



Air Products and Chemicals
INC.

CALVERT CITY PLANT
INTEROFFICE MEMORANDUM

To: B. D. Helms

Date: 5 September 1980

From: L. C. Toney

Copies: A. J. Diglio, Trexlertown

Re: August Monthly
Environmental Report

Vinyl Chloride Regulations

There were no emergency vinyl chloride releases during the month. A monthly summary regarding emergency vinyl chloride releases for the month of July was prepared for J. T. Barr for the SPI study on vinyl chloride releases.

Air Emissions

On 14 August Ja-an Su and Linda Byerly of the Kentucky Division of Air Pollution Control inspected the air emission points as a requirement to issuing a new operating permit. A request was received on 23 August for additional information which included storage tank dimensions and thruput and production rates for use in reviewing the operating permit.

L.W.D. Landfill

Laboratory experiments and testing are being conducted to determine the feasibility of solidifying off-spec emulsion with ashes to permit landfilling in the L.W.D. landfill. If landfilling of the emulsions-ashes mixture proves feasible, a request for special permission to landfill the mixture will be submitted to the State. Several tanks of off-spec emulsions are to be disposed in this manner if permission is obtained.

New Landfill

Construction of the new landfill was near completion at the end of the month. The dikes had been constructed and fertilizing and seeding had been completed. Permission was granted by the State to landfill the chemical sludge prior to receiving an operating permit. Landfilling of the chemical sludge in the new landfill was started when the lease on the existing landfill terminated on 10 August.

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The first set of samples from the ground water monitoring wells was taken on 28 August. The well pumps had not been installed, but a contractor with a portable pump and generator was utilized to obtain the samples.

Existing Landfill

Landfilling at the existing landfill was discontinued on 10 August when the lease on the property was terminated. A letter was sent to the State on 11 August refusing to accept the new operating permit for the landfill. The permit contained several close-out requirements which had not been discussed previously in meetings with State personnel regarding closure.

A revised closure plan was submitted to the State on 28 August. The plan included all the items requested by the State except for ground water monitoring wells and post-closure maintenance. The position is being maintained that monitoring wells and post-closure maintenance are the responsibility of the landowner.

Hazardous Wastes

Notification of hazardous waste activity was sent to the U. S. Environmental Protection Agency on 15 August. RCRA regulations required that notification be submitted by 19 August 1980.

Registration of a hazardous waste storage facility was prepared and submitted to the Kentucky Division of Hazardous Waste and Materials Management on 29 August. The Kentucky Hazardous Waste Regulations require that registration be made by 2 September. Although the hazardous wastes are not normally stored for 90 days and would therefore not require a permit, registration was made in case disposal problems would cause a delay in disposal beyond the 90 days.

Ditch Contamination

Checking of the major storm water ditches on a regular basis to assure that the storm water is not being contaminated is continuing. The main ditch leaving the north side of the plant is being checked by the security guard each shift to provide quick response to any contamination.

Construction work is nearing completion for many of the items included on the 30-day plan for elimination of contamination of the storm water. A list of items to be included in the 180-day plan has been compiled and cost estimates for the items are being prepared.

Following a complaint received that Air Products was losing emulsion to the storm water ditch, Peyton Adams, inspector for the Kentucky Division of Water Quality, called on 6 August to see if the complaint was valid. Upon checking it was found that a small amount of emulsion white water was going to the ditch. However, it had only been running for a short time and had not gotten to the slough. The ditch was blocked immediately to stop the flow. The drain line from the truck alley to the lift station had plugged, causing the truck alley to overflow to the ditch. Peyton Adams made a visit to the plant on 12 August to see that the problem had been satisfactorily corrected.

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Wastewater Treatment

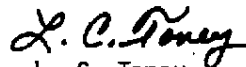
At their request, a description of the wastewater treatment facilities following the revisions to convert to activated sludge was sent to EPA. This was needed for their review for issuing a new NPDES permit.

General

Attended information meeting on 19 August in Hopkinsville on the Kentucky Hazardous Waste Regulations conducted by the Kentucky Division of Hazardous Materials and Waste Management.

Reviewed "Federal Register" for developments important to Calvert City.

Reviewed cost estimates to assure that environmental requirements would be met.


L. C. Toney

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OFFICIAL CORRESPONDENCE

<u>Date</u>	<u>Agency</u>	<u>Nature of Correspondence</u>
11 August 1980	Kentucky Division of Hazardous Waste and Materials Management	Refusal to accept operating permit for existing landfill - Baliker to Haight (L. C. Toney)
11 August 1980	EPA, Water Enforcement	Description of the revised wastewater treatment facilities - Baliker to Wick- strom (L. C. Toney)
15 August 1980	EPA, RCRA Regulations	Notification of hazardous waste activity - Baliker to EPA (L. C. Toney)
18 August 1980	EPA, Water Enforcement	NPDES monitoring report - Baliker to EPA (L. C. Toney)
28 August 1980	Kentucky Division of Hazardous Waste and Materials Management	Revised landfill closure plan - Baliker to Haight (L. C. Toney)
29 August 1980	Kentucky Division of Hazardous Waste and Materials Mangement	Registration of a hazardous waste storage facility - Baliker to Haight (L. C. Toney)

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PLANS FOR NEXT MONTH

(L.C. Toney)

<u>Project</u>	<u>Status</u>	<u>Benefits</u>
New landfill	Construction almost completed; approval to landfill chemical sludge received.	Required in order to close out existing landfill.
Close-out of existing landfill	Revised closure plans submitted 28 August.	Landfill does not meet state and RCRA regulations.
Hazardous waste regulations	Hazardous waste identification sent to EPA and registration of hazardous waste storage facility sent to State.	Compliance with RCRA regulations required starting 19 November 1980.
Vinyl chloride semi-annual report	Much of data to be collected from plants.	Due 15 September.
Determine feasibility of land-filling off-spec emulsion with cinders	Test batches have been made up in laboratory and leachate tests are being run.	Provide means of disposing of off-spec emulsion.
Ditch inspections	Inspections as frequent as time will permit.	Aid in elimination of storm water contamination.
180-day plan for storm water ditches	Corrective items listed and cost estimates are being prepared.	Required by State for elimination of storm water contamination.

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