DOW CHEMICAL U.S.A.

May 12, 1983

LOUISIANA DIVISION
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Mr. Frank Dautriel
Enforcement Program Manager
Hazardous Waste Management Division
Department of Natural Resources
Office of Environmental Affairs
P. O. Box 44066
Baton Rouge, Louisiana 70804

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Department of Natural Resources
Hazardous Waste Management

MARCH 10, 1983 COMPLIANCE INSPECTION - LETTER OF WARNING RESPONSE
DOW CHEMICAL U.S.A., LOUISIANA DIVISION (GDT-234)

Dear Mr. Dautriel:

This letter is the response to your April 12, 1983 Letter of Warning. Part I of our letter addresses the eight violations listed in your letter. Part II addresses other items covered in your letter.

Part I

1. "Contrary to Condition S of your Interim Permit as outlined in the Analytical Operating Procedures Manual (AOPM), Part C.47, inspections for freeboard requirements in the Light Hydrocarbons Impoundment could not be confirmed."

   Effective April 28, 1983, the round sheet (shift inspection sheet) includes inspection for freeboard level of the LHC I/II impoundment. This action provides the required documentation and will prevent failure of checking the level.

   The continuous level indication will be moved into the control room for monitoring purposes by May 27, 1983.

   Inspection for freeboard requirements will be added to the training checklist reviewed annually.

2. "Contrary to Section 8.4.2.D.2) of the Hazardous Waste Management Plan, the containment area for trucks discharging to the Central Waste Incinerator's waste storage tanks did not appear adequate to contain a ten-minute discharge."

   The roadway, in the area from which trucks discharge to the waste storage tanks of the above incinerator, is sloped to drain toward the plant drainage ditch. The ditch flow can be routed to the oily water sump and subsequently to waste oil tank storage.

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A concrete curb will be added as part of the planned project for additional paving. The expected completion date is December 31, 1983. (capital must be authorized before the project can begin). The curbing will offer additional protection for containment of any spills.

Please note a name change. Environmental Operations is the new name of our previously named Central Waste Incinerator and Central Waste Treatment Plant operations.

3. "Contrary to Condition N of your Interim Permit as outlined in the AOPM, Part C.76, no analysis has been performed for sulfur, lead, or mercury; and no documentation was available to indicate that these elements are not present for wastes burned in the Vinyl II and Solvents Incinerators."

   Documentation is presented as Attachment A from the Solvents Plant and Attachment B from the Vinyl II Plant. From process knowledge, the denoted wastes do not contain sulfur, lead or mercury.

   Before wastes which have not previously been treated may be received for thermal oxidizer treatment, they will be characterized to determine any pollutants which might be emitted. Heating value, sulfur, halogen, mercury and lead contents will be determined as required by AOPM Part C.76.

4. "Contrary to Condition K of your Interim Permit as outlined in the AOPM, Part C.34.2, weekly inspection of the container storage area near the Central Waste Incinerator could not be confirmed."

   Weekly inspection of drum storage areas will be documented on operator round sheets. Round sheets will be retained for three years. The target date for this action is June 1, 1983.

5. "Contrary to Condition K of your Interim Permit as outlined in the AOPM, Part C.33., you were found storing a container of hazardous waste that had a hole in the drum cover."

   Weekly inspection of drum storage will catch such problems as leaks or damaged containers. The particular damaged lid found during the inspection was replaced with a proper lid.

6. "Contrary to Section 8.4.2.A. of the Hazardous Waste Management Plan, your facility does not analyze a representative sample of wastes received from off-site to verify the information on the manifest."

   All waste received at Environmental Operations is Dow-generated. Manifested waste consists of containers (30-gallon plastic packs) and bulk shipments of liquids in tank trucks. Before a new waste

type can be received, a Waste Characterization Summary must be submitted by the generator. A blank copy of the revised form is submitted as Attachment C. The summary contains such information as composition, flash point, pH, toxicity, reactivity and Btu value.

For subsequent containerized waste shipments, a visual inspection is made randomly to compare it to a visual inspection made the first time the waste type was received.

For bulk liquids, a sample is submitted with each shipment for both a visual inspection and differential thermal analysis to determine compatibility with other liquid wastes.

The above procedures are now in effect.

7. "Contrary to Condition S of your Interim Permit as outlined in the AOPM, Part C.47, and Section 8.4.3 of the Hazardous Waste Management Plan, the asbestos impoundment is not managed as a hazardous waste facility."

The question of inclusion of the Cell Service asbestos impoundment in the Hazardous Waste Management Program has been addressed several times with personnel from the Hazardous Waste Management Division.

At the time of the October 26, 1981 technical site visit of the Louisiana Division, the Hazardous Waste Management Permit Application Review Team considered the Cell Service impoundment. The November 12, 1981 letter from Don Howard, pursuant to the October 26 visit, stated that the "Department must take the position that the asbestos from the chlorine production cells is hazardous and the facilities receiving the asbestos could constitute a treatment, storage or disposal facility". Dow was invited to submit analysis to the contrary and did so.

The contrary analysis was submitted to the Hazardous Waste Management Division January 7, 1982 as part of the response to the technical site visit. The Dow response notes that the toxicity problem with asbestos occurs only when asbestos is airborne (friable) and as such is regulated by OSHA. Also the asbestos in the Cell Service Impoundment is neither a commercial chemical product nor a manufacturing chemical intermediate which would fall under the HWMP. The asbestos impoundment is a manufacturing process waste; this process waste is not part of Category I, lists A or B. The impoundment asbestos is not identified as hazardous under Category III. Waste asbestos recovered from the impoundment is handled as if hazardous; it is recovered, while wet, contained while wet and is disposed of in a hazardous waste landfill. Consult the January 7, 1982 response for more details.

On April 5, 1982, Jerry Martin, Dow Environmental Control Manager, and Tom Austin, then Environmental Operations Plant Superintendent, met with Gerald Healy and Don Howard. Their discussion was an extension of the technical site visit. At that meeting, all agreed that Dow would amend its pending hazardous waste pemit application to include five additional facilities in question. The Cell Service impoundment was not among these. The plan of action was outlined by a May 17, 1982 letter by Jerry Martin to Don Howard and was acknowledged by a June 11, 1982 letter from Don Howard.

8. "Contrary to Section 8.3.5.A.1) of the Hazardous Waste Management Plan, water discharges from the Northwest Landfill are not regulated under a NPDES permit."

Northwest Landfill (NWLF) #3 is completely surrounded by a dike. The surface water discharge from NWLF #3 consists of rainwater falling within this diked area. Presently, all rainwater is contained, analyzed and discharged to Bayou Bourbeaux. There is no NPDES permit for this discharge. However, before the valve is opened to release the surface water to the bayou, the water is analyzed and must meet discharge limits set by Dow. The analytical parameters and discharge limits are listed.

Parameter	Dow Limit
pH	4.5 - 10.5
Inorganic Chloride	250 mg/l
Total Oxygen Demand	75 mg/l
Volatile Organic Analysis	1 mg/l
Total Chromium	5 mg/l

None of the above limits have been exceeded since this discharge began nearly three years ago.

Plans are now underway to collect the NWLF #3 rainwater and to discharge it to the Louisiana Division return canal system by way of a pipeline. The Division return canal system is covered by NPDES Permit No. LA0003301, Outfall 021.

Additionally, negotiations are in progress with EPA in Dallas and the Louisiana DNR Water Pollution Control Division to provide an NPDES outfall specific to the NWLF surface water discharge at the point at which it enters the Division return canal system.

Part II

A. "While the Department recognizes the need for drains to allow excess water to drain from ash collection hoppers, the drains should not be open during transit."

Drains on the incinerator ash bins will be eliminated or plugged. The target date is July 1, 1983.

B. "As an operator of a treatment, storage and disposal facility accepting out-of-state wastes, you are responsible for all the requirements of Section 5.4 of the Hazardous Waste Management Plan, as noted in Section 5.4.6.A. of the Hazardous Waste Management Plan."

Dow acknowledges applicability of the requirements of HWMP 5.4 Manifest System.

C. "Spillage and messy housekeeping in the areas of the API separator, slop oils tank and around Tank 410 associated with the Vinyl II Incinerator should be cleaned."

API Separator and Slop Oil Tank Areas: It should be understood that these areas are process areas and not hazardous waste areas. The housekeeping in these areas is now far superior to what it has been in the past. Dow acknowledges your unsolicited opinion of this area.

Vinyl II Tank 410 Area: This area has been cleaned since the inspection. Miscellaneous items around the tank were removed and the area has been swept.

D. "Monitoring wells which are no longer being used should be grouted to prevent contamination from the surface."

The two out-of-use monitoring wells within Northwest Landfill #3 were grouted on April 15, 1983. These wells may be identified by reference to Exhibit 5.3.4.A.4)a) Part 1 of the Hazardous Waste Permit Application for Northwest Landfill. On this exhibit are shown four monitoring wells. Wells #1 and #2 located by Dow coordinates 110 + 39.34 N, 115 + 51.67E* and 110 + 02.13N, 108 + 78.35E*, respectively, were grouted. These wells were closed, as they fall within the active portion of NWLF #3. Other wells identified to the inspector in March are now used for monitoring purposes.

*The origin of Dow coordinates is at latitude 30°19"48.2", longitude 91°17'58.2". Dow grid north has a bearing of N38°50'E.

E. "Also, perimeter wells were observed to be holding water between the well casing and the protective steel cover. One perimeter well did not have the proper cap on the casing."

Perimeter wells which have the problem of holding water between the well casing and protective steel casings will have drainage holes drilled through the protective casing to allow water to drain. These holes will be carefully drilled to prevent puncturing the well casing. Expected accomplishment date is June 15, 1983.

A screw (proper) cap will have been obtained for the perimeter well casing by May 17, 1983.

F. "Since slop oil and API separator sludge may be burned in the Rotary Kiln Incinerator for fuel value, please submit the heating value for these materials."

The requested heating values are, for slop oil, 15,000 Btu/lb, and for API Separator sludge, 5,000 - 15,000 Btu/lb. Note that these fuel values are listed according to categories under Item 15 of the Waste Characterization Summary, Attachment C.

We acknowledge the professional manner in which Ms. Joan Albritton conducted her inspection in March.

Call us if you have any questions.

Sincerely,

Jerry B. Martin /by Carole Tuttle

Jerry B. Martin
Environmental Control Manager

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