

MODULE III

STORAGE OF HAZARDOUS WASTE IN CONTAINERS

III.A. MODULE HIGHLIGHTS

This Module contains the regulatory requirements for Rinchem Company, Inc., (**the Permittee**) to manage and store the hazardous wastes at the Container Storage Facility (**CSF**). The Facility is authorized to manage and store at the CSF only those hazardous wastes listed in Permit Attachment B, *Authorized Wastes*). Specific Facility and process information for the management, storage and transfer of hazardous waste, and a description of the CSF are provided in Permit Attachments A, and C. The location of the CSF is shown in Permit Attachment C, Figure C-1, *Plan View of the Container Storage Facility*. The photographs following Figure C-1, labeled Rooms A through F show the interior of each room at the Facility.

III.A.1. Waste Handling Building

The Permittee shall manage and store hazardous waste in the CSF building as specified in Permit Attachment C subject to the following conditions:

III.A.1.a. Storage Containers

The Permittee shall manage and store hazardous waste in the containers specified by Permit Condition III.C.1. of this Permit Module.

III.A.1.b. Storage Locations and Quantities

The Permittee shall manage and store hazardous waste containers at the CSF as specified in Table III.B.1. The Permittee shall manage and store quantities of hazardous waste containers in these locations not to exceed the maximum capacities specified in Table III.B.1.

III.A.1.c. Storage on Concrete Floor

The Permittee shall manage and store hazardous waste containers unloaded from the trucks transporting waste containers from off-site generators to the CSF in individual storage areas, segregated by waste type and compatibility. Each storage area shall have a concrete floor that slopes towards the aisles to expose any spills quickly as described in Permit Attachment C, *Design and Operation of the Container Storage Unit*.

III.A.1.d. Storage Time Limit

The Permittee shall not store any hazardous waste in the CSF for more than one (1) year.

III.A.1.e. Minimum Aisle Space

The Permittee shall maintain sufficient aisle space between storage drums in the storage rooms to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area within the CSF as described in Permit Attachment C, and as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.35.

III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION

III.B.1. Permitted Waste

The Permittee shall manage and store for subsequent transfer to a permitted treatment, storage, or disposal facility, only the hazardous wastes listed in Permit Attachment B, *Authorized Wastes*, subject to the terms of this Permit.

III.B.2. Prohibited Waste

The Permittee is prohibited from managing and storing any hazardous waste that is not identified in Permit Condition III.B.1. of this Permit. The Permittee shall not store more than 55,000 gallons of the Hazardous Wastes Types in containers at the CSF at any one time. Table III.B.1. shows the maximum amounts of hazardous waste that the Permittee shall manage and store at the CSF subject to the terms of this Permit.

TABLE III.B.1.

Maximum Storage Capacities of Rinchem's Container Storage Facility

TYPE OF STORAGE UNIT	EPA HAZARDOUS WASTE TYPE	AREA (Square Feet)	MAXIMUM VOLUME OF WASTES (Gallons)
Room A	Inorganic Chemicals	1250	15,840
Room B	Organic Chemicals	1250	15,840
Room C	Organic Chemicals	5000	79,860
Room D	Organic Chemicals	5000	73,900
Room E	Organic Chemicals	5500	81,800
Room F	Inorganic Chemicals	5500	81,800

III.C. CONDITION OF CONTAINERS

If a container holding hazardous waste is not in good condition (e.g., has severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste from such a container to a container that is in good condition or otherwise manage the waste in compliance with the Conditions of this Permit, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.171.

III.C.1. Acceptable Storage Containers

The Permittee shall use containers that comply with the requirements of the U.S. Department of Transportation shipping container regulations (*49 CFR §173 – Shipper's -General Requirements for Shipment and Packaging, and 49 CFR §178 - Specifications for Packaging*) for management and storage of hazardous waste at the CSF. The following is a description of the type of containers that the Permittee shall use at the CSF:

Standard 55-gallon (208-liter) drums - with a gross internal volume of 7.3 ft³ (0.21 m³), as well as 10 gallon/1.23 ft³ (0.04 m³), and 35 gallon/4.64 ft³ (0.13 m³) drums, as necessary.

III.D. COMPATIBILITY OF WASTE WITH CONTAINERS

The Permittee shall use containers made of, or lined with, materials which will not react with and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.172. The Permittee shall ensure compliance with this requirement by conducting pre-

acceptance characterization of waste, as described in Permit Attachment D, *Waste Analysis Plan*, considering the precautions described under "*Preventive Measures*", in Permit Attachment C.

III.E. MANAGEMENT OF CONTAINERS

The Permittee shall keep all containers closed during storage, except when it is necessary to add or remove waste, and shall not open, handle, or store containers in a manner which may rupture the container or cause it to leak, as required by 20.4.1.500 NMAC, incorporating at 40 CFR §264.173.

III.F. SECONDARY CONTAINMENT SYSTEMS

The Permittee shall construct and maintain secondary containment systems for all containers in the CSF in accordance with the specifications required by 20.4.1.500 NMAC, incorporating 40 CFR §264.175, and the procedures described in Permit Attachment C, *Design and Operation of the Container Storage Unit*.

III.G. INSPECTION SCHEDULES AND PROCEDURES

The Permittee shall inspect the CSF for the condition of containers and secondary containment systems, safety equipment, and aisle space daily, quarterly, and annually, to detect leaking containers, deterioration of containers and the containment system caused by corrosion and other factors, in accordance with the Schedules contained in Permit Attachment F, *Appendix F-1, Inspection Matrix Sheets*, and as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.174.

III.H. RECORD KEEPING

The Permittee shall place the results of all waste analyses and any other documentation in the CSF operating record, as specified in (Module II) Permit Condition II.L., *Record Keeping and Reporting*, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.73(a).

III.I. CLOSURE

During closure of the CSF, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system in accordance with the procedures described in Permit Attachment F, *Closure Plan*, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.178. [Remaining containers, liners, bases and soils containing or contaminated with hazardous waste or hazardous waste residues must be decontaminated or removed, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.178].

III.J. SPECIAL CONTAINER PROVISIONS FOR IGNITABLE OR REACTIVE WASTE

III.J.1. Location of Ignitable and Reactive Waste

The Permittee shall not locate containers holding ignitable or reactive hazardous waste within 15 meters (50 feet) of the Facility's property line as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.176.

III.J.2. Procedures to Prevent Ignition/Reaction

The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures specified in Permit Attachment C, as required by 20.4.1.500 NMAC, incorporating §264.17 and §264.176.

III.J.3. Storage of Hazardous Waste Containers

Containers of ignitable and reactive wastes shall be stacked no more than two high, in order to comply with the National Fire Protection Association's *Flammable and Combustible Liquids Code*.

III.K. SPECIAL CONTAINER PROVISIONS FOR INCOMPATIBLE WASTE

III.K.1. Storage of Incompatible Wastes

The Permittee shall not place incompatible wastes in the same containers, as set forth in Permit Attachment C, *Design and Operation of the Container Storage Facility*, and as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.177(a).

III.K.2. Management of Unwashed Containers

The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material, as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.177(b).

III.K.3. Separation of Hazardous Waste Containers

The Permittee shall separate containers of incompatible wastes as described in Permit Attachments C, and as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.177(c).