PLAINTIFF'S
EXHIBIT
CEL-225

teraffice Memorandum

and Location)	DATE
* DISTRIBUTION LIST ATTACHED	7/19/82
M (Name and Location)	REFERENCE NO.
W. H. Brough - S.H.E. Dept., Bishop	WHB-755-82

cc: J. Garza, S.H.E. Dept., Bishop
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Bishop File: 202.4
WHB File - RCRA Operating Rpt.
Central Files (2)

HAZARDOUS WASTE RULES AND REGULATIONS CHANGES

Since the initial effective date of the Hazardous Waste Regulations in November, 1980, there have been several rule changes and modifications. Below I have listed the changes that effect the plant. CAREFULLY READ THESE CHANGES SINCE THEY ARE EITHER STATE OR FEDERAL REQUIREMENTS.

1. Asbestos is no longer considered a hazardous waste since it is regulated under the Federal National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulations.

2. All tanks and sumps containing hazards wastes must have the words "Hazardous Wastes" affixed to the container.

   This is a new regulation that became effective on June 21, 1982. Compliance with this regulation can be easily accomplished by making a stencil with the words "Hazardous Wastes". Then use the stencil to paint these words on the sump or tank. It is my recommendation to spray paint the wording on the lid of the sump or on the concrete covering the sump.

   All rain water and process sumps must have this wording affixed to them. The only tanks which must have the wording affixed are the BOD Unit test pond, surge pond, the two liquid incinerator feed tanks, and the methanol slop tank at the Corpus Christi Terminal.

3. All waste methanol (or methanol and water) and acetone (or acetone and water) from the terminals must be manifested with a TDWR Hazardous Waste Manifest before transport to the Bishop Plant.

4. The Corpus Christi Terminal slop tank has been exempted from permitting under the hazardous waste laws. However, it is still subject to the inspection requirements and other tank storage requirements.

4. Tanks Containing Hazardous Wastes - (This includes sumps, BOD Unit test ponds and surge pond, Corpus Christi Terminal slop tank, and liquid incinerator storage tanks.

   a. Inspect discharge control equipment (e.g. waste feed cut-off systems, by-pass systems, and drainage systems), at least once each operating day, to ensure that it is in good operating condition. NOTE: SUMPS ARE EXEMPTED FROM THIS REQUIREMENT SINCE IT HAS BEEN DETERMINED THAT IF A SUMP IS FULL, IT WILL NO LONGER ACCEPT LIQUID. THE SUMP DOES NOT OVERFLOW, IT JUST NO LONGER ACCEPTS FLUID. ALSO, THE LIQUID OVERFLOW IS OBVIOUS AND WILL BE IMMEDIATELY CARED FOR.

   b. Inspect the data gathered from monitoring equipment (e.g., pressure and temperature gauges), if the equipment is available (NOTE: DO NOT INSTALL NEW MONITORING EQUIPMENT), at least once each operating day, to ensure that the tank is being operated according to its design.

   c. Inspect the level of waste in the tank, at least once each operating day. All open top tanks must have a two foot freeboard. SUMPS ARE EXEMPTED FROM THIS REQUIREMENT SINCE AN OVERFLOW OF THE SUMP GENERALLY IS VISIBLE AND IN A CONFINED AREA.

   d. Inspect the construction materials of the tank, at least weekly to detect corrosion or leaking of fixtures or seams. This is a visual inspection of the above surface portion of the facility. This should also include an inspection of the pumps and associated valving and piping around the sumps and tanks.

   e. Inspect the integrity of the dikes at the BOD Unit Test Pond and surge once per week.

5. Surface Impoundments (Solar Ponds)

   a. Inspect the freeboard level at least once each operating day to ensure that the two foot freeboard minimum is attained. Record the freeboard operating level each day.

   b. Once a week, inspect the dikes to detect any leaks, deterioration or failures. Correct these failures at once.

6. Landfills (this means the hazardous waste landfills only)

   a. Inspect the dikes provided to protect the landfill from runon and runoff or rainfall and surface water. Perform this inspection weekly.

   b. Be sure that landfilling operations do not allow the release of airborne contaminants. In other words, cover or otherwise manage the landfill so that wind dispersal of the hazardous waste is controlled. There is no recordkeeping required for this item.

7. Incinerators (trash incinerator, chemical solid incinerator or Celcon incinerator, liquid incinerator, and CP&SC die burner) NOTE: THESE INSPECTION REQUIREMENTS MAY BE SUBJECT TO CHANGE SINCE NEW REQUIREMENTS HAVE BEEN RECENTLY PROMULGATED.

   a. Existing instruments (do not install new instruments) which relate to the combustion and emission control must be monitored at least every 15 minutes. Appropriate corrections to maintain steady state combustion conditions must be made immediately or by the operator. Instruments which relate to combustion and emission control would normally include those measuring waste feed, auxiliary fuel free, air flow, incinerator temperature, scrubber pH, etc. I DO NOT BELIEVE THAT WE HAVE ANY OF THESE INSTRUMENTS EXCEPT A FLOW METER ON THE LIQUID FLOW TO THE LIQUID INCINERATOR. THEREFORE NONE OF THESE MEASUREMENTS NEED TO BE TAKEN IF THE INSTRUMENT IS NOT INSTALLED. THE TRASH INCINERATOR AND THE CELCON INCINERATOR ARE CHECKED HOURLY TO BE SURE THE BLOWER IS ON.

   b. The stack plume must be observed visually at least hourly for normal appearance. This is presently being done by BH-2 for the liquid incinerator when it burns, maintenance and plant security for the trash incinerator and Celcon incinerator, and the Nylon Unit for the CP&SC die burner.

c. The complete incinerator and associated equipment (pumps, valves, conveyors, pipes, etc.) must be inspected at least daily for leaks, spills, and fugitive emissions.

ALL INSPECTIONS OUTLINED ABOVE ARE TO BE RECORDED. THESE RECORDS SHALL SHOW THE DATE OF THE INSPECTION, THE INSPECTOR'S NAME, THE ITEM INSPECTED, THE MAINTENANCE ACTION REQUIRED, AND THE DATE OF THE COMPLETION OF THE REPAIR. ALL RECORDS OF INSPECTION WILL BE KEPT IN THE OPERATING UNIT OR IN THE MAINTENANCE AREAS.

Please check your recordkeeping and inspections schedule to be sure your area is in compliance with the regulations. If there are any questions about this inspection schedule or the changes in regulations, please contact me at extention 4602.

W. H. Brough

WHB/rgs