

**SECTION M**  
**SOLID WASTE MANAGEMENT UNITS**

**Revision 0**  
**February 2021**

## **SECTION M – SOLID WASTE MANAGEMENT UNITS**

### **TABLE OF CONTENTS**

1.0	SOLID WASTE MANAGEMENT UNITS .....	1
2.0	RELEASES FROM SOLID WASTE MANAGEMENT UNITS .....	1

## SECTION M

### 1.0 SOLID WASTE MANAGEMENT UNITS

Per the requirements for solid waste management units (SWMU) specified in 40 CFR 270.14(c) and (d) and 40 CFR 264 Subpart F, Systech Tulsa (Systech) must identify the location of each SWMU at the facility and provide available information pertaining to any release of hazardous wastes or hazardous constituents from these units. Information on the design, operation, and wastes managed is contained in Sections A and D of this application. The Systech facility is a ~1-acre area that is an active waste management facility. Systech operates the following SWMUs:

- Two 180,000-gallon storage tanks (S02) that are also considered as Treatment Units (T04) due to the agitation system installed with each tank;
- A container storage area (S01) limited to storage of 13,100 gallons of waste that is located in the Truck Off-loading Area, an 80 by 39 foot bermed concrete slab. This includes as many as two (2) 6,000-gallon tanker trucks and other smaller containers totaling 1,100 gallons that may be in the off-loading area.

Systech does not operate surface impoundments, landfills, waste piles or land treatment units and is not subject to the requirements of 40 CFR 264 Subpart F.

### 2.0 RELEASES FROM SOLID WASTE MANAGEMENT UNITS

Central Plains Cement Company (CPCC) and Systech completed a combined RCRA Facility Assessment (RFA) in February 2010. The RFA included the proposed Systech SWMUs that were not constructed at that time. These SWMU were not subject to a RCRA Facility Investigation (RFI) at that time. A summary of the Systech SWMUs identified in the RFA report within the Systech property is included in the table below.

SWMU NO.	DESCRIPTION	SIZE
19	FQW storage tank farm	Two 180,000-gallon tanks
20	FQW container storage area	55' x 80'

Systech inspects the tanks, ancillary equipment, and the secondary containment on a daily basis and the findings are recorded on a log. The container storage area is inspected weekly. Because the site is so small, facility personnel will be aware of any releases in the truck bay where containers are stored and trucks are offloaded, as well as any issues that pose a threat of release to the environment.

Should any cracks develop in the secondary containment areas, these will be sealed to prevent the potential for any release of hazardous waste to migrate to the subsoils. There have been no spills while cracks in the containment were unsealed. In addition, any releases of material outside of containment have been cleaned up and documented in the facility's operating record.

Pursuant to Systech's RCRA permit, a new RFA will be prepared if Systech identifies a new SWMU on its property. Systech will follow the procedures outlined in the permit for conducting the RFA and RFI, if required. Systech's current SWMUs are permitted as hazardous waste management units and as such, they are subject to the closure requirements of the RCRA hazardous waste management rules and permit. Any issue such as a spill or release due to routine operations will be addressed at the time of closure, unless a release of hazardous waste or hazardous constituents occurs outside of the containments that are subject to immediate spill response reporting and remediation. Therefore, an RFA is not applicable to any of the Systech SWMUs at this time.