

SECTION III – CONTAINER STORAGE

A. SECTION HIGHLIGHTS

Systech Environmental Corporation (Systech) owns and operates a hazardous waste management facility that is located within the site boundary of the Tulsa Cement, LLC (Tulsa Cement) DBA Central Plains Cement Company (CPCC) facility. Systech activities include the receiving, blending and storage of hazardous waste fuel that is subsequently supplied to Tulsa Cement for recycling in the cement kilns.

Systech stores hazardous waste in containers and tanker trucks in the truck unloading bay. The truck unloading bay has a container storage capacity of twenty (20) 55-gallon drums (or equivalent) and two (2) 6,000-gallon tanker trucks.

B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

1. The Permittee may store hazardous waste in the truck unloading bay subject to the terms of this Permit.
2. The Permittee is prohibited from storing hazardous waste identified in Section 3.4 of the Waste Analysis Plan, Permit Attachment 1.
3. The Permittee is prohibited from the use of direct transfer of hazardous waste, as described in 40 CFR 266.111, from trucks to the Tulsa Cement kilns.

C. CONDITION OF CONTAINERS

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 Permittee shall transfer the hazardous waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this Permit. [40 CFR 264.171].

D. COMPATIBILITY OF WASTE WITH CONTAINERS

1. The Permittee shall use containers made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste being stored, so that the ability of the container to contain the waste is not impaired. [40 CFR 264.172]
2. The Permittee shall not store waste in containers which do not meet the specifications established by the Department of Transportation (DOT) in 49 CFR 171-179.

E. MANAGEMENT OF CONTAINERS

1. The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak. [40 CFR 264.173]

2. The Permittee shall keep all containers containing free liquids in rows not more than two containers wide with minimum aisle spacing of two feet between each row.

F. CONTAINMENT SYSTEMS

The Permittee shall maintain the containment system in accordance with the conditions of this Permit. [40 CFR 264.175].

G. INSPECTION SCHEDULE AND PROCEDURES

The Permittee shall inspect the container storage area weekly in accordance with the Inspection Plan, Permit Attachment 2, to detect leaking and/or deterioration of containers and the containment system caused by corrosion and other factors. [40 CFR 264.174].

H. RECORDKEEPING

The Permittee shall place the results of all waste analysis, trial tests, and any other documentation showing compliance with the requirements of this Permit, as well as 40 CFR 264.17(b) and 264.177, in the facility operating record. [40 CFR 264.73].

I. CLOSURE

At closure of the container storage area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure Plan, Permit Attachment 5. [40 CFR 264.178].

J. SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the facility's property line. [40 CFR 264.176].
2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste, including but not limited to the requirements in 40 CFR 264.17(a) and 264.176.

K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

1. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, in the same container. [40 CFR 264.177(a)].
2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material. [40 CFR 264.177(b)].
3. The Permittee shall separate containers of incompatible wastes. [40 CFR 264.177(c)].

L. REQUIRED AISLE SPACE

The Permittee shall maintain aisle space in the truck unloading bay container storage area sufficient to allow the unobstructed movements of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any portion of the container storage area. [40 CFR 264.35].

M. AIR EMISSION REQUIREMENTS FOR CONTAINERS

Systech containers are subject the provisions of 40 CFR Part 264 Subpart I. Pursuant to 40 CFR 264.1080(b)(7), the requirements of 40 CFR 264 Subpart CC do not apply to these containers, provided that Systech certifies that the containers are equipped with and operating with air emissions controls in accordance with applicable 40 CFR Part 60, 61, and/or 63 regulations. Pursuant to 40 CFR 264.1089(j)(1), Systech has certified that it complies with the standards of 40 CFR 63.688 governing air emissions from containers, maintained in the facility operating record. All containers shall be inspected in accordance with the schedule outlined in Permit Attachment 2.

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