

## PART III STORAGE OF HAZARDOUS WASTE IN CONTAINERS

### III.A. PART HIGHLIGHTS

This Part contains the regulatory requirements for the Permittee to manage and store the hazardous wastes at the CSU. The Facility is authorized to manage and store at the CSU only those hazardous wastes listed in Permit Attachment A, *Authorized Wastes*. Specific Facility and process information for the management, storage and transfer of hazardous waste, and a description of the CSU are provided in Permit Attachments B, and C. The location of the CSU is shown in Figure B-3 of Permit Attachment B.

#### III.A.1. Waste Handling Building

The Permittee shall manage and store hazardous waste in the CSU 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 Part.

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

The Permittee shall manage and store hazardous waste containers in the indoor covered container storage building and the covered outdoor storage areas as specified in Table III.B.1. below. 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 the on-site generators to the CSU 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, *Container Storage Unit Design and Operation*.

##### III.A.1.d. Storage Time Limit

The Permittee shall not store any hazardous waste in the CSU 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 CSU as described in Permit Attachment G, *Preparedness and Prevention Procedures*, 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 43,340 gallons of the Hazardous Wastes Types in containers at the CSU at any one time. Table III.B.1. below shows the maximum amounts of hazardous waste that the Permittee shall manage and store at the CSU subject to the terms of this Permit.

**TABLE III.B.1.**

#### **Total Storage Capacities of HAFB's Container Storage Unit**

<b>TYPE OF STORAGE UNIT</b>	<b>MAXIMUM VOLUME OF WASTES (Gallons)</b>
Covered Indoor Storage Building	15,840 [i.e., Approximately 288 55-gallon Drums]
Covered Outdoor Storage Building	27,500 [i.e., Approximately 500 55-gallon Drums]

### **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 container shipping 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 subject CSU. The following is a description of the type of containers that the Permittee shall use at the CSU:

Standard 55-gallon (208-liter) drums - with a gross internal volume of 7.3 ft<sup>3</sup> (0.21 m<sup>3</sup>), and 85-gallon salvage drums or self-contained packaging including lead-acid batteries or transformers.

### **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 managed and 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 in Permit Attachment C, *Design and Operation of the Container Storage Unit*.

### **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 CSU in accordance with the specifications required by 20.4.1.500 NMAC, incorporating 40 CFR §264.175, and the procedures described in Table C-1 of Permit Attachment C, *Design and Operation of the Container Storage Unit*.

### **III.G. INSPECTION SCHEDULES AND PROCEDURES**

The Permittee shall inspect the CSU for the condition of containers and secondary containment systems, safety equipment, and aisle space at least weekly, monthly, and annually, to detect leaking containers, deterioration of containers and the containment system caused by corrosion and other factors, in accordance with the Schedules in the Inspection Plan of Permit Attachment F, Table F-1, 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 CSU operating record, as specified in Permit Condition II.L, Permit Attachment I, *Manifesting, 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 CSU, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system in accordance with the procedures described in Permit Attachment K, *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, *Container Storage Unit Design and Operation*, 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 when placed directly on each other on the floor, 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, *Container Storage Unit Design and Operation*, 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, *Container Storage Unit Design and Operation*, and as required by 20.4.1.500 NMAC, incorporating 40 CFR §264.177(c).