



(JWK 96-84)

TO: Files

DATE: December 11, 1984

FROM: J. W. Kachtick

SUBJECT: Site Visits - Chemical Waste Management Facilities
at Port Arthur, Texas and Lake Charles, Louisiana

Tom Moore and I visited the Chemical Waste Management waste disposal facilities at Port Arthur (Winnie) and at Lake Charles (Carlyss) on December 4, 1984 to verify that the hazardous wastes/Class I wastes we periodically ship to CWM are handled in a proper manner. Based on these inspections, I feel that the Lake Charles facility is very well run and that the Port Arthur facility is moderately well run at this time. The Pasadena plant's exposure in continuing to use the Lake Charles facility should be minimal.

Susie Cutaia, Technical Sales Representative, accompanied Tom Moore and myself during the visits.

Port Arthur (Winnie) Facility

The Port Arthur site was previously visited in January, 1983. Chemical Waste Management owns approximately 3,000 acres at this site. The current active disposal facility occupies 282 acres. Operations include land filling of hazardous waste, Class I waste, and Class II waste in clay-lined cells and a deep injection well. Each cell is 100 feet wide, 500 feet long and 20-25 feet deep. A three foot clay liner is used as well as a clay cap (upon closure of the cell). A leachate collection system is installed in each cell.

The entire active area is surrounded by a dike with a storm water collection system inside the dike. Storm water is periodically discharged to Taylor Bayou under an NPDES/TDWR permit. The local TDWR office normally sends a representative to the site when storm water is discharged.

The injection well is 7,300 feet deep and is used to dispose of CWM's collected leachate and some customers' aqueous wastes. It has a separate TDWR permit.

The last RCRA inspection was made in December, 1983. Numerous inspections pertaining to the Part B (RCRA) application have also been made by the TDWR. The Part B application has been submitted by CWM, but has not yet been acted on by the TDWR. Discrepancies involving records on collection/injection of leachate and the height of the dikes have delayed approval, according to CWM.

The lack of a Part B permit and the fact that the remaining landfill space in the current active area is limited has prompted Chemical Waste Management to make a decision to temporarily stop accepting waste at Port Arthur as of January 1, 1985 (See attached letter). When the Part B permit is approved, the following additional modifications for this site are planned:

1. Above-grade expansion of existing cells to 35 foot elevation

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2. Below-grade cells at the Bayou Farms (previous land-farming site) covering 400 acres
3. Installation of an above-ground tank to replace the below-ground tank for collection of lab wastes
4. Drums (containing solid wastes only) handling facility
5. Sulfide and cyanide treatment facility
6. Rotary kiln to burn PCB's (1986)

CWM anticipates that at least a year will be needed to get their Part B permit. "Special" wastes may be accepted at Port Arthur during this period.

Housekeeping practices appear to be adequate; some "organic" odors were noticed. The wet-weather condition of some of the roads was poor. A safety sign indicated that 18 days had passed since the last lost-time-accident.

The on-site laboratory is well-equipped and is used to "fingerprint" wastes upon receipt and run compatability tests. CWM's Allied Lab (in Dallas) is used in some waste characterizations and solidification analyses.

Liquids and sludges are stabilized with flue dust or kiln dust in mixing pits adjacent to the landfill cells.

The facility contains a grid-type groundwater monitoring well system. CWM says that no groundwater contamination problems have occurred.

Lake Charles (Carlyss) Facility

This is the first visit to the Lake Charles site, which the Pasadena plant began to use in 1984. Chemical Waste Management owns about 280 acres at this site. The current active landfill disposal facility occupies about 230 acres. The entire landfill area is surrounded by a Bentonite slurry wall which is 3 feet wide and 40 feet deep, keying into an impervious clay layer. In addition to landfilling, current operations at the Lake Charles site include drum disposal, neutralization and chemical fixation/treatment.

Hazardous and Class I wastes are landfilled in "moving-trench" cells, each 100 feet wide and 35-40 feet deep. The current cell, which is nearly filled, is 2050 feet long. Subsequent cells will have synthetic liners in addition to the current three foot clay liner. A 4 foot clay cap will be installed upon closure of each cell.

A drum decanting system has recently been put in operation. It includes adjacent above-ground storage tanks for collected liquid wastes. Next year, an enclosed auger mixer system will be installed to solidify drummed liquids, sludges and bulk liquids.

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A 1,000,000 gallon storage tank is being installed for collected leachate. This material is currently barged to CWM's facility in Corpus Christi for deep well injection. Storm water is discharged to Bayou Choupique under an NPDES/DNR permit. There are no plans to install a deep injection well at the Lake Charles facility.

The Part B (RCRA) permit application has been submitted to the EPA and to the Louisiana Department of Natural Resources. Current activities will be continued under RCRA interim status until the state issues a Part B permit

The following additions/modifications are planned for the Lake Charles site in 1985-86:

1. Bulk liquid storage tanks (at solidification facility)
2. Electric arc furnace to burn whole PCB capacitors
3. Drum crusher

Housekeeping practices appear to be good; no odors were obvious. A stringent clothing-change policy and vehicle-wash policy are in place. In addition, fresh air masks are required for specific operations or in certain locations (such as while working in an active cell).

The on-site lab is well-equipped and is used to "fingerprint" wastes upon receipt. This site also utilizes the Allied Lab in Dallas.

Liquids and sludges (both drummed and bulk) are currently stabilized with flue dust or kiln dust in pits adjacent to the landfill cells.

The facility contains a grid-type groundwater monitoring well system with 8 of the 31 wells located inside the slurry walled area. Three air monitoring stations are also located on the facility to insure compliance with the state-issued air permit.


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