

Interoffice Communication

To Distribution
From J. C. Ledvina
Date April 12, 1984
Subject UNIFORM HAZARDOUS WASTE MANIFEST

Attached is the final rule on Uniform Hazardous Waste Manifests. As I read it, all states, whether they have the RCRA program or not, must use this form starting 9/20/84. I'm sure your states will be providing information to you before that time.



J. C. Ledvina

ajo

Distribution:

Ed Taylor
Ross Oliver
Dave Mahler
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Paul Warner

New copy for Ross

VEU-173439

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

File: ENV 5-1
FOIA
~~FOIA~~
~~FOIA~~

JUL 27 1991

OFFICE OF
SOLID WASTE AND EMERGENCY RESPONSE

Mr. Ronald E. Meissen
Senior Environmental Engineer
Travenol Laboratories, Inc.
Deerfield, Illinois 60015

Dear Mr. Meissen:

I apologize for not responding to your letter of March 3 sooner. As you can imagine, the last few months have been exceedingly busy for us.

You requested confirmation on a telephone interpretation I provided clarifying the totally enclosed treatment facility definition. You also said that you had received a somewhat different response from Mr. Gardner in our Office of General Counsel. Unfortunately, because of the newness of the regulations, the number of people involved here in their development, and their complexity, it has not been uncommon for somewhat different interpretations to have arisen on occasion.

There have been a lot of questions similar to yours concerning the totally enclosed treatment facility. We have prepared the enclosed clarification which I think answers your questions. If we can be of any further assistance, please call (202/755-9185).

Sincerely yours,



Alfred W. Lindsey
Deputy Director

Hazardous & Industrial Waste Division (WH-565)

Enclosure

VEU-173440

TOTALLY ENCLOSED TREATMENT FACILITY

Regulatory Clarification

I. Issue: From questions asked since promulgation of the regulations on May 19, 1980, it is clear that the definition and practical application of the term "totally enclosed treatment facility" require clarification.

ii. Discussion: The definition appears in §250.10(a) as follows:

Totally enclosed treatment facility means a facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment. An example is a pipe in which waste acid is neutralized.

A facility meeting this definition is exempted from the requirements of Parts 264 and 265 (See §§264.1(g)(5) and 265.1(c)(9)) and, by extension, the owner or operator of that facility need not notify nor seek a permit for that process. The purpose of this provision is to remove from active regulation those treatment processes which occur in close proximity to the industrial process which generates the waste and which are constructed in such a way that there is little or no potential for escape of pollutants. Such facilities pose negligible risk to human health and the environment.

The part of the definition which has generated the most uncertainty is the meaning of "totally enclosed." The Agency intends that a "totally enclosed" treatment facility be one which is completely contained on all sides and poses little or

no potential for escape of waste to the environment even during periods of process upset. The facility must be constructed so that no predictable potential for overflows, spills, gaseous emissions, etc., can result from malfunction of pumps, valves, etc., associated with the totally enclosed treatment or from a malfunction in the industrial process to which it is connected. Natural calamities or acts of sabotage or war (earthquakes, tornadoes, bombing, etc.) are not considered predictable, however.

As a practical matter, the definition limits "totally enclosed treatment facilities" to pipelines, tanks, and to other chemical, physical, and biological treatment operations which are carried out in tank-like equipment (e.g., stills, distillation columns, or pressure vessels) and which are constructed and operated to prevent discharge of potentially hazardous material to the environment. This requires consideration of the three primary avenues of escape: leakage, spills, and emissions.

To prevent leaking, the tank, pipe, etc., must be made of impermeable materials. The Agency is using the term impermeable in the practical sense to mean no transmission of contained materials in quantities which would be visibly apparent. Further, as with any other treatment process, totally enclosed treatment facilities are subject to natural deterioration (corrosion, etc.) which could ultimately result in leaks. To meet the requirement in the definition that treatment be conducted

" . . . in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment . . . ,"
the Agency believes that an owner or operator claiming the exemption generally will have to conduct inspections or other discovery activities to detect deterioration and carry out maintenance activities sufficient to remedy it. A tank or pipe which leaks is not a totally enclosed facility. As a result, leaks must be prevented from totally enclosed facilities or the facility is in violation of the regulations.

A totally enclosed facility must be enclosed on all sides. A tank or similar equipment must have a cover which would eliminate gaseous emissions and spills. However, many tanks incorporate vents and relief valves for either operating or emergency reasons. Such vents must be designed to prevent overflows of liquids and emissions of harmful gases and aerosols, where such events might occur through normal operation, equipment failure, or process upset. This can often be accomplished by the use of traps, recycle lines, and sorption columns of various designs to prevent spills and gaseous emission. If effectively protected by such devices, a vented tank would qualify as a totally enclosed treatment facility.

When considering protective devices for tank vents, the question arises as to whether the protective device is itself adequate. The test involves a judgment as to whether the overflow or gaseous emission passing through the vent will be

prevented from reaching the environment. For example, an open catchment basin for overflows is not satisfactory if the hazardous constituents in the waste may be emitted to the air. Similarly, it may also not be satisfactory if it is only large enough to hold the tank overflow for a brief period before it also overflows. However, even in this situation, alarm systems could be installed to ensure that the capacity of the catchment basin is not exceeded. Where air emissions from vents or relief valves are concerned, if the waste is non-volatile or the emissions cannot contain gases or aerosols which could be hazardous in the atmosphere, then no protective devices are necessary. An example might be a pressure relief valve on a tank containing non-volatile waste. Where potentially harmful emissions could occur, then positive steps must be taken. For example, the vent could be connected to an incinerator or process kiln. Alternately, a sorption column might be suitable if emission rates are low, the efficiency of the column approaches 100 percent, and alarms or other safeguards are available so that the upset causing the emission will be rectified before the capacity of the column is exceeded. Scrubbers will normally not be sufficient because of their tendency to malfunction and efficiencies typically do not approach 100 percent.

Tanks sometimes have floating roofs. To be eligible as a totally enclosed facility, such tanks should be constructed so that the roof has a sliding seal on the side which is designed

to prevent gaseous emissions and protect against possible overflow.

The part of the definition requiring that totally enclosed treatment facilities be "directly connected to an industrial production process" also generates some uncertainty. As long as the process is integrally connected via pipe to the production process, there is no potential for the waste to be lost. The term "industrial production process" was meant to include only those processes which produce a product, an intermediate, a byproduct, or a material which is used back in the production process. Thus, a totally enclosed treatment operation, integrally connected downstream from a wastewater treatment lagoon would not be eligible for the exemption because the process to which it is connected is not an "industrial production process." Neither would any totally enclosed treatment process at an off-site hazardous waste management facility qualify, unless it were integrally connected via pipeline to the generator's production process. Obviously, a waste transported by truck or rail is not integrally connected to the production process.

Hazardous waste treatment is often conducted in a series of unit operations, each connected by pipe to the other. As long as one end of a treatment train is integrally connected to a production process, and each unit operation is integrally connected to the other, all qualify for the exemption if they meet the requirement of being "totally enclosed." If one unit operation is not "totally enclosed" or is not "integrally connected,"

then only unit operations upstream from that unit would qualify for the exemption. The unit and downstream process would require a permit.

The device connecting the totally enclosed treatment facility to the generating process will normally be a pipe. However, some pipes (e.g., sewers) are constructed with manholes, vents, sumps, and other openings. Pipes with such openings may qualify as totally enclosed only if there is no potential for emissions or overflow of liquids during periods of process upset, or if equipment (sorption columns, catchment basins, etc.) has been installed to prevent escape of hazardous waste or any potentially hazardous constituent thereof to the environment.

This exemption for totally enclosed treatment facilities applies only to the facility itself. The effluent from that facility may still be regulated. If the waste entering the totally enclosed treatment facility is listed in Subpart D of Part 261, then the effluent from the facility is automatically a hazardous waste and must be treated as such, unless it is "delisted" in accordance with §§260.20 and 260.22. If, on the other hand, the waste entering the totally enclosed treatment facility is hazardous because it meets one of the characteristics described in Subpart C of Part 261, then the effluent waste is a regulated hazardous waste only if the effluent meets one of the characteristics. Since the totally enclosed treatment facility is exempted from the regulatory requirements, it is only the effluents from such processes which are of interest

to the Agency. Thus, whether the waste in a totally enclosed treatment facility must be considered towards the 1000 kg/month small quantity generator limit, depends on whether it is a regulated hazardous waste as it exits the totally enclosed treatment facility.

Finally, it is important to note that if the effluents from a totally enclosed treatment facility are discharged to a surface water body (lake or stream) or to a publicly owned treatment works or sewer line connected thereto, then these wastes are not subject to the RCRA hazardous waste controls at all but are, instead, subject to the Clean Water Act and regulations promulgated thereunder (See 45 FR 76075).

III. Resolution: In sum, a "totally enclosed treatment facility" must:

- (a) Be completely contained on all sides.
- (b) Pose negligible potential for escape of constituents to the environment except through natural calamities or acts of sabotage or war.
- (c) Be connected directly by pipeline or similar totally enclosed device to an industrial production process which produces a product, byproduct, intermediate, or a material which is used back in the process.

VEU-173447

File: ENV 5-1
RCRA
Federal
TRAVENOL LABORATORIES, INC.

Deerfield, Illinois 60015

July 7, 1981

RECEIVED

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JAN 26 1984

Environmental Affairs

Mr. Alfred W. Lindsey
Deputy Director
Hazardous & Industrial Waste
Division (WH-565)
U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20460

RE: Totally Enclosed Hazardous Waste
Treatment Facilities
RCRA Hazardous Waste Regulations

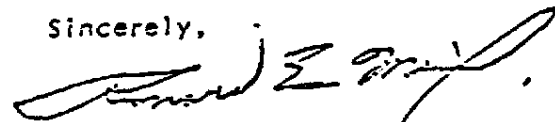
Dear Mr. Lindsey:

Last spring I wrote to you requesting clarification of regulatory requirements, concerning Totally Enclosed Hazardous Waste Treatment Facilities (Refer to Attached Letter, dated March 3, 1981).

To date we have not received any reply to our inquiry on this aspect of the RCRA Regulations. Please clarify U.S. EPA's position at your earliest convenience.

Thank you for your assistance.

Sincerely,



Ronald E. Meissen, P.E.
Senior Environmental Engineer

REM/at
Attachment

copies to: Judy Weathers
1/27/84 Sue Luft
JRM

File REG 1-1-2-1

VEU-173448



TRAVENOL LABORATORIES, INC.

Deerfield, Illinois 60015

March 3, 1981

Mr. Alfred W. Lindsay
Deputy Director
Hazardous & Industrial Waste
Division (WH-565)
U.S. Environmental Protection Agency
401 M Street
Washington, D.C. 20460

RE: Totally Enclosed Hazardous Waste
Treatment Facilities

Dear Mr. Lindsay:

Travenol Laboratories, Inc., a large manufacturer of therapeutic medical care products, has plants in the U.S. which generate, treat, or store hazardous waste.

Per our telephone conversation February 27, 1981, you informed me of the following:

1. If we have a Totally Enclosed Hazardous Waste Treatment Facility we are completely exempt from all RCRA Regulations.
2. If the system is "Totally Enclosed" we only have to check the final stream/effluent to confirm it is not a hazardous waste.
3. Since we are exempted from RCRA, any hazardous waste generated/treated in the system is not considered towards the 1000 kg/mo limit.

In late February 1981, Mr. William Blackburn, an attorney with Travenol, spoke with Dr. Dick Gardner, attorney for the U.S. EPA Office of General Counsel, concerning the above subject. Mr. Gardner said that hazardous wastes which are treated in a totally enclosed treatment facility must be covered in determining whether or not a hazardous waste generator meets the 1000 kg. small generator exemption. He told Blackburn that the applicable regulations may be changed in two months or so as a consequence of the recent negotiations which address the petition filed by the National Solid Waste Management Association concerning the small generator exemption.

VEV-173449

Mr. Alfred W. Lindsey
March 3, 1981

Page 2

Mr. Gardner added that if we desired relief from the current regulatory provisions prior to modification of the regulations, we would have to request it in a letter to him.

Because we have received different interpretations on this issue we are confused. Please clarify U.S. EPA's position.

Thank you for your assistance.

Sincerely,



Ronald E. Meissen, P.E.
Senior Environmental Engineer

REM/lc

bcc: D. Nurnberg - NK-C



UEV-173450

COMPLIANCE MANUAL
FOR HAZARDOUS WASTE HANDLING
CONOCO CHEMICALS COMPANY
BALTIMORE, MARYLAND
JANUARY 6, 1981

Revised: January 1, 1984

VEV-173451

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- B. EPA Hazardous Waste Facility Permit
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UEV-173452

COMPLIANCE MANUAL
FOR HAZARDOUS WASTE HANDLING
CONOCO CHEMICALS COMPANY
BALTIMORE, MARYLAND

INTRODUCTION

Hazardous waste activities at Conoco Chemicals' Baltimore Plant are controlled by the Federal Resource Conservation and Recovery Act (RCRA) and by the State of Maryland under the Waste Management and Enforcement Programs. The plant is currently under permit as a designated hazardous substance facility by the State of Maryland (see Appendix A) and has interim status as a hazardous substance generator, treatment, and storage facility through the RCRA program (see Appendix B).

As required by the State permit, this Compliance Manual is designed to give a general understanding of the responsibilities the Baltimore Plant has as a generator and treater of hazardous wastes. The requirements set by the State and Federal Governments, as well as procedures to be adhered to are outlined as follows:

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I. GENERATOR

A. Description of Wastes

In general, the hazardous waste streams generated by the Baltimore Plant are covered by two broad categories: corrosive waste and ignitable waste. A corrosive waste is defined as an aqueous waste with a pH less than or equal to 2.0 or greater than or equal to 12.5. An ignitable waste is a liquid having a flash point of less than 140°F (60°C).

Most of the corrosive streams generated by the plant are product streams which are normally sold. These liquids include muriatic acid, spent sulfuric acid, spent caustic, and aluminum chloride liquor. If these materials cannot be sold due to quality or market, they are manifested and hauled away to licensed corrosive hazardous waste disposal sites, with the exception of off-specification muriatic acid, which is neutralized on-site.

The other hazardous wastes hauled from the plant will fall under the ignitable category -- these may include slop oil solids from the API separator and tank bottoms. These wastes and the above-mentioned wastes, plus any special cases, are to be handled through the plant's waste material manifesting system.

B. Waste Material Manifesting

A manifest system has been designed to initiate, approve, execute, and record the disposal of any designated hazardous waste from Conoco Chemicals' Baltimore Plant. This procedure is to be used only for those hazardous wastes which are removed from the plant site.

The manifest specifications, as detailed by the Resource Conservation and Recovery Act of the EPA, are that it include the following:

1. A manifest document number.
2. The generator's name, mailing address, telephone number, and EPA identification number.
3. The name and EPA identification number of each transporter.
4. The name, address, and EPA identification number of the designated disposal facility and an alternate facility, if any.
5. The proper shipping name and description of the waste, in accordance with Department of Transportation regulations.

6. The total quantity of each hazardous waste by units of weight or volume, and the type and number of containers loaded onto the transport vehicle.

The manifest system for Conoco Chemicals' Baltimore Plant is designed around these requirements and includes:

1. An initiation procedure for hazardous waste hauling.
2. Sampling and lab verification of hazardous waste classification (by comparison with State and Federal hazardous waste classifications).
3. Plant approval of hazardous waste hauled, disposal sites, and waste transporters.
4. A recordkeeping system including verification of receipt of waste by the disposal site.

C. Waste Material Packaging

Any hazardous waste to be disposed of off-site is to be packaged, labeled as to its contents, and marked as a hazardous waste in accordance with the Department of Transportation regulations.

Also, each container of 110 gallons or less is to be marked with the following statement:--

"HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U. S. Environmental Protection Agency."

Generator's Name and Address:

Manifest Document Number: _____

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D. Accumulation of Waste

Hazardous waste other than Slop Oil and Muriatic Acid may be accumulated on-site for less than 90 days provided that:

- The waste is placed in containers meeting the requirements of the Waste Material Packaging section of this manual.
- The date on which the waste began to be accumulated is clearly marked on each container.
- The requirements of the Operator Training, and Emergency (Contingency) Plan sections of this manual are met with respect to the stored waste.

Slop Oil and Muriatic Acid may be stored on Plant for more than 90 days.

E. Recordkeeping

The following records are to be maintained by the Director of Environmental Control. All records are to be retained for 3 years.

1. Lab analyses to determine the composition and classification of a hazardous waste disposed of outside the Baltimore Plant site. not
not
2. Manifests of hazardous wastes disposed of off-site.
3. Receipts confirming the delivery of a hazardous waste to a disposal facility.
4. Annual reports and exception reports.

A

F. Annual Report

An annual report for a generator of hazardous waste is to be submitted by March 1st of each year. This report is to be completed by the Director of Environmental Control from records maintained during the year. The report consists of EPA forms 8700-13 and 8700-13A and is sent to the Maryland State Coordinator:

Mr. Lou Martino
MD Waste Management Administration
201 W. Preston Street
Baltimore, MD 21201

383-5734

A copy of the annual report form is included in the Appendix.

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G. Exception Reporting

If a receipt from the hazardous waste disposal facility is not received within 35 calendar days of the date the material was accepted by the transporter, it is the Baltimore Plant's responsibility to make inquiries. The transporter and/or the owner or operator of the disposal facility is to be contacted by the Director of Environmental Control to determine the status of the waste.

An exception report is to be submitted by the Director of Environmental Control to Mr. Lou Martino for the State Office of Environmental Programs (address given in Emergency Plan section) if a receipt from the hazardous waste disposal facility is not received within 45 days of the date the material was accepted by the transporter.

The exception report consists of:

- A copy of the manifest for which the Baltimore Plant does not have confirmation of delivery.
- A cover letter explaining the efforts taken to locate the hazardous waste and the results of those efforts.

II. TREATMENT FACILITY

A. Description of Wastes

The hazardous wastes treated by Conoco Chemicals at Baltimore are classified into two groups: corrosives and ignitable liquids.

1. CORROSIVE LIQUIDS -- The major corrosive liquid handled is off-specification muriatic acid. The normal treatment of this material is to neutralize it with limestone in a covered, concrete pit to a pH of 4-5 and discharge the resulting calcium chloride and carbonic acid solution to the inlet of the Baltimore Plant wastewater treatment facility for final treatment prior to discharge to Baltimore's municipal sewer system. The plant wastewater facility uses caustic to adjust the pH of the combined wastewater and neutralized acid solution to 6-10, as required by Baltimore City's pretreatment standards.

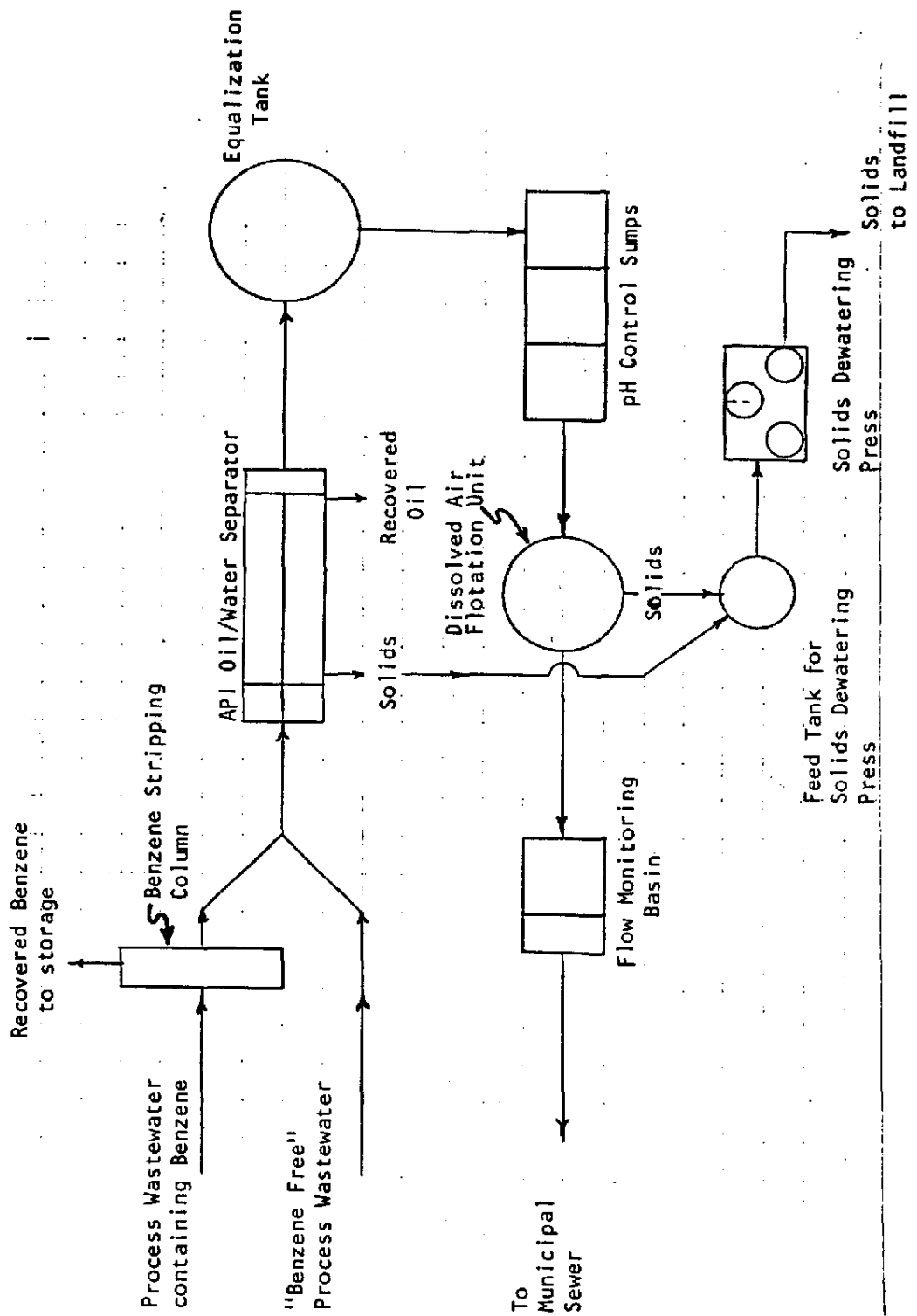
2. IGNITABLE LIQUIDS -- Process areas are curbed with collection boxes such that any oil leaks, overflows, etc., are contained by the process sewer for recovery at the wastewater treatment unit. This oil may contain sufficient quantities of benzene and C₁₀-C₁₇ paraffins to be classified as an ignitable material. Most of this oil is removed by the API separator and by oil skimming devices.

The oil removed is collected in two tanks where entrained solids are allowed to settle before the oil is pumped to a large tank (T-248) for further settling and storage. If the resulting slop oil is low enough in solids content it can be recycled to the process or burned as fuel. If the solids content is excessive, however, the slop oil is manifested and hauled away to licensed flammable hazardous waste disposal sites.

A schematic diagram of the treatment process is given in Figure 1.

A plot plan, showing the position of the wastewater treatment facilities in relation to the rest of the plant, is given in Figure 2.

FLOW DIAGRAM OF WASTEWATER TREATMENT PLANT
CONOCO CHEMICALS - BALTIMORE



VEV-173466

B. Waste Analysis

No outside hazardous wastes are to be handled at Conoco Chemicals' Baltimore Plant. If any non-routine on-site hazardous wastes are to be treated, such as tank bottoms, a sample shall be sent to the lab, where a hazardous waste disposal form will be initiated.

This form is to be sent to the Director of Environmental Control and the Process Superintendent for approval before disposal of the waste is begun. --

C. Operator Training

The Operator whose responsibilities include the wastewater treatment facilities is to complete a training program covering the requirements for treating hazardous waste. This program is to include training in safety and emergency procedures, as well as on-the-job experience under a qualified Operator.

The Operator is to be given an annual review of the initial training. Also, records documenting the completion of each operator's initial and review training are to be maintained by the Personnel Department.

D. Inspection and Maintenance

The Operator is to periodically make rounds and record observations of the operating variables on a daily log sheet. These include:

Acid Neutralization Basins, Wingwall, Outfall

- pH at wingwall and outfall
- temperature at outfall
- total flow at the outfall
- pressure at the blower suction, discharge, and the scrubber base (vent system of the neutralization basin).

API Separator

- pH at the inlet
- pH at the first and second pH control pumps.

The Operator also is to record observations on the daily log sheet as to the operation of equipment and levels of waste in tanks, including:

Acid Neutralization Basins, Wingwall, Outfall

- need for addition of limestone to the neutralization basin
- level in the recovered oil tank at the wingwall.

API Separator

- flow back from overflow storage
- operation of the traveling bridge
- operation of the south & north roller skimmers
- tank dike valves closed
- oil level in each forebay
- level in the API oil sump
- level in the recovered oil storage tanks.

The Operator is to note on the log sheet any problems with the operation of the equipment, pump or valve leaks, and general condition of the piping, tanks, acid neutralization basins, and API separator. He/she is to initiate the necessary work orders for repairs and record on the log sheet when repairs are completed.

The lab analyzes the pH of periodic wastewater samples from the inlet to the API separator, the pH control sump, the wingwall and the Patapsco River outfall. Also, if the wingwall or outfall pH meters read less than 6 or greater than 9, special samples are analyzed by the lab to check meter accuracy. Based on a comparison of lab data and the in situ meter readings, the pH probes are to be cleaned or calibrated if the meter readings differ significantly from the lab analyses.

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Critical areas of the wastewater piping and tank system, as identified by records of past problems, are to be subjected to an on-stream inspection yearly. External thickness measurements are to be made on steel piping using a sound-wave technique. Visual inspection of non-metallic piping is to be done.

At least one time per year each acid neutralization pit is taken out of service, cleaned out, and given a thorough inspection. A similar cleanout and inspection is provided for the API Separator every other year. Where there is identical equipment operating in parallel such as the forebays and channels of the API separator, or back-up equipment, such as the acid neutralization pits, flow will be contained in one set of equipment while the other is inspected. The equipment will be cleaned, visually inspected, and repaired as needed. The Director of Environmental Control is to inform the Waste Management and Enforcement Programs office 5 days in advance of this inspection.

For both of the above inspections, a report is to be written including the date of the inspection, the date the WMEP office was informed, the names of the inspectors, the observations made, and repairs needed. Copies of the work orders resulting from the inspection are to be retained for 3 years.

Files of all the information mentioned above are maintained, i.e., operator log sheets, outfall pH meter calibration and maintenance records, print-outs from the outfall pH meter, inspection reports, and records of repairs resulting from the inspection.

E. Emergency (Contingency) Plan

It is the intention of Conoco Chemicals' Baltimore Plant to prevent spills and other emergencies through adherence to proper equipment maintenance and operating procedures. Therefore, this section of the Compliance Manual is designed to inform plant personnel of practices for prevention of spills and to establish a procedure for responding quickly and effectively in the event of an emergency.

The hazardous waste handling equipment has the following design features to prevent and contain spills:

ACID NEUTRALIZATION BASINS -- The plastic-lined concrete construction of the neutralization pits prevents seepage of muriatic acid into the surrounding area. The acid neutralization pit normally in service is covered and the vent gases scrubbed to reduce acid fumes. A back-up pit is available, although not covered at this time. In addition, supplies of limestone, which are ordinarily stored adjacent to the pits, will come in contact with and neutralize acid should an upset occur.

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API SEPARATOR -- A Parshall flume at the entrance to the concrete-constructed API separator is designed so wastewater flows of greater than 800-1000 gpm overflow into sumps. These are then emptied into temporary storage facilities. The stored wastewater is returned to the separator at low flow periods. This feature guards against overloading the separator and insures that even during peak loading the separator capacity is not exceeded.

The two channel separators operate in parallel so that one is not affected when the other is out of service. Also, the speed of the roll skimmer is variable in order to accommodate the volume of oil which reaches it.

In the event of a power failure, a diesel-driven generator will supply electricity to instruments, lighting, and pumps for overflow service. The generator starts automatically after ten seconds without power.

Instrumentation is provided to monitor levels, flows, pump discharge pressures, and pH at several points, such that upsets which may lead to spills can be diagnosed and corrected.

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Containment of a spill on land is accomplished by a three-foot concrete dike with concrete floor surrounding the recovered oil treatment tanks. Also, the area around the API separator is enclosed by a one-foot concrete dike.

If, for any reason, Conoco's Baltimore Plant does not comply with the provisions of the approved Compliance Manual or experiences a spill of a designated hazardous substance, this is termed a non-compliance act.

A spill of corrosive material occurs when a material with a pH less than or equal to 2.0 or greater than or equal to 12.5 escapes its normal containment facilities and moves into the environment.

A reportable spill of oil as a hazardous waste occurs when more than 50 gallons of oil is released by one of the following means or if there is a chance that the oil will reach surface water.

- Oil is released from one of the recovery or storage tanks and overflows the concrete dike surrounding it.
- Oil overflows the API separator onto the ground.
- Oil bypasses the API separator and reaches the Patapsco River.

NON-COMPLIANCE REPORTING -- Within 4 hours of becoming aware of the non-compliance, it must be reported by phone to the Enforcement Division of the Office of Environmental Programs. This telephone call will satisfy the immediate notification requirement for both a hazardous waste and, if applicable, the NPDES permit. If an NPDES violation is involved both permits should be mentioned in the call. The telephone number is (301) 383-6650 (8:30 a.m. - 4:30 p.m., Monday - Friday) or (301) 269-3181 (oil spills, evening and weekend), (301) 243-8700 (hazardous material spill, evening and weekend).

The following information, for notification of a hazardous waste spill, must be provided in writing by the Director of Environmental Control within 5 days to:

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Mr. Lou Martino
Waste Management and Enforcement Programs
Office of Environmental Programs
Department of Health and Mental Hygiene
201 West Preston Street
Baltimore, Maryland 21201

(address as of 1/1/84)

1. Description of the non-compliance..
2. Cause of the non-compliance.
3. Anticipated duration of the condition of non-compliance or, if such condition has been corrected, the actual duration of the non-compliance.
4. Steps taken or to be taken by the Conoco Baltimore Plant to bring the facility into compliance with the conditions of its permit.
5. Steps to be taken by the Conoco Baltimore Plant to prevent recurrence of the condition of non-compliance.
6. A description of the accelerated or additional monitoring by the Baltimore Plant to determine the impact of the non-compliance on the environment and public health.

The same information, for notification of an NPDES violation, must be sent by the Director of Environmental Control within 5 days to:

Mr. Paul Thompson
Regional Chief
Waste Management and Enforcement Programs
201 W. Preston Street
Baltimore, MD 21201

(address as of 1/1/84)

*Who if poss
is immediate
Used procedure
for someone on
Site*

EMERGENCY REPORTING -- If a release, fire, or explosion occurs which could threaten human health, or the environment, outside the facility the Director of Environmental Control is to notify the National Response Center (using their 24-hour number: 800/424-8802). The call must include:

1. Name and telephone number of reporter.
2. Name and address of facility.
3. Time and type of incident.
4. Name and quantity of materials involved, to the extent known.
5. The extent of injuries, if any.
6. The possible hazards to human health, or to the environment, outside the facility.

Before resuming operation of the affected area of the wastewater treatment facilities, the State Co-ordinator (Lou Martino, 383-5734) is to be notified by the Director of Environmental Control that the equipment is clean and fit for use and the area clean-up is completed.

In addition, within 15 days after the incident, the Director of Environmental Control is to submit a written report to the State Co-ordinator (Lou Martino). The report is to include:

1. Name, address, and telephone number of the facility owner (corporate).
2. Name, address, and telephone number of the facility.
3. Date, time, and type of incident.
4. Name and quantity of materials involved.
5. The extent of injuries, if any.
6. An assessment of actual or potential hazards to human health or the environment, where applicable.
7. Estimated quantity and state of recovered material that resulted from the incident.

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In the event of an oil spill, the Baltimore Plant's Oil Spill Containment and Clean-up Plan goes into effect. This plan includes designated action co-ordinators, a listing and description of equipment available, local authorities to be contacted, and an evacuation procedure to be used if necessary.

The Baltimore Plant also has a Fire and Emergency Plan to be used if such an emergency should occur. The plan includes a list of emergency co-ordinators, specific duties to be performed by plant personnel, locations of emergency equipment, and local authorities to be contacted.

F. Security

Entry to the Baltimore Plant site is restricted to the front entrance where all visitors must sign in and out. Visitors are to be accompanied by a Conoco employee at all times.

The perimeter of the plant is fenced except for the east end of the plant, which is bounded by the Patapsco River as a natural boundary. All Conoco employees are

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required to report any intruders to their immediate supervisor. This is for the safety of the intruder unfamiliar with the plant, as well as the protection of the plant.

Both hazardous waste treatment facilities, the API separator and the acid neutralization basin, are surrounded by posted warning signs. In addition, these areas are to be inspected regularly by the operator on his/her rounds.

G. Annual Report

An annual report for a treatment facility for hazardous waste is to be submitted under the same conditions as those specified in the Annual Report section of the Generator requirements. The same EPA forms are used as a generator and as a treatment facility.