordance with the air permit. This state of no visible emissions must be maintained effectively at all times during normal operating and maintenance conditions, including when vehicles and personnel are entering and exiting the unit.

**V.G.3.e.** The Permittee must take measures to monitor the performance of the carbon beds consistent with the manufacturer's specifications and recommendations to ensure the carbon bed has not reached the end of its useful

life. Document the monitoring procedures in the operation and maintenance plan and record results of the monitoring in the operating record. Replace the bed or bed segment before it has reached the end of its useful life.

**V.G.3.f.** The Permittee shall not treat more than 165 tons per day of hazardous waste per unit.

#### **V.G.4 Inspections**

##### **V.G.4.a. Requirements**

**V.G.4.a.i.** The Permittee shall inspect the Thermal Desorber Units, Thermal Desorber Unit Area, and associated equipment in accordance with the Inspection Plan (see Attachment 1). The Permittee shall complete the following as part of these inspections:

**V.G.4.a.i.(1)** The Thermal Desorber Units, Thermal Desorber Unit Area, and associated equipment shall be subject to a daily thorough, visual inspection by the Permittee, whenever the unit contains hazardous waste. The purpose of these inspections shall be to identify leaks, spills, fugitive emissions, and signs of tampering.

**V.G.4.a.ii.** The automatic waste feed cut off system and associated alarms must be tested at least once every seven (7) calendar days when hazardous waste is treated to verify operability, unless the applicant demonstrates to the Administrative Authority that weekly inspections will unduly restrict or upset operations and that less frequent inspections are adequate. Support for this demonstration shall be included in the operational record. At a minimum, operational testing of the automatic waste feed cut off system must be conducted at least monthly.

#### **V.G.5 Recordkeeping**

##### **V.G.5.a. Inspections**

**V.G.5.a.i.** Written inspection records shall be part of the operating record for this Permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection; (2) inspector's name; (3) any inspection observations; and (4) date and nature of corrective action. The inspection record shall be completed in accordance with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.



**V.G.5.a.i.(1)** The daily and weekly log sheets shall include all inspected areas.

**V.G.5.a.i.(2).** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

**V.G.5.a.i.(3)** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

**V.G.5.a.ii.** A written record of the automatic waste feed cutoff system tests shall be part of the operating record for this permit and shall be available at all times to the Administrative Authority.

#### **V.G.6. Response to Leaks and Spills**

**V.G.6.a.** The Permittee must properly manage all spilled or leaked waste and accumulated precipitation associated with the Thermal Desorber Unit Area and all other associated equipment and structures.

**V.G.6.a.i.** Any collected spilled or leaked waste that is a hazardous waste must be managed as a hazardous waste in accordance with all applicable requirements. Spilled or leaked waste must be removed in as timely a manner as is necessary to prevent overflow of the spilled and leaked waste collection system.

**V.G.6.a.ii.** Contact storm water shall be managed and discharged through a properly permitted NPDES wastewater treatment system or other disposal method authorized by the Administrative Authority. Accumulated precipitation must be removed in a timely manner to prevent overflow of the accumulated precipitation collection system.

#### **V.G.7. Monitoring and Calibration**

##### **V.G.7.a. Requirements**

**V.G.7.a.i.** The Permittee shall maintain, calibrate, and operate continuous monitoring equipment as specified in Table 29 that monitor and record the operating conditions specified in Condition V.G.11 of this Permit. The continuous monitoring requirements shall be as specified in Tables 30 and 31 of this Permit.

**V.G.7.a.ii.** The Permittee must calibrate the equipment according to the manufacturer's specifications and any applicable state or federal regulations. Calibration procedures shall be included in the operating record of the facility and available at all times for the review by the Administrative Authority.

**V.G.7.a.iii.** Hazardous waste may continue to be introduced into the Thermal Desorber Unit during the daily continuous emission monitoring system (CEMS) calibration check periods. The CEMS shall be maintained according to the following schedule: (1) at least daily; a calibration check of the instrument; (2) at least daily, a system audit; (3) at least quarterly, a calibration error test; and (4) at least annually, a performance specification test. The procedures for CEMS maintenance are outlined in 40 CFR 266 Appendix IX Section 2.0, "Performance Specifications for Continuous Emission Monitoring Systems."

**V.G.7.a.iv.** At a minimum, the Permittee shall analyze values from the continuous monitoring system and the continuous emission monitoring system (CEMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds for use in calculating an hourly rolling average basis for the treatment process to demonstrate compliance with the monitoring requirements.

**V.G.7.a.v.** The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

**V.G.7.a.vi.** Monitoring samples and measurements shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V.Chapter 49.Appendix D or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised or equivalent methods.

#### **V.G.7.b. Records**

In the operating record, the Permittee shall record and maintain, in accordance with LAC 33:V.1529, all monitoring data compiled to satisfy the permit requirements.

Electronic records may be maintained, in lieu of paper copies.



**TABLE 29**  
**INSTRUMENTATION TO BE CALIBRATED TO MANUFACTURER'S SPECIFICATIONS**  
**FOR THE THERMAL DESORBER UNIT**

| CONTROL PARAMETER                                   | INSTRUMENT DESCRIPTION <sup>1</sup>           | LOCATION                                         | CALIBRATION FREQUENCY <sup>2</sup>                                           |
|-----------------------------------------------------|-----------------------------------------------|--------------------------------------------------|------------------------------------------------------------------------------|
| Carbon Bed Pressure Gauge, psi                      | Differential Pressure Gauge                   | Carbon Bed Pre-filter                            | Annually                                                                     |
| Carbon Bed Pressure Gauge, psi                      | Differential Pressure Gauge                   | Carbon Bed Final Filter                          | Annually                                                                     |
| Maximum Hazardous Waste Feed Rate, tons/hr          | Flow Meter                                    | In feed line, upstream from the Thermal Desorber | Annually                                                                     |
| Maximum Treatment Drum Pressure, H <sub>2</sub> O " | Pressure Transmitter                          | Thermal Desorber Treatment Drum                  | Annually                                                                     |
| Minimum Inner Chamber Temperature, °F               | Thermocouple                                  | Thermal Desorber Treatment Drum                  | Annually                                                                     |
| Minimum Afterburner Chamber Temperature, °F         | Thermocouple                                  | Thermal Oxidizer                                 | Annually                                                                     |
| Maximum Afterburner Pressure, H <sub>2</sub> O"     | Pressure Transmitter                          | Thermal Oxidizer                                 | Annually                                                                     |
| Maximum CO, ppm v                                   | Extractive sampler CO/O <sub>2</sub> analyzer | Exhaust Stack                                    | Daily Calibration check, calibrate per 40 CFR 266 Appendix IX specifications |
| Flue Gas Flow Rate                                  | Flow Meter                                    | Exhaust Stack                                    | Annually                                                                     |
| Scrubber Pressure Drop,                             | Differential                                  | Scrubber                                         | Annually                                                                     |
| Scrubber Flowrate                                   | Flow Meter                                    | Scrubber                                         | Annually                                                                     |
| Scrubber pH                                         | pH Meter                                      | Scrubber                                         | Annually                                                                     |

<sup>1</sup>Equipment identification numbers can change as new maintenance systems are incorporated; new tag ID #'s will be tracked with calibration records.

<sup>2</sup>Replacement of the instrument is acceptable when the instrument cannot be calibrated or when accuracy cannot be verified.

## **V.G.8. Automatic Waste Feed Cut Off**

### **V.G.8.a. Requirements**

**V.G.8.a.i.** The Permittee shall operate the Thermal Desorber Unit to automatically cut off the hazardous waste feed when the monitored operating conditions deviate from the set points specified in the permit.

**V.G.8.a.ii.** Exhaust gases must be vented to the air pollution control system, operated in accordance with the permit requirements, while hazardous waste remains in the Thermal Desorber Unit.

**V.G.8.a.iii.** Operating parameters for which permit limits are established must continue to be monitored following the cut off. The hazardous waste feed shall not be restarted until the levels of those parameters that caused the automatic waste feed cut off are restored to permit limits. All other

parameters must also be within the permit limits.

**V.G.8.a.iv.** In the event of a malfunction of the automatic waste feed cut off system, the Permittee shall immediately cut off and/or lock out the waste feed.

#### **V.G.8.b. Records**

**V.G.8.b.i.** The Permittee shall record in the facility operating record the date and time of all automatic waste feed cut off events. The records shall also include the known or suspected cause of the automatic waste feed cut off, the triggering parameters, the corrective actions taken, the duration of the event, and the date and time of restarting waste feed following the automatic waste feed cut off.

**V.G.8.b.ii.** The Permittee shall record in the facility operating record all failures of the automatic waste feed cut off system, including the date and time of the failure, a description of the failure, root cause of the failure, and corrective actions taken.

**V.G.8.b.iii.** The operating record shall be maintained in an organized manner for a period of not less than three (3) years and be available at all times for inspection by the Administrative Authority.

#### **V.G.8.c. Reports**

**V.G.8.c.i.** The date, cause, and remedial action for the waste feed cutoff activation shall be documented in the operating record. A summary of such occurrences must be included in the annual reports.

**V.G.8.c.ii.** The Permitted shall report in writing to the Administrative Authority if there are more than fifty (50) waste feed cut offs per month. This report shall be due within thirty (30) days after the end of such month and shall include cause and remedial actions taken.

#### **V.G.9. Closure and Post-Closure**

**V.G.9.a.** The Permittee shall close the Thermal Desorber Units, the Thermal Desorber Unit Area, and all other associated equipment according to the requirements specified in LAC 33:V.Chapters 32 and 35 and in accordance with the Closure Plan (see Attachment 1).

**V.G.9.b.** At closure, the Permittee must attempt to clean close and remove all hazardous waste and residues from the Thermal Desorber Units, the Thermal Desorber Unit Area, and all other associated equipment. If the Thermal Desorber Unit Area cannot be clean closed and the Permittee has not demonstrated through



a risk assessment approved by the Administrative Authority that closure with the remaining contaminant levels is protective of human health and the environment; or if any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period

**V.G.9.c.** If the facility cannot be clean closed, the Permittee shall submit a Post-Closure Plan that meets the requirements of LAC 33:V.3523.B, for approval by the Administrative Authority.

**V.G.9.d.** The Administrative Authority may re-evaluate the adequacy of the closure plan and/or the clean-closure confirmatory sampling procedures prior to the commencement of closure based upon the wastes historically managed at the unit.

#### **V.G.10. Specific Operating Conditions**

##### **V.G.10.a. Performance Standards**

The Permittee shall comply with the performance standards specified in this Permit when hazardous waste is thermally treated in the Thermal Desorber Unit.

**V.G.10.a.i.** The emissions of dioxin and furans must not exceed 0.20 nanograms toxic equivalents (TEQ) per dry standard cubic meter corrected to seven (7) percent oxygen.

**V.G.10.a.ii.** The emissions of mercury must not exceed 8.1 micrograms per dry standard cubic meter, corrected to seven (7) percent oxygen.

**V.G.10.a.iii.** The emissions of cadmium and lead must not exceed 10 micrograms per dry standard cubic meter, corrected to seven (7) percent oxygen.

**V.G.10.a.iv.** The emissions of arsenic, beryllium, and chromium must not exceed 23 micrograms per dry standard cubic meter, corrected to seven (7) percent oxygen.

**V.G.10.a.v.** The emissions of hydrogen chloride and chlorine gas must not exceed 21 parts per million by volume, combined emissions, expressed as chlorine (Cl) equivalent, dry basis and corrected to seven (7) percent oxygen.

**V.G.10.a.vi.** The emissions of particulate matter must not exceed 0.08 grains per dry standard cubic foot, corrected to seven (7) percent oxygen.

**V.G.10.a.vii.** The emissions of carbon monoxide must not exceed 100 parts per million by volume, dry basis and corrected to seven (7) percent oxygen.

**V.G.10.b. Implementation Schedule for the Thermal Desorber Unit Comprehensive Performance Test (CPT)**

The Permittee must conduct an initial Comprehensive Performance Test (CPT) as defined below and submit to the Administrative Authority a recertification of compliance CPT under the operating parameters set forth under Condition V.G.11 of this permit with the permit renewal application. A recertification of compliance CPT is required for major modifications to the unit or if the Permittee is seeking new operating conditions.

**V.G.10.b.i.** The CPT plan will be developed in order to:

**V.G.10.b.i.1.** Demonstrate compliance with the emission limitations set forth in Condition V.G.10.a.;

**V.G.10.b.i.2.** Demonstrate compliance with the Destruction and Removal Efficiency standard of 40 CFR 63.1219.c.1.

**V.G.10.b.i.3.** Establish limits for the operating parameters set forth in Condition V.G.11.

**V.G.10.b.i.4.** The CPT plan must include the information specified in 40 CFR 63.1207.f and must be submitted to the Administrative Authority for review and approval at least one hundred eighty (180) days prior to commencement of the CPT.

The CPT plan will allow the Permittee to demonstrate compliance with emission standards for mercury, semivolatile metals, low volatile metals, and hydrogen chloride/chlorine gas emission standards based upon exhaust gas flow rate or hazardous waste thermal concentration in accordance with 40 CFR 63.1207.m.

**V.G.10.b.i.5.** The CPT plan and CMS performance evaluation test plan must be public noticed at least sixty (60) days prior to initiation of the test. All requirements of 40 CFR 63.1207.e must be met.

**V.G.10.b.ii.** With the initial introduction of hazardous waste to the unit and ending with initiation of the CPT, and only for the minimum time required to establish operating conditions, not to exceed a duration of seven hundred twenty (720) hours operating time for the processing of hazardous waste, the operating requirements of Condition V.G.10.c must



be applicable to demonstrate compliance with the performance standards described in Condition V.G.10.b.i. The Permittee may request a time extension for conducting the CPT for reasons deemed acceptable by the Administrative Authority. Any time extensions for conducting the CPT are requested, it must be reviewed and approved by the Administrative Authority.

**V.G.10.b.iii.** Within ninety (90) days of completing the CPT for the Thermal Desorber Unit, the Permittee must submit a Notification of Compliance (NOC), documenting compliance with the emission limitations set for the in Condition V.G.10.a, the removal efficiency standard of 40 CFR 63.1219.c.1 and the continuous monitoring system requirements set forth in Table 30 and 31; and identifying limits for the operating parameters set forth in Condition V.G.11 to the Administrative Authority for approval.

**V.G.10.c. Process Operating Conditions Prior to Submitting Notification of Compliance**

Prior to the Permittee submitting a NOC to the Administrative Authority (see Condition V.G.10.b.iii), the Thermal Desorber Unit must be operated within the operating conditions proposed in the approved CPT plan. If there is a discrepancy between an operating condition prescribed in Condition V.G.11 and an operating condition proposed in the approved CPT plan, the Thermal Desorber Unit must be operated in accordance with the more stringent operating condition. For instance, where there is no prescribed operating limits in Condition V.G.11.a.(vii - xiii), the Thermal Desorber Unit must be operated in accordance with the operating condition proposed in the approved CPT plan.

**V.G.10.d. Process Operating Conditions after Submitting Notification of Compliance**

**V.G.10.d.i.** Upon submitting a NOC to the Administrative Authority, the Thermal Desorber Unit must be operated within the operating conditions prescribed in Condition V.G.11 and within the operating conditions proposed in the NOC. If there is a discrepancy between an operating condition prescribed in Condition V.G.11 and an operating condition proposed in the NOC, the Thermal Desorber Unit must be operated in accordance with the more stringent operating condition. For instance, where there is no prescribed operating limits in Condition V.G.11.a.(vii - xiii), the Thermal Desorber Unit must be operated in accordance with the operating condition proposed in the NOC.

**V.G.10.d.ii.** Within seven (7) days of receiving a Finding of Compliance (FOC), in accordance with 40 CFR 63.1206.b.3, from the Administrative Authority, the Permittee shall initiate a Class 1<sup>1</sup> permit modification to

change any operating parameters listed in Condition V.G.11, remove any operating parameters listed in Condition V.G.11, and/or add any additional operating parameter limits to Condition V.G.11 based on the results of the Thermal Desorber Unit CPT.

**V.G.10.d.iii.** Upon approval of the Class 1<sup>1</sup> permit modification required by Condition V.G.10.d.ii, the Thermal Desorber Unit must be operated within the modified conditions prescribed in V.G.11.

### **V.G.11. Process Operating Conditions**

The Thermal Desorber Unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit.

#### **V.G.11.a. Group A Parameters**

The Permittee must operate the Thermal Desorber Unit with a functioning system to automatically cut off waste feed to the unit when operating conditions deviate from those established below.

**V.G.11.a.i.** Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the unit must be maintained below the maximum value of ten (10) tons per hour.

**V.G.11.a.ii.** Whenever hazardous waste is in the unit, the pressure in the treatment drum of the Thermal Desorber Unit must be maintained below the maximum value of 0 inches of water column with respect to atmospheric. If the pressure is equal to or greater than 0 inches for fifteen (15) seconds, then automatic waste feed cut off (AWFCO) will initiate.

**V.G.11.a.iii.** Whenever hazardous waste is in the unit, the afterburner chamber temperature must be maintained above the minimum value of 1,400 °F.

**V.G.11.a.iv.** Whenever hazardous waste is in the unit, the afterburner must be kept totally sealed to protect against the escape of fugitive emissions. The Permittee must monitor the outside of the unit for signs of fugitive emissions at least daily.

**V.G.11.a.v.** Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level must be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven (7) percent oxygen, dry gas basis.

**V.G.11.a.vi.** As an indicator of gas residence time in the control device, the unit must be maintained below the maximum flue gas flowrate value



of **TBD** on an hourly rolling average basis.

**V.G.11.a.vii.** Whenever hazardous waste is in the unit, the hourly rolling average pressure drop across the scrubber must be maintained above the minimum value of **TBD**.

**V.G.11.a.viii.** Whenever hazardous waste is in the unit, the hourly rolling average liquid to gas ratio must be maintained above the minimum value of **TBD**. This is a calculated value based on the minimum scrubber water flowrate and the maximum flue gas flowrate.

**V.G.11.a.ix.** Whenever hazardous waste is in the unit, the hourly rolling average scrubber water flowrate must be maintained above the minimum value of **TBD** gallons per minute.

**V.G.11.a.x.** Whenever hazardous waste is in the unit, the hourly rolling average pH of the feed to the scrubber must be maintained above the minimum value of **TBD**.

#### **V.G.11.b. Group B Parameters**

The Permittee must operate the Thermal Desorber Unit without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.G.11.b.1.** Whenever hazardous waste is in the unit, the Thermal Desorber Unit inner chamber temperature must be maintained above the minimum value of 500 °F.

**V.G.11.b.2.** Reserved for maximum mercury feed rate

**V.G.11.b.3.** Reserved for maximum total chlorine and chloride feed rate.

**V.G.11.b.4.** Reserved for maximum cadmium and lead feed rate.

**V.G.11.b.5.** Reserved for maximum arsenic, beryllium, and chromium feed rate.

**V.G.11.b.6.** O<sub>2</sub> must be monitored continuously whenever hazardous waste is in the Thermal Desorber Unit, in accordance with the CEMS regulations.

#### **V.G.11.c. Group C Parameters**

The Permittee must operate the Thermal Desorber Unit without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.G.11.c.i.** The Permittee must immediately stop the flow of hazardous waste into the Thermal Desorber Unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

**V.G.11.c.ii.** For a Continuous Monitoring System (CMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

**TABLE 30**  
**Group A Parameter Limits for the Thermal Desorber Unit**  
**(Automatic Waste Feed Cut Offs)**

| <b>CONTROL PARAMETER</b>                | <b>FINAL OPERATING LIMITS<br/>AUTOMATIC WASTE FEED CUT OFF<br/>POINT</b> |
|-----------------------------------------|--------------------------------------------------------------------------|
| Maximum Hazardous Waste Feed Rate       | 10 tons/hour                                                             |
| Maximum Inner Drum Chamber Pressure     | 0 Inches H <sub>2</sub> O Column, 15 second delay                        |
| Minimum Afterburner Chamber Temperature | 1,400 °F                                                                 |
| Maximum Carbon Monoxide Concentration   | 100 ppmv, hourly rolling average                                         |
| Minimum Liquid to Gas Ratio             | <b>TBD</b>                                                               |
| Maximum Flue Gas Flowrate               | <b>TBD</b>                                                               |
| Minimum Scrubber Pressure Drop          | <b>TBD</b>                                                               |
| Minimum Scrubber Water Flow Rate        | <b>TBD</b>                                                               |
| Minimum Scrubber Feed pH                | <b>TBD</b>                                                               |

**TABLE 31**  
**Group B & C Parameter Limits for the Thermal Desorber Unit**

| <b>CONTROL PARAMETER</b>                      | <b>FINAL OPERATING LIMITS</b> |
|-----------------------------------------------|-------------------------------|
| Maximum Total Chloride and Chlorine Feed Rate | <b>TBD</b>                    |
| Minimum Inner Drum Chamber Temperature        | 500°F                         |
| Maximum Feed Rate of Arsenic <sup>1</sup>     | <b>TBD</b>                    |
| Maximum Feed Rate of Beryllium <sup>1</sup>   | <b>TBD</b>                    |
| Maximum Feed Rate of Cadmium <sup>1</sup>     | <b>TBD</b>                    |
| Maximum Feed Rate of Chromium <sup>1</sup>    | <b>TBD</b>                    |
| Maximum Feed Rate of Lead                     | <b>TBD</b>                    |
| Maximum Feed Rate of Mercury                  | <b>TBD</b>                    |

<sup>1</sup> Carcinogenic Metal – Feed rate is further limited to a level such that the sum of the actual feed rate, divided by the allowable feed rate for all carcinogenic metals, must be less than or equal to 1.00.



The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in Table 30 must not exceed 1.0, as provided by the following equation:

$$\sum_{i=1}^n \text{AFR}_{(i)} / \text{FRL}_{(i)} \leq 1.00$$

$\text{AFR}_{(i)}$  = **Actual Feed Rate (AFR)**  
The actual feed rate of carcinogenic metal (i) introduced into the thermal desorber chamber from all feedstreams.

$N$  = Number of Carcinogenic Metals.

$\text{FRL}_{(i)}$  = **Feed Rate Limit (FRL)**  
The regulatory feed limit of carcinogenic metal (i) listed in Table 31.

## V.H. AIR EMISSION STANDARDS

### V.H.1. Performance Standards for Equipment Leaks

**V.H.1.a.** The Oil Recovery Unit Area and the Thermal Desorber Unit Area must be equipped with operating air emissions controls in accordance with all applicable regulations of LAC 33:V.1717 to 1745 and 1747 to 1799 for all equipment, tanks, and containers associated with operations that treat, store, or dispose of hazardous waste with organic concentrations equal to or greater than 10 percent by weight for equal to or greater than three hundred (300) hours per calendar year. The facility must maintain documentation of compliance in the facility operating record.

**V.H.1.b.** The remaining facility not associated with the proposed Oil Recovery Area and Thermal Desorber Area are exempt from LAC 33:V.Chapter 17 Subchapter B in accordance with LAC 33:V.1717.B. No equipment that contains or contacts hazardous waste with organic concentrations of at least ten (10) percent by weight shall be managed at the facility.

**V.H.1.c.** The facility must maintain an exemption log in the facility operating record in accordance with LAC 33:V.1743.K.

## **V.H.2. Standards for Tanks**

### **V.H.2.a. Existing Hazardous Waste Storage Tanks**

Tanks T-502, T-503, T-504 A, T-504 B, T-505, T-506, T-903, T-904, T-905, T-906, and T-907 are exempt from LAC 33:V.Chapter 17 Subchapter C in accordance with LAC 33:V.1751.C.1. No hazardous waste entering Tanks T-502, T-503, T-504 A, T-504 B, T-505, T-506, T-903, T-904, T-905, T-906, and T-907 shall have an average volatile organic concentration, at the point of waste origination, greater than 500 parts per million by weight.

**V.H.2.a.i.** The average volatile organic concentration shall be determined in accordance with the procedures in LAC 33:V.1753.A.

**V.H.2.a.ii.** The facility shall review and update, as necessary, the volatile organic concentration determination once every twelve (12) months.

**V.H.2.a.iii.** In accordance with LAC 33:V.1765.F, the facility shall record the information used for each waste determination (e.g., test results, measurements, calculations, and other documentation) in the facility operating log. If analysis results for waste samples are used for the waste determination, then the facility shall record the date, time, and location that each waste sample is collected in accordance with the applicable requirements of LAC 33:V.1753.

### **V.H.2.b. Proposed Hazardous Waste Storage Tanks**

See Condition II.E.25.h of this Permit.

### **V.H.2.c. Existing Hazardous Waste Treatment Tanks**

**V.H.2.c.i.** Tanks T-303, T-304, and T-306 are exempt from LAC 33:V.Chapter 17 Subchapter C in accordance with LAC 33:V.1751.C.1. No hazardous waste entering Tanks T-303, T-304, and T-306 shall have an average volatile organic concentration, at the point of waste origination, greater than 500 parts per million by weight.

**V.H.2.c.i.(1)** The average volatile organic concentration shall be determined in accordance with the procedures in LAC 33:V.1753.A.

**V.H.2.c.i.(2)** The facility shall review and update, as necessary, the volatile organic concentration determination once every twelve (12) months.

**V.H.2.c.i.(3)** In accordance with LAC 33:V.1765.F, the facility



shall record the information used for each waste determination (e.g., test results, measurements, calculations, and other documentation) in the facility operating log. If analysis results for waste samples are used for the waste determination, then the facility shall record the date, time, and location that each waste sample is collected in accordance with the applicable requirements of LAC 33:V.1753.

**V.H.2.c.ii.** Building 302, which houses Tanks T-303, T-304, and T-306, shall be maintained closed when treatment operations are being conducted.

**V.H.2.c.iii.** A ventilation system shall continuously exchange the air in Building 302 and route the air from Building 302 to a baghouse filter system when treatment operations are being conducted.

**V.H.2.c.iii.(1)** Dust generated by the baghouse system shall be returned to Tanks T-303 and T-304 for reuse in the treatment process.

**V.H.2.c.iv.** A negative pressure shall be maintained in Building 302 whenever treatment operations are being conducted.

**V.H.2.d. Proposed Hazardous Waste Treatment Tanks**

See Condition II.E.25.h of this Permit.

**V.H.3. Standards for Container Storage Areas**

**V.H.3.a.** The Permittee shall comply with the applicable requirements of LAC 33:V.1747 to 1799 for the permitted container storage areas, as listed in Table 2.

**V.H.4. Standards for Proposed Oil Recovery Units**

**V.H.4.a.** The Permittee shall comply with the applicable requirements of LAC 33:V.Chapter 17, Subchapters B and C, and the air permit for the Oil Recovery Unit.

**V.H.5. Standards for Proposed Thermal Desorber Units**

**V.H.5.a.** The Permittee shall comply with the applicable requirements of LAC 33:V.Chapter 17, Subchapters B and C, and the air permit for the Thermal Desorber Units.

**TABLE 32**  
**Air Emission Controls for Containers**

| <b>CONTAINER STORAGE AREA</b> | <b>LAC REFERENCE(S)</b>                                         | <b>AIR EMISSION CONTROLS</b> |
|-------------------------------|-----------------------------------------------------------------|------------------------------|
| Building 201                  | LAC 33:V.1759.A, B, C, D,<br>F, G, and H;<br>LAC 33:V.1763-1767 | Level 1 and Level 2          |
| Building 202                  | LAC 33:V.1759.A, B, C, D,<br>F, G, and H;<br>LAC 33:V.1763-1767 | Level 1 and Level 2          |
| Building 205                  | See Condition II.E.25.f of this Permit                          |                              |
| Building 204                  | LAC 33:V.1759.A, B, C, D,<br>F, G, and H;<br>LAC 33:V.1763-1767 | Level 1 and Level 2          |
| Building 801                  | LAC 33:V.1759.A, B, C, D,<br>F, G, and H;<br>LAC 33:V.1763-1767 | Level 1 and Level 2          |
| Building 802                  | See Condition II.E.25.f of this Permit                          |                              |

## **V.I. PERMIT CONDITIONS APPLICABLE TO THE PERMITTED CLOSED POST-CLOSURE UNITS**

### **V.I.1. Post-Closure Care Period**

Upon the effective date of this permit the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527, including maintenance and monitoring, for each of the hazardous waste management units (Landfill Cells 5, 6, 7, 14, and 8, at final closure), as specified in this permit. The post-closure care period will be in effect for the period of thirty (30) years, unless extended or shortened by the Administrative Authority, as specified in LAC 33:V.3521.A.1 and 2.

### **V.I.2. Post-Closure Maintenance**

After final closure, the owner or operator must comply with all post-closure requirements contained in LAC 33:V.3519 through 3527 and Permit Condition III.P of this permit, including maintenance and monitoring throughout the post-closure care period specified in Condition V.I.1 and LAC 33:V.3521.A.1. The owner or operator must:

- V.I.2.a.** maintain the integrity and effectiveness of the final cover, including making repairs to the cap as necessary to correct the effects of settling,



subsidence, erosion, or other events;

**V.I.2.b.** maintain and monitor the leak detection system in accordance with LAC 33:V.2503.L.4.d, 2503.L.5, and 2507.D, where such system is present between double liner systems and comply with all other applicable leak detection system requirements of LAC 33:V.Subpart 1;

**V.I.2.c.** continue to operate the leachate collection and removal system until leachate is no longer detected;

**V.I.2.d.** maintain and monitor the groundwater monitoring system and comply with all other applicable requirements of LAC 33:V.Chapter 33;

**V.I.2.e.** manage a run-on and run-off control system to prevent erosion and other damage to the final cover;

**V.I.2.f.** protect and maintain surveyed benchmarks used in complying with LAC 33:V.Chapter 33;

**V.I.2.g.** for all closed permitted landfill units, maintain the cover with a final cover designed, constructed and maintained to:

**V.I.2.g.i.** provide long-term minimization of migration of liquids through the permitted landfill cells,

**V.I.2.g.ii.** function with minimal maintenance at all permitted landfill units,

**V.I.2.g.iii.** promote drainage and minimize erosion or abrasion of the final cover at all permitted landfill units,

**V.I.2.g.iv.** accommodate settling and subsidence, as necessary, so that the cover's integrity is maintained for all permitted landfill units, and

**V.I.2.g.v.** have a permeability less than or equal to the permeability of any bottom liner system or natural subsoils present.

The annual report shall include a Post-Closure activity report.

During the post-closure care period, if liquid is present in a leak detection system installed under LAC 33:V.3305, and collects at a rate above the action leakage rate (where such a rate has been established) or above two standard deviations from the mean of historic data (where action leakage rates have not been established), the Permittee must notify the Office of Environmental Services of the leakage rate in writing within seven (7) days after determining the leakage rate.

### **V.I.3. Post-Closure Restrictions**

The Administrative Authority may require, at partial and final closure, continuation of any of the security requirements of LAC 33:V.1507, during part or all of the post-closure period when access by the public or domestic livestock may pose a hazard to human health.

The Permittee must post warning signs at each entrance to the closed units, in accordance with LAC 33:V.3521.B and LAC 33:V.1507.K.

### **V.I.4. Post-Closure Property or Site Use**

Post-closure use of property on or in which hazardous wastes remain after partial or final closure must never be allowed to disturb the integrity of the final cover, liner(s), or any other components of the containment system, or the function of the permitted closed unit's monitoring systems, unless the Administrative Authority finds that the disturbance:

**V.I.4.a.** is necessary to the proposed use of the property and will not increase the potential hazard to human health or the environment; or

**V.I.4.b.** is necessary to reduce a threat to human health or the environment.

Any post-closure activity other than that specified in this permit must have prior approval of the Administrative Authority.

### **V.I.5. Post-Closure Contact**

The Permittee shall provide the name, address, and phone number of the person or office to contact about the hazardous waste disposal unit or facility during the post-closure care period.

### **V.I.6. Post-Closure Notices**

**V.I.6.a.** The Permittee shall maintain, on site, a certification, signed by the Permittee, that he has recorded the notation as specified by LAC 33:V.3517 and maintain a copy of the document in which the notation has been placed.

**V.I.6.b.** If the Permittee or any subsequent Permittee of the land upon which these hazardous waste disposal units is located wishes to remove hazardous wastes and hazardous waste residues, the liner (if any), or contaminated soils, then he or she must request a modification to the post-closure permit in accordance with the applicable requirements in LAC 33:V.Chapters 3 and 7. The Permittee must demonstrate that the removal of hazardous wastes will satisfy the criteria of LAC 33:V.3521. By removing hazardous waste, the Permittee may become a generator of hazardous waste and must manage it in accordance with all applicable requirements of LAC 33:V.Subpart 1. If the Permittee is granted a



permit modification or otherwise granted approval to conduct such removal activities, the Permittee may request that the Administrative Authority approve either:

**V.I.6.b.i.** the removal of the notation on the deed to the facility property or other instrument normally examined during title search; or

**V.I.6.b.ii.** the addition of a notation to the deed or instrument indicating the removal of the hazardous waste.

#### **V.I.7. Certification of Completion of Post-Closure Care**

No later than sixty (60) days after completion of the established post-closure care period for each hazardous waste disposal unit(s), the Permittee must submit to the Administrative Authority, by registered mail, a certification that the post-closure care period for the hazardous waste disposal unit was performed in accordance with the specifications in the approved post-closure plan. The certification must be signed by the Permittee and an independent Louisiana registered professional engineer. Documentation supporting the independent Louisiana registered professional engineer's certification must be furnished to the Administrative Authority upon request until the Administrative Authority releases the Permittee from the financial assurance requirements for post-closure care under LAC 33:V.3711.I.

## **VI. GROUND WATER PROTECTION**

### **VI.A. APPLICABILITY**

The regulation of LAC 33:V. Chapters 3, 5, 15, 25, 33, and 35, LAC 33:I. Chapter 39, and Louisiana Water Control Law, R.S., 30:2203 and 2076 of the Environmental Quality Act, R.S., 30:2001 et seq., and the provisions of this section shall apply to ground water protection programs at Chemical Waste Management, Incorporated, located in Carlyss, Louisiana. All requirements and conditions of this section must be satisfied and shall apply during the active life of the facilities. This includes compliance, closure, and post-closure care periods. The regulated units are identified as:

**VI.A.1.** Landfill Cell 5 – clay lined landfill.

**VI.A.2.** Landfill, Cell 14 – double composite liner system (2 clay liners and 2 synthetic liners) landfill.

**VI.A.3.** Landfill, Cell 6 – double composite liner system (2 clay liners and 2 synthetic liners) landfill.

**VI.A.4.** Landfill, Cell 7 – double composite liner system (2 clay liners and 2 synthetic liners).

**VI.A.5.** Landfill, Cell 8 – double composite liner system (2 clay and 2 synthetic liners) landfill that consist of the currently constructed modules and modules that are scheduled for construction in the future.

### **VI.B. REQUIRED PROGRAM**

The Permittee must continue to conduct detection monitoring from the existing well system for Cells 5, 14, 6, 7, and 8 and must commence construction and operation of the detection monitoring systems for modules south of the southern boundaries of Modules 3 and 4 and prior to waste placement in Module 5 as shown in the approved design drawings for Cell 8, and as outlined in Condition VI.H of this permit. If required, Compliance Monitoring (Permit Condition VI.I) and/or Corrective Action Monitoring (Permit Condition VJ.J) programs will be initiated in accordance with the permit. All wells, listed in Table 339 must be monitored, and all piezometers listed on Table 339 must be measured for water levels unless exempted from the program at a later date by the administrative authority. All wells and piezometers, must be maintained, protected from moving equipment, and cannot be abandoned unless exempted from the program at a later date by the Administrative Authority.

In accordance with LAC 33:V.3305.D, leachate monitoring systems shall be established (for new landfill modules) and maintained (for existing landfill modules) as described in Condition V.E.2, and V.E.3 of this permit, regarding riser pipe location and construction, and pumping systems. In accordance with LAC 33:V.3305.E, air monitoring is described in Condition V.E.2.a.xiii.



## **VI.C. GROUNDWATER PROGRAM**

**VI.C.1.** For existing wells, the Permittee must utilize and maintain the present groundwater monitoring system listed in Table 339 of this permit. Facility monitoring wells designated F30, F31, F32, F33, MW01AS, MW01AD, B04A, MW02BS, and MW02BD are designated upgradient wells for all regulated units as listed in Condition VI.A. Monitoring wells F01, F02, F03, F04, F05, F06, F07, F08, F09, F10, F11 and D01B are designated downgradient of Cell No. 5 and shall serve as the point of compliance for Cell No. 5. Monitoring wells F26, F27, F28, F29, F38, F39, F40, and D02A are designated downgradient of Cell No. 14 and shall serve as the point of compliance for Cell No. 14. Monitoring wells F12, F13, F14, F15, F16, F34, F35, F36, F37, F41, F42, F43, F44, and F45, are designated downgradient of Cell No. 6 and shall serve as the point of compliance for Cell No. 6. Monitoring wells F17, F18, F19, F20, F21, F22, F23, F24, F25, and E03 are designated downgradient of Cell No. 7. Facility monitoring wells G-28, G-29, and G-30 are designated upgradient wells for Cell 8. Monitoring wells G-1, G-2, G-3, G-22, G-23, G-24, G-25, G-26, G-27, G-31, G-32, G-33, G-34, G-35 and G-36 are designated downgradient of Phase I of Cell No. 8 (Modules 1, 2, 3, and 4) and shall serve as the point of compliance for Phase I (Modules 1, 2, 3, and 4) of Cell No. 8. Monitoring wells G-4, G-5, G-6, G-7, G-8, G-9, G-10, G-11, G-12, G-13, G-14, G-15, G-16, G-17, G-18, G-19, G-20, and G-21 are designated as downgradient monitoring wells for Cell 8. Wells M03A, MW-14A, C01A, C02B, MW05A, MW11A, MW06, MW12B, MW07, MW13A, GP01, GP02, GP03, GP04, GP05, GP06, GP07, and GP08 must be maintained as piezometers to monitor water levels inside and outside the slurry trench in the Lower Pervious Zone. These Piezometers provide water level data for the Lower Pervious Zone and the 60 Foot Sand surrounding Cell 8. If water level information indicates the potential for groundwater in the Lower Pervious Zone to flow from the landfill outward, additional evaluation and/or sampling may be required.

Procedures for future monitoring well construction, as well as for borehole abandonment, must conform to the standards and guidelines in the latest edition of "Construction of Geotechnical Boreholes and Groundwater Monitoring Systems Handbook" prepared by the Louisiana Department of Environmental Quality and the Louisiana Department of Transportation and Development, dated December 2000 (or subsequent revisions) as required in Condition VI.K.

The Permittee must comply with conditions specified in this permit that are designed to ensure that hazardous waste and hazardous waste constituents do not exceed the Practical Quantitation Limits (PQL) as specified in Tables 35 and 37.

**VI.C.2.** The Permittee must utilize and maintain the present ground water monitoring system referenced in Condition VI.C.1 and identified in Table 3329. In addition, all monitoring wells must be maintained so that surface infiltration is prohibited and ground water samples are generated that are representative of the monitored zone.



**VI.C.3.** The Permittee must also conduct field measurements, in quadruplicate, of pH and Specific Conductance (conventional parameters, see Table 34) as standard indicators of ground water quality, each time a well is sampled. The results must be interpreted and reported per Condition VI.C.4 of this permit.

**VI.C.4.** The Permittee must adhere to the Sampling and Analysis Plan outlined below:

**VI.C.4.a.** All wells, other than piezometers, must be sampled semi-annually and annually, as referenced in Tables 35 and 36 and the samples managed and tested as required under this Condition. The analytical results must be submitted to the administrative authority within 90 days after completion of the groundwater sampling event. Additionally, monitoring results must be compiled in reportable form and maintained on site by the Permittee for review at any time by Departmental personnel, until submitted to the Administrative Authority with the groundwater monitoring report. However, if subsequent contamination to groundwater is discovered, then reporting must be in accordance with Conditions VI.D and VI.H of this permit as applicable. Single samples will be obtained for analysis of the parameters in Tables 35 and 36; only field determinations of pH and specific conductance will be made in quadruplicate.

**VI.C.4.b.** All monitoring wells and piezometers must be measured for total depth at least once per year. Wells with dedicated pumps which prohibit direct total depth measurement must be measured for total depth biennially (every other year). To accomplish these measurements, it shall be acceptable to use a permanently installed weighted stainless steel cable marked at the bottom depth when first installed. Acceptable subsequent measurements can then be referenced to the original cable mark. Depth to water must be measured on the same day and prior to purging. All measurements (total depth and depth to water) must be to the nearest 0.01 foot, and the values must be recorded in field notes and reproduced and submitted in the Groundwater Annual Report in accordance with LAC 33:V.1529.D. If 10% of the screened interval is blocked by sediments, the well must be redeveloped prior to the next required sampling event.

**VI.C.4.c.** Purging must be accomplished by removing a minimum of three casing volumes of groundwater from the well at a rate equal to or less than the recharge rate of the aquifer. The well must be sampled immediately upon purging and/or when sufficient water for sampling has recharged the well. Purging and sampling methods must be consistent throughout the life of the facility.

**VI.C.4.d.** Samples must be withdrawn using dedicated or adequately cleaned equipment for each well. No equipment or method may be used that will chemically or physically alter or influence the sample. Care must be taken to avoid placing clean sampling equipment on the ground or on any contaminated surface. Sampling methods and equipment must be compatible throughout the active life of the facility.



**VI.C.4.e.** Sample preservation, handling and containerization must meet the specifications of the Test Methods for Evaluating Solid Waste Physical/Chemical Methods 3rd Ed. (EPA Publication Number SW-846), 1986, as amended) or an equivalent substitute as approved by the Administrative Authority (see Table 34).

**VI.C.4.f.** Analytical methods equivalent to SW-846 (or analyses for parameters not listed in SW-846) must be approved by the Administrative Authority prior to implementation.

**VI.C.4.g.** A chain of custody protocol must be employed that will allow for the tracing of possession and handling of samples from the time of collection through laboratory analysis. All sample containers must be labeled to prevent mis-identification, have proper seals, and indicate the test parameters required.

**VI.C.4.h.** Up-to-date field logs must be kept at the site which documents for each sample the well identification number, total well depth, water level, water color (visual), well evacuation procedures and equipment, sample withdrawal procedures and equipment, date, time, sample identification numbers, field measurements (pH, specific conductance, etc.) and methods, name of collector, field observations, calculations of the standing water volume in the well, and the total volume evacuated.

#### **VI.D. HAZARDOUS CONSTITUENTS, PARAMETERS, ANALYTICAL FREQUENCY, AND CONCENTRATION LIMITS**

**VI.D.1.** The monitoring wells, hazardous constituents, semi-annual and annual sampling frequency, and PQLs are referenced in Conditions VI.C.1 and Tables 33, 35, and 36.

The Permittee shall continue detection monitoring and shall notify the Administrative Authority in accordance with the schedule specified in Condition VI.H, when any laboratory analytical result for a detection monitoring parameter referenced in Tables 35 and 36 from groundwater obtained from wells listed in Table 33 or from any other monitoring wells at the site, exceeds the appropriate PQL referenced in Tables 35 and 36 and has been verified by resampling and reanalysis to exceed this PQL at the points of compliance. In the event that compliance monitoring and/or corrective action is required pursuant to this Section, the Permittee shall institute corrective actions in all areas where groundwater has been affected by releases from a regulated unit of hazardous wastes or constituents exceeding the established groundwater protection standards and implement corrective measures in other areas impacted by the regulated units which may be discovered to exceed these limits in the future.

If, at any time, it is determined that any detection monitoring parameter concentration is a result of past or present facility operations or other non-naturally occurring conditions, the Permittee must submit to the Administrative Authority, within ninety (90) days of the determination, a request for a permit modification in accordance with LAC 33:V.321. This modification must include a plan to initiate assessment actions, which will include



delineation of the vertical and horizontal extent of the ground water contamination, and will institute or extend corrective actions for impacted zones.

**VI.D.2.** If the owner or operator determines, pursuant to LAC 33:V.3319.D, that the PQLs under this Condition are being exceeded at any well, he or she may demonstrate that a source other than a regulated unit caused the contamination or that the detection is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater. In making a demonstration under this Condition, the owner or operator must follow the provision established in LAC 33:V.3319.I.

#### **VI.E. POINT OF COMPLIANCE**

The points of compliance at which the groundwater protection standard of LAC 33:V.3305.A apply at which monitoring must be conducted are the vertical intervals intercepted by the monitor well screens as identified in Table 339.

#### **VI.F. COMPLIANCE PERIOD**

The compliance period during which the ground water protection standard of LAC 33:V.3305.A applies is the active life of the regulated units, and the thirty (30) years of post-closure monitoring, or as required by the administrative authority, if a unit is not clean closed. The compliance period begins when a compliance monitoring program meeting the requirements of Condition VI.I of this permit is initiated.

If a unit is clean closed then the compliance period is the active life of the unit and the post-closure monitoring as specified by the Administrative Authority. In the event of a release from a regulated unit, the compliance period is the active life of the unit, the duration of the corrective action to remediate the release, and three (3) additional consecutive years after an acceptable clean up level has been achieved. If termination of the corrective action and/or post corrective action monitoring occurs within the thirty (30) year post-closure monitoring period, then the Permittee must revert back to post-closure monitoring as described in this Condition or a monitoring schedule as specified by the administrative authority.

#### **VI.G. GENERAL REQUIREMENTS**

**VI.G.1.** The Permittee's groundwater monitoring system for the hazardous waste management facilities identified in Condition VI.A shall consist of all monitoring wells referenced in Conditions VI.C.1 and Table 33 of this Condition, unless exempted in the future by the Administrative Authority. In addition, water levels will be measured in piezometers referenced in Table 33.

**VI.G.2.** Upgradient wells F30, F31, F32, F33, MW01AS, MW01AD, B04A, MW2BS, MW02BD, G-28, G-29, and G-30 must always yield groundwater samples that are representative of groundwater that has not been affected by possible leakage from the waste management units. Downgradient wells F01, F02, F03, F04, F05, F06, F07, F08, F09, F10, F11 D01B, F26, F27, F28, F29, F38, F39, F40, D02A, F12, F13, F14, F15,



F16, F34, F35, F36, F37, F41, F42, F43, F44, F45, F17, F18, F19, F20, F21, F22, F23, F24, F25, E03, G-1, G-2, G-3, G-22, G-23, G-24, G-25, G-26, G-27, G-31, G-32, G-33, G-34, G-35, and G-36 must represent the quality of groundwater beneath the facilities that reach the points of compliance. Downgradient Monitoring Wells for Phase 2 (Modules 5, 6, 7, 8, 9, and 10) of Cell 8 include G-4, G-5, G-6, G-7, G-8, G-9, G-10, G-11, G-12, G-13, G-14, G-15, G-16, G-17, G-18, G-19, G-20, G-21 (See discussion in Condition VI.C.1). Piezometers M03A, MW-14A, C01A, C02B, MW05A, MW11A, MW06, MW12B, MW07, MW13A, GP01, GP02, GP03, GP04, GP05, GP06, GP07, and GP08 must yield groundwater level data that is representative of the formation in which they are screened.

**VI.G.3.** The Permittee must maintain the structural and mechanical integrity of all monitoring wells and piezometers and provide protection from accidental damage and surface infiltration as well as implement a monitoring well inspection schedule. A written report on the damage to any well must be submitted to the administrative authority within 90 days of the inspection.

**VI.G.4.** The Permittee must conform to the sampling and analysis requirements listed in Conditions VI.C.4, herein, and as required by LAC 33:V.3305 and LAC 33:V.3315. A potentiometric map must be prepared and submitted on a semi-annual basis for the 60 Foot/Channel Sand. Additionally a map of groundwater levels, showing gradient direction(s) for the Lower Pervious Zone shall also be prepared and submitted on a semi-annual basis.

**VI.G.5.** The Permittee must use the statistical procedure outlined in Condition VI.H of this permit, and in accordance with LAC 33:V.3315.H.3 and I.4.

**VI.G.6.** The Permittee must also graphically represent the values of pH and specific conductance (i.e., conventional parameters, see Table 34) and any parameters as applicable for each sampling episode. The graphic interpretations of data must be submitted with the analytical results in the annual report and should be utilized in evaluating facility impact on groundwater.

**VI.G.7.** Records of all sampling and analytical work must be maintained at the site during the life of the facilities, including post-closure care periods.

**VI.G.8.** The Permittee shall submit Semi-Annual Groundwater Reports by September 1<sup>st</sup> and March 1<sup>st</sup> of each year. The reports shall include the following: 1) a table showing well number, well depth. Interval screened, zone monitored, well diameter, screen and casing material (and the type pump, if applicable) for all wells; 2) a facility map showing all wells (e.g., up gradient, point of compliance, etc.) and identifying zones in which wells are screened; 3) a scaled potentiometric surface showing well locations, groundwater elevations with respect to mean sea level for each monitored zone; 4) a summary of all analytical data, including QA/QC; 5) a statistical method (PQL's or Shewart-CUSUM control chart limits) shall be used in evaluating data for each hazardous constituent, as approved by the Administrative Authority; 6) for those hazardous



constituents that have been detected as defined in LAC 33:V.3303.A.1 at the point of compliance as a result of a release from the regulated unit, a graphical representation of data pursuant to the statistical method employed for those constituents (The graphical representation must include: contaminant concentration isopleth maps and contaminant concentration versus time graphs, as applicable); 7) a discussion of any significant changes in the data from the last reporting period; 8) a discussion of the down time for any well or part of the system and actions taken to return the system to normal operations and maximum efficiency; and 9) evaluation of the effectiveness and progress of any corrective action associated with the permitted unit, if applicable.

An annual groundwater report must be submitted each year no later than March 1, as required by LAC 33:V.1529.D. This report shall include the requirements of the September 1<sup>st</sup> submittal and shall also summarize all groundwater activities for the preceding calendar year including an evaluation of the monitoring strategy in relation to the direction of groundwater flow and locations of wells associated with the regulated facilities. Applicable calculations must also include groundwater flow contaminant migration rates (as applicable), statistical comparisons, and any other information as required by this permit.

## **VI.H. DETECTION MONITORING PROGRAM**

**VI.H.1.** All Monitoring wells listed in Conditions VI.C.1 and Table 339 must be sampled for the parameters listed in Tables 35 and 36 on a semi-annual and annual basis.

**VI.H.2.** For Detection Monitoring at existing monitoring wells as listed in Conditions VI.C.1 and Table 33, the Permittee must utilize the groundwater detection monitoring system described in Condition VI.G to obtain samples that provide a reliable indication of the statistically significant presence of indicator parameters in groundwater, utilizing PQLs as set forth in Tables 35 and 36. As part of the statistical evaluation, verification resampling at wells that yield an initial test result greater than the PQL (or Shewart-CUSUM control chart limit for monitoring wells F13, F14, and F15), shall be done within 30 days after the sampling event. A statistically significant presence or change of an indicator parameter will only be declared if the verification resample also yields a result greater than the PQL in Tables 35 and 36 or the Shewart-CUSUM control chart limit shown on Table 35.

For Detection Monitoring at required monitoring wells associated with areas after completion of waste placement in Phase I and II modules of Cell No. 8, the Permittee must utilize the groundwater detection monitoring system described in Condition VI.G to obtain samples that provide a reliable indication of the statistically significant presence of naturally occurring indicator parameters in groundwater. Statistical methods shall include prediction limits, Shewart-CUSUM control chart limits, or tolerance intervals, by order of preference, based upon the distribution of background concentrations or the presence of non-naturally occurring parameters at or above the PQLs listed in Tables 35 and 36. As part of the statistical evaluation, verification resampling at wells that yield initial results greater than the chosen statistical limit and/or PQL shall be done as soon as



practical after reporting this initial result. A statistically significant presence of a naturally occurring parameter or a detection of a non-naturally occurring parameter above the parameter's PQL will only be declared if the verification resample also yields a result greater than the chosen statistical limit for a naturally occurring parameter or the PQL listed in Tables 35 and 36 for a non-naturally occurring parameter.

**VI.H.3.** The system as described in Condition VI.C shall be sampled in accordance with the schedule in Condition VI.H.1 (semi-annually and annual). Background values for indicator parameters and PQL's for the existing monitoring well network have already been established, as shown in Tables 35 and 36. For the natural occurrence of arsenic at wells F13, F14, and F15, Shewart-CUSUM control chart limits have been computed. Background values and PQLs for indicator parameters and other hazardous constituents will be updated with additional data to provide temporal variation. Parameters selected for analysis under the Detection Monitoring Program are presented in Tables 35 and 36 of this permit with associated PQLs.

Within 90 days of the sampling event, the Permittee shall submit a report to the Administrative Authority containing test results, the statistical comparative data, and the groundwater potentiometric maps for the sampling event. Copies of the field logs and chain of custody, and a list of the parameters that were statistically significant above background concentrations for naturally occurring parameters or at or above the PQLs listed in Tables 35 and 36 for non-naturally occurring parameters must be forwarded for review by the Administrative Authority.

**VI.H.4.** The sampling and analysis program outlined in Condition VI.C.4 must be utilized for groundwater sampling.

**VI.H.5.** If the Permittee determines that there are statistically significant changes in naturally occurring indicator parameters in Tables 35 and 36 or concentrations of non-naturally occurring in parameters listed Tables 35 and 36 as specified by the semi-annual and annual sampling schedule listed in Condition VI.H.1 at any monitoring well listed in Table 339 and VI.C of this permit, the Permittee must notify the Administrative Authority of this finding in writing within seven (7) days indicating which parameters exhibit statistically significant change. The Permittee must also, within 30 days after the sampling event, sample the groundwater in all monitoring wells associated with the regulated unit listed in Table 339, of this permit and determine whether constituents listed in LAC 33:V.3325.Table 4 are statistically present, and if so, in what concentrations.

For any LAC 33:V.3325.Table 4 compounds statistically present, at levels equal to or above PQL's, in the analysis, the owner or operator may resample within thirty (30) days and repeat the analysis for those compounds statistically present. If the results of the second analysis confirm the initial results, then those constituents will form the basis for compliance monitoring. If the owner or operator does not resample for the compounds detected, the hazardous constituents detected during this initial LAC 33:V.3325.Table 4 analysis will become the compliance monitoring parameters.



**VI.H.6.** If the results of resampling do not confirm that an impact on groundwater has occurred, a report on this conclusion shall be submitted to the Administrative Authority and detection monitoring will continue before the next sampling event.

**VI.H.7.** If the results of resampling confirm the statistical presence of LAC 33:V.3325.Table 4 compounds from the initial sampling, the Permittee must also, within 90 days, submit to the Administrative Authority an application for a permit modification to establish a compliance monitoring program meeting the requirements of LAC 33:V.3319. The application must include the following information:

**VI.H.7.a.** an identification of the concentration of any LAC 33:V.3325.Table 4 constituent statistically detected in the groundwater at each monitoring well at the compliance point;

**VI.H.7.b.** any proposed changes to the groundwater monitoring system at the facility necessary to meet the requirements at each well at the compliance point;

**VI.H.7.c.** any proposed changes to the groundwater monitoring frequency, sampling and analysis procedures or methods, or statistical methods used at the facility necessary to meet the requirements of LAC 33:V.3319;

**VI.H.7.d.** for each hazardous constituent statistically present, after verification resampling at monitoring wells listed in Table 33, where physically present, a proposed concentration limit under LAC 33: V.3309.A.3.a or b, or a notice of intent to seek an alternate concentration limit under LAC 33.V.3309.B.

Within 180 days, the Permittee must submit to the Administrative Authority:

**VI.H.7.e.** all data necessary to justify an alternate concentration limit sought under LAC 33:V.3309.B; and

**VI.H.7.f.** an engineering feasibility plan for a corrective action program necessary to meet the requirement of LAC 33:V.3321, unless

**VI.H.7.f.i.** all hazardous constituents identified under LAC 33:V.3317.G.2 are listed in Table 1 of LAC 33:V.3309, and their concentrations do not exceed the respective values given in that table; or

**VI.H.7.f.ii.** the Permittee has sought an alternative concentration limit under LAC 33:V.3309.B for every hazardous constituent identified under LAC 33:V.3317.G.2.

**VI.H.8.** If the Permittee determines, pursuant to LAC 33:V.3317.F, that there is a statistically significant difference (above the listed PQL or Shewart-CUSUM control chart limit) after verification resampling for the existing monitor well network; above the



chosen statistical limit after verification resampling for wells associated with existing and future modules for Cell 8, for chemical parameters or hazardous constituents specified pursuant to LAC 33:V.3317.A at any monitoring well listed in Table 339, of this permit, where physically present, he or she may demonstrate that a source other than a regulated unit caused the statistical presence or that the statistical presence is an artifact caused by an error in sampling, analysis, or statistical evaluation or natural variation in the groundwater. The Permittee may make a demonstration under this Paragraph in addition to, or in lieu of, submitting a permit modification application under LAC 33:V.3317.G.4; however, the Permittee is not relieved of the requirement to submit a permit modification application within the time specified in LAC 33:V.3317.G.4 unless the demonstration made under this paragraph successfully shows that a source other than a regulated unit caused the increase, or that the increase resulted from error in sampling, analysis, or evaluation. In making a demonstration under this Paragraph, the Permittee must:

**VI.H.8.a.** notify the administrative authority in writing within seven (7) days of determining statistically significant evidence of contamination at the well(s) shown on Table 339 of this permit that he or she intends to make a demonstration under this Paragraph;

**VI.H.8.b.** within 90 days, submit a report to the administrative authority that demonstrates that a source other than a regulated unit caused the contamination or that the concentration resulted from error in sampling, analysis, or evaluation;

**VI.H.8.c.** within 90 days, submit to the administrative authority for a permit modification to make any appropriate changes to the detection monitoring program for the facility; and

**VI.H.8.d.** continue to monitor in accordance with the detection monitoring program established in Condition VI.H.

## **VI.I. COMPLIANCE MONITORING**

If the Permittee is required to establish a compliance monitoring program under this Condition VI.I and LAC 33:V.3303, the Permittee, at a minimum, must follow the regulations in LAC 33:V.3319.

## **VI.J. CORRECTIVE ACTION PROGRAM**

If the Permittee is required to establish a corrective action program under this section and LAC 33:V.3303, the Permittee, at a minimum, must follow the regulations in LAC 33:V.3321.

## **VI.K. CONSTRUCTION AND ABANDONMENT OF MONITORING WELLS AND GEOTECHNICAL BOREHOLES**

The construction and abandonment of groundwater monitoring wells must conform to the standards and guidelines specified in **"CONSTRUCTION OF GEOTECHNICAL**

**BOREHOLES AND GROUNDWATER MONITORING SYSTEMS HANDBOOK"**, latest edition. This document is printed by and available from the Louisiana Department of Transportation and Development (DOTD), Water Resources Section, P.O. Box 94245, Baton Rouge, Louisiana 70804-9245. The document is also available online at [http://dnr.louisiana.gov/assets/OC/env\\_div/gw\\_res/200010\\_GREENBOOK.pdf](http://dnr.louisiana.gov/assets/OC/env_div/gw_res/200010_GREENBOOK.pdf).

A work plan for the construction of a new well must be submitted to the Administrative Authority for approval as the entire groundwater monitoring system must be approved. Any required new well should be installed within thirty (30) days of approval of the work plan by the Administrative Authority. Upon completion of new or replacement well, a copy of DOTD-GW-1 S, DOTD Well Registration Short Form, is to be provided to the Administrative Authority.

The Permittee must provide for the sealing of any vertical migration path resulting from exploratory boring, leachate collection or detection systems and/or groundwater monitoring programs as provided in LAC 33:V.3323. A work plan for the plugging and abandonment of a well must be submitted for approval by the Administrative Authority, whenever such migration pathways are discovered. Upon completion of well abandonment, a copy of DOTD-GW-2, DOTD Well Plugging and Abandonment Form, is to be provided to the Administrative Authority.



**TABLE 33**  
**MONITORING WELL SYSTEM**

|                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Upgradient Monitoring Wells (Cells 5,6, 7, and 14)<br>F30, F31, F32, F33, MW01AS, MW01AD, B04A, MW02BS, MW02BD                                                                                                                      |
| Upgradient Monitoring Wells (Cell 8)<br>G-28, G-29, G-30<br>(See discussion in Condition VI.C.1)                                                                                                                                    |
| Downgradient Monitoring Wells for Cell 5<br>F01, F02, F03, F04, F05, F06, F07, F08, F09, F10, F11, D01B                                                                                                                             |
| Downgradient Monitoring Wells for Cell 14<br>F26, F27, F28, F29, F38, F39, F40, D02A                                                                                                                                                |
| Downgradient Monitoring Wells for Cell 6<br>F12, F13, F14, F15, F16, F34, F35, F36, F37, F41, F42, F43, F44, F45                                                                                                                    |
| Downgradient Monitoring Wells for Cell 7<br>F17, F18, F19, F20, F21, F22, F23, F24, F25, E03                                                                                                                                        |
| Downgradient Monitoring Wells for Phase 1 (Modules 1, 2, 3, and 4) of Cell 8<br>G-1, G-2, G-3, G-22, G-23, G-24, G-25, G-26, G-27, G-31, G-32, G-33, G-34, G-35, G-36                                                               |
| Downgradient Monitoring Wells for Phase 2 (Modules 5, 6, 7, 8, 9, and 10) of Cell 8<br>G-4, G-5, G-6, G-7, G-8, G-9, G-10, G-11, G-12, G-13, G-14, G-15, G-16, G-17, G-18, G-19, G-20, G-21<br>(See discussion in Condition VI.C.1) |
| Piezometers<br>M03A, MW-14A, C01A, C02B, MW05A, MW11A, MW06, MW12B, MW07, MW13A, GP01, GP02, GP03, GP04, GP05, GP06, GP07, GP08,                                                                                                    |

**TABLE 34**  
**PARAMETERS, CONTAINERS, AND PRESERVATION**

| Parameter                       | Container Type             | Preservation Method          |
|---------------------------------|----------------------------|------------------------------|
| Volatile Organic Compounds      | Glass<br>Zero headspace    | Cool to 4 degrees C          |
| Semi-Volatile Organic Compounds | Glass<br>Minimal headspace | Cool to 4 degrees C          |
| Dissolved Metals                | Plastic                    | HNO <sub>3</sub> to pH < 2.0 |
| Conventional Parameters         | Glass or Plastic           | Cool to 4 degrees C          |

**TABLE 35**  
**MONITOR WELL DETECTION MONITORING PARAMETERS AND PRACTICAL**  
**QUANTITATION LIMITS (PQLS)**  
**(Semi-Annual Sampling Schedule)**

| <b>Volatile Organic Compound</b> | <b>PQL µg/l</b> | <b>Analytical Method*</b> |
|----------------------------------|-----------------|---------------------------|
| Chloromethane                    | 10              | 8260B                     |
| Bromomethane                     | 10              | 8260B                     |
| Vinyl Chloride                   | 2               | 8260B                     |
| Chloroethane                     | 10              | 8260B                     |
| 1,1-Dichloroethene               | 5               | 8260B                     |
| 1,1-Dichloroethane               | 5               | 8260B                     |
| trans-1,2-Dichloroethene         | 7               | 8260B                     |
| Chloroform                       | 5               | 8260B                     |
| 1,2-Dichloroethane               | 5               | 8260B                     |
| 1,1,1-Trichloroethane            | 5               | 8260B                     |
| Carbon Tetrachloride             | 5               | 8260B                     |
| Bromodichloromethane             | 5               | 8260B                     |
| 1,1,2,2-Tetrachloroethane        | 5               | 8260B                     |
| 1,2-Dichloropropane              | 5               | 8260B                     |
| trans-1,3-Dichloropropene        | 5               | 8260B                     |
| Trichloroethene                  | 5               | 8260B                     |
| Dibromochloromethane             | 5               | 8260B                     |
| 1,1,2-Trichloroethane            | 5               | 8260B                     |
| Benzene                          | 5               | 8260B                     |
| cis-1,3-Dichloropropene          | 5               | 8260B                     |
| Bromoform                        | 5               | 8260B                     |
| Tetrachloroethene                | 5               | 8260B                     |
| Toluene                          | 5               | 8260B                     |
| Chlorobenzene                    | 5               | 8260B                     |
| Ethyl Benzene                    | 5               | 8260B                     |
| Trichlorofluoromethane           | 10              | 8260B                     |
| Methylene Chloride               | 5               | 8260B                     |
| Acetone                          | 20              | 8260B                     |
| 2-Butanone (MEK)                 | 5               | 8260B                     |
| Carbon disulfide                 | 5               | 8260B                     |
| 4-Methyl-2-pentanone             | 5               | 8260B                     |
| Ethyl ether                      | 5               | 8260B                     |
| Xylenes (total)                  | 10              | 8260B                     |
| <b>Dissolved Metal</b>           |                 |                           |
| Arsenic                          | 10**            | 200.7                     |
| Chromium                         | 20              | 200.7                     |
| Cadmium                          | 10              | 200.7                     |
| Lead                             | 10              | 200.7                     |
| Selenium                         | 20              | 200.7                     |

\* Methods may be replaced with equivalent methods that meet the appropriate performance standards

\*\*PQL of 10 µg/l for monitor wells other than F13, F14, and F15. Limits for these wells follow:

F13: Shewart-CUSUM Control Chart Limit = 18.4 µg/l

F14: Shewart-CUSUM Control Chart Limit = 36.1 µg/l

F15: Shewart-CUSUM Control Chart Limit = 18.4 µg/l



**TABLE 36**  
**MONITOR WELL DETECTION MONITORING PARAMETERS AND PRACTICAL**  
**QUANTITATION LIMITS (PQLS)**  
**(Annual Sampling Schedule)**

| <b>Semi-Volatile Organic Compound</b>             | <b>PQL µg/l</b> | <b>Analytical Method*</b> |
|---------------------------------------------------|-----------------|---------------------------|
| Phenol                                            | 10              | 8270C                     |
| bis(2-chloroethyl)ether                           | 10              | 8270C                     |
| 2-Chlorophenol                                    | 10              | 8270C                     |
| 1,3-Dichlorobenzene                               | 10              | 8270C                     |
| 1,4-Dichlorobenzene                               | 10              | 8270C                     |
| Benzyl Alcohol                                    | 20              | 8270C                     |
| 1,2-Dichlorobenzene                               | 10              | 8270C                     |
| 2-Methylphenol                                    | 10              | 8270C                     |
| bis(2chloroisopropyl)ether                        | 10              | 8270C                     |
| 4-Methylphenol                                    | 10              | 8270C                     |
| N-Nitroso-Dipropylamine                           | 10              | 8270C                     |
| Hexachloroethane                                  | 10              | 8270C                     |
| Nitrobenzene                                      | 10              | 8270C                     |
| Isophorone                                        | 10              | 8270C                     |
| 2-Nitrophenol                                     | 10              | 8270C                     |
| 2,4-Dimethylphenol                                | 10              | 8270C                     |
| Benzoic acid                                      | 50              | 8270C                     |
| bis(2-chloroethoxy)methane                        | 10              | 8270C                     |
| 2,4-Dichlorophenol                                | 10              | 8270C                     |
| 1,2,4-Trichlorobenzene                            | 10              | 8270C                     |
| Naphthalene                                       | 10              | 8270C                     |
| 4-Chloroaniline                                   | 20              | 8270C                     |
| Hexachlorobutadiene                               | 10              | 8270C                     |
| 4-Chloro-3-methylphenol (para-chloro-meta-cresol) | 10              | 8270C                     |
| m-cresol (3-Methylphenol)                         | 20              | 8270C                     |
| 2-Methylnaphthalene                               | 10              | 8270C                     |
| Hexachlorocyclopentadiene                         | 10              | 8270C                     |
| 2,4,6-Trichlorophenol                             | 10              | 8270C                     |
| 2,4,5-Trichlorophenol                             | 10              | 8270C                     |
| 2-Chloronaphthalene                               | 10              | 8270C                     |
| 2-Nitroaniline                                    | 50              | 8270C                     |
| Dimethyl Phthalate                                | 10              | 8270C                     |
| Acenaphthylene                                    | 10              | 8270C                     |
| 3-Nitroaniline                                    | 50              | 8270C                     |
| Acenaphthene                                      | 10              | 8270C                     |
| 2,4-Dinitrophenol                                 | 50              | 8270C                     |
| 4-Nitrophenol                                     | 50              | 8270C                     |
| 2,4-Dinitrotoluene                                | 10              | 8270C                     |
| 2,6-Dinitrotoluene                                | 10              | 8270C                     |
| 4-Chlorophenyl Phenyl Ether                       | 10              | 8270C                     |
| Fluorene                                          | 10              | 8270C                     |
| 4-Nitroaniline                                    | 50              | 8270C                     |
| 4,6-Dinitro-2-methylphenol                        | 50              | 8270C                     |
| N-nitrosodiphenylamine                            | 10              | 8270C                     |
| 4-Bromophenyl Phenyl Ether                        | 10              | 8270C                     |

|                        |      |       |
|------------------------|------|-------|
| Hexachlorobenzene      | 10   | 8270C |
| Pentachlorophenol      | 50   | 8270C |
| Phenanthrene           | 10   | 8270C |
| Anthracene             | 10   | 8270C |
| Fluoranthene           | 10   | 8270C |
| Pyrene                 | 10   | 8270C |
| 3,3'-Dichlorobenzidine | 20   | 8270C |
| Benzo(a)anthracene     | 10   | 8270C |
| Chrysene               | 10   | 8270C |
| Benzo(b)fluoranthene   | 10   | 8270C |
| Benzo(k)fluoranthene   | 10   | 8270C |
| Benzo(a)pyrene         | 10   | 8270C |
| Ideno(1,2,3-cd)pyrene  | 10   | 8270C |
| Dibenz(a,h)anthracene  | 10   | 8270C |
| Benzo(g,h,i)perylene   | 10   | 8270C |
| Aniline                | 10   | 8270C |
| Beta-BHC               | 0.05 | 8081  |
| Gamma-BHC (Lindane)    | 0.05 | 8081  |
| 4-4'-DDE               | 0.05 | 8081  |
| 2,4-D                  | 4    | 8151  |
| 2,4,5-T                | 1    | 8151  |
| <b>Other Parameter</b> |      |       |
| Cyanide (total)        | 40   | 335.3 |
| Mercury (dissolved)    | 2    | 245.1 |

\* Methods may be replaced with equivalent methods that meet the appropriate performance standards



**HAZARDOUS AND SOLID  
WASTE AMENDMENTS  
(HSWA)**

## **VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS**

### **VII.A. STANDARD CONDITIONS**

#### **VII.A.1. Waste Minimization**

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee which minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

**VII.A.1.a.** Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;

**VII.A.1.b.** Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;

**VII.A.1.c.** An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;

**VII.A.1.d.** Factors that have prevented implementation of source reduction and/or recycling;

**VII.A.1.e.** Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);

**VII.A.1.f.** An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

**VII.A.1.g.** A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;



**VII.A.1.h.** A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;

**VII.A.1.i.** A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;

**VII.A.1.j.** A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and

**VII.A.1.k.** The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on [https://www.epa.gov/sites/production/files/2013-12/documents/iems\\_implementation\\_guide\\_full.pdf](https://www.epa.gov/sites/production/files/2013-12/documents/iems_implementation_guide_full.pdf).

#### **VII.A.2. Dust Suppression**

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

#### **VII.A.3. Failure to Disclose**

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

#### **VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit**

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

**VII.A.4.a.** If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

**VII.A.4.b.** The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

**VII.A.4.c.** Modifications of this Permit do not constitute a reissuance of the Permit.

#### **VII.A.5. Permit Review**

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.315 and LAC 33:V.323. Nothing in this section shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

#### **VII.A.6. Compliance with Permit**

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which:

**VII.A.6.a.** Become effective by statute;

**VII.A.6.b.** Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

**VII.A.6.c.** Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

#### **VII.A.7. Specific Waste Ban**

**VII.A.7.a.** The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

**VII.A.7.b.** The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.



**VII.A.7.c.** The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

**VII.A.7.d.** The Permittee shall review the waste analysis plan and analyze the waste when a process changes in order to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Section III.C.1 and 2.

**VII.A.8. Information Submittal for the Corrective Action Strategy**

Failure to comply with any condition of the Permit, including information submittal, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. A summary of the planned reporting requirements pursuant to the corrective action requirements of this Permit is found in Table 1 after section VIII. Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

Louisiana Department of Environmental Quality  
Office of Environmental Services  
Remediation Services Division  
P.O. Box 4313  
Baton Rouge, LA 70821-4313

All plans and reports required under the corrective action strategy must follow the guidelines for formatting and content found in the RECAP document to the extent practicable. Further guidance on formatting and content may be provided by the Administrative Authority, as deemed necessary.

**VII.A.9. Plans and Schedules Incorporation into Permit**

All plans and schedules required by this Permit are, upon approval by the Administrative Authority, incorporated into this Permit by reference and become an enforceable part of this Permit. When applicable, the Permittee must modify the permit according to LAC 33:V. Chapter 3. Since required items are essential elements of this Permit, failure to submit any of the required items or submission of inadequate or insufficient information



may subject the Permittee to enforcement action under Section 3008 of RCRA which may include fines, suspension, or revocation of the Permit. Also, where applicable the Permittee must meet all the permit modification requirements of LAC 33:V.321, 322 and 323.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this Permit. Written requests for extensions of due dates for submittals may be granted by the Administrative Authority in accordance with LAC 33:I.1505.E.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this Permit according to procedures in LAC 33:V.321.

#### **VII.A.10. Data Retention**

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

#### **VII.A.11. Management of Wastes**

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process. Previously approved remedial measures and/or corrective action activities only apply when warranted by new information and/or data that was not available to the Administrative Authority at the time of submission and approval of the measures and/or activities relevant to the previously approved remedial measures and/or corrective action activities.

### **VII.B. AA-BB AIR REGULATIONS**

See Condition V.H. Air Emission Standards.



### **VII.C. SPECIFIC CONDITION - CLOSURE**

Pursuant to Section 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

**VII.C.1.** Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;

**VII.C.2.** The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and

**VII.C.3.** The Permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

## **VIII. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY**

Corrective Action for Releases: Section 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action for a release area. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and expedite the process, and shall use the **Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP)** for screening and media-specific cleanup standards. EPA has interpreted the term "release" to mean, "any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment." (50 FR 2873, July 15, 1985). The CAS refers to "release areas" as solid waste management units (SWMUs) and areas of concern (AOCs) while the RECAP refers to release areas as areas of investigation (AOIs). SWMUs and AOCs may also be referred to as "AOIs" when investigated and managed under the RECAP.

### **VIII.A. ALTERNATE CORRECTIVE ACTION**

#### **VIII.A.1. This Permit will utilize the CAS Guidance Document**

(<https://www.epa.gov/sites/production/files/2015-09/documents/r6-cas2015.pdf>)

developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.



The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that can be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment. The CAS process also considers activities previously conducted under the traditional corrective action process. Appendix 1 of this permit contains a summary of corrective action activities completed to date and also describes where the Permittee is in the CAS process at the time of issuance of this permit. The applicability of various provisions of the CAS will depend on where the Permittee is in the CAS process as detailed in Appendix 1.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMIs, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the CAS as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, abide by the terms and conditions of this permit, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

#### **VIII.A.2. Performance Standards**

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards as defined in Conditions VIII.A.2.a through c. The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.



The Permittee shall submit the performance standards in writing along with the Conceptual Site Model (Condition VIII.D) within one-hundred and twenty (120) days after the scoping meeting. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

#### **VIII.A.2.a. Source Control Performance Standard**

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs and AOCs does not mean avoidance of controlling source materials.

#### **VIII.A.2.b. Statutory and Regulatory Performance Standard**

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

#### **VIII.A.2.c. Final Risk Goal Performance Standard**

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Condition VIII.A.3).



### **VIII.A.3. Use of RECAP**

The latest edition of the RECAP document shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

The RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Section 2.4 and 2.5), to determine the identity of an AOI as described in RECAP Section 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Section 2.8.

The RECAP shall be used by the Permittee to evaluate land use as described in RECAP Section 2.9, and groundwater/aquifer use as described in RECAP Section 2.10.

The RECAP shall be used by the Permittee to prioritize AOCs, SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Section 2.5) and use the following management options, as appropriate, to address each release site.

**VIII.A.3.a. Use of the Screening Option** - The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

**VIII.A.3.b. Use of Management Option 1** – The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity values. Under MO-1, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

**VIII.A.3.c. Use of Management Option 2** – The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME)



assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

**VIII.A.3.d. Use of Management Option 3** – The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant a NFA-ATT determination, or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

#### **VIII.A.4. Corrective Action for Releases Beyond Facility Boundary**

Section 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment for all releases of hazardous waste or constituents from any solid waste management unit at the facility, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

#### **VIII.A.5. Financial Responsibility**

Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection. The Administrative Authority reserves the right to require financial assurance prior to remedy selection based upon facility compliance history, the extent and degree of contamination, financial health of the Permittee, and input from the public.

#### **VIII.A.6. Summary of Corrective Action Activities**

A summary of the corrective action activities associated with the facility is provided in Condition VIII, Appendix 1 of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Condition VIII, Appendix 1, Table 1 of this permit.



#### **VIII.A.7. Approval of Alternate Schedule**

The Permittee may submit a written request for an alternate schedule for a submittal deadline as presented in Condition VIII, Table 1. The request should propose a specific alternate schedule and include an explanation as to why the alternate schedule is necessary. The Administrative Authority will consider site-specific criteria in either approving or disapproving the request for an alternate schedule.

### **VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING**

#### **VIII.B.1. Notice of Intent**

The Permittee must submit to the Administrative Authority a Notice of Intent to conduct corrective action using the CAS upon identification of a newly identified SWMU or AOC per Condition VIII.L or notification of newly identified releases at a SWMU or AOC per Condition VIII.M. The notice of intent should state the following in a concise manner:

**VIII.B.1.a.** General information regarding facility location;

**VIII.B.1.b.** General information regarding the facility's operational history;

**VIII.B.1.c.** General discussion on how the Permittee will proceed through the CAS;

**VIII.B.1.d.** Brief description of proposed performance standards for corrective action; and

**VIII.B.1.e.** Propose a date for a scoping meeting between the Permittee and the Administrative Authority to be held within sixty (60) days of the date of the Notice of Intent.

#### **VIII.B.2. Scoping Meeting**

The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, the level of detail required in the conceptual site model (see Condition VIII.D) and expectations for remediation goals will be discussed during the scoping meeting(s). During the scoping meeting the Permittee will present the following information to the Administrative Authority:

**VIII.B.2.a.** A conceptual site model (if one already has been developed);

**VIII.B.2.b.** Discussions on history of corrective action at the facility, including facility investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;

**VIII.B.2.c.** Proposed performance standards for the facility with justification, and potential risk management approaches;

**VIII.B.2.d.** Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;

**VIII.B.2.e.** A Communication Strategy Plan that specifies where in the CAS process the Permittee is currently and how the Permittee will provide information about future progress at the facility to the Administrative Authority (i.e., progress reports, conference calls, routine meetings, etc.);

**VIII.B.2.f.** Site-specific concerns (i.e., sensitive environments or special subpopulations);

**VIII.B.2.g.** Need for interim measures or stabilization activities, if necessary; and

**VIII.B.2.h.** Schedule for submittal of the CAS Investigation Workplan and proposed schedule for conducting and completing CAS requirements, including public participation.

Information plans and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. The Permittee must coordinate with the Administrative Authority in order to determine the date, time, and location of the scoping meeting.

### **VIII.C. REPORTING REQUIREMENTS**

**VIII.C.1.** The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by the Administrative Authority. The reporting schedule shall be determined on a case-by-case basis by the Administrative Authority. These reports shall contain, as applicable to the stage of corrective action, the information required by CAS, as well as the following:

**VIII.C.1.a.** A description of the work completed and an estimate of the percentage of work completed;

**VIII.C.1.b.** Summaries of all findings, including summaries of laboratory data;

**VIII.C.1.c.** Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;

**VIII.C.1.d.** Projected work for the next reporting period;

**VIII.C.1.e.** Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest



groups or State government during the reporting period;

**VIII.C.1.f.** Changes in key project personnel during the reporting period; and

**VIII.C.1.g.** Summaries of all changes made in implementation during the reporting period.

**VIII.C.2.** Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports, drilling logs and laboratory data) shall be made available to the Administrative Authority upon request.

**VIII.C.3.** In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2 above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

**VIII.C.4.** The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during the scoping meeting or status review briefings as described in Condition VIII.C.3.

#### **VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL (CSM)**

No later than 120 days after the scoping meeting, the Permittee shall submit to the Administrative Authority a CSM (along with the Performance Standards detailed in Condition VIII.A.2) or an update of any CSM submitted at the scoping meeting providing background information and the current conditions at the facility. The level of detail required for the CSM will be discussed during the scoping meeting. At a minimum, the CSM must address current site conditions, land use, known and/or potential constituent source(s), routes of constituent migration, exposure media (i.e., soil, surface waters, groundwater), exposure points, points of compliance and pathways, receptors and source media to be evaluated under the RECAP. The CSM must include a completed Figure 8 (LAC 33:I.Chapter 13). The Permittee may include completed investigations, existing data, or previously submitted documents in the CSM by reference. References must include the names, dates, and brief summaries of the documents.

If a CSM has been previously developed, the scoping meeting will also provide the opportunity for the Permittee and Administrative Authority to consider and identify all data gaps in the CSM. The initial CSM shall be considered the “base document” to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Section 2.16), or technical impracticability (TI) waiver determinations, when appropriate.

The Administrative Authority reserves the right to require revisions to the CSM based upon data resulting from ongoing investigations and activities. Revisions to the CSM may also be required for newly identified SWMUs or AOCs according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority.



The CSM shall be divided into Profiles as detailed in Conditions VIII.D.1 through 6. If the Permittee chooses to use existing data and documents in the CSM, it may not be necessary to prepare the Profiles as detailed in Conditions VIII.D.1 through 6. However, the existing documents and data must provide sufficient information and detail which corresponds to the information required by the Facility, Land Use and Exposure, Physical, Release, Ecological, and Risk Management Profiles.

#### **VIII.D.1. Facility Profile**

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past management practices. The Facility Profile shall include:

**VIII.D.1.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.1.a.i.** General geographic location;

**VIII.D.1.a.ii.** Property lines with the owners of all adjacent property clearly indicated;

**VIII.D.1.a.iii.** Facility structures, process areas and maintenance areas;

**VIII.D.1.a.iv.** Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Section 2.6; and

**VIII.D.1.a.v.** Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

**VIII.D.1.b.** The Facility Profile shall also include a description of ownership and operation of the facility.

**VIII.D.1.c.** The Permittee shall provide pertinent information for those spills that have not been assessed and reported to the Administrative Authority during facility investigations, addressed by facility spill contingency plans, or previously remediated or deemed for no further action. The information must include at minimum, approximate dates or periods of past waste spills, identification of the



materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

#### **VIII.D.2. Land Use and Exposure Profile**

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Sections 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Section 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

**VIII.D.2.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.2.a.i.** Surrounding land uses, resource use locations, and natural resources/wetlands;

**VIII.D.2.a.ii.** Locations of sensitive subpopulations; and

**VIII.D.2.a.iii.** An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (CMS example) of the RECAP.

#### **VIII.D.3. Physical Profile**

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

**VIII.D.3.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.3.a.i.** Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

**VIII.D.3.a.ii.** Surface water features including routes of all drainage ditches, waterways, direction of flow, and how they migrate to other surface water bodies such as canals and lakes;

**VIII.D.3.a.iii.** Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

**VIII.D.3.a.iv.** Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

**VIII.D.3.a.v.** Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

**VIII.D.3.a.vi.** Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

#### **VIII.D.4. Release Profile**

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

**VIII.D.4.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.4.a.i.** Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Section 2.8 of RECAP;

**VIII.D.4.a.ii.** Isopleth maps depicting lateral extent and concentrations of COCs;

**VIII.D.4.a.iii.** Results of fate and transport modeling showing potential exposure concentrations and locations; and



**VIII.D.4.a.iv.** Locations of potential sources including past or present waste units or disposal areas and all SWMUs/AOCs.

**VIII.D.4.b.** Table(s) depicting the following information for each SWMU/AOC, including but not limited to: location; type of unit/disposal/release area; design features; operating practices (past and present); period of operation; age of unit/disposal/release area; general physical condition; and method of closure.

**VIII.D.4.c.** Table(s) depicting the following waste/contaminant characteristics for those areas referenced in Condition VIII.D.4.b, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

#### **VIII.D.5. Ecological Profile**

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current, as well as, future impacts to receptors and/or their habitats shall be considered. The Ecological Profile shall include:

**VIII.D.5.a.** A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries;

**VIII.D.5.b.** A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas;

**VIII.D.5.c.** A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.;

**VIII.D.5.d.** A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors;

**VIII.D.5.e.** An ecological checklist as described in Section 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of the RECAP) shall be

used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

#### **VIII.D.6. Risk Management Profile**

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Section 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

**VIII.D.6.a.** A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action at this time (NFA-ATT) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.

**VIII.D.6.b.** A list of identified site-wide data gaps for further investigation.

**VIII.D.6.c.** Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

#### **VIII.E. INTERIM MEASURES**

**VIII.E.1.** If at any time during the term of this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU/AOC poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and an Interim Measures Workplan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit. However, depending upon the nature of the interim measures, a permit modification may not be required.

**VIII.E.2.** The Permittee may propose interim measures at any time by submittal of an Interim Measures Workplan subject to the approval of the Administrative Authority.

**VIII.E.3.** The Administrative Authority shall notify the Permittee in writing of the requirement to perform interim measures and may require the submittal of an Interim

Measures Workplan. The following factors will be considered by the Administrative



Authority in determining the need for interim measures and the need for permit modification:

**VIII.E.3.a.** Time required to develop and implement a final remedy;

**VIII.E.3.b.** Actual and potential exposure to human and environmental receptors;

**VIII.E.3.c.** Actual and potential contamination of drinking water supplies and sensitive ecosystems;

**VIII.E.3.d.** The potential for further degradation of the medium in the absence of interim measures;

**VIII.E.3.e.** Presence of hazardous wastes in containers that may pose a threat of release;

**VIII.E.3.f.** Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;

**VIII.E.3.g.** Weather conditions that may affect the current levels of contamination;

**VIII.E.3.h.** Risks of fire, explosion, or accident; and

**VIII.E.3.i.** Other situations that may pose threats to human health and the environment.

**VIII.E.5.** Upon approval of the Interim Measures Workplan and completion of the interim measure(s) implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.

**VIII.E.6.** At anytime during or after the interim measure(s), including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMUs/AOCs for further corrective action.

#### **VIII.F. CAS (CORRECTIVE ACTION STRATEGY) INVESTIGATION WORKPLAN**

**VIII.F.1.** The CAS Investigation Workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 days after the scoping meeting between the Permittee and the Administrative Authority. The CAS Investigation Workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated, for those SWMUs/AOCs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.



**VIII.F.1.a.** The CAS Investigation Workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQOs). (DQOs are determined based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Investigation Workplan is required to have DQOs that are developed to support the performance standard for each release.) The CAS Investigation Workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

**VIII.F.1.b.** The CAS Investigation Workplan shall describe sampling, data collection quality assurance, data management procedures (including formats for documenting and tracking data and other results of investigations) and health and safety procedures.

**VIII.F.1.c.** Development of the CAS Investigation Workplan and reporting of data shall be consistent with the latest version of the following EPA and State guidance documents or the equivalent thereof:

**VIII.F.1.c.i.** Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

**VIII.F.1.c.ii.** Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

**VIII.F.1.c.iii.** Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

**VIII.F.1.c.iv.** Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

**VIII.F.1.c.v.** Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

**VIII.F.1.c.vi.** 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

**VIII.F.1.c.vii.** RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;



**VIII.F.1.c.viii.** Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3<sup>rd</sup> Edition. November 1992, with revisions;

**VIII.F.1.c.viv.** The LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems,” prepared by the LDEQ and the Louisiana Department of Transportation and Development.** This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Section, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

**VIII.F.1.c.x.** The LAC 33:I.Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP).

**VIII.F.2.** After the Permittee submits the CAS Investigation Workplan; the Administrative Authority will approve, disapprove, or otherwise modify the CAS Investigation Workplan in writing. All approved workplans become enforceable components of this Permit.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS Investigation Workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

**VIII.F.3.** The Administrative Authority shall review for approval, as part of the CAS Investigation Workplan or as a new workplan, any plans developed pursuant to Condition VIII.L addressing further investigations of newly-identified SWMUs/AOCs, or Condition VIII.M addressing new releases from previously-identified SWMUs/AOCs.

#### **VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS**

No later than fourteen (14) days after the Permittee has received written approval from the Administrative Authority for the CAS Investigation Workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS Investigation Workplan and the following:

**VIII.G.1.** The Permittee shall notify the Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this

Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

**VIII.G.2.** Deviations from the approved CAS Investigation Workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Condition VIII.C), RECAP Report (Condition VIII.H) and the final Risk Management Plan (Condition VIII.J).

## **VIII.H. RECAP REPORT**

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. The Administrative Authority will review and evaluate the report and provide the Permittee with written notification of the report's approval or a notice of deficiency. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS Investigation Workplan (Permit Condition VIII.F), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

**VIII.H.1.** The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

**VIII.H.2.** The report shall include, but not be limited to, the following:

**VIII.H.2.a.** Documentation of site investigation activities and results;

**VIII.H.2.b.** Evaluation of exposure scenarios to document impacts from releases;

**VIII.H.2.c.** Deviations from the CAS Investigation Workplan;

**VIII.H.2.d.** Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

**VIII.H.2.e.** The revised CSM with updated profiles which incorporate investigation and screening results; and

**VIII.H.2.f.** Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

## **VIII.I. REMEDIAL ALTERNATIVES STUDY**

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI according to the



performance standards described in Condition VIII.A.2. The remedial alternatives shall be submitted to the Administrative Authority in the Remedial Alternatives Study (RAS) within ninety (90) days of the Administrative Authority's approval of the RECAP Report. In the Remedial Alternatives Study, the Permittee shall identify and evaluate various potential remedies that would meet the performance-based corrective action objectives and propose one or more specific remedies based on an evaluation of applicable data and available corrective action technologies. The RAS shall be prepared in a manner that addresses the extent and nature of the contamination at the facility.

**VIII.I.1.** The Permittee shall evaluate remedies for each AOI that shall:

**VIII.I.1.a.** attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

**VIII.I.1.b.** control sources of releases;

**VIII.I.1.c.** meet acceptable waste management requirements;

**VIII.I.1.d.** protect human health and the environment; and

**VIII.I.1.e.** meet applicable statutory and regulatory requirements (as noted in Condition VIII.A.2.b).

**VIII.I.2.** The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remedial performance standards for each AOI.

**VIII.I.3.** The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.

**VIII.I.4.** If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Section 2.15 of RECAP).

**VIII.I.5.** The RAS shall at a minimum include:

**VIII.I.5.a.** An evaluation of the performance reliability, ease of implementation, and the potential impacts of the potential remedies;

**VIII.I.5.b.** An assessment of the effectiveness of potential remedies in achieving adequate control of sources and meeting remedial performance standards;

**VIII.I.5.c.** An assessment of the costs of implementation for potential remedies;

**VIII.I.5.d.** An assessment of the time required to begin and complete the remedy;

**VIII.I.5.e.** An explanation of the rationale for the remedy proposed for each AOI or group of AOIs; and

**VIII.I.5.f.** An assessment of institutional requirements (e.g., state permit requirements that may impact remedy implementation).

**VIII.I.6.** The Administrative Authority will review and evaluate the RAS and provide the Permittee with written notification of the study's approval or a notice of deficiency. If the Administrative Authority determines the RAS does not fully meet the requirements detailed in Conditions VIII.I.1 through VIII.I.5, the Administrative Authority shall notify the Permittee in writing of the RAS's deficiencies, and specify a due date for submittal of a revised RAS to the Administrative Authority. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

#### **VIII.J. RISK MANAGEMENT PLAN**

Within ninety (90) days of the Administrative Authority's approval of the RAS, the remedy/remedies proposed for selection shall be documented and submitted in the Risk Management Plan. The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A or as directed by the Administrative Authority.

**VIII.J.1.** The Risk Management Plan shall at a minimum include:

**VIII.J.1.a.** A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;

**VIII.J.1.b.** The final CSM with proposed remedies, including locations of AOIs addressed by a risk management activity, COC concentrations that represent the long-term fate and transport of residual COCs and the exposure pathways affected by the risk management activity;

**VIII.J.1.c.** Cost estimates and implementation schedules for proposed final remedies;

**VIII.J.1.d.** Proposed remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements and right-of-way requirements, special health and safety requirements, and community relations activities;



#### **VIII.J.1.e. Remedy Performance Criteria and Monitoring**

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

**VIII.J.1.f.** Contingency plans; and

**VIII.J.1.g.** Description and schedules for performance reviews.

**VIII.J.2.** After the Permittee submits the Risk Management Plan, the Administrative Authority will review and evaluate the plan and subsequently either inform the Permittee in writing that the plan is acceptable for public review or issue a notice of deficiency.

**VIII.J.3.** If the Administrative Authority determines the Risk Management Plan does not fully meet the remedial objectives, the Administrative Authority shall notify the Permittee in writing of the plan's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan. In addition, the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies.

**VIII.J.4.** After the Administrative Authority has determined the Risk Management Plan is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the plan as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

**VIII.J.5.** After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

**VIII.J.6.** If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.3 of this permit.

**VIII.J.7.** If, after considering all public comments, the Administrative Authority determines that the Risk Management Plan is adequate and complete, the Administrative Authority will issue a public notice for final approval the Class 3 permit modification.



The resultant modified permit will include schedules for remedy implementation as well as financial assurance provisions as required by Condition VIII.A.5 of this permit.

## **VIII.K . DETERMINATION OF NO FURTHER ACTION**

### **VIII.K.1. NFA-ATT Determinations for Specific SWMUs/AOCs**

**VIII.K.1.a.** Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1<sup>1</sup> permit modification (<sup>1</sup> requiring Administrative Authority approval) request under LAC 33:V.321.C.1. The NFA-ATT request must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU/AOC that pose a threat to human health and/or the environment.

The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used.

**VIII.K.1.b.** If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information the Administrative Authority determines that releases or suspected releases from an individual SWMU/AOC which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

**VIII.K.1.c.** In accordance with LAC 33:V.321.C.1.a.ii, the Permittee must notify the facility mailing list within ninety (90) days of the Administrative Authority's approval of the Class 1<sup>1</sup> permit modification (<sup>1</sup> requiring Administrative Authority approval) request.

### **VIII.K.2. Facility-Wide NFA-ATT Determination**

**VIII.K.2.a.** Upon the completion of all activities specified in the Risk Management Plan and after all SWMUs and AOCs at the facility have been remediated according to the standards dictated by the selected RECAP MO, the Permittee shall submit a summary report supporting a determination of NFA-ATT on a facility-wide basis.

**VIII.K.2.b.** The summary report must include a historical narrative for each SWMU/AOC at the site that includes a summary of the investigation, sampling & analysis, remedial, and confirmatory sampling activities leading to the NFA-ATT request. The basis for the determination of NFA-ATT shall follow the guidelines as described in the RECAP (Section 1.2.1 of RECAP) for each AOI, depending on the MO used. The facility-wide NFA-ATT determination must consider any



newly-identified SWMUs/AOCs discovered after submittal of the Risk Management Plan.

**VIII.K.2.c.** The Administrative Authority will review and evaluate the summary report and subsequently either inform the Permittee in writing that the report is acceptable for public review or issue a notice of deficiency.

**VIII.K.2.d.** If the Administrative Authority determines the summary report does not fully demonstrate that all remedial objectives have been satisfied, the Administrative Authority shall notify the Permittee in writing of the summary report's deficiencies and specify a due date for submittal of a revised summary report.

**VIII.K.2.e.** After the Administrative Authority has determined the facility-wide NFA-ATT summary report is acceptable for public review, the Administrative Authority shall inform the Permittee in writing and instruct the Permittee to submit the summary report as a Class 3 permit modification request in accordance with the requirements of LAC 33:V.321.C.3.

**VIII.K.2.f.** After conclusion of a 60-day comment period, the Administrative Authority will either grant or deny the Class 3 permit modification request. In addition the Administrative Authority must consider and respond to all significant comments received during the 60-day comment period.

**VIII.K.2.g.** If, based upon review of the Permittee's Class 3 permit modification request, the results of the site investigations, confirmatory sampling, and other pertinent information, the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will grant the modification request.

**VIII.K.2.h.** If the Class 3 Modification request is granted, the Administrative Authority shall prepare a draft permit incorporating the proposed changes in accordance with LAC 33:V.703.C and solicit public comment on the draft permit modification according to Condition VIII.N.4 of this permit.

**VIII.K.2.i.** If, after considering all public comments, the Administrative Authority determines that all activities specified in the Risk Management Plan have been completed and that all SWMUs and AOCs have been remediated to the selected MO, the Class 3 permit modification for facility-wide NFA-ATT will receive final approval. The CAS permit conditions will remain a part of the modified permit in the event that the remedial actions taken fail to maintain the established performance standard and to address any SWMUs/AOCs discovered at a later date.

### **VIII.K.3. Continued Monitoring**

If necessary to protect human health and/or the environment, a determination of NFA-ATT shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

### **VIII.K.4. Additional Investigations**

A determination of NFA-ATT shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU/AOC at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

## **VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs**

**VIII.L.1.** The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMUs and potential AOCs (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water monitoring, field investigations, environmental audits, or other means, no later than thirty (30) days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

**VIII.L.1.a.** The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs/AOCs);

**VIII.L.1.b.** The type and function of the unit;

**VIII.L.1.c.** The general dimensions, capacities, and structural description of the unit (supply any available drawings);

**VIII.L.1.d.** The period during which the unit was operated;

**VIII.L.1.e.** The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

**VIII.L.1.f.** Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents



have occurred, are occurring, or are likely to occur from the SWMU/AOC.

**VIII.L.2.** Based on the information provided in the notification, the Administrative Authority will determine whether or not the area is a newly-identified SWMU or AOC. If the area is determined to be a newly-identified SWMU or AOC, the Administrative Authority will inform the Permittee in writing and request that the Permittee submit a Class 1<sup>1</sup> permit modification (<sup>1</sup> requiring Administrative Authority approval) request under LAC 33:V.321.C.1 to add the newly-identified SWMU/AOC to Appendix 1, Table 1 of this permit.

Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU or AOC. If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The plan for

investigation of SWMU or AOC will be reviewed for approval as part of the current CAS Investigation Workplan or a new CAS Investigation Workplan. The results of the investigation of any newly-discovered SWMU/AOC shall be incorporated into the CSM.

#### **VIII.M. NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED RELEASES AT A SWMU OR AOC**

The Permittee shall notify the Administrative Authority of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. The notification must be in accordance with the procedures specified in Conditions II.E.16 through II.E.20 of this permit and based upon the nature, extent, and severity of the release. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the CSM, completed RECAP Report, or investigation of an AOC, the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification.

The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Investigation Workplan or a new CAS Investigation Workplan. The Permit will be modified to incorporate the investigation, according to the Class 1<sup>1</sup> permit modification (<sup>1</sup>requiring Administrative Authority approval) procedures under LAC 33:V.321. The results of the investigation of any newly-identified release(s) shall be incorporated into the CSM.

#### **VIII.N. PUBLIC PARTICIPATION REQUIREMENTS**

Public participation is an essential element in the implementation of any corrective action program at the facility. The CAS promotes the early and continued involvement of stakeholders



in site remediation activity during permit issuance, renewal, or modification. The public is invited to review and comment on the corrective action requirements contained in any draft permitting decisions or draft permit modification documents and the associated plans and reports submitted by the Permittee. The Administrative Authority reserves the right to require more extensive public participation requirements based upon site-specific conditions and other relevant factors (e.g., compliance history, potential offsite impact, community interest, etc.). At a minimum, the public participation requirements shall include the following.

#### **VIII.N.1. NFA-ATT Determinations for Specific SWMUs/AOCs**

Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may request a NFA-ATT determination for a specific SWMU/AOC by submittal of a Class 1<sup>1</sup> permit modification request (<sup>1</sup>requiring

Administrative Authority approval) under LAC 33:V.321.C.1. The Permittee must notify the facility mailing list within 90 days of the Administrative Authority's approval of the Class 1<sup>1</sup> permit modification request, in accordance with LAC 33:V.321.C.1.a.ii and Condition VIII.K.1.c of this permit.

#### **VIII.N.2. Draft Permitting Decision**

The public may review and comment on the terms and conditions of the CAS during the public notice and comment period of the draft permitting decision. The Administrative Authority shall issue public notice upon preparation of the draft permitting decision in accordance with LAC 33:V.715. During the forty-five (45) day public comment period, the Administrative Authority will accept public comments on the draft permitting decision. At the end of the public comment period, the Administrative Authority will consider and address all public comments and make any necessary revisions to the draft permitting decision. After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permitting decision. The final permitting decision will include a "Responsiveness Summary" detailing all comments received on the draft permitting decision and the actions taken (if necessary) to correct the draft before issuance of the final permitting decision.

#### **VIII.N.3. Final Remedy Selection**

The public may review and comment on the terms and conditions of the Risk Management Plan as described in Conditions VIII.J.4 through VIII.J.7 of this permit. If after addressing all public comments the Administrative Authority determines that the Risk Management Plan is satisfactory, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will identify the proposed remedy for corrective action at the site and the reasons for its selection, describe all other remedies that were considered, and solicit for



public review and comments on the Risk Management Plan included in the draft permit modification document.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.

#### **VIII.N.4. Facility-Wide NFA-ATT**

Upon the completion of all activities specified in the Risk Management Plan and after all facility remedial objectives have been met, the Permittee may submit a summary report for a determination of NFA-ATT on a facility-wide basis in accordance with Condition VIII.K.2 of this permit. The public may review and comment on the summary report as described in Condition VIII.K.2.b. If after addressing all public comments the Administrative Authority determines that all SWMUs and AOCs have been remediated to the selected MO and no further action at the facility is warranted, the Administrative Authority will prepare a draft permit modification document in accordance with LAC 33:V.703.C.

The draft permit modification document will include a "Basis of Decision". The "Basis of Decision" will provide a summary detailing contamination sources, site investigations, the MO selected for the facility, facility remedial standards, remedial actions, and sampling results demonstrating that the facility remedial standards have been achieved.

After addressing all public comments, the Administrative Authority will issue a public notice for issuance of the final permit modification. The final permit modification will include a "Responsiveness Summary" detailing all comments received on the draft permit modification and the actions taken (if necessary) to correct the draft before issuance of the final permit modification.



**Table 37: Corrective Action Strategy Notification and Reporting Requirements**

Below is a summary of the major notifications and reports that may be required by the Administrative Authority under the Corrective Action Strategy of this Permit in the event of releases requiring RCRA corrective action. The Administrative Authority will notify the Permittee of the notification and reporting requirements during the scoping meeting or another applicable stage of the corrective action process.

| <u><b>Actions</b></u>                                                                                                                         | <u><b>Due Date</b></u>                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Submit Notice of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)                 | To be submitted upon identification of a newly identified SWMU or AOC per Condition VIII.L or notification of newly identified releases at a SWMU or AOC per Condition VIII.M. |
| CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)                                                   | Within sixty (60) days of submittal of the Notice of Intent                                                                                                                    |
| Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)                                                | Schedule to be determined by the Administrative Authority on a case-by-case basis                                                                                              |
| Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)                               | Upon request of the Administrative Authority                                                                                                                                   |
| Provide briefings to the Administrative Authority (Condition VIII.C.3)                                                                        | As necessary and upon request by the Administrative Authority                                                                                                                  |
| Submit Conceptual Site Model (CSM) (Condition VIII.D) and facility Performance Standards (Condition VIII.A.2) to the Administrative Authority | Within one-hundred and twenty (120) days after the scoping meeting                                                                                                             |
| Perform Interim Measures (Condition VIII.E)                                                                                                   | As determined by the Administrative Authority on a case by case basis                                                                                                          |
| Submit Corrective Action Strategy (CAS) Workplan for the facility investigation to the Administrative Authority (Condition VIII.F)            | Within one-hundred and eighty (180) days after the CAS Scoping Meeting                                                                                                         |
| Implement site investigation activities under CAS Investigation Workplan according to approved schedule (Condition VIII.G)                    | Within fourteen (14) days of receipt of approval by the Administrative Authority                                                                                               |
| Submit RECAP Report to the Administrative Authority (Condition VIII.H)                                                                        | Within ninety (90) days of completion of the site investigation                                                                                                                |
| Submittal of Remedial Alternatives Study (RAS) to the Administrative Authority                                                                | Within ninety (90) days of completion of approval of the RECAP Report by the                                                                                                   |



|                                                                                                 |                                                                               |
|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| (Condition VIII.I)                                                                              | Administrative Authority                                                      |
| Submit Risk Management Plan to the Administrative Authority (Condition VIII.J)                  | Within sixty (90) days of approval of the RAS by the Administrative Authority |
| Submit NFA (and Permit Modification) request to the Administrative Authority (Condition VIII.K) | As necessary                                                                  |
| Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)                    | Thirty (30) days after discovery                                              |
| Notification of newly-discovered releases (Condition VIII.M)                                    | Fifteen (15) days after discovery                                             |

## APPENDIX 1

**Table 1: SUMMARY OF CORRECTIVE ACTION ACTIVITIES**

| <i><b>AOC/SWMU<br/>Group or Area</b></i> | <i><b>AOC or SWMU<br/>Number/Area Name</b></i> | <i><b>AOC/SWMU Description</b></i>                                    | <i><b>Status of CA<br/>Activity</b></i> | <i><b>Corrective<br/>Action</b></i> | <i><b>EDMS<br/>Document ID #/<br/>Approval Date</b></i> |
|------------------------------------------|------------------------------------------------|-----------------------------------------------------------------------|-----------------------------------------|-------------------------------------|---------------------------------------------------------|
| SWMU                                     | SWMU-6                                         | Former Landfarm Area                                                  | No physical remedy required             | NFA-ATT                             | 09/26/00                                                |
|                                          | SWMU-11                                        | Inactive Retention Basin (Area includes SWMU 7, Former Landfarm Area) | No physical remedy required             | NFA-ATT                             | 09/26/00                                                |
|                                          | SWMU 3                                         | Former Landfill Cells 1, 2, 3                                         | SWMU removed from RFI by EPA            | N/A                                 | 02/28/91                                                |
|                                          | SWMU 46,                                       | Inactive Basin in Process Area                                        | SWMU removed from RFI by EPA            | N/A                                 | 02/28/91                                                |
|                                          | SWMU 47                                        | Inactive Basin South of Former Landfarm                               | SWMU removed from RFI by EPA            | N/A                                 | 02/28/91                                                |
|                                          | Tanks T-301 and T-302                          | Stabilization Mixing Basins                                           | Clean closure of tanks approved         | N/A                                 | 12/23/94                                                |
| AOC                                      | Vehicle Fueling Area                           | BG-1 Active Vehicle Fueling Area                                      | Risk based closure approved             | NFA-ATT                             | 04/12/10                                                |



# **ATTACHMENT 1**

**ATTACHMENT 1**  
**LIST OF FACILITY DOCUMENTS INCORPORATED**  
**IN THE PERMIT BY REFERENCE**

**CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY**  
**AI#742/EPA ID#LAD00777201**  
**PERMIT#LAD000777201-OP-RN-MO-1**

| <b>DOCUMENT TYPE</b>                                                 | <b>APPLICATION/<br/>DOCUMENT<br/>DATE</b> | <b>ELECTRONIC<br/>DATABASE<br/>MANAGEMENT<br/>SYSTEM (EDMS)<br/>DOCUMENT ID<sup>1</sup></b> | <b>COMMENTS</b>                                                                                                                    |
|----------------------------------------------------------------------|-------------------------------------------|---------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| Closure Plan/<br>Post-closure Plan and<br>Cost Estimates             | 9/16/2015<br>2/5/2016                     | 9927941<br>10076710                                                                         | Response to NOD I (Attachments 17 & 18) and NOD II (Attachment 6) for Class 3 Permit Modification Application, Attachments 17 & 18 |
| Contingency Plan                                                     | 9/16/2015                                 | 10506656                                                                                    | Stand Alone Document, from Response to NOD I for Class 3 Permit Modification Application, Attachment 16 <sup>2</sup>               |
| Groundwater Sampling and Analysis Plan (Groundwater Monitoring Plan) | 11/5/2014                                 | 9528605                                                                                     | Class 3 Permit Modification Application, Volume 1: Part 3, Appendix A, Attachment 5                                                |
| Inspection Plan                                                      | 9/16/2015<br>2/5/2016                     | 9927941<br>10076710                                                                         | Response to NOD I (Attachment 15) and NOD II (Attachment 3) for Class 3 Permit Modification Application                            |
| Personnel Training Plan                                              | 11/5/2014                                 | 10506678                                                                                    | Stand Alone Document, from Class 3 Permit Modification Application, Volume 1: Part 3, Appendix A, Attachment 6 <sup>3</sup>        |
| Security Plan                                                        | 9/16/2015                                 | 10506922                                                                                    | Stand Alone Document, from Response to NOD I for Class 3 Permit Modification Application, Attachment 14 <sup>2</sup>               |
| Waste Analysis Plan                                                  | 9/16/2015                                 | 10506676                                                                                    | Stand Alone Document, from Response to NOD I for Class 3 Permit Modification Application, Attachments 13 <sup>2</sup>              |

<sup>1</sup> EDMS is the LDEQ's electronic repository of official records that have been created or received by LDEQ. Employees and members of the public can search and retrieve documents stored in the EDMS via this web application.  
(See <http://edms.deq.louisiana.gov/app/doc/querydef.aspx>)

<sup>2</sup> Original EDMS Document No. 9927941.

<sup>3</sup> Original EDMS Document No. 9528605.



# **BASIS FOR DECISION**

**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL SERVICES**

**BASIS FOR DECISION**

**CLASS 3 PERMIT MODIFICATION**

**MODIFIED HAZARDOUS WASTE OPERATING AND POST-CLOSURE PERMIT**

**CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY  
SULPHUR, CALCASIEU PARISH, LOUISIANA  
LAD000777201/LAD000777201-OP-RN-MO-1  
AGENCY INTEREST (AI) NO. 742**

The Louisiana Department of Environmental Quality, Office of Environmental Services (LDEQ) has approved a Class 3 Permit Modification for the Modified Hazardous Waste RCRA Operating and Post-Closure Permit (permit modification), Number LAD000777201-OP-RN-MO-1 to Chemical Waste Management, Inc. (CWMLC) for the Lake Charles Facility (the facility). The facility is located in Sulphur, Calcasieu Parish, Louisiana.

This Basis for Decision (BFD) document provides an explanation of the LDEQ's basis for approval of the permit modification. This explanation provides background information on the permit applicant, the facility, and its operations; a discussion of the public notice, public comments and responses to the comments; an "IT" analysis; an examination of CWMLC's compliance history; and a conclusion.

Documents containing information referenced in this document are located in the LDEQ's Electronic Document Management System (EDMS).<sup>1</sup>

---

<sup>1</sup> EDMS stands for Electronic Document Management System, the LDEQ's electronic repository of official records that have been created or received by LDEQ. Employees and members of the public can search and retrieve documents stored in the EDMS via this web application. (See <http://edms.deq.louisiana.gov/app/doc/querydef.aspx>).



## **I. BACKGROUND**

### **A. Description of Facility**

CWMLC owns and operates an existing commercial hazardous waste treatment, storage, and disposal facility. CWMLC currently maintains a Hazardous Waste Resource Conservation Recovery Act (RCRA) Operating and Post-closure Permit Number LAD00077201-OP-RN-MO-1 (operating/post-closure permit). The operating/post-closure permit was issued for the commercial treatment, storage, and disposal of hazardous waste and for the post-closure monitoring of previously RCRA-closed hazardous waste landfill cells.

The facility is physically located at 7170 John Brannon Road in Sulphur, Louisiana, Calcasieu Parish at latitude 30° 7' 10" and longitude 93° 24' 10". The facility mailing address is 7170 John Brannon Road, Sulphur, Louisiana. Incoming waste is currently treated to meet land disposal requirements, and then disposed in the permitted hazardous waste Landfill Cell 8, located on the west side of John Brannon Road, which is adjacent to the other operational areas of the facility.

### **B. Permit Action**

CWMLC submitted a Class 3 Permit Modification application to the LDEQ on November 5, 2014. This permit modification authorizes CWMLC to add two new technologies to the facility's current operations.<sup>2</sup> The new systems include two (2) oil recovery units (ORUs), two (2) thermal desorber units (TDUs), and nineteen (19) associated tanks. These systems are permitted as miscellaneous units within the existing operating and post-closure permit. A brief description of the ORUs, TDUs, and their operating processes is set forth below:

#### ORUs:

Acceptable material will be received at the facility and will be evaluated for resource recovery. As part of the waste acceptance process, composite sampling of the waste streams destined for the ORU process will be performed in accordance with the facility's Waste Analysis Plan (WAP). The waste material will be separated into three streams: recovered oil for resale on fuels market; recovered water for reuse or disposal; and solids for landfilling.

---

<sup>2</sup> See permit application, EDMS Document Nos. 9528630, 9529433, 9528605, 9529104, and 9528644.

ORU Operating Process:

- The units (2 centrifuges) will separate oil from drilling fluids, refinery tank bottoms, commercially exempt waste, and other hazardous and non-hazardous wastes.
- Several tanks and two off-loading pits will be associated with the operations of the units from offloading to preheating of materials prior to entering the centrifuge unit.
- A small combustion device fired by propane or natural gas will be installed for steam heating.
- Following centrifuging, materials handling will be required for sludge/solids disposal.
- Separated oils will be loaded for off-site transport.

TDUs:

The system will be comprised of two units designed to process tank bottoms, sludge, catalyst slurry oil, organic contaminated soils, and other organic hazardous wastes requiring thermal treatment to meet land disposal restrictions. Several tanks will be associated with the operations. The units will be designed to separate the organic constituents from the incoming waste stream by condensing the organic components. This process will allow for the disposal of the contaminants and for the collection and recycling of recovered oil.

TDU Operating Process:

- Organic components will be separated from the waste via indirect heat.
- A conveyor system will receive untreated material and feed it to one of two units for thermal separation.
- Conveyors will route the processed solids to two separate discharge points.
- Clean, treated solids will exit the units and will be hydrated to suppress dust.
- All vapors will be routed to the Vapor Recovery Unit where they will mix directly with cool process water.
- Condensed oils will be collected in the Oil Water Separator, which is an integral part of the Water Treatment Unit.
- Recovered oil will be sold.
- Non-condensable gas will be routed to a Thermal Oxidizer.
- This process will render the feed material non-hazardous, with organic components removed, while still preserving the hydrocarbons.



### C. Definitions

To assist with a better understanding of CWMLC's facility and operations, the LDEQ provides the following definitions as contained in the hazardous waste regulations and the modified permit:

**Miscellaneous Unit** – a hazardous waste management unit where hazardous waste is treated, stored, or disposed of and that is not a container, tank, surface impoundment, pile, land treatment unit, landfill, incinerator, boiler, industrial furnace, underground injection well (with appropriate technical standards under 40 CFR Part 146), containment building, corrective action management unit, unit eligible for a research, development, and demonstration permit under LAC 33:V.329, or staging pile.

**RCRA Permit** - the full permit, with the Resource Conservation and Recovery Act (RCRA) and 1984 Hazardous and Solid Waste Amendments (HSWA) to RCRA portions.

**Thermal Treatment** - the process of treating solid or hazardous waste in a device that uses elevated temperatures as the primary means to change the chemical, physical, or biological character or composition of the waste.

**HSWA** - the 1984 Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act.

**Landfill** – a disposal facility or part of a facility where hazardous waste is placed in or on land and which is not a pile, land treatment facility, surface impoundment, underground injection well, salt dome formation, salt bed formation, underground mine, cave, or correction action management unit.

**Landfill Cell** – a discrete volume of a hazardous waste landfill which uses a liner to provide isolation of wastes from adjacent cells or wastes. Examples of landfill cells are trenches and pits.

**Monitoring** – inspection and collection of data following a predesigned schedule and system on operational parameters of the facility or on the quality of the environment including the air, groundwater, surface water or soils.

## **D. Permit Application**

The following dates and activities are relevant to the LDEQ's review of CWMLC's permit modification application:

CWMLC submitted a Class 3 Permit Modification application, dated November 5, 2014.<sup>3</sup> The permit application was determined to be administratively complete on January 20, 2015.<sup>4</sup> The LDEQ issued an email Notice of Deficiency (NOD) #1 on April 9, 2015.<sup>5</sup> The LDEQ issued a letter NOD #1 on July 8, 2015.<sup>6</sup> CWMLC submitted five (5) 30-day extension requests to respond to NOD #1 on May 8, 2015,<sup>7</sup> June 8, 2015,<sup>8</sup> July 7, 2015,<sup>9</sup> August 6, 2015<sup>10</sup>, and September 4, 2015.<sup>11</sup> CWMLC submitted responses to NOD #1 on September 16, 2015.<sup>12</sup> The LDEQ issued NOD #2 on February 3, 2016.<sup>13</sup> CWMLC submitted responses to NOD #2 on February 5, 2016,<sup>14</sup> February 16, 2016,<sup>15</sup> and March 30, 2016.<sup>16</sup> On March 30, 2016, the regulations were technically addressed, or will be addressed via a schedule of compliance, by the applicant for the facility as required under Subtitle C of RCRA. A draft permit decision was prepared for public notice on May 13, 2016.<sup>17</sup>

## **II. PUBLIC PARTICIPATION**

### **A. Public Notice**

Public notice regarding the Hazardous Waste RCRA Operating and Post-closure Class 3 Permit Application was published in *The Advocate*, in Baton Rouge, Louisiana and in *The American Press* in Lake Charles, Louisiana on November 13, 2014.<sup>18</sup> Public notice of the draft permit decision was prepared and published in *The*

<sup>3</sup> See permit application, EDMS Document Nos. 9528630, 9529433, 9528605, 9529104, and 9528644.

<sup>4</sup> See EDMS Document No. 9604416.

<sup>5</sup> See EDMS Document No. 9710826.

<sup>6</sup> See EDMS Document No. 9837540.

<sup>7</sup> See EDMS Document No. 9757812.

<sup>8</sup> See EDMS Document No. 9800898.

<sup>9</sup> See EDMS Document No. 9835607.

<sup>10</sup> See EDMS Document No. 9882900.

<sup>11</sup> See EDMS Document No. 9926552.

<sup>12</sup> See EDMS Document No. 9927941.

<sup>13</sup> See EDMS Document Nos. 10072026 and 10066157.

<sup>14</sup> See EDMS Document No. 10076710.

<sup>15</sup> See EDMS Document No. 10085276.

<sup>16</sup> See EDMS Document No. 10137954.

<sup>17</sup> See EDMS Document No. 10188739.

<sup>18</sup> See EDMS Document Nos. 9535396 and 9545416.



*Advocate*, in Baton Rouge, Louisiana, in *The American Press*, in Lake Charles, Louisiana, and announced on KAOK-AM in Lake Charles, Louisiana on May 13, 2016.<sup>19</sup> The notice was also mailed to concerned citizens listed in the LDEQ, Office of Environmental Services' Public Notice Mailing List on May 12, 2016.<sup>20</sup> A second public notice regarding the public hearing was published in *The Advocate* in Baton Rouge, Louisiana, *The American Press* in Lake Charles, Louisiana, and announced on KYKZ-FM in Lake Charles, Louisiana on October 14, 2016.<sup>21</sup> The Public Notices set a time for public comment submittals and notified the time and location for the public hearing regarding the draft modified permit. The public comment period began on May 13, 2016 and was extended to December 5, 2016.

Copies of the Class 3 Permit Modification application, including the Environmental Assessment Statement (EAS) or "IT Analysis" required by La. R.S. 30:2018 and the draft modified permit, were made available for review at the LDEQ Capital Regional Office, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA 70802; the Calcasieu Public Library – Sulphur Regional Branch, located at 1160 Cypress Street, Sulphur, LA 70663; and through the Electronic Document Management Systems (EDMS) on the LDEQ website.<sup>22</sup> Copies could also be requested through the Public Records Act.

## **B. Public Hearing**

A public hearing was held on Tuesday, November 29, 2016 at the Frasch Park Meeting Room, located at 400 Picard Road in Sulphur, Calcasieu Parish, LA.<sup>23</sup>

## **C. Public Comment**

The LDEQ received written comments from the CWMLC, the Environmental Protection Agency (EPA) – Region VI, Mr. Carl Palmer, Mr. Robert Yarbrough, Ms. Mary Ellender, and Mr. Dale Clement.

At the public hearing, a representative for CWMLC made a statement regarding the proposed permit modification. In addition, Mr. Carl Palmer made a statement regarding the permitting requirements for the proposed permit modification.

<sup>19</sup> See EDMS Document Nos. 10196842, 10197076, and 10210728.

<sup>20</sup> See EDMS Document No. 10190071.

<sup>21</sup> See EDMS Document Nos. 10386589, 10386552, and 10386543.

<sup>22</sup> <http://www.deq.louisiana.gov/portal/tabid/2604/Default.aspx>

<sup>23</sup> See EDMS Document No. 10435094.

At the public hearing, one (1) person spoke in support of the permit application and draft modified permit and one (1) person spoke in opposition of the permit application and draft modified permit. The public comment period ended on December 5, 2016.

#### **D. Response to Public Comment**

A “Responsiveness Summary” was prepared for all significant comments and is attached and made a part of this Basis for Decision.

### **III. “IT” ANALYSIS**

#### **A. The Requirements**

An “IT Analysis” consists of five requirements that both the permit applicant and the LDEQ consider during the permit application review process.<sup>24</sup> Although the five requirements have been expressed as three requirements, the requirements remain basically the same whether stated as five or as three.<sup>25</sup> The “IT Analysis” considers whether:

- 1) the potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible;
- 2) a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the project demonstrate that the latter outweighs the former;
- 3) there are alternative projects or alternative sites or mitigating measures, which would offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.

Notably, the Louisiana Constitution does not establish environmental protection as an exclusive goal, but instead, requires a balancing process in which environmental costs and benefits must be given full and careful consideration along with economic, social, and other factors.<sup>26</sup>

---

<sup>24</sup> See *Save Ourselves v. Env'tl. Control Comm'n*, 452 So.2d 1152,1157 (La. 1984).

<sup>25</sup> See *Matter of Rubicon, Inc.*, 95-0108, (La. App. 1 Cir. 2/14/96), 670 So.2d 475, 483.

<sup>26</sup> *Save Ourselves v. Env'tl. Control Comm'n*, 452 So.2d 1152,1157 (La. 1984).



## B. LDEQ's Analysis

As part of the LDEQ's extensive analysis pursuant to the "IT" Requirements, the LDEQ finds that "adverse environmental impacts have been minimized or avoided as much as possible consistently with the public welfare." *Save Ourselves v. La. Env'tl. Control Comm'n*, 452 So. 2d 1153, 1157 (La. 1984); see also *In The Matter of Rubicon, Inc.*, 607 So. 2d 475 (La. App. 1<sup>st</sup> Cir. 1996), *rehearing denied*.

For purposes of clarity and emphasis, the "IT" Requirements will be analyzed in five (5) parts as originally set forth in *In the Matter of Blackett v. Department of Environmental Quality*, 506 So. 2d 749 (La. App. 1<sup>st</sup> Cir. 1987). The LDEQ utilized CWMLC's information in the EAS or "IT" Decision Responses during the review process for the permit modification application. While the LDEQ recognizes that the concepts of alternative sites, alternative projects, and mitigating measures are closely interrelated and overlap, each concept is addressed separately in the document for purposes of emphasis and clarity.

However, the LDEQ stresses the interrelation of the three; for example, the choice of a particular site could involve mitigating factors and possibly alternative project considerations. Likewise, selection of an alternative project could invoke mitigating factors and impact site selection. Apparently, the Louisiana First Circuit Court of Appeal has also recognized this interrelationship and now considers the three requirements as one.<sup>27</sup>

### 1. AVOIDANCE OF ADVERSE ENVIRONMENTAL EFFECTS: Have the potential and real adverse environmental effects of the proposed facility been avoided to the maximum extent possible?

The modification of CWMLC's existing operating/post-closure permit adds 2 ORUs, 2 TDUs, and 19 associated tanks to the facility's operation. The ORUs and TDUs will be located, designed, constructed, operated, and maintained in a manner that will ensure protection of the human health and the environment. The engineering design and operating procedures associated with the units and tanks will comply with all regulatory and permitting requirements.

Upon arrival at the facility and prior to acceptance, incoming waste is subject to inspection and screening procedures, which include the submission by a generator of a waste profile, a certification by the generator of the information and data

---

<sup>27</sup> *Matter of Rubicon, Inc.* 95-0108 (La. App. 1 Cir. 2/14/96), 670 So. 2d 475, 483.

contained in the profile, and the pre-acceptance of the waste for disposal prior to arrival at the facility. Wastes will be loaded into the ORUs and TDUs within an enclosed building under slightly negative air pressure, to control run-on and run-off from the units.

The ORUs and TDUs will include protective design and operation features to prevent or control potential unauthorized releases to the environment, such as secondary containment, dust suppression, air emission control devices, and redundant shutdown systems. Air control devices will be installed to meet the emission limitations of the related air permit (0520-00081-11).<sup>28</sup> Dust suppression measures are utilized for the off-loading pits, conveyor systems, and solids recovery to capture potential contaminants to the air. The secondary containment systems surrounding the new units and associated equipment will be constructed using reinforced concrete. This material will protect against waste spills and runoff, which have the potential to contaminate the underlying soils and groundwater.

CWMLC employs a full-time Environmental Manager and regularly conducts safety and environmental training to ensure that its employees are aware of and comply with environmental laws, regulations, and policies. Additionally, in accordance with the applicable regulations, CWMLC has developed a site-specific inspection plan. The inspection plan provides a mechanism to prevent and detect system malfunctions, equipment deterioration and operator errors, which have the potential to cause a release of hazardous waste constituents to the environment or create a threat to human health. The inspection program is designed to provide an early warning of the potential for such events in order that corrective and preventive actions may be taken in a timely manner.

The inspection plan for the treatment and disposal units encompasses process-specific monitoring, control systems and associated structures. The units will be subject to specific inspections to minimize potential environmental effects. The inspection program is divided into two segments: (1) general facility inspection, and (2) specific process unit inspections. The former focuses on items which apply to facility-wide operations. Specific treatment process units, including the ORUs and TDUs, are included within the second category.

The inspection program is implemented by qualified individuals who are trained to recognize any noncompliance conditions at the facility and to prevent adverse

---

<sup>28</sup> See EDMS Document No. 10155418.



consequences to human health and/or the environment. The designated individuals have the authority to implement the required inspections, perform the necessary evaluations and hazard assessments, and recommend appropriate corrective or remedial actions.

Inspections are performed according to a pre-determined schedule based on regulatory requirements (where applicable), and engineering knowledge and operational experience with the systems and processes involved. The units will be inspected on a regular basis at a frequency which will alert facility personnel prior to development of a serious problem. An inspector will evaluate and assess each unit to detect and remedy any potential malfunction, equipment deterioration, or operator error.

CONCLUSION: The LDEQ finds that the control and safety features associated with the operation of the ORUs, TDUs, and associated tanks will minimize the potential and real adverse environmental effects to the maximum extent possible.

**2. COST/BENEFIT ANALYSIS (BALANCING): Does a cost benefit analysis of the environmental impact costs balanced against the social and economic benefits of the proposed facility demonstrate that the latter outweighs the former?**

CWMLC has operated its commercial hazardous waste treatment, storage and disposal facility for over 30 years. CWMLC provides a significant contribution to both the state and local economies by the provision of employment and tax revenue generated by the facility's operations. CWMLC currently employs ninety (90) full-time employees and four (4) contract workers. As stated by CWMLC, based upon information contained in the administrative record, and accepted by the LDEQ, CWMLC has directly or indirectly been responsible for 519 jobs and \$53.7 million in business activity in Calcasieu Parish, as well as 530 jobs and \$90 million in spending statewide. The operation of the ORUs, the TDUs, and associated tanks is expected to provide 20-30 additional jobs.<sup>32</sup>

The inclusion of the new units in CWMLC's operating/post-closure permit is expected to have little or no negative effect on current property values in the surrounding area. Further, the new technologies will not result in an increase in costs to the local government. The existing public services and infrastructure, such as police and fire protection, schools, and roads, are adequate to support the

---

<sup>32</sup> See EDMS Document No. 9927941, pgs. 82-117.

facility's expanded operations. The additional treatment units will result in a slight increase in the number of trucks and employee vehicles entering and exiting the facility; however, the additional vehicles are not expected to have a significant impact on local traffic conditions.

CWMLC provides valuable waste treatment, storage and disposal services to a number of businesses and industries in Louisiana. The new processes are designed as an economical method to reduce the volume of residuals and organic constituents to be landfilled, while also allowing for the recovery of oil for sale and reuse.<sup>33</sup>

CONCLUSION: The LDEQ finds that the social and economic benefits of the facility, including the additional waste treatment processes, outweigh the environmental impact costs.

**3. ALTERNATIVE PROJECTS: Are there alternative projects which would offer more protection to the environment than the proposed facility without unduly curtailing non-environmental benefits?**

The addition of the ORUs, TDUs, and associated tanks to CWMLC's existing operation will provide waste generators with state-of-the-art methods to recover valuable natural resources, alternative disposal options, and organics treatment that complies with the Universal Treatment Standards. The new technologies will provide industry customers with an economically viable treatment alternative to direct landfill disposal of petroleum contaminated waste. Employing these treatment methods will largely reduce generator waste streams, resulting in a reduction of the total volume of waste that is landfilled. Moreover, the additional treatment processes will recover separated oil which will then be available for reuse. Without such treatment of the waste streams, this valuable commodity would remain unsalvaged. CWMLC's continued implementation of established monitoring, testing, inspections, response, and reporting procedures and frequencies will help to ensure compliance with all applicable regulatory and permitting requirements governing the new units.<sup>35</sup>

CONCLUSION: The LDEQ finds there are no alternative projects which would offer more protection to the environment than the proposed additional treatment processes, without unduly curtailing non-environmental benefits.

---

<sup>33</sup> See EDMS Document No. 9927941, pgs. 82-117.

<sup>35</sup> See EDMS Document No. 9927941, pgs. 82-117.



**4. ALTERNATIVE SITES: Are there alternative sites which would offer more protection to the environment than the proposed facility site without unduly curtailing non-environmental benefits?**

As previously stated, the new units will be incorporated into CWMLC's existing facility, and will not entail an expansion beyond the current footprint. Constructing a new site at an alternate location would result in an increased environmental footprint, without providing any additional protection to the environment. The existing site offers advantages over alternate sites because it is already permitted and constructed, and has a history of safe operation. Moreover, the continued treatment and disposal of hazardous waste at the current site eliminates the need to utilize additional land for these purposes.

The immediate area surrounding the facility has little residential population and is primarily used for industrial and agricultural purposes. The area is zoned I-3, allowing for hazardous industrial use. The customers that ship waste to the CWMLC facility are primarily located within the state, and many of those industrial customers are situated in the local vicinity. The facility's existing location allows CWMLC's customers to ship waste to the facility economically while reducing the time and distance that hazardous waste is transported on public roadways.<sup>37</sup>

CONCLUSION: The LDEQ finds that there are no alternative sites that would be more protective of the environment without unduly curtailing non-environmental benefits.

**5. MITIGATIVE MEASURES: Are there mitigating measures which would offer more protection to the environment than the proposed facility, without unduly curtailing non-environmental benefits?**

The avoidance of potential and real adverse environmental effects of the new treatment processes has been discussed in Section III.B.1, above. By continuing to implement established monitoring, testing, analytical data collection, inspections, response, and reporting procedures, and instituting additional control and safety features particular to the ORUs and TDUs, CWMLC is expected to meet or exceed compliance with the limits of its operating permits, which have been determined to be protective of human health and the environment.

---

<sup>37</sup> See EDMS Document No. 9927941, pgs. 82-117.

A detailed discussion of release prevention and mitigation measures is included in the inspection plan and the training plan, as well as the contingency plan. These plans establish operating controls, routine maintenance and inspection procedures, training and review, and emergency response procedures that will minimize releases to the environment.<sup>40</sup>

**CONCLUSION:** The LDEQ finds there are no mitigating measures which would offer more protection to the environment, without unduly curtailing non-environmental benefits.

#### **IV. COMPLIANCE HISTORY**

##### **A. Facility Violations**

The LDEQ has examined CWMLC's compliance with Louisiana's environmental regulations for the past five years. Enforcement actions issued by the LDEQ to the facility include one (1) Amended Compliance Order (ACO) and Notice of Potential Penalty (NOPP) related to the water permit; one (1) NOPP related to the hazardous waste permit; and one (1) Settlement Agreement related to the water permit. The enforcement issues are detailed below:

- March 21, 2012 – The LDEQ issued CWMLC an ACO and NOPP to the facility's associated water permit.<sup>41</sup> The violations are as follows:
  - Exceedance of the effluent limitations;
  - Failure to report sample values on Discharge Monitoring Reports (DMRs); and
  - Unauthorized discharge.
- May 28, 2013 – The LDEQ issued CWMLC a NOPP to the facility's associated hazardous waste permit.<sup>42</sup> The violation is as follows:
  - Failure to provide prompt notification of unauthorized discharge that caused an emergency condition.
- January 5, 2016 – The LDEQ and CWMLC reached a Settlement Agreement between both parties associated with the above-referenced violations related to the facility's water permit.<sup>43</sup>

---

<sup>40</sup> See EDMS Document No. 9927941, pgs. 82-117.

<sup>41</sup> See EDMS Document No. 8328859.

<sup>42</sup> See EDMS Document No. 8863852.

<sup>43</sup> See EDMS Document No. 10042534.



## **B. LDEQ Analysis**

The LDEQ has evaluated information in the administrative record associated with this permit action, including the compliance history, as detailed above.

Pursuant to La. R.S. 30:2014, prior to granting or denying a permit, the LDEQ is required to consider the compliance history of the “facility” subject to the application. Additionally, LAC 33:I.1701.A provides, in pertinent part, that

[i]n addition to meeting the requirements for permits outlined in the applicable sections of the environmental quality regulation, an applicant shall have no history of environmental violation(s) that demonstrates to the department unwillingness or inability to achieve and maintain compliance with the permit for which the application is being made unless the department determines that the applicant’s history of environmental violations(s) can be adequately addressed by permit conditions.

After evaluating the compliance history of CWMLC, the LDEQ has concluded that the facility has had no history of environmental violations that demonstrates to the Department unwillingness or inability to achieve and maintain compliance with the permit for which the application is being made.

## **V. CONCLUSION**

Based on a careful review and evaluation of the entire administrative record, which includes but is not limited to, the permit modification application, the Environmental Assessment Statement, additional application-related information, compliance history, and all public comments, the Louisiana Department of Environmental Quality, Office of Environmental Services, finds that CWMLC’s modified permit will comply with all applicable statutes and regulations and will comply with the requirements of *Save Ourselves v. La. Env’tl. Control Commission*, 452 So. 2d 1152, 1157 (La. 1984.). Particularly, the LDEQ finds that potential and real adverse environmental impacts have been minimized or avoided to the maximum extent possible and that social and economic benefits outweigh environmental impacts.



Elliott B. Vega  
Assistant Secretary  
Office of Environmental Service

3/21/17

Date



# **RESPONSIVENESS SUMMARY**

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

**ITEM                      1**

**REFERENCE**            Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit.<sup>1</sup>

**ISSUE**                 Permit Conditions V.F.4.c and V.G.4.c

**COMMENT**            Chemical Waste Management, Inc. - Lake Charles Facility (CWMLC) requests that the reference to LAC 33:V.Chapter 17 be removed from the above conditions.

The only Chapter 17 requirements pertinent to the above referenced conditions are those found in LAC 33:V.Chapter 17.Subchapter A setting forth standards for process vent control systems. However, Subchapter A requirements do not apply to process vents where the facility owner or operator certifies that all of the process vents that would otherwise be subject to the subchapter are equipped with and operating air emission controls in accordance with the process vent requirements of an applicable Clean Air Act regulation codified under 40 CFR Part 61. (LAC 33:V.1705.A.3) Similarly, Subchapter C requirements do not apply to tanks, surface impoundments, and containers where the facility owner or operator certifies that all of the tanks, surface impoundments, and containers that would otherwise be subject to the subchapter are equipped with and operating air emission controls in accordance with the requirements of an applicable Clean Air Act regulation codified under 40 CFR Part 61. (LAC 33:V.1747.B.7).

The oil recovery and thermal desorber units covered by the above referenced hazardous waste permit conditions are also subject to 40 CFR 61 Subpart FF requirements, and will be equipped and operated with air emission controls as mandated by Subpart FF and CWMLC's air permit. Therefore, the oil recovery and thermal desorber units should not be subject to the emission control standards of LAC 33:V.Chapter 17.

Because of this, CWMLC requests that both of the above cited conditions (V.F.4.c and V.G.4.c) be reworded to read as follows:

The Permittee shall operate and maintain all particulate control devices in accordance with 40 CFR 61 Subpart FF, and sound air pollution control practices as detailed in the site's air permit.<sup>2</sup>

---

<sup>1</sup> EDMS Document No. 10219574.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>The conditions set forth under V.F.4.c and V.G.4.c pertain to the particulate control devices of the ORU and the TDU respectively. As these processes are not associated with the operations listed under LAC 33:V.Chapter 17.Subchapter A and are not tanks, surface impoundments, and containers as required under LAC 33:V.Chapter 17. Subchapter C, the permit language for these conditions has been modified to better reflect the applicable regulations of LAC 33:V.Chapter 17.Subchapter B for equipment leaks.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ACTION           | <p>Due to changes in the permit, the numbering sequence of the permit conditions have been revised.</p> <p>For the ORU, see Permit Condition V.F.3.f, which states the following:</p> <p>The Permittee shall operate and maintain all particulate collection devices in accordance with sound air pollution control practices, the facility's air permit, and applicable requirements of LAC 33:V.Chapter 17.Subchapter B.</p> <p>For the TDU, the particulate control is handled by the vapor recovery unit (i.e. venture scrubber) Group A Process Operating Conditions. See Permit Condition V.G.11.a.vii, which states the following:</p> <p>Whenever hazardous waste is in the unit, the hourly rolling average pressure drop across the scrubber shall be maintained above the minimum value of <b>TBD</b>.<sup>3</sup></p> <p>See Permit Condition V.G.11.a.viii, which states the following:</p> <p>Whenever hazardous waste is in the unit, the hourly rolling average liquid to gas ratio shall be maintained above the minimum value of <b>TBD</b>.<sup>3</sup></p> <p>See Permit Condition V.G.11.a.x, which states the following:</p> <p>Whenever hazardous waste is in the unit, the hourly rolling average pH of the feed to the scrubber shall be maintained above the minimum value of <b>TBD</b>.<sup>3</sup></p> |

---

<sup>2</sup> EDMS document 10219574, page 3.

<sup>3</sup> To Be Determined at the completion of the Comprehensive Performance Test (CPT).

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM      | 2                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| REFERENCE | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>4</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ISSUE     | Definition of “Continuous Monitoring System (CMS)”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| COMMENT   | <p>CWMLC requests that the minimum frequencies specified for operational verification, sampling, evaluation and recordation of the CMS as set forth in the last two sentences of the definition be deleted in their entirety. The frequency of operational verification, sampling, evaluation and recordation should be specified for the CMS of each respective operational unit in the pertinent Permit Conditions relating to that unit. To the extent the Draft Permit already does so, inclusion of minimum frequencies in the definition is unnecessary; to the extent the frequencies cited in the definition may vary from those in the specific Permit Conditions, conflict and ambiguity concerning the proper standard of compliance may be created hindering the permittee’s ability to determine what is required to maintain compliance with the hazardous waste permit.</p> |

To resolve these issues, CWMLC would propose that the definition of CMS be revised to read as follows:

**“Continuous Monitoring System (CMS)”** is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for continuously sampling a parameter without interruption and evaluating the detector response as defined by this permit.”

Alternatively, CWMLC would request that the definition of CMS be revised to read as follows:

**“Continuous Monitoring System (CMS)”** is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for continuously sampling a parameter without interruption and evaluating the detector response as defined by this permit. The installation and operation of a CMS must be verified at a frequency and in a manner consistent with

---

<sup>4</sup> EDMS document 10219574.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

manufacturer specifications, but no less frequent than once per year. CMS must sample the regulated parameter without interruption, evaluate the detector response at least once every 15 seconds, and compute and record the average values at least every 60 seconds when hazardous waste is in the unit. Should there be any conflict between the requirements contained in this definition and the requirements set forth in Permit Conditions applicable to a specific permitted unit, the requirements set forth in the Permit Conditions section applicable to a specific permitted unit shall control.<sup>5</sup>

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following response:

The frequencies cited in the definition have been included in the specific permit conditions for the required units and have been removed from the definition.

ACTION

The definition has been revised to the following:

**“Continuous Monitoring System (CMS)”** is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for continuously sampling a parameter without interruption and evaluating the detector response as defined by this permit. The installation and operation of a CMS requires, at a minimum, to comply with the manufacturer’s written specifications or recommendations for installation, operation, and calibration of the system. The calibration of a CMS must be verified at a frequency and in a manner consistent with manufacturer specifications, but no less frequently than as specified in this permit.

---

<sup>5</sup> EDMS document 10219574, page 4.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|             |                                                                                                                                                                                |
|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b> | <b>3</b>                                                                                                                                                                       |
| REFERENCE   | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>6</sup>                                     |
| ISSUE       | Definition of “Continuous Monitoring System (CMS)”                                                                                                                             |
| COMMENT     | CWMLC requests that the minimum calibration frequency (once per year) specified in the above definition be deleted for reasons in addition to those cited in Comment #2 above. |

Assuming the frequencies specified in the above definition applies to CMS operated within the oil recovery units and thermal desorber units, it is not economically or commercially feasible to calibrate certain components of the CMS within those units and their support facilities on an annual basis (or at any frequency). For example, a thermocouple can only be calibrated by removing it from the unit and sending it to the manufacturer. As another example, the available calibration methods for a tank level indicator strongly depend on the type of indicator used and would likely also require removing it from the unit to be sent to the manufacturer. Since this is not a service that is routinely provided by the monitoring device manufacturer, this would require weeks, if not months, of downtime while the required calibrations are performed. There are no field calibration methods available for either of these monitoring devices. Note that these are examples and are not an exhaustive list of all such monitoring devices for which calibrations are not realistic.

The requirements specified in Conditions V.F.8.a.v and V.G.8.a.v adequately address all relevant calibration requirements for each individual piece of monitoring equipment within the oil recovery units and thermal desorber units. To resolve this issue, CWMLC would propose that the definition of CMS be revised as follows (but only if the Department fails to revise the definition of CMS as proposed in Comment #2 above):

“Continuous Monitoring System (CMS)” is a comprehensive term that may include, but is not limited to, continuous emission monitoring systems, continuous opacity monitoring systems, continuous parameter monitoring systems, or other manual or automatic monitoring that is used for continuously sampling a parameter without interruption and evaluating the detector response as defined by this permit. The installation and operation of

---

<sup>6</sup> EDMS document 10219574.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

a CMS must be verified at a frequency and in a manner consistent with manufacturer specifications. CMS must sample the regulated parameter without interruption, evaluate the detector response at least once every 15 seconds, and compute and record the average values at least every 60 seconds when hazardous waste is in the unit.<sup>7</sup>

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following response:

The frequencies cited in the definition have been included in the specific permit conditions for the required units and have been removed from the definition.

ACTION

See the LDEQ Response to Item No. 2.

---

<sup>7</sup> EDMS document 10219574, page 5.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM             | 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| REFERENCE        | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>8</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ISSUE            | Permit Condition V.G.8.a.i                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| COMMENT          | <p>CWMLC requests that the reference to LAC 33:V.1709.H be removed from the above cited Permit Condition. Section 1709.H is found within LAC 33:V.Chapter 17.Subchapter A. However, as noted in Comment #1 above, Subchapter A requirements do not apply to process vents where the facility owner or operator certifies that all of the process vents that would otherwise be subject to the subchapter are equipped with and operating air emission controls in accordance with the process vent requirements of an applicable Clean Air Act regulation codified under 40 CFR Part 61. The thermal desorber units are subject to 40 CFR 61 Subpart FF, and will be equipped and operated with air emission controls as mandated by Subpart FF and CWMLC's air permit. Therefore, the thermal desorber units should not be subject to the emission control standards of LAC 33:V.Chapter 17. Subchapter A, including those found in LAC 33:V.1709.H.</p> <p>Because of this, CWMLC requests that Condition V.G.8.a.i be revised to read as follows:</p> <p>The applicable continuous monitoring system (CMS) to the unit shall be installed, operated, and maintained in accordance with the manufacturer's specifications, the requirements of 40 CFR 61 Subpart FF, this permit, and the air permit.<sup>9</sup></p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>Clarification of the Monitoring and Calibration requirements have been changed as listed in section V.G.7 of this permit.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ACTION           | Permit Condition V.G.7 has been revised to state the following:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

**V.G.7. Monitoring and Calibration**

---

<sup>8</sup> EDMS document 10219574.

<sup>9</sup> EDMS document 10219574, page 6.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

**V.G.7.a. Requirements**

**V.G.7.a.i.** The Permittee shall maintain, calibrate, and operate continuous monitoring equipment as specified in Table 29 that monitor and record the operating conditions specified in Condition V.G.11 of this Permit. The continuous monitoring requirements shall be as specified in Tables 30 and 31 of this Permit.

**V.G.7.a.ii.** The Permittee must calibrate the equipment according to the manufacturer's specifications and any applicable state or federal regulations. Calibration procedures shall be included in the operating record of the facility and available at all times for the review by the Administrative Authority.

**V.G.7.a.iii.** Hazardous waste may continue to be introduced into the Thermal Desorber Unit during the daily continuous emission monitoring system (CEMS) calibration check periods. The CEMS shall be maintained according to the following schedule: (1) at least daily; a calibration check of the instrument; (2) at least daily, a system audit; (3) at least quarterly, a calibration error test; and (4) at least annually, a performance specification test. The procedures for CEMS maintenance are outlined in 40 CFR 266 Appendix IX Section 2.0, "Performance Specifications for Continuous Emission Monitoring Systems."

**V.G.7.a.iv.** At a minimum, the Permittee shall analyze values from the continuous monitoring system and the continuous emission monitoring system (CEMS) every fifteen (15) seconds. The Permittee must record these values every sixty (60) seconds for use in calculating an hourly rolling average basis for the treatment process to demonstrate compliance with the monitoring requirements.

**V.G.7.a.v.** The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

**V.G.7.a.vi.** Monitoring samples and measurements shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V.Chapter 49.Appendix D

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised or equivalent methods.

**V.G.7.b. Records**

In the operating record, the Permittee shall record and maintain, in accordance with LAC 33:V.1529, all monitoring data compiled to satisfy the permit requirements.

Electronic records may be maintained, in lieu of paper copies.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM      | 5                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| REFERENCE | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>10</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ISSUE     | Permit Conditions V.F.8.a.ii and V.G.8.a.ii                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| COMMENT   | <p>At a minimum, the Permittee must analyze values from the continuous parameter monitoring system (CPMS) every fifteen (15) seconds and compute and record the average values at least every sixty (60) seconds for an hourly rolling average basis for the treatment process and closed vent system that indicate proper system operation.</p> <p>CWMLC requests that the monitoring, computation and recording frequencies specified in the above conditions be deleted.</p> <p>The above conditions specify a greater monitoring frequency for the units than is required by the facility's air permit. Calculating and reporting multiple averages based upon different frequencies for the same constituents and for the same purpose is duplicative, unnecessary and may increase the risk of reporting/monitoring errors. As currently written, these conditions require CWMLC to calculate an hourly rolling average, averaged every 60 seconds. Certain parameters are regulated under 40 CFR 61 Subpart FF – National Emissions Standard for Benzene Waste Operations (BWON). For these parameters for which continuous monitoring is required, BWON requires each hourly average to be calculated based on 15 minute averages that are then averaged over the hour in question in accordance with 40 CFR 60.13. If LDEQ requires CWMLC to maintain averages at significantly more frequent intervals to demonstrate compliance with the hazardous waste permit, it will require CWMLC to maintain multiple sets of data to comply with these conflicting regulations, which may lead to confusion regarding compliance status and recordkeeping.</p> <p>Therefore, CWMLC requests that both of the above cited conditions be revised to read as follows:</p> <p>For each parameter that is required to be monitored by the air permit, compliance with the monitoring and recordkeeping provisions of the air permit is determined to be compliance with the monitoring and</p> |

---

<sup>10</sup> EDMS document 10219574.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

recordkeeping provisions of this hazardous waste permit.<sup>11</sup>

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

For the ORUs, the conditions of V.F.8.a.ii have been clarified under Permit Conditions V.F.3 and V.F.4.

For the TDUs, the conditions of V.G.8.a.ii have been clarified under specific operating and process operating conditions of V.G.10 and V.G.11, respectively.

ACTION

For the ORUs, Permit Conditions V.F.3 and V.F.4 have been revised to state the following:

**V.F.3. General Design, Operating, and Maintenance Requirements**

**V.F.3.a.** The Oil Recovery Units, Oil Recovery Unit Area, and associated equipment, piping, pumps, instruments, containment, and vent controls must be operated and maintained in accordance with all applicable sections of LAC 33:V.Chapter 32 and the specifications, design criteria, and design limits approved by this permit and/or the Administrative Authority.

**V.F.3.b.** The Permittee must use controls and practices to maintain the containment areas for the Oil Recovery Unit Area to prevent run-on and run-off.

**V.F.3.c.** The Permittee must maintain the Oil Recovery Unit Area in a manner that minimizes the possibility of fire, explosion, or any unplanned, sudden or non-sudden releases of hazardous waste constituents to air, soil, or surface water that might threaten human health or the environment in accordance with LAC 33:V.1511.B.

**V.F.3.d.** The Permittee must take measures to control fugitive dust emissions such that any openings (doors, windows, vents, cracks, etc.) exhibit no visual emissions in accordance

---

<sup>11</sup> EDMS document 10219574, page 7.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

with the air permit. This state of no visible emissions shall be maintained effectively at all times during normal operating and maintenance conditions, including when vehicles and personnel are entering and exiting the unit.

**V.F.3.e.** The Permittee must take measures to monitor the performance of the carbon beds consistent with the manufacturer's specifications and recommendations to ensure the carbon bed has not reached the end of its useful life. Document the monitoring procedures in the operation and maintenance plan and record results of the monitoring in the operating record. Replace the bed or bed segment before it has reached the end of its useful life.

**V.F.3.f.** The Permittee must operate and maintain all particulate collection devices in accordance with sound air pollution control practices, the facility's air permit, and applicable requirements of LAC 33:V.Chapter 17. Subpart B.

**V.F.3.g.** The Permittee shall not process more than 126,000 gallons per day of waste per unit.

**V.F.4. Specific Operating Conditions**

The Oil Recovery Unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit.

**V.F.4.a.** Whenever hazardous waste is in the Oil Recovery off-loading pits, the pressure differential gages at the pre-filter and final filter within the carbon bed must be monitored at all times as an indicator of efficiency operations.

**V.F.4.b.** The hazardous waste feed to the Oil Recovery Unit shall stop immediately under the following conditions:

**V.F.4.b.i.** There is a loss of power to the centrifuge.

**V.F.4.b.ii.** There is a loss of hydraulics to the automatic hydraulic back-drive of the system.

**V.F.4.b.iii.** There is a blockage to the discharge of the

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

weir plates, oil, and light phase adjustable nozzles.

**V.F.4.c.** Whenever hazardous waste is in the Oil Recovery Unit, the bowl speed must maintain a minimum of ten (10) revolutions per minute (RPM).

**V.F.4.d.** Whenever hazardous waste remains in the Oil Recovery Unit, exhaust gases must be vented to the air pollution control system, operated in accordance with the air permit requirements.

For the TDUs, Permit Conditions V.G.10 and V.G.11 have been revised to state the following:

**V.G.10. Specific Operating Conditions**

**V.G.10.a. Performance Standards**

The Permittee shall comply with the performance standards specified in this Permit when hazardous waste is thermally treated in the Thermal Desorber Unit.

**V.G.10.a.i.** The emissions of dioxin and furans must not exceed 0.20 nanograms toxic equivalents (TEQ) per dry standard cubic meter corrected to seven (7) percent oxygen.

**V.G.10.a.ii.** The emissions of mercury must not exceed 8.1 micrograms per dry standard cubic meter, corrected to seven (7) percent oxygen.

**V.G.10.a.iii.** The emissions of cadmium and lead must not exceed 10 micrograms per dry standard cubic meter, corrected to seven (7) percent oxygen.

**V.G.10.a.iv.** The emissions of arsenic, beryllium, and chromium must not exceed 23 micrograms per dry standard cubic meter, corrected to seven (7) percent oxygen.

**V.G.10.a.v.** The emissions of hydrogen chloride and



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

chlorine gas must not exceed 21 parts per million by volume, combined emissions, expressed as chlorine (Cl) equivalent, dry basis and corrected to seven (7) percent oxygen.

**V.G.10.a.vi.** The emissions of particulate matter must not exceed 0.08 grains per dry standard cubic foot, corrected to seven (7) percent oxygen.

**V.G.10.a.vii.** The emissions of carbon monoxide must not exceed 100 parts per million by volume, dry basis and corrected to seven (7) percent oxygen.

**V.G.10.b. Implementation Schedule for the Thermal Desorber Unit Comprehensive Performance Test (CPT)**

The Permittee must conduct an initial Comprehensive Performance Test (CPT) as defined below and submit to the Administrative Authority a recertification of compliance CPT under the operating parameters set forth under Condition V.G.11 of this permit with the permit renewal application. A recertification of compliance CPT is required for major modifications to the unit or if the Permittee is seeking new operating conditions.

**V.G.10.b.i.** The CPT plan will be developed in order to:

**V.G.10.b.i.1.** Demonstrate compliance with the emission limitations set forth in Condition V.G.10.a.;

**V.G.10.b.i.2.** Demonstrate compliance with the Destruction and Removal Efficiency standard of 40 CFR 63.1219.c.1.

**V.G.10.b.i.3.** Establish limits for the operating parameters set forth in Condition V.G.11.

**V.G.10.b.i.4.** The CPT plan must include the information specified in 40 CFR 63.1207.f and

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

must be submitted to the Administrative Authority for review and approval at least one hundred eighty (180) days prior to commencement of the CPT.

The CPT plan will allow the Permittee to demonstrate compliance with emission standards for mercury, semivolatile metals, low volatile metals, and hydrogen chloride/chlorine gas emission standards based upon exhaust gas flow rate or hazardous waste thermal concentration in accordance with 40 CFR 63.1207.m.

**V.G.10.b.i.5.** The CPT plan and CMS performance evaluation test plan must be public noticed at least sixty (60) days prior to initiation of the test. All requirements of 40 CFR 63.1207.e must be met.

**V.G.10.b.ii.** With the initial introduction of hazardous waste to the unit and ending with initiation of the CPT, and only for the minimum time required to establish operating conditions, not to exceed a duration of seven hundred twenty (720) hours operating time for the processing of hazardous waste, the operating requirements of Condition V.G.10.c must be applicable to demonstrate compliance with the performance standards described in Condition V.G.10.b.i. The Permittee may request a time extension for conducting the CPT for reasons deemed acceptable by the Administrative Authority. Any time extensions for conducting the CPT are requested, it must be reviewed and approved by the Administrative Authority.

**V.G.10.b.iii.** Within ninety (90) days of completing the CPT for the Thermal Desorber Unit, the Permittee must submit a Notification of Compliance (NOC), documenting compliance with the emission limitations set for the in Condition V.G.10.a, the removal



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

efficiency standard of 40 CFR 63.1219.c.1 and the continuous monitoring system requirements set forth in Table 30 and 31; and identifying limits for the operating parameters set forth in Condition V.G.11 to the Administrative Authority for approval.

**V.G.10.c. Process Operating Conditions Prior to Submitting Notification of Compliance**

Prior to the Permittee submitting a NOC to the Administrative Authority (see Condition V.G.10.b.iii), the Thermal Desorber Unit must be operated within the operating conditions proposed in the approved CPT plan. If there is a discrepancy between an operating condition prescribed in Condition V.G.11 and an operating condition proposed in the approved CPT plan, the Thermal Desorber Unit must be operated in accordance with the more stringent operating condition. For instance, where there is no prescribed operating limits in Condition V.G.11.a.(vii - xiii), the Thermal Desorber Unit must be operated in accordance with the operating condition proposed in the approved CPT plan.

**V.G.10.d. Process Operating Conditions after Submitting Notification of Compliance**

**V.G.10.d.i.** Upon submitting a NOC to the Administrative Authority, the Thermal Desorber Unit must be operated within the operating conditions prescribed in Condition V.G.11 and within the operating conditions proposed in the NOC. If there is a discrepancy between an operating condition prescribed in Condition V.G.11 and an operating condition proposed in the NOC, the Thermal Desorber Unit must be operated in accordance with the more stringent operating condition. For instance, where there is no prescribed operating limits in Condition V.G.11.a.(vii - xiii), the Thermal Desorber Unit must be operated in accordance with the operating condition proposed in the NOC.

**V.G.10.d.ii.** Within seven (7) days of receiving a

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

Finding of Compliance (FOC), in accordance with 40 CFR 63.1206.b.3, from the Administrative Authority, the Permittee shall initiate a Class 1<sup>1</sup> permit modification to change any operating parameters listed in Condition V.G.11, remove any operating parameters listed in Condition V.G.11, and/or add any additional operating parameter limits to Condition V.G.11 based on the results of the Thermal Desorber Unit CPT.

**V.G.10.d.iii.** Upon approval of the Class 1<sup>1</sup> permit modification required by Condition V.G.10.d.ii, the Thermal Desorber Unit must be operated within the modified conditions prescribed in V.G.11.

**V.G.11. Process Operating Conditions**

The Thermal Desorber Unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit.

**V.G.11.a. Group A Parameters**

The Permittee must operate the Thermal Desorber Unit with a functioning system to automatically cut off waste feed to the unit when operating conditions deviate from those established below.

**V.G.11.a.i.** Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the unit must be maintained below the maximum value of ten (10) tons per hour.

**V.G.11.a.ii.** Whenever hazardous waste is in the unit, the pressure in the treatment drum of the Thermal Desorber Unit must be maintained below the maximum value of 0 inches of water column with respect to atmospheric. If the pressure is equal to or greater than 0 inches for fifteen (15) seconds, then AWFCO will initiate.

**V.G.11.a.iii.** Whenever hazardous waste is in the unit,



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

the afterburner chamber temperature must be maintained above the minimum value of 1,400 °F.

**V.G.11.a.iv.** Whenever hazardous waste is in the unit, the afterburner must be kept totally sealed to protect against the escape of fugitive emissions. The Permittee must monitor the outside of the unit for signs of fugitive emissions at least daily.

**V.G.11.a.v.** Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level must be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven (7) percent oxygen, dry gas basis.

**V.G.11.a.vi.** As an indicator of gas residence time in the control device, the unit must be maintained below the maximum flue gas flowrate value of **TBD** on an hourly rolling average basis.

**V.G.11.a.vii.** Whenever hazardous waste is in the unit, the hourly rolling average pressure drop across the scrubber must be maintained above the minimum value of **TBD**.

**V.G.11.a.viii.** Whenever hazardous waste is in the unit, the hourly rolling average liquid to gas ratio must be maintained above the minimum value of **TBD**. This is a calculated value based on the minimum scrubber water flowrate and the maximum flue gas flowrate.

**V.G.11.a.ix.** Whenever hazardous waste is in the unit, the hourly rolling average scrubber water flowrate must be maintained above the minimum value of **TBD** gallons per minute.

**V.G.11.a.x.** Whenever hazardous waste is in the unit, the hourly rolling average pH of the feed to the scrubber must be maintained above the minimum value of **TBD**.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

**V.G.11.b. Group B Parameters**

The Permittee must operate the Thermal Desorber Unit without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.G.11.b.1.** Whenever hazardous waste is in the unit, the Thermal Desorber Unit inner chamber temperature must be maintained above the minimum value of 500 °F.

**V.G.11.b.2.** Reserved for maximum mercury feed rate

**V.G.11.b.3.** Reserved for maximum total chlorine and chloride feed rate.

**V.G.11.b.4.** Reserved for maximum cadmium and lead feed rate.

**V.G.11.b.5.** Reserved for maximum arsenic, beryllium, and chromium feed rate.

**V.G.11.b.6.** O<sub>2</sub> must be monitored continuously whenever hazardous waste is in the Thermal Desorber Unit, in accordance with the CEMS regulations.

**V.G.11.c. Group C Parameters**

The Permittee must operate the Thermal Desorber Unit without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.G.11.c.i.** The Permittee must immediately stop the flow of hazardous waste into the Thermal Desorber Unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

**V.G.11.c.ii.** For a Continuous Monitoring System (CMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM      | 6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| REFERENCE | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>12</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| ISSUE     | Permit Conditions V.F.8.a.ii and V.G.8.a.ii:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| COMMENT   | <p>At a minimum, the Permittee shall analyze values from the continuous parameter monitoring system (CPMS) every fifteen (15) seconds and compute and record the average values at least every sixty (60) seconds for an hourly rolling average basis for the treatment process and closed-vent system that indicate proper system operation.</p> <p>In addition to the issues noted in Comment # 5 above, these conditions would require the use of non-representative data in gauging regulatory compliance under the hazardous waste permit. In addition, the Permittee could be required to record and use certain data for determining compliance under the hazardous waste permit that might be invalidated and therefore excluded from consideration in determining compliance with its air permit.</p> <p>40 CFR 61 Subpart FF – National Emissions Standard for Benzene Waste Operations (BWON) allows certain monitoring data to be invalidated when it clearly does not represent unit operation (See, 40 CFR 61.14). For example, data collected during system repairs, calibrations, and zero and span adjustments may be excluded from any averages calculated for determining compliance under the facility's air permit.</p> <p>The language in Conditions V.F.8.a.ii and V.G.8.a.ii would require that CWMLC collect and record that data at all times without interruption and then use this data to calculate an hourly rolling average, averaged every 60 seconds for determining compliance with the hazardous waste permit.</p> <p>This variance in the use of data between the air permit and the hazardous waste permit for purposes of monitoring compliance for the same activity will require that CWMLC maintain multiple sets of data to comply with these conflicting regulations, which may lead to confusion regarding compliance status and recordkeeping and result in results under the hazardous waste permit that do not accurately reflect the true compliance status of the monitored activity.</p> |

---

<sup>12</sup> EDMS document 10219574.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

Therefore, CWMLC requests that both of the above-cited conditions be revised as proposed in Comment # 5 above.<sup>13</sup>

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

For the ORUs, the conditions of V.F.8.a.ii have been clarified under Permit Conditions V.F.3 and V.F.4.

For the TDUs, the conditions of V.G.8.a.ii have been clarified under specific operating and process operating conditions of V.G.10 and V.G.11.

ACTION

See Permit Conditions V.F.3 and V.F.4 for the additional permitting requirements for the ORUs and Permit Conditions V.G.10 and V.G.11 for the additional permitting requirements for the TDUs.

---

<sup>13</sup> EDMS document 10219574, page 8.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM             | 7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| REFERENCE        | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>14</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ISSUE            | Permit Conditions V.F.8.a.ii and V.G.8.a.ii:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| COMMENT          | <p>At a minimum, the Permittee shall analyze values from the continuous parameter monitoring system (CPMS) every fifteen (15) seconds and compute and record the average values at least every sixty (60) seconds for an hourly rolling average basis for the treatment process and closed-vent system that indicate proper system operation.</p> <p>In addition to the issues raised in Comments # 5 and 6 above, the difference in monitoring frequencies between the above hazardous waste permit conditions and those included in the facility's air permit may result in situations where it is impossible for the permittee to comply with both permits. For example, system pressure within the closed vent system must be monitored and recorded under both the hazardous waste permit and the air permit. If the monitoring system were to suffer an unavoidable breakdown or malfunction 40 CFR 61.14 (b) which is incorporated into the Air Permit would require the system be repaired "as soon as practicable after" the breakdown or malfunction. During the period of repair, there could be a period of time where it is not possible to record system pressure data. 40 CFR 61 Subpart FF would exclude this time period for compliance purposes in accordance with 40 CFR 61.14). However, Conditions V.F.8.a.ii and V.G.8.a.ii require that data to be collected at all times and without interruption. Under this scenario, CWMLC could be charged as being in violation of the hazardous waste permit if it removes the faulty pressure monitor from the unit such that it no longer provides a reading, but could likewise be charged as being in violation of the air permit if it fails to remove the monitor so that it can be repaired as soon as practicable as mandated by 40 CFR 61.14(b). For this additional reason, CWMLC requests that both of the above cited conditions be revised as proposed in Comment # 5 above.<sup>15</sup></p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>For the ORUs, the conditions of V.F.8.a.ii have been clarified under Permit</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

<sup>14</sup> EDMS document 10219574.

<sup>15</sup> EDMS document 10219574, page 8.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

Conditions V.F.3 and V.F.4.

For the TDUs, the conditions of V.G.8.a.ii have been clarified under specific operating and process operating conditions of V.G.10 and V.G.11, respectively.

ACTION

See Permit Conditions V.F.3 and V.F.4 for the additional permitting requirements for the ORUs and Permit Conditions V.G.10 and V.G.11 for the additional permitting requirements for the TDUs.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>              | <b>8</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>REFERENCE</b>         | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>16</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>ISSUE</b>             | Permit Conditions V.F.8.a.ii and V.G.8.a.ii:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>COMMENT</b>           | <p>In addition to the issues raised in Comments # 5-7 above, the above referenced conditions require data to be collected and averaged at a frequency that is not relevant for the purpose of indicating proper system operation. The language of this condition requires CWMLC to monitor and record all data from all monitoring devices used in each unit every 15 seconds and compute and record the average values every 60 seconds for an hourly rolling average basis. It is not clear what environmental benefit there would be in monitoring and recording this data at this frequency. CWMLC would be averaging and recording the data at the specified frequency simply to comply with this permit condition. It would not be representative of proper system operation because it would not necessarily compare with the treatment parameters that would be expected to result in properly treated waste. Since the proposed waste to be processed through these units will vary greatly in composition of regulated constituents, these treatment parameters would vary greatly with each waste making it impossible to specify operational ranges that would provide any meaningful demonstration of proper system operation. CWMLC feels that the requirements of the hazardous waste permit and the air permit that regulate the content of the final treated waste and the content of the air emissions are adequate to protect human health and the environment, indicate proper system operation, and comply with all applicable federal and state regulations. For this additional reason, CWMLC requests that both of the above-cited conditions be revised as proposed in Comment # 5 above.<sup>17</sup></p> |
| <b>LDEQ<br/>RESPONSE</b> | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>For the ORUs, the conditions of V.F.8.a.ii have been clarified under Permit Conditions V.F.3 and V.F.4.</p> <p>For the TDUs, the conditions of V.G.8.a.ii have been clarified under specific operating and process operating conditions of V.G.10 and V.G.11,</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

<sup>16</sup> EDMS document 10219574.

<sup>17</sup> EDMS document 10219574, page 9.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

respectively.

ACTION

See Permit Conditions V.F.3 and V.F.4 for the additional permitting requirements for the ORUs and Permit Conditions V.G.10 and V.G.11 for the additional permitting requirements for the TDUs.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>9</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| REFERENCE        | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>18</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| ISSUE            | Permit Table 2, Building 802 and Building 205                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| COMMENT          | CWMLC requested during the technical review period for Building 802 to be revised in Table 2 to match Table 1's information for Building 801. The Maximum Permitted Storage Capacity for Building 802 should state, Liquid Storage – 240,000 gallons OR Solid Storage – 80 roll-off boxes (484,704 gallons). The information was inserted in the row regarding Building 205. Please leave the original information for Building 205 (Liquid Storage: 1,052 drums (57,860 gallons AND Solid Storage: 640 drums (35,200 gallons) Total: 93,060 gallons, and add the liquid storage information to Building 802. Attachment B includes the technical worksheet comment pertaining to Table 2 and Table 2. <sup>19</sup> |
| LDEQ<br>RESPONSE | The LDEQ acknowledges the above comment and concurs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ACTION           | Table 2 for Building 802 has been revised to similarly match the information of Table 1 for Building 801. In addition, the information for Building 205 in Table 2 has been revised to correctly reflect the maximum permitted storage capacity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

---

<sup>18</sup> EDMS document 10219574.

<sup>19</sup> EDMS document 1 0219574, page 10.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>10</b>                                                                                                                                                                                                                            |
| REFERENCE        | Chemical Waste Management, Inc. – Lake Charles, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>20</sup>                                                                                          |
| ISSUE            | General Comment                                                                                                                                                                                                                      |
| COMMENT          | CWMLC believes the above-suggested revisions if adopted will provide clarity and avoid potential confusion regarding Permit requirements and will establish conditions protective of human health and the environment. <sup>21</sup> |
| LDEQ<br>RESPONSE | The LDEQ acknowledges the above comment.                                                                                                                                                                                             |
| ACTION           | See the LDEQ Responses to Item Numbers 1-9.                                                                                                                                                                                          |

---

<sup>20</sup> EDMS document 10219574.

<sup>21</sup> EDMS document 10219574, page 10.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM             | 11                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| REFERENCE        | Environmental Protection Agency (EPA), Region VI, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>22</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ISSUE            | Permitting of Thermal Desorber Unit (TDU)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| COMMENT          | <p>Chapter 32 is entitled “Miscellaneous Units”, and is the State equivalent of 40 C.F.R. Part 264, Subpart X. Due to the absence of any proposed engineering specifications, performance test, operating conditions, operating parameters, monitoring and recordkeeping requirements, we have identified permit conditions for the TDU and TOU [thermal oxidizer unit] below that we believe are required by the regulations for operation of the TDU and TOU.</p> <p>How the TDU and TOU are permitted determine the appropriate permit requirements for the units. The material being treated in the TDU and the TOU is already a hazardous waste. Thermal treatment after a material becomes a hazardous waste is fully regulated under RCRA, 54 Fed. Reg. 50968, 50973 (December 11, 1989). The combustion of the non-condensable gases in the TOU meets the definition of “thermal treatment” in L.A.C. 33:V.109 [40 C.F.R. § 2610.10] (an enclosed device that uses controlled flame combustion). However, rather than permitting the TOU as an incinerator, LDEQ could permit the TDU and TOU together as a miscellaneous unit under L.A.C. 33:V. Chapter 32 [40 C.F.R. Part 264, Subpart X]. If this occurs, then LDEQ is required to include in the permit requirements from L.A.C. 33:V. Chapters 3, 5, 7, 17, 19, 19, 21, 23, 25, 27, 29, 21, 4301.F, H, 4302, 4303, and 4305, all other applicable requirements of L.A.C. 33:V. Subpart 1, and of 40 C.F.R. Part 63, Subpart EEE and 40 C.F.R. Part 146, that are appropriate for the miscellaneous unit being permitted.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |

---

<sup>22</sup> EDMS document 10252724.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to the Comprehensive Performance Test (CPT) as required by Permit Condition V.G.10.b.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>              | <b>12</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>REFERENCE</b>         | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>23</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>ISSUE</b>             | Permitting of Thermal Desorber Unit (TDU) and Oil Recovery Unit (ORU)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>COMMENT</b>           | <p>CWMLC should provide the Department with detailed information describing the waste intended to be managed and the appropriate technical information for the hazardous waste thermal treatment unit, as required by 40 CFR § 270.19 (LAC 33:V.529);</p> <p>CWMLC should provide a “trial burn” plan or “comprehensive performance test (CPT)” plan specifically addressing demonstrating their unit’s compliance with 40 CFR Part 63 Subpart EEE (aka MACT EEE) emission limits, and the Department should make implementation of this testing a condition of the operation of the TDUs (typically within the first 720 hours of operation);</p> <p>CWMLC should provide a description of the TDU automatic waste feed cutoff (AWFCO) system, and adopt appropriate operating parameter limits (OPLs) that will assure continued compliance with MACT EEE emission limits, and the Department should make compliance with these AWFCOs and OPLs a condition of the permit;</p> <p>CWMLC should provide detailed description and compliance and monitoring limits for air emissions control associated with the proposed waste receiving pits for the TDUs and ORUs. CWMLC describes the receiving of hazardous waste for both the TDUs and the ORUs into large off-loading pits that qualify as “tanks”, however no description is provided for the control of VOC air emissions from these “tanks” as is specifically required by 40 CFR Part 264 Subpart CC if CWMLC intends to manage material with greater than 500 ppm VOC content (refer to Tank Numbers T-601 and T-602 with capacity of 48,474 gallons each, and T-701, T-702, T-703 and T-704, with capacity of 330 tons each).</p> |
| <b>LDEQ<br/>RESPONSE</b> | The LDEQ acknowledges the above comment and provides the following information:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

---

<sup>23</sup> EDMS documents 9581834 and 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

ACTION

See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to the Comprehensive Performance Test (CPT) as required by Permit Condition V.G.10.b.

Also, see Permit Condition V.H for the air emission standards and Schedule of Compliance Permit Condition II.E.25.h, which requires CWMLC to submit a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units before placing any proposed units into service.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>13</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Application and the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>24</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| ISSUE            | Waste Analysis Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| COMMENT          | I have an additional comment related to the fact that CWMLC appears to be planning on generating and selling a recycled oil from the processing of hazardous waste liquids and solids in the TDUs and centrifuges. The Department should implement specific conditions of operation for both the TDUs and the centrifuges to preclude the disposal of listed hazardous waste in the “recovered oil” that is generated from these units. The Waste Analysis Plan (“WAP”) provided by CWMLC includes no provisions for testing of the “recovered oil” to establish that it is neither a hazardous waste, nor derived from a hazardous waste. The WAP further provides no-feedstream management plan for the TDUs and centrifuges to assure that “recovered oil” generated by these units does not instead contain listed or otherwise hazardous waste materials. In the absence of these features of the WAP, the Department should make a condition of operation of the TDUs and centrifuges that the oil recovered from them be manifested and disposed as hazardous waste. |
| LDEQ<br>RESPONSE | The LDEQ acknowledges the above comment. CWMLC will submit a revised Waste Analysis Plan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| ACTION           | See Schedule of Compliance Permit Conditions II.E.25.f and II.E.25.g, which require, among other items, CWMLC to submit a revised Waste Analysis Plan to include additional information regarding the waste feed cut off for the TDU.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

---

<sup>24</sup> EDMS documents 9581834 and 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b> | <b>14</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| REFERENCE   | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>25</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| ISSUE       | Permit Condition II.E.25.e                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| COMMENT     | <p>This condition requires CWMLC to prepare and submit for LDEQ approval final engineering specifications and operating parameters for the TDUs 180 days prior to construction. However, the requirements for this document include only a broad reference to “LAC 33:V.Chapter 32 and all applicable regulations.” While the CWMLC response to this condition has the potential to resolve many of my comments, especially those related to compliance with 40 CFR 63 Subpart EEE, as written the condition is not sufficient. This condition should include specific itemized requirements for the documents to assure compliance with the appropriate regulatory requirements. Minimum additional requirements for the CWMLC document submittal should be added as follows:</p> <ul style="list-style-type: none"><li>• CWMLC should provide a detailed engineering description of the TDUs and the TO, the physical and chemical form of the hazardous waste feed materials, a waste analysis plan specific to the operation of the TDU and TO, procedures for assuring the TDU and TO will be operated so as to not exceed appropriate emissions limits, provisions for installation and operation of an automatic waste feed cutoff system for the TDUs, adoption of appropriate operating parameter limits to assure compliance with emission limits, a startup schedule for introducing hazardous waste feed to the TDUs and TO (typically allowing for no more than 720 hours of “shakedown operation” on hazardous waste feed including the time required to perform the “trial burn”), testing procedures including stack emissions testing for the TO with provisions for three runs per mode of operation to establish compliance with emissions limits, and plans to adopt both interim and final operating parameter limits based on measured performance during the “trial burn.” These plan should meet the appropriate technical requirements for a miscellaneous unit performing thermal treatment of hazardous waste, as itemized in both 40 CFR 270.19 and MACT EEE (40 CFR 63.1207(e)(1)(i) ), to assure that operation of the TDU will provide continuous compliance with MACT EEE emission limits.</li></ul> |

---

<sup>25</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

- CWMLC must recommend and adopt, with LDEQ concurrence, appropriate operating parameter limits (OPLs) for the TDU, as well as AWFCO limits, that will assure continuing compliance with requirements and emission limits as specified in MACT EEE (40 CFR 63.1206 and .1219), and these OPLs and AWFCOs should include the time period between startup and the comprehensive performance test (CPT), the interim period after the CPT, and the final period after LDEQ review and approval of the CPT report.
- LDEQ should clearly state in this condition that the emissions from the TDU's thermal oxidizer are required to comply with MACT EEE (40 CFR 63.1219(b)).
- LDEQ should clearly state in this condition that CWMLC is required to perform a CPT within a specified timeframe of initial operations of the TDUs on hazardous waste feed, typically within 720 hours.

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to the Comprehensive Performance Test (CPT) as required by Permit Condition V.G.10.b.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

**ITEM 15**

REFERENCE Mr. Carl R. Palmer, TD\*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit.<sup>26</sup>

ISSUE Permit Condition II.E.25.f.

COMMENT This condition requires CWMLC to submit to LDEQ additional plans regarding air emission controls for all proposed units. At the end of this condition, LDEQ should include a specified minimum itemization of requirements, to the effect of:

... including at a minimum the following information:

- Engineering and operating parameter details for the TDUs and their associated thermal oxidizers to assure continued compliance with MACT EEE, including the appropriate technical information for a miscellaneous unit performing hazardous waste thermal treatment as itemized in 40 CFR 270.19.
- Engineering and operating parameter details for the emission controls for the hazardous waste material feed building for the TDUs and ORUs that assures continued compliance with 40 CFR 264 Subpart CC, or, if emission controls are not provided, the operating procedures that will preclude material having more than 500 ppm total VOCs from being managed in the building and the TDUs.

LDEQ RESPONSE The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

---

<sup>26</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

ACTION                      See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b. Also, see Permit Condition V.G.11 for the process operating conditions for the TDUs.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>16</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>REFERENCE</b> | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>27</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>ISSUE</b>     | Permit Condition V.F.2.a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>COMMENT</b>   | <p>This condition provides a short list of four types of wastes that are allowed to be processed in the Oil Recovery Units (ORUs). This listing does not provide any EPA hazardous waste ID numbers for these waste types. Rather a broad reference is made to the Part A Permit Application and the CWMLC WAP. Because it is a stated intent of CWMLC to manage material in the ORUs to generate a recoverable oil, this itemization, whether in the listed wastes, or in the WAP, or both, needs to be much more specific. For example, if listed waste F001 is managed in the ORUs, then the “recoverable oil” generated from that waste is derived from listed waste F001 and remains F001. The WAP as currently written provides for no analysis or operating procedures to properly manage listed hazardous waste remaining in the ORU recoverable oils. Therefore, this “recoverable oil” could be sold by CWMLC as a recycled product rather than properly disposed as required by RCRA permit doctrine at a RCRA permitted facility such as at a high temperature hazardous waste incinerator. Furthermore, if characteristically hazardous waste is managed in the ORUs the WAP as currently written includes no analysis or procedures to verify that the “recoverable oil” is no longer hazardous waste by characteristic. The WAP needs to have substantial expansion of the characterization of the hazardous waste status of materials destined for both the ORUs and TDUs, and corresponding management methods for the recoverable oil derived from listed and characteristic hazardous waste feeds.</p> <p>Also, the waste referenced in V.F.2.a.iii as “commercially exempt waste” needs to be further defined with a specific reference to the exemption(s) that would make this presumably exempt from regulation under RCRA.</p> <p>Also, the waste referenced in V.F.2.a.iv as “other miscellaneous hazardous and non-hazardous waste” need further definition as to which “hazardous” wastes are acceptable for management in the ORU and what will be the disposition of the recoverable oils that are derived from those hazardous wastes.</p> |

---

<sup>27</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the Oil Recovery Units and the Thermal Desorber Units under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions. The ORUs and TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE. Also, “commercially exempt waste” and “other miscellaneous hazardous and non-hazardous waste” will be better defined in the permit.

However, the LDEQ does not concur with the commenter’s statement regarding the Waste Analysis Plan. CWMLC’s current Waste Analysis Plan includes procedures for the pre-treatment and post-treatment analyses of the referenced material. The in-process analyses of the solids are conducted to meet the Land Disposal Requirements (LDR).

ACTION

See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs.

Also, see Permit Conditions V.F.2.a.iii. and V.F.2.a.iv, which better define “commercially exempt waste” and “other miscellaneous hazardous and non-hazardous waste. The permit conditions have been revised to state the following:

**V.F.2.a.iii.** commercially exempt oil-bearing waste,  
and

**V.F.2.a.iv.** other hazardous and non-hazardous waste  
oil-bearing waste

In addition, see Section 6.2 of the Waste Analysis Plan for the Treatment Operations. Also, see section 6.2.10 and Figure 6.10 of the Waste Analysis Plan for the ORUs and Section 6.2.11 and Figure 6.11 for the TDUs.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>17</b>                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>28</sup>                                                                                                                                                                                                                                                                                                               |
| ISSUE            | Permit Condition V.F.5.a.i.(1)                                                                                                                                                                                                                                                                                                                                                                                                                      |
| COMMENT          | This inspection condition should contain an explicit reference to compliance with 40 CFR 264 Subpart BB. The wastes managed in the ORU are typically much greater than 10% organic content, and as such are explicitly subject to Subpart BB. Even if the feed material is characterized by CWMLC as being less than 10% organic content, the processing goal of the ORU is to generate a recoverable oil that is essentially 100% organic content. |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p>                                                             |
| ACTION           | See Permit Condition V.F for the additional permitting requirements for the ORUs.                                                                                                                                                                                                                                                                                                                                                                   |

---

<sup>28</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM             | 18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>29</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| ISSUE            | Permit Condition V.G.2.a                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| COMMENT          | <p>This condition provides a short list of four types of wastes that are allowed to be processed in the Thermal Desorption Units (TDUs). This listing does not provide any EPA hazardous waste ID numbers for these waste types. Rather a broad reference is made to the Part A Permit Application and the CWMLC WAP. Because it is a stated intent of CWMLC to manage material in the TDUs to generate a recoverable oil, this itemization, whether in the listed wastes, or in the WAP needs to be much more specific. For example, if listed waste F001 is managed in the TDUs, then the “recoverable oil” generated from that waste is derived from listed waste F001 and remains F001. The WAP as currently written provides for no analysis or operating procedures to properly manage listed hazardous waste remaining in the TDU recoverable oils. Furthermore, if characteristically hazardous waste is managed in the TDUs the WAP as currently written includes no analysis or procedures to verify that the “recoverable oil” is no longer hazardous waste by characteristic.</p> <p>Also, the waste referenced in V.F.2.a.iv as “other miscellaneous hazardous and non-hazardous waste” need further definition as to which “hazardous” wastes are acceptable for management in the TDU and what will be the disposition of the recoverable oils that are derived from those hazardous wastes.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions. Also, the “hazardous and non-hazardous waste” will be better defined in the permit. Note, “other miscellaneous” has been removed from the reference. However, the LDEQ does not concur with the commenter’s statement regarding the Waste Analysis Plan. CWMLC’s current Waste Analysis Plan</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

---

<sup>29</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

includes procedures for the pre-treatment and post-treatment analyses of the referenced material. The in-process analyses of the solids are conducted to meet the Land Disposal Requirements (LDR).

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs.

Also, see Permit Conditions V.F.2.a.iii. and V.F.2.a.iv, which better defines “commercially exempt waste” and “other miscellaneous hazardous and non-hazardous waste. The permit conditions have been revised to state the following:

**V.F.2.a.iii.** commercially exempt oil-bearing waste,  
and

**V.F.2.a.iv.** other hazardous and non-hazardous waste  
oil-bearing waste

In addition, see Section 6.2 of the Waste Analysis Plan for the Treatment Operations. Also, see section 6.2.10 and Figure 6.10 of the Waste Analysis Plan for the ORUs and Section 6.2.11 and Figure 6.11 for the TDUs.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>19</b>                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>30</sup>                                                                                                                                                                                                                                                                                                           |
| ISSUE            | Permit Condition V.G.5.a.i.(1)                                                                                                                                                                                                                                                                                                                                                                                                                  |
| COMMENT          | This inspection condition should contain an explicit reference to compliance with 40 CFR 264 Subpart BB. The wastes managed in the TDUs are typically greater than 10% organic content, and as such are explicitly subject to Subpart BB. Even if the feed material is characterized by CWMLC as being less than 10% organic content, the processing goal of the TDU is to generate a recoverable oil that is essentially 100% organic content. |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the Thermal Desorber Units under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p>                                       |
| ACTION           | See Permit Condition V.G for the additional permitting requirements for the TDUs.                                                                                                                                                                                                                                                                                                                                                               |

---

<sup>30</sup> EDMS document and 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>20</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>31</sup>                                                                                                                                                                                                                                                                                                                                                                                             |
| ISSUE            | Permit Condition V.H.1.b                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| COMMENT          | This condition excludes the “remaining facility” from Subpart BB equipment leak requirements by stating that the material is less than 10% organic concentrations. The wastes managed in both the ORUs and TDUs are typically greater than 10% organic content, and as such are explicitly subject to Subpart BB. Even if the feed material is characterized by CWMLC as being less than 10% organic content, the processing goal of the ORUs and TDUs is to generate a recoverable oil that is essentially 100% organic content. |
| LDEQ<br>RESPONSE | The LDEQ acknowledges the above comment and will better define “remaining facility.”                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ACTION           | Permit Condition V.H.1.b has been revised to state the following:<br><br><b>V.H.1.b.</b> The remaining facility not associated with the proposed Oil Recovery Area and Thermal Desorber Area are exempt from LAC 33:V.Chapter 17 Subchapter B in accordance with LAC 33:V.1717.B. No equipment that contains or contacts hazardous waste with organic concentrations of at least ten (10) percent by weight shall be managed at the facility.                                                                                     |

---

<sup>31</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>21</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>REFERENCE</b> | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>32</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>ISSUE</b>     | Attachment 1, Waste Analysis Plan                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>COMMENT</b>   | <p>The WAP as written is not adequate for either the ORUs or TDUs. It is proposed that both listed and characteristically hazardous wastes be managed in these units. In that case, when listed waste is present in the unit's feedstream then the materials derived from that unit are also listed waste. The ORUs and TDUs generate a waste water that will remain a listed hazardous waste. Also, the recovered oil from the ORUs and TDUs remains a hazardous waste and must be managed according to RCRA manifesting and disposal requirements. Furthermore, if characteristically hazardous waste is managed in the ORUs and TDUs the WAP as currently written includes no analysis or procedures to verify that the "recoverable oil" is no longer hazardous waste by characteristic. These issues for both listed and characteristically hazardous waste residues remain true unless specific methodology is included in the WAP that allow for the conditional management of the materials otherwise. LDEQ must specifically review and approve any non-hazardous waste management of the "recoverable oil." In its present form the WAP does not provide any framework for non-hazardous waste management of the "recoverable oil."</p> <p>Also, the WAP should identify methods and procedures for providing compliance with the Operating Parameter Limits (OPLs) for chemical constituents in the TDU feedstream that are required to be maintained to provide continued compliance with MACT EEE emission limits. In particular compliance procedures should be established in the WAP to provide confirmation that TDU feedstream limits on mercury, chlorine, and MACT EEE listed toxic metals are maintained. No such information is present in the WAP as currently written.</p> |

---

<sup>32</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The ORUs and the TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

Also, under CWMLC's current LPDES permit, the wastewater being discharged from both the ORU and TDU will be disposed of off-site. CWMLC submitted a modification to the LPDES permit, which would require testing of the wastewater. Under the proposed modification, the wastewater will be directed to their treatment system in which CWMLC would have to follow limitations based on the Centralized Waste Treater (CWT) classification.

However, the LDEQ does not concur with the commenter's statement regarding the Waste Analysis Plan. CWMLC's current Waste Analysis Plan includes pre-treatment and post-treatment analyses for the referenced material. The in-process analyses of the solids are conducted to meet the Land Disposal Requirements (LDR).

ACTION

See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test Plan (CPT) is required in accordance with Permit Condition V.G.10.b. Also, see Permit Condition V.G.11 for the process operating conditions for the TDUs.

In addition, see Section 6.2 of the Waste Analysis Plan for the Treatment Operations. Also, see section 6.2.10 and Figure 6.10 of the Waste Analysis Plan for the Oil Recovery Units and Section 6.2.11 and Figure 6.11 for the TDUs.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|---------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM          | 22                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| REFERENCE     | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and Notice of Deficiency (NOD) #1 Response <sup>33</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| ISSUE COMMENT | <p>LAC 33:V.517.T.7.b, Response to NOD #1, Item Number 42</p> <p>517.T.7.b requests that the permit application describe the facility operations plan, and provide information on the disposal method, its capacity, detailed process description, and storage and disposal procedures. In NOD1 question 42, LDEQ informs CWMLC that burning of waste in the TDU would change the definition of what the unit is doing and that this application would have to change to a combustor of hazardous waste. The CWMLC response refers to only the burning of natural gas and propane fuel. It ignores the fact that a portion of the hazardous waste feed to the TDUs is burned in the unit's associated thermal oxidizer; a processing step that USEPA specifically identifies as triggering compliance for the TDU with the appropriate technical requirements of MACT EEE, the hazardous waste combustor MACT.</p> <p>It is understood that the primary burners in the TDU furnace are natural gas or propane fired, as is the auxiliary (startup) burner in the Thermal Oxidizer. However, CWMLC does not accurately describe the thermal treatment device as it relates to the environmental standards that apply to the combination of the TDU and the Thermal Oxidizer. Non-condensable gases are generated by the thermal treatment of listed and characteristic hazardous waste in the TDU. These gases are combusted in the associated Thermal Oxidizer. That act of combustion renders the combined unit to be RCRA regulated thermal treatment. That indeed does change the definition of what the unit is doing, as is postulated by LDEQ in question 42. CWMLC should provide complete plans as required by RCRA under Subpart X for the regulated thermal treatment of hazardous waste, demonstrating compliance with the appropriate technical requirements of Parts I, J, O, AA, BB, CC, Part 270 (in particular Part 270.19), and Part 63 Subpart EEE. The modification request does not provide these plans and should be amended to provide them. CWMLC should provide these plans, and in particular a "Trial Burn Plan" and "Comprehensive Performance Test Plan," so that the application does comply with LAC 517.T.7.b, and LAC Chapter 32 (i.e. RCRA Subpart X "Miscellaneous Units")</p> |

---

<sup>33</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

The application of these thermal treatment standards to a TDU that combusts the noncondensable gas generated from hazardous waste treatment in a Thermal Oxidizer is clearly established by USEPA in multiple enforcement actions in EPA Region 6 since 2008. CWMLC must provide a complete permit modification request demonstrating compliance with these regulated thermal treatment requirements.

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>          | <b>23</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>REFERENCE</b>     | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application Notice of Deficiency (NOD) #1 Response <sup>34</sup>                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>ISSUE</b>         | LAC 33:V.517.T.7.b, NOD # 1 Response, Item Number 43.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>COMMENT</b>       | CWMLC does not provide the requested information to “State if emissions are being captured from the heating of the waste.” VOC emissions from the offloading pits (tanks T-601, 602) and the steam heated mix tanks (T-610 thru 613, 631 and 632) need to be controlled in compliance with RCRA Subpart CC. Alternatively, LDEQ can place a permit condition on CWMLC that the feed material for the ORUs must be below 500 ppm VOCs, as well as any “recoverable oil” that is collected from the ORUs.                                             |
| <b>LDEQ RESPONSE</b> | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p> |
| <b>ACTION</b>        | <p>See Permit Condition V.F for the additional permitting requirements for the ORUs.</p> <p>Also, see Permit Condition V.A for the permit requirements for the permitted tanks. See Permit Conditions V.H.2.b and II.E.25.h, which requires CWMLC to submit a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units before placing any proposed units into service.</p>                                                                                                 |

---

<sup>34</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>24</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application Notice of Deficiency (NOD) #1 Response <sup>35</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| ISSUE            | LAC 33:V.517.T.7.b, NOD #1 Response, Item Number 44                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| COMMENT          | CWMLC does not provide the requested information to “State how the emissions from the TDU are being measured as being in compliance with air emissions standards.” It is noted that the in the response, new process information is provided stating that the hazardous waste feed may be heated to as high as 2000°F in the TDU. CWMLC should provide complete plans as required by RCRA under Subpart X for the regulated thermal treatment of hazardous waste, demonstrating compliance with the appropriate technical requirements of Parts I, J, O, AA, BB, CC, Part 270 (in particular Part 270.19), and Part 63 Subpart EEE. The modification request does not provide these plans and should be revised to include them. CWMLC should provide these plans, in particular a “Trial Burn Plan” and “Comprehensive Performance Test Plan,” to comply with LAC 517.T.7.b, as well as LAC Chapter 32 (i.e. RCRA Subpart X “Miscellaneous Units”). |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p>                                                                                                                                                                                                                                                                                                                                                                                                                   |
| ACTION           | See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

---

<sup>35</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>25</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application <sup>36</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ISSUE            | Response to Section 523.A.6                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| COMMENT          | This section requires an emission monitoring plan as part of the permit modification. No plan is provided by CWMLC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>The commenter incorrectly cited the wrong chapter response. Section 526.A.6 is the appropriate citation.</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE and the facilities air permit.</p> |
| ACTION           | <p>See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.</p> <p>Also, see Permit Condition V.H for the air emission standards and Schedule of Compliance Permit Condition II.E.25.h, which requires CWMLC to submit a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units before placing any proposed units into service.</p>                                                                             |

---

<sup>36</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>26</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application <sup>37</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| ISSUE            | Response to Section 526                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| COMMENT          | <p>This section of the code specifically requires CWMLC to provide specific information and calculations with the permit application to verify that the waste receiving buildings for the ORUs and TDUs meet the applicable RCRA requirements for emissions from tank systems. No such information is provided in the application.</p> <p>CWMLC intends to place waste feed material for the ORUs and TDUs into open pits that are considered by them to be tanks. If that material contains greater than 500 ppm VOCs, specific standards for the design and operation of those tanks are required for the control of VOC emissions from those tanks. Neither the permit modification request nor the NOD response provides any description of these required controls. In the absence of that information, CWMLC may propose taking a permit limit that the VOC content of waste materials managed in these tanks will always be less than 500 ppm VOCs. Otherwise the modification should provide description of the design and operation methods for compliance, as well as the required calculations and certifications. CWMLC response simply states that the offloading buildings do not meet the regulatory definition of a “containment building.” While that may be true, it does not address that absence of required design and operating information in the modification request and final permit to demonstrate compliance with RCRA Subpart CC.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

---

<sup>37</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

CFR 63, Subpart EEE, and the facility's air permit.

No thermal treatment will occur in the ORUs; the ORUs will be governed by CWMLC's air permit.

ACTION

See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to CPT testing as required by Permit Conditions V.G.10.b.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM      | 27                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| REFERENCE | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application <sup>38</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| ISSUE     | Response to Section 529                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| COMMENT   | <p>In the CWMLC permit modification request, the statement is made that “waste is not incinerated at the CWMLC facility” and no response or information regarding these standards is provided. While the TDU may not be an incinerator, it is clearly a RCRA permitted hazardous waste thermal treatment unit. Under the RCRA Subpart X “Miscellaneous Unit” standards the appropriate technical requirements of Section 529 apply to the unit. A response addressing those appropriate requirements should be provided by CWMLC. It is appropriate to include that response under Section 534, but the appropriate technical requirements come from this section.</p> <p>According to multiple EPA Region 6 enforcement actions, a TDU that combusts all or part of the vent gases from the TDU is a RCRA permitted thermal treatment device subject to either RCRA Subpart O, or RCRA Subpart X, including appropriate provisions of Subparts O, MACT EEE and 270.19. Engineering and technical data must be provided for the TDUs to comply with these standards. They are not in the application. The application should be amended to include:</p> <ul style="list-style-type: none"><li>• a Trial Burn Plan containing the appropriate technical information and requirement consistent with 270.19 (LAC Chapter 31),</li><li>• description of the TDU and its operation so that it will comply with MACT EEE emission limits (dioxins and furans, PM, DRE, mercury, HCl, listed toxic metals (aka SVM and LVM), THC, CO),</li><li>• both interim and final operating parameter limits (OPLs) for the TDU process and feedstream composition, to assure compliance with emission limits,</li><li>• AWFCO system and its alarm setpoints, as a minimum.</li></ul> <p>CWMLC makes reference to an existing air permit with regard to control of emissions from the TDU and its “process vents.” The CWMLC air permit application does not contain the necessary information to determine and assure compliance with RCRA Subpart X, especially the appropriate technical requirements and emission limits from MACT EEE.</p> |

---

<sup>38</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.

Also, see Permit Condition V.G.10.a for the specific performance standards and Permit Condition V.G.11 for the process operating conditions for the TDUs.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>28</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application NOD #1 Response <sup>39</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| ISSUE            | Response to Section 534.A.2, NOD #1 Response, Item Number 51                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| COMMENT          | <p>This section requires the permittee to provide detailed plans and engineering reports to demonstrate compliance with Chapter 32 “Miscellaneous Unit” standards (i.e. RCRA Part 264 Subpart X).</p> <p>It is presumed that LDEQ question is direction to provide said detailed plans and engineering reports. CWMLC must include means for compliance with all Subpart X requirements, including appropriate requirements from Subpart O (engineering specifications and a trial burn plan), MACT "EEE" (all emission limits, OPLs, AWFCOs, etc). The NOD1 response does not provide an engineering report for the TDU with the required details.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p>                                                                               |
| ACTION           | See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.                                                                                                                                                                                                                                                                                                                                                                   |

---

<sup>39</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>              | <b>29</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>REFERENCE</b>         | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application NOD #1 Response <sup>40</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>ISSUE</b>             | Response to Section 534.D, NOD #1 Response, Item Number 52                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>COMMENT</b>           | <p>This section requires test data to demonstrate compliance with appropriate technical requirements. In other words, a requirement to perform a trial burn to demonstrate compliance with MACT EEE emission limits.</p> <p>CWMLC should provide a trial burn plan and/or comprehensive performance test plan that must include provisions to demonstrate compliance with all emissions limits (MACT "EEE" dioxins, DRE, THC, CO, PM, SVM, LVM, Hg, etc.) The state issued air permit presently has no compliance test requirement. Also the DRE given by CWMLC in the September 2015 air permit modification gives a performance standard for DRE that does not comply with MACT EEE requirements of 99.99% DRE.</p> <p>In the absence of a requirement for CWMLC to perform a trial burn on the TDUs, there may be excessive air emissions of very toxic air pollutants, such as mercury, dioxins, hydrochloric acid, and toxic metals such as lead, cadmium, chromium, arsenic, etc. In fact, based on the typical design of this type of TDU, with the burning of relatively large volumes and masses of noncondensable vent gases, it is almost assured that all of the above pollutants can be in the thermal oxidizer exhaust gases. A credible comprehensive performance test is a must to assure safe operation of the TDU meeting required emission limits.</p> |
| <b>LDEQ<br/>RESPONSE</b> | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

---

<sup>40</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

CFR 63, Subpart EEE.

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM          | 30                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| REFERENCE     | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application <sup>41</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| ISSUE         | Response to Section 1519.B.7                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| COMMENT       | <p>This section requires CWMLC to prepare and follow a Waste Analysis Plan for the testing of hazardous waste feedstreams to the ORUs and TDUs, as well as the testing and description of hazardous waste management for the products and residuals of the operation of these units.</p> <p>The WAP in the permit modification does not specify tests, procedures, and criteria for management of the “recoverable oil” from the TDU and ORU. If listed wastes are managed in these units, listings transfer to the “recoverable oil” that is derived from the treatment of that hazardous waste. Oil can only be sold and burned under specific conditions and these must be included in the WAP and resulting final permit.</p> <p>Also, the WAP should provide testing and management methods to assure that the waste feedstream to the TDUs does not contain chemical constituents above amounts that will cause the air emissions from the TDU’s thermal oxidizers to exceed MACT EEE emission limits for hydrogen chloride, mercury, and listed toxic metals, as a minimum. Operating Parameter Limits (OPLs) must be established for the TDU feedstream to comply with all emission limits.</p> <p>Also, procedures must be given for sampling and analysis of the desorber solids to confirm they meet the LDR UTS prior to placement in the CWMLC landfill.</p> <p>Also, the water that is part of the hazardous waste feed to the ORUs and TDUs remains listed hazardous waste after separation in these units. Appropriate sampling and analysis prior to land disposal is required for this waste water. Typical quantities of hazardous waste water from the ORUs and TDUs at 120,000 ton/yr feed rate would be expected to be over 20,000 gallons per day.</p> |
| LDEQ RESPONSE | The LDEQ acknowledges the above comment and provides the following information:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

---

<sup>41</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

However, the LDEQ does not concur with the commenter's statement regarding the Waste Analysis Plan. CWMLC's current Waste Analysis Plan includes procedures for the pre-treatment and post-treatment analyses of the referenced material. The in-process analyses of the solids are conducted to meet the Land Disposal Requirements (LDR).

Also, under CWMLC's current LPDES permit, the wastewater being discharged from both the ORU and TDU will be disposed of off-site. CWMLC submitted a modification to the LPDES permit, which would require testing of the wastewater. Under the proposed modification, the wastewater will be directed to their treatment system in which CWMLC would have to follow limitations based on the Centralized Waste Treater (CWT) classification.

ACTION

See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to the Comprehensive Performance Test (CPT) as required by Permit Condition V.G.10.b. See Permit Condition V.G.11 for the process operating conditions for the TDUs.

See Section 6.2 of the Waste Analysis Plan for the Treatment Operations. In addition, see Section 6.2.10 and Figure 6.10 of the Waste Analysis Plan for the ORUs and Section 6.2.11 and Figure 6.11 for the TDUs.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>          | <b>31</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>REFERENCE</b>     | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and NOD #2 Response <sup>42</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>ISSUE</b>         | Response to Section 1521.H, Attachment 29, and NOD #2 Response, Item Number 8                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>COMMENT</b>       | <p>LDEQ asks a question regarding the P&amp;IDs (Process &amp; Instrumentation Diagrams) for the ORUs and TDUs. LDEQ is correctly asking that the source of the “vent gases” from the ORUs and TDUs be described, how it originates with the process and how it flows to the final emission. CWMLC clearly states that the “process gas” that is volatilized vapors from the waste treatment process (i.e. the TDUs) is condensed then the remaining non-condensable “off gas” is routed to the thermal oxidizer(s). CWMLC then goes on to perform regulatory analysis for a RCRA waste determination as though these gases are newly generated wastes, and not actually constituents of the hazardous waste that was originally fed to the TDU only seconds ago. CWMLC makes the argument that combustion of these “uncontained gases” is not regulated by RCRA.</p> <p>EPA Region 6 has clearly rejected that position in their determinations for Rineco (2010) and USET/TD*X (2012). EPA has determined that the combustion of these process gases is RCRA regulated thermal treatment. As such, the combustion must comply with appropriate technical requirements from both 40 CFR Part 264 Subpart O and 40 CFR 63 Subpart EEE.</p> <p>LDEQ must include requirements that CWMLC fully describe the combustion of these process gases as RCRA regulated thermal treatment, provide appropriate test plans to demonstrate compliance with MACT EEE, and include definitive operating parameter limits in the RCRA permit to restrict operations so that emissions comply with MACT EEE emission limits.</p> |
| <b>LDEQ RESPONSE</b> | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

---

<sup>42</sup> EDMS document 0247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.

ACTION

See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test Plan (CPT) is required in accordance with V.G.10.b. Also, see Permit Condition V.G.11 for the process operating conditions for the TDUs.

Also, see Permit Conditions V.H.2.b and II.E.25.h, which requires CWMLC to submit a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units before placing any proposed units into service.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM             | 32                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and NOD #2 Response <sup>43</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| ISSUE            | Response to Section 1523.A and B                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| COMMENT          | <p>The inspection plan provided by CWMLC to meet this section is deficient. Operation of both the ORUs and TDUs will trigger compliance with BWON regulations under 40 CFR 63 Subpart FF if wastes from refineries that require control are managed in these units.</p> <p>Inspection plan should incorporate the statutory inspections and monitoring required for BWON compliance.</p> <p>The RCRA permit application and final permit need to establish that BWON compliance is required for both the ORUs and TDUs and that means are provided for compliance. Or otherwise restrict acceptance of feed material to materials that have already been controlled to BWON standards, or restrict the feed sources to materials not subject to BWON control.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE and the facility's air permit for 40 CFR 63 Subpart FF, BWON regulations.</p>                                                                                                                |
| ACTION           | See Permit Condition V.F. for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. A Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

---

<sup>43</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>33</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>REFERENCE</b> | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and NOD #1 and NOD#2 Response <sup>44</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>ISSUE</b>     | Response to Section 1709, NOD #1, Item Number 60, and NOD #2, Item Number 4                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>COMMENT</b>   | <p>This section requires CWMLC to install, operate, monitor, and inspect air emission controls for VOCs from tanks and “process vents” such as from the ORUs and TDUs tanks, oil water separators and waste management units. CWMLC addresses this with a short sentence stating that they will comply. A description of the methods of compliance should be provided in the permit application.</p> <p>The control device requirements apply to equipment that is required to be connected to a closed vent system according to RCRA Subpart CC requirements. These are tanks and certain containers. The feed pits for the ORU and TDU are tanks and require control if they are used to managed waste with VOC content greater than 500 ppm. Significant data exist regarding average and maximum VOC content of the waste proposed for management in these units showing that the annual average VOC content is over 1000 ppm, and maximum VOC content is greater than 10,000 ppm VOC. Subpart CC controls are required on the feed receiving tanks (and/or enclosures). In the absence of air emission controls, many tons per year of VOCs from hazardous waste solids and liquids will be released to the air as uncontrolled air pollution. Of course LDEQ could impose a condition that CWMLC develop operating procedures and WAP testing to verify that all material received in the ORU and TDU facilities has less than 500 ppm VOCs as a partial means of compliance. It is noted that both the ORUs and TDUs concentrate the “recovered oil” and its VOC content and will very likely generate materials in their RCRA regulated operations that contain greater than 500 ppm VOCs, and as such are subject to RCRA Subpart CC controls for VOC air emissions.</p> <p>In NOD2 response CWMLC correctly identifies that these air emission controls are also required to comply with standards for Closed Vents and Control Devices under 40 CFR 61 Subpart FF (the Benzene Waste Operations NESHAP or BWON). However, no description is provided of how compliance will be established. What mandatory components will be</p> |

---

<sup>44</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

provided and operated? What will be monitored to establish compliance? It is noted that LDEQ is requiring CWMLC to submit plans for air emission control as condition II.E.25.f of the RCRA Permit modification.

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment and provides the following information:

After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.

The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE and the facility's air permit for BWON.

ACTION

See Permit Condition V.F. for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b.

Also, see Permit Condition V.H for the air emission standards and Schedule of Compliance Permit Condition II.E.25.h, which requires CWMLC to submit a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units before placing any proposed units into service.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>34</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application <sup>45</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| ISSUE            | Response to Section 1755                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| COMMENT          | <p>CWMLC addresses this with a short sentence stating that they will comply. A description of the methods of compliance should be provided in the permit application.</p> <p>The control device requirements apply to equipment that is required to be connected to a closed vent system according to RCRA Subpart CC requirements. These are tanks and certain containers. The feed pits for the ORU and TDU are tanks and require control if they are used to managed waste with VOC content greater than 500 ppm. Significant data exist regarding average and maximum VOC content of the waste proposed for management in these units showing that the annual average VOC content is over 1000 ppm, and maximum VOC content is greater than 10,000 ppm VOC. Subpart CC controls are required on the feed receiving tanks (and/or enclosures). In the absence of air emission controls, many tons per year of VOCs from hazardous waste solids and liquids will be released to the air as uncontrolled air pollution.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs and ORUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| ACTION           | See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

---

<sup>45</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

required in accordance with Permit Condition V.G.10.b.

See Permit Condition V.A for the permit requirements for the permitted tanks. Also, see Permit Conditions V.H.2.b and II.E.25.h, which requires CWMLC to submit a revised inspection plan, a revised closure plan, and the engineering details for the air emission controls for all proposed units before placing any proposed units into service.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>35</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and NOD #1 Response <sup>46</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| ISSUE            | Response to Section 3203.C, NOD #1 Response, Item Number 80                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| COMMENT          | <p>This section requires CWMLC to prevent releases and control air emissions from the TDUs. CWMLC states that air emissions from the TDUs will be controlled in accordance with their approved state air permit.</p> <p>The air permit nor its application do not include any requirement to comply with the emission limits and appropriate technical requirements of MACT EEE. The LDEQ question recognizes that additional information is required from CWMLC in the permit application to address air emissions from the TDUs. The application should provide this information in the form of engineering reports as referenced in numerous places above.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p>                                                                                                               |
| ACTION           | See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to Comprehensive Performance Test (CPT) testing as required by Permit Condition V.G.10.b                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

---

<sup>46</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ITEM             | 36                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application <sup>47</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| ISSUE            | Response to Section 3205.A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| COMMENT          | <p>Equipment design, monitoring, inspection and recordkeeping is required for the TDU and its associated Thermal Oxidizer(s) to meet the appropriate requirements of RCRA Subpart O and MACT EEE. These units combust hazardous waste (the vented gas from RCRA regulated hazardous waste thermal treatment) and must comply with all appropriate sections of these standards.</p> <p>Air emissions standards include compliance with MACT "EEE" emission limits for dioxins, PM, mercury, hydrochloric acid, toxic metals (SVM, LVM), THC and CO. The unit must be equipped with an AWFCO. Parameters for the AWFCO must be established in the permit. A trial burn plan compliant with Part 270.19 must be prepared and approved, including technical data on the proposed unit and the wastes to be treated. Operating parameter limits must be established to assure initial and continued compliance with emission limits. A trial burn must be completed within 720 hours of initial operation establishing compliance with all emission limits.</p> <p>None of these elements is present in the application. They must be in accordance with EPA compliance enforcement decisions against Rinco (2010) and US Ecology Texas/TD*X (2012).</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

---

<sup>47</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

ACTION            See Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, the TDUs are subject to Comprehensive Performance Test (CPT) testing as required by Permit Condition V.G.10.b.

Also, see Permit Condition V.G.11 for the process operating conditions for the TDUs.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>              | <b>37</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <b>REFERENCE</b>         | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and NOD #1 Response <sup>48</sup>                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>ISSUE</b>             | WAP Section 6.2.11, NOD #1 Response, Item Number 83                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>COMMENT</b>           | Operating Parameter Limits (OPLs) must be established for the TDU to comply with all emission limits (Hg, Cl, SVM, LVM, etc.). The WAP must specify sampling and analysis procedures to establish that incoming waste for both the TDUs and the ORUs is managed within these OPLs.                                                                                                                                                                                                                                                                               |
| <b>LDEQ<br/>RESPONSE</b> | <p>The LDEQ acknowledges the above comment and provides the following information:</p> <p>After the draft permit was public-noticed, CWMLC submitted documentation for the operation of the ORUs and the TDUs under a confidentiality request. Based upon review of this information, the LDEQ has determined that the final permit will include additional RCRA operating parameter conditions.</p> <p>The TDUs are being permitted as miscellaneous units in accordance with the applicable provisions of LAC 33:V. Chapter 32 and 40 CFR 63, Subpart EEE.</p> |
| <b>ACTION</b>            | See Permit Condition V.F for the additional permitting requirements for the ORUs and Permit Condition V.G for the additional permitting requirements for the TDUs. In addition, a Comprehensive Performance Test (CPT) Plan is required in accordance with Permit Condition V.G.10.b. See Permit Condition V.G.11 for the process operating conditions for the TDUs.                                                                                                                                                                                             |

---

<sup>48</sup> EDMS document 10247853.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

|                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>38</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| REFERENCE        | Mr. Carl R. Palmer, TD*X Associates, LLC, Written Comments on the Class 3 Permit Modification Application and NOD #1 Response <sup>49</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| ISSUE            | WAP Section 6.2.11, NOD #1 Response, Item Number 83                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| COMMENT          | <p>The WAP does not specify tests, procedures, and criteria for management of the “recoverable oil” from the TDUs and ORUs. If listed hazardous wastes are managed in these units, listings transfer to the “recoverable oil” that is derived from their treatment. Oil can only be sold and burned under specific conditions and these must be included in the WAP and resulting final permit. Otherwise all “recoverable oil” from the units should be disposed as RCRA hazardous waste and not sold as stated by CWMLC presumably with any further RCRA regulation.</p> <p>Also, procedures must be given for sampling and analysis of the desorber solids to confirm they meet the LDR UTS prior to placement in the CWMLC landfill. These wastes originate from numerous different RCRA regulated waste streams and generators. The sampling and analysis for LDR verification must address the variability of both the original waste and the ORU and TDU treatment processes used by CWMLC.</p> <p>Also, the water that is part of the hazardous waste feed to the ORUs and TDUs remains listed hazardous waste after separation in these units. Appropriate sampling and analysis prior to land disposal is required for this waste water. Typical quantities of hazardous waste water from the ORUs and TDUs at 120,000 ton/yr feed rate would be expected to be over 20,000 gallons per day.</p> |
| LDEQ<br>RESPONSE | <p>The LDEQ acknowledges the above comment, but does not concur with the commenter’s statement regarding the Waste Analysis Plan. CWMLC’s current Waste Analysis Plan includes procedures for the pre-treatment and post-treatment analyses of the referenced material. The in-process analyses of the solids are conducted to meet the Land Disposal Requirements (LDR).</p> <p>Also, under CWMLC’s current LPDES permit, the wastewater being discharged from both the ORU and TDU will be disposed of off-site. CWMLC submitted a modification to the LPDES permit, which would require testing of the wastewater. Under the proposed modification, the</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

---

<sup>49</sup> EDMS document 10247853.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

wastewater will be directed to their treatment system in which CWMLC would have to follow limitations based on the Centralized Waste Treater (CWT) classification.

ACTION

See Section 6.2.10 and Figure 6.10 of the Waste Analysis Plan for the ORUs and Section 6.2.11 and Figure 6.11 for the TDUs.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

|                  |                                                                                                                                 |
|------------------|---------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>      | <b>39</b>                                                                                                                       |
| <b>REFERENCE</b> | Ms. Mary Ellender, Private Citizen, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>50</sup> |
| <b>ISSUE</b>     | Facility Concerns                                                                                                               |
| <b>COMMENT</b>   | Chem. Waste is requesting two new oil recovery units and two thermal desorber units with associated tanks.                      |

My family and I live within two miles of Chem. Waste. Through the years the residents have been subjected to dust, odors, speeding 18 wheelers and road-side litter from the waste dump. There was a fire that lit up the night sky. There was putrid, foul-smelling odors that spread throughout the community and settled into people's homes. We live day to day wondering, what is next.

Much of the site is located within the 100 year flood plain. Chem. Waste states that their facility is surrounded by a levee of sufficient height. We have experienced 22 inch rains and an almost direct hit of a category 4 hurricane. While I did not witness the condition of the site during these events, immediately after I found John Brannon Road flooded and the adjacent property as well. Choupique Bayou was brim full at Highway 108, northwest of the site, and possibly overflowing at the company's outfall. As I have been told, these are ideal conditions for illegal releases.

Landfill pits are encased in plastic liners that we are told "make it safe". I was on site and witnessed the puncture of a liner. A tractor with a fork attachment on the back was parked on the liner of the pit. Instead of going forward, the driver accelerated in reverse – driving the forks through the plastic liner. Having witnessed this creates suspicion as to what else goes on.

At the November 29, 2016, DEQ Public Hearing, Mr. Carl R. Palmer's testimony provided information that Mercury, Hydrogen Chloride, Dioxins and Furans, toxic heavy metals and other combustion products will be emitted through the stacks into the air from the thermal desorber units.

The toxic emissions from the thermal desorber units have the potential to negatively impact community members living in the area of the Chem.

---

<sup>50</sup> EDMS document 10448070.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

Waste facility. DEQ must require Chem. Waste to perform continuous monitoring of the air around the entire facility for all of the toxic chemicals with the potential to be released from the stacks of the thermal desorber units. The monitoring data must be made available in real time for community members to have access to at all times.

Appropriate trial burns must be conducted once the thermal desorber units are on line, and on a bi-annual basis for the life of the desorber units.

All safeguards mentioned at the Public Hearing and in correspondence you receive must be implemented towards the health, safety and well-being of the Chem. Waste workers and the community. To do less fails the people of Louisiana.

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment.

With regard to the odor complaints at the facility, the LDEQ encourages citizens to utilize the LDEQ-Single Point of Contact (SPOC) hotline to report any environmental complaints. The SPOC Hotline number is (225) 342-1234 or toll free 1-888-763-5424.

With regard to the referenced “fire” incident, the commenter did not provide a specific date of the incident. On October 15, 2010, an incident had occurred at the facility in which a covered roll-off box was reportedly emitting odors and steam. The LDEQ investigated the incident and issued a Notice of Potential Penalty (NOPP)<sup>51</sup> to CWMLC. CWMLC provided a response to the NOPP,<sup>52</sup> which is currently under review by the LDEQ.

With regard to the concerns following hurricane events at the facility, CWMLC did not incur any flooding at the site for the past three hurricanes, including Hurricanes Rita, Ike, and Gustav.<sup>53</sup>

With regard to the landfill liners, each module of the landfill has a composite liner system that is designed, constructed, and maintained to prevent the discharge of any wastes or waste constituents from the landfill into the area groundwater. Each composite liner system consists of a pressure relief system (high density polyethylene (HDPE) drainage net), secondary liner system (3 foot recompacted clay liner overlain by 60 mil HDPE

<sup>51</sup> EDMS Document 8863852.

<sup>52</sup> EDMS Document 9126816.

<sup>53</sup> EDMS Document 5243450, 5177620, 5192853, 5108370, 6250979, 6268214, and 6232985.

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

geomembrane liner), leak detection system (HDPE drainage net), primary liner system (3 foot recompacted clay liner overlain by 60 mil HDPE geomembrane liner), and a leachate collection system (1 foot of silicious gravel and HDPE drainage net). Please see Permit Condition V.E.3 for further detailed information regarding the landfill design and construction requirements. In accordance with LAC 33:V.2507, CWMLC is required to monitor and inspect the landfill liner. As referenced in CWMLC's Inspection Plan, the landfill liner for the active cell is inspected daily for any rips, tears, or sharp objects on or near the vicinity of the liner.

With regard to concerns of the permit modification to add the Thermal Desorber Units, CWMLC is required to conduct continuous monitoring for carbon monoxide in accordance with Permit Conditions V.F and V.G.

In accordance with Permit Condition V.G.10.b, CWMLC is required to conduct an initial Comprehensive Performance Test (CPT) trial burn, also known as emission testing, prior to commencement of operations for the Thermal Desorber Unit. In addition, a recertification of compliance Comprehensive Performance Test (CPT) is required for the following: CWMLC's permit renewal application; for any major modifications to the unit; or if CWMLC seeks to add a new waste stream or change operating conditions. CWMLC is required to issue a public notice to all persons on the facility mailing list announcing the availability of the test plan and the location where the test plan is available for review. The test plans will be accessible to the public for sixty (60) calendar days before initiation of the test, beginning on the date the public notice is issued. Within ninety (90) days of the completion of the CPT trial burn, CWMLC is required to submit the results to the LDEQ for review. All data submitted to the LDEQ is part of the public record and will be available to review in EDMS.

ACTION

No revisions will be made to the permit.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST#742

|                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ITEM</b>              | <b>40</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>REFERENCE</b>         | Mr. Dale Clement, Private Citizen, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit. <sup>54</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>ISSUE</b>             | Facility Concerns                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>COMMENT</b>           | My name is Dale Clement - I own land right next to Chem Waste on 7170 John Brannon Rd. in Carlyss La.. Chem Waste has already reduced my land to be worth nothing, The land is surrounded on three sides by Chem Waste, so I would like any Information about this matter. How can a big company with big money come in and reduced a poor man land to worth nothing is beyond me. How can the Gov. of La. let this happen. So yes I need to know information about this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>LDEQ<br/>RESPONSE</b> | The LDEQ acknowledges the above comment. The LDEQ affords the public to view the Class 3 Permit Modification Application, Draft Permit, and Final Permit online through the Electronic Document Management Systems (EDMS) on the LDEQ website. <sup>55</sup> CWMLC submitted a Class 3 Permit Modification Application to add two ORUs, two TDUs, and associated tanks to the existing permitted facility. Based upon the information provided, the LDEQ is approving the permit modification request. For additional information regarding the permit action, please see the attached Basis for Decision document. The Basis for Decision provides a detailed explanation of the LDEQ's approval of the permit modification, including information on the permit applicant, the facility, and its operations; a discussion of the public notice, public comments and responses to the comments; an "IT" analysis; an examination of CWMLC's compliance history; and a conclusion. |
| <b>ACTION</b>            | No revisions will be made to the permit.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

---

<sup>54</sup> EDMS document 10448078.

<sup>55</sup> <http://www.deq.louisiana.gov/portal/tabid/2604/Default.aspx>

RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

**ITEM                      41**

**REFERENCE**            Mr. Robert Yarbrough, Private Citizen, Written Comments on the Draft Modified Hazardous Waste RCRA Operating Permit.<sup>56</sup>

**ISSUE**                 Facility odor issues, road complaints, and moisture content for treatment in the Thermal Desorber Unit.

**COMMENT**            I am writing concerning the new permit requested by Chemical Waste Management, Inc. located in Carly's, Louisiana.

Al no. 742

Permit no. La D00077201-OP-RN-Mo-1

Activity No. PER20140007

I live approximately 2 miles west of the current facility. As it stands now, if weather conditions are right at certain times (east wind being one factor), I get a chemical odor that has to be coming from CWM. Sometimes this is accompanied by a chemical like taste in my mouth. Neither of these complaints are all the time, but they do take place. I have lived at this location for 21 years, and off and on we have smelled and tasted whatever it is.

The main route from hi-way 27 is La 108. From continuous heavy truck traffic to the facility on John Brannon Rd. The hi-way is "rutted" where the wheels of the trucks run. What this causes in times of rain is water to stand in these places. Hydroplaning takes place unless one is extremely cautious at this time. Any vehicle traveling in the opposite direction throws an enormous amount of water on your windshield making for another danger. Hi-way 108 about 4-5 miles west of John Brannon Rd. is in deplorable condition. Any truck traffic going east on 108 will have this dangerous stretch to contend with. Any additional permitting will only exasperate these problems those of us whom live here will have to deal with in conjunction with the CWM facility.

Doing some quick research on TDU processing of contaminated waste, I was surprised to find out how little moisture it takes in the waste to make the process much more costly to do efficiently. We have had an extremely wet year here. We are subject to high humidity most of the year. If waste is delivered in open trucks with only a tarp to keep moisture out, it appears it

---

<sup>56</sup> EDMS document 10448072.



RESPONSIVENESS SUMMARY  
CHEMICAL WASTE MANAGEMENT, INC. – LAKE CHARLES FACILITY

CLASS 3 PERMIT MODIFICATION  
MODIFIED HAZARDOUS WASTE RCRA OPERATING PERMIT  
PERMIT NUMBER LAD000777201-OP-RN-MO-1  
AGENCY INTEREST# 742

would be very tempting to not follow guidelines and use the proper amount of heat necessary to attain the desired results. This area is also subject to occasional heavy rains, not to mention hurricanes.

I feel we are subject to enough everyday challenges from CWM as it exist today. They have been here a long time, and it is my desire to see them phase out of our community, not expand

LDEQ  
RESPONSE

The LDEQ acknowledges the above comment.

With regards to the odor complaints at the facility, the LDEQ encourages citizens to utilize the LDEQ-Single Point of Contact (SPOC) hotline to report any environmental complaints. The SPOC Hotline number is (225) 342-1234 or toll free 1-888-763-5424.

With regards to the roadway complaints, the LDEQ has no regulatory authority over public roadways. Please contact the appropriate agency, the Louisiana Department of Transportation and Development, for concerns over the roadways.

With regards to concerns over the potential high moisture content in the material to be treated, the TDU will be able to treat the material regardless of the moisture content. The material is centrifuged to remove any excess water or moisture. Once the material is in the desorption unit, if the moisture content continuous to is high, more natural gas will be utilized to heat off the moisture.

ACTION

No revisions will be made to the permit.