

Subpart X Permitting Group Case Study

Drum Crusher

Drum Crusher

- Project Manager – Lisa Woodward
- Spokesman – Joe Putnam
- Team
 - Stan Kukier
 - Keith Goff
 - Jamie Smathers
 - Elizabeth Bartlett - Recorder

Maintenance

- Epoxy seal floor
- Tank clean-out schedule
- Facility decontamination between incompatible wastes
- Maintain conveyors
- Maintain air locks, hydraulic ram, maceration tank, fire suppression system, relief valves, communication system, sumps, nitrogen purge system

General Permit Conditions

from CFR §§270.14 and 264, Subpart B

- Facility description; EPA ID #
- Waste characteristics/analysis
- Procedures to prevent hazards
- Contingency plan
- Personnel training
- Closure & post-closure plans
- Groundwater protection
- Surface water protection
- Waste minimization
- Inspections

General Permit Conditions (cont'd)

from CFR §§270.14 and 264, Subpart B

- Financial assurance
- Corrective action
- Security
- Notices
- Recordkeeping
- Construction quality assurance
- Location standards
- Incompatibility requirements

Waste Characterization

- Waste profile
- Test pH, specific gravity
- Composite samples for PCBs
- 10% of containers sampled, composited and sent to lab (if PCB waste, use 10% also)
- Inspect containers
- PCBs analyzed per Methods 3510C and 3620B requirements or equivalent approved method
- Must be manifested

Operating Conditions

- Processing rate
- Decontamination rate
 - Number of drums
 - Incompatible waste streams
- Sampling rates for solids, liquids and air
- Performance standards
- Emission rates
- If shipment fails screening analysis, then shipment can not be processed

Operating Conditions (cont'd)

- Modeling for air emissions to determine permit conditions
- Modeling for normal/upset operating conditions (site specific)
- Sample drinking water wells – make sure sampling includes appropriate constituents

Safety

- Contingency plan
- Secondary containment
- Personnel training
- SOPs for safety equipment
- Incompatible wastes

Separated Metal

- Metal must be managed as hazardous waste for transportation

Monitoring

- Air emission points
- Nitrogen levels
- Processing feed rates
- Secondary containment sumps
- Groundwater monitoring
- Tank levels
- Process monitoring

Inspection Checklist

- Physical condition of unit
- Waste analysis
 - Sampling 10%
 - Recordkeeping
- Containment devices
 - Berms
 - Floor
 - Sumps
- Run-on and run-off control
- Security devices
- Check monitoring well and air emissions data (schedule)

Inspection Checklist (cont'd)

- Satellite accumulation areas
- Hazardous waste storage areas
- Safety and emergency equipment
 - Communication system
 - Emergency shower
 - PPE
 - Fire equipment
 - Alarms
- Air monitoring points and devices
- Sampling locations

Inspection Checklist (cont'd)

- Recordkeeping
 - SOPs
 - Operating log
 - Inspection log
- Tanks
- Waste transfer areas
- Other processing areas