
To: David Anderson, Manager
ER Cleanup and Hazardous Waste Section

Date: December 16, 2021

From: Spencer Bohaboy, Permit Writer, Eastern Region, DEQ

Section: The Dalles Office, Eastern Region

Subject: Chemical Waste Management of the Northwest, Inc.
Proposed Hazardous Waste Container Storage Unit, MOD 127

DESCRIPTION OF SUBMITTAL

On October 1, 2021, Chemical Waste Management of the Northwest, Inc. (CWMNW) submitted a modification request (PMR) to add a new container storage unit (S-12) for the management of both solid and liquid containerized (hazardous) wastes. The proposed changes were submitted as a Class II PMR in accordance with 40 CFR 270.42, Appendix I Section F.1.

Approval of this PMR would increase the volume of the permitted container storage at CWMNW by 25%.

DESCRIPTION OF PERMIT MODIFICATION REQUEST

This PMR seeks to add a new Container Management Unit to the CWMNW facility. The PMR included major and minor changes to the permit's language, figures and three of the 21 standalone documents. These are the Inspection Plan (Standalone #3), Closure Post-Closure Plan (Standalone #5), Container Storage and Operations Plan (Standalone #9) and Waste Pile Plan (Standalone #21).

EVALUATION OF THE PROPOSED MODIFICATION

The proposed changes to the permit, figures and attachments allow for the addition of a new Container Management Unit (S-12) pursuant to 40 CFR 264 Sub-part I (**Use and Management of Containers**). The changes also remove references to Waste Pile #1, which was removed and determined to be "clean-closed" by the department on August 10th, 2020. Finally, a number of miscellaneous changes were made to address minor typographic errors, update the naming of facility units and provide clarification to the narrative descriptions.

As seen in Attachment #9, the new S-12 unit will be an outdoor container management unit that measures 500 by 220 feet and is comprised of 5 sub-units (A through E). Each subunit will conform to the design requirements of 40 CFR 264.175 and 270.15 and will be surrounded by a berm and drain to a lined sump that has been sized to contain potential container leakage (10% of cumulative container volume) or a significant precipitation event. Initially, the sub-units will be constructed to accommodate containerized solids but may be retrofitted to add geotextile fabric, a HDPE liner and additional soil compaction allowing for the storage of containerized liquids. Prior to the initial construction or retrofit of the sub-units, the permittee will be required to submit construction details to the department and receive approval.



The new unit will be operated in accordance with the requirements specified in 40 CFR 264.171 through 40 CFR 264.174. These provisions are addressed through a combination of permit requirements (see Condition III.A.3), and narrative language in Attachments #3 (Inspection Plan) and #9 (Operations Plan). Specifically, the permit requirements addressing the Condition of Containers, Compatibility of Waste with Containers, Management of Containers and Inspections are described in Attachment #3, Section 4.3 and Attachment #9, Section 2.2.

The proposed location for S-12 is the former location for Waste Pile #1 (WP-1), which stored demolition materials bearing the State-Only waste codes of F998 and F999. The wastes were removed and the unit was closed pursuant to 264 Subpart G (Closure and Post-Closure) and 40 CFR 264.258 (Closure and post-closure care for waste piles). The closure of the unit was certified by the department on August 10, 2020. Per 40 CFR 270.42 Appendix I A8, references to the former WP-1 have been removed from the permit, site figures and the various attachments. The former Waste Pile Plan has been deleted and the attachment number (#21) reserved for future use.

The revision of the permit and attachments also include a number of minor corrections to address typographic errors and informational changes per 40 CFR 270.42 Appendix I A1&A2. The later includes the update of facility unit names and clarifications of the narrative descriptions.

PERMITTEE'S PUBLIC COMMENT PERIOD

A public information meeting and public comment period are required for a Class II PMR. The Permittee held a 60-day public comment period beginning October 1, 2021 and ending on November 30, 2021. The Permittee held a virtual public information meeting on the PMR on October 21, 2021 at 5:00 pm.

No comments were received during this comment period.

DEPARTMENT'S PUBLIC COMMENT PERIOD

The proposed revisions are considered a Class II modification per 40 CFR 270.42 (b) and a departmental Public Comments period is not required.

FINAL CONSIDERATIONS

Although no comments were submitted, a number of minor changes and clarifications were made to the permit and attachments to address inconsistencies, typographic errors and provide additional clarifications. These changes were minor and did not affect the design, scope or operation of the proposed unit.

DEPARTMENT CONCLUSION/RECOMMENDATION

It has been determined that the information from the Permittee in this PMR is complete and sufficient to reach a decision on the proposed changes. The proposed changes are in compliance with, and exceed, the regulatory requirements for the use and management of containers described in 40 CFR Part 264 Subpart I.

It is recommended that the Department approve this PMR as amended by the Permittee and the Department.