

**MODULE III - CONTAINERS****III.A. APPLICABILITY**

This module shall regulate storage of hazardous waste in containers at U.S. Army Dugway Proving Ground. The Permittee shall comply with R315-8-9 and all conditions of this Module.

- III.A.1. The designated hazardous waste storage areas at the Central Hazardous Waste Storage Facility (CHWSF) are the 16 bays and 5 chemical storage cabinets in the Container Storage Building and the 4 bays located in the 90 foot long by 20 foot wide P999/F999 Container Storage Building.

**III.B. PERMITTED AND PROHIBITED WASTE IDENTIFICATION**

- III.B.1. The Permittee may store the following hazardous wastes, as listed by hazardous waste code, in containers at the Central Hazardous Waste Storage Facility subject to the terms of this Permit and as follows:

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D012, D013, D014, D015, D016, D017, D018, D019, D020, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D031, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043,

F001, F002, F003, F004, F005, F027, F999,

P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P020, P021, P022, P023, P024, P026, P027, P028, P029, P030, P031, P033, P034, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P054, P056, P057, P058, P059, P060, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P081, P082, P084, P085, P087, P088, P089, P092, P093, P094, P095, P096, P097, P098, P099, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115, P116, P118, P119, P120, P121, P122, P123, P999

U001, U002, U003, U004, U005, U006, U007, U008, U009, U010, U011, U012, U014, U015, U016, U017, U018, U019, U020, U021, U022, U023, U024, U025, U026, U027, U028, U029, U030, U031, U032, U033, U034, U035, U036, U037, U038, U039, U041, U042, U043, U044, U045, U046, U047, U048, U049, U050, U051, U052, U053, U055, U056, U057, U058, U059, U060, U061, U062, U063, U064, U066, U067, U068, U069, U070, U071, U072, U073, U074, U075, U076, U077, U078, U079, U080, U081,

U082, U083, U084, U085, U086, U087, U088, U089, U090, U091, U092, U093, U094, U095, U096, U097, U098, U099, U101, U102, U103, U105, U106, U107, U108, U109, U110, U111, U112, U113, U114, U115, U116, U117, U118, U119, U120, U121, U122, U123, U124, U125, U126, U127, U128, U129, U130, U131, U132, U133, U134, U135, U136, U137, U138, U140, U141, U142, U143, U144, U145, U146, U147, U148, U149, U150, U151, U152, U153, U154, U155, U156, U157, U158, U159, U160, U161, U162, U163, U164, U165, U166, U167, U168, U169, U170, U171, U172, U173, U174, U176, U177, U178, U179, U180, U181, U182, U183, U184, U185, U186, U187, U188, U189, U190, U191, U192, U193, U194, U196, U197, U200, U201, U202, U203, U204, U205, U206, U207, U208, U209, U210, U211, U213, U214, U215, U216, U217, U218, U219, U220, U221, U222, U223, U225, U226, U227, U228, U234, U235, U236, U237, U238, U239, U240, U243, U244, U246, U247, U248, U249, U328, U353, U359

The Permittee may store the following waste, as listed by hazardous waste code, in containers in the P999/F999 Container Storage Building

D001, D002, D003, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D027, D028, D029, D030, D034, D035, D036, D038, D039, D040, F001, F002, F003, F004, F005, F999, P999, U002, U044, U154, U210, U239

III.B.2. The Permittee shall be prohibited from storing hazardous waste that is not identified in Permit Condition III.B.1. Addition of hazardous waste codes to Condition III.B.1 requires modification of the permit as specified in R315-3-9 and 40 CFR 270.42.

III.B.3. Prohibited Wastes. The Permittee shall be prohibited from storing the following wastes in containers:

Compressed Gas Cylinders;

Mixed waste (radioactive waste mixed with hazardous waste);

Explosives; and

Dilute, Neat, or off-specification Chemical Agent or other agent wastes as described in Condition III.B.3.a.

III.B3.a Prior to storage in the CHWSF and F999 Container Storage Building, all P999 solid hazardous wastes must be certified to have chemical agent vapor concentrations below 0.003 mg/m<sup>3</sup> for mustard agents, 0.0001 mg/m<sup>3</sup> for G agents and 0.00001 mg/m<sup>3</sup> for VX. All P999 liquid hazardous wastes must be

certified as having concentrations of chemical agents below the drinking water standard for G, H and VX agents in liquids.

**III.C. CONDITION OF CONTAINERS**

If a container holding hazardous waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste, or the container itself, to a Department of Transportation (DOT) approved container in accordance with Attachment 9, as soon as possible but not later than 24 hours from the time the problem was discovered. The Permittee must also follow the plans in Attachment 9, Appendix D-1-2, Section 15 for spill prevention and cleanup.

**III.D. COMPATIBILITY OF WASTE WITH CONTAINERS**

The Permittee shall assure that the waste is compatible with the containers as required by R315-8-9.3. The types of containers to be used for storage are listed in Attachment 9, Exhibit D-1-3.

III.D.1. The Permittee must follow the compatibility plan in Attachment 10, Section D-1a(3), under the subheading Segregation of Incompatible Wastes. The Permittee must also follow the plans in Attachment 9 and Attachment 10 for management of incompatible waste.

**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 R315--8-9.4.

III.E.1 The Permittee shall manage containers as specified in Attachment 9.

III.E.2 condition deleted

III.E.3 In the Container Storage Building (CSB), the Permittee shall store all containers on pallets and shall not stack containers in any bay more than two (2) containers high. In the CSB, the Permittee may use shelving for storage of containers. The Permittee shall store containers in the five (5) storage cabinets as specified in Attachment 9 and shall not exceed the storage specifications of each cabinet as specified in Attachment 11, Appendix D-1-7.

- III.E.3.a. In the P999/F999 Container Storage Building, the Permittee shall store containers on pallets and shall not stack containers in any bay more than two (2) containers high. Containers may be stacked on shelving. Solid F999 and P999 wastes may be contained in crates, pallets, wooden boxes, metal boxes, or other containers. Other types of containers that may be used for storage in the F999 Container Storage Building are specified in Attachment 9, Exhibit D-1-3. The total capacity of each container used for storage of solid P999/F999 waste shall be maintained in the operating record. Solids and liquids shall not be stored in the same bay at the same time. The secondary containment capacity of each bay, and the total secondary containment capacity of 1,713 gallons for the Building, as shown in Attachment 11 and as indicated in Attachment 9, shall not be exceeded.
- III.E.4 The Permittee shall unload any transport vehicle hauling containers of hazardous waste for storage at the Container Storage Building or the P999/F999 Container Storage Building within 24 hours following arrival at the site. Arrival for purposes of this permit shall be the day the vehicle arrived and the hazardous waste is logged into the facility. The Permittee shall follow the load and unload procedures described in Attachment 9.
- III.E.4.a condition deleted
- III.E.5 The Permittee shall maintain proper aisle space as specified in R315-8-3.6.
- III.E.6 The Permittee shall provide storage for and maintain at the Central Hazardous Waste Storage Facility, 85 gallon (or other applicable size) overpack drums. The Permittee shall follow the procedures in Attachment 9 for overpacking of containers.
- III.E.7 The Permittee shall comply with R315-13-1 for proper storage of wastes under the land disposal restrictions. The Permittee shall record in the operating record any wastes prohibited from storage that are stored for a period of time exceeding one year. Justification for storage of prohibited wastes beyond one year must be included in the operating record.

**III.F. CONTAINMENT SYSTEMS**

The Permittee shall maintain the containment system in accordance with the attached plans and specifications, contained in Attachment 11, Appendix D-1-1 and as specified in R315-8-9.6.

- III.F.1 The Permittee shall use the container management areas and the Permittee shall use the stacking configurations as shown on the drawings listed below:

Attachment 11, Appendix D-1-1, Sheet A-4 presents the details of construction of the Container Storage Building (formerly referred to as the Central Hazardous Waste Storage Facility) and Sheets 1, 2, and 3 of this same attachment and appendix present the details of construction for the P999/F999 Container Storage Building.

Attachment 9, Exhibits D-1-6 and D-1-7 present container stacking configurations for the Container Storage Building. Attachment 9, Exhibit D-1-8 presents the layout of pallets in the P999/F999 Container Storage Building.

At capacity, the Permittee may store the following volumes of wastes:

- III.F.1.a. Container Storage Building - 24,640 gallons in the 16 bays and 240 gallons in the five chemical storage cabinets with a total capacity of 24,880 gallons.
- III.F.1.b. P999/F999 Container Storage Building - 16,500 gallons of P999/F999 liquid or P999/F999 solid waste in drums, or 180 cubic yards of otherwise contained (e.g. crates, pallets, wooden boxes, metal boxes) solid P999/F999 waste. Drums and otherwise contained waste may be stored in the P999/F999 building at the same time, as specified in Condition III.E.3.a.
- III.F.1.c. condition deleted, but Dugway has not provided as built drawings showing changes
- III.F.2. Container management areas (the location of the sumps in the Container Storage Building are shown in Attachment 11, Appendix D-1-1, sheet A-4 and the locations of the sumps in the P999/F999 Container Storage Building are shown in Attachment 11, Appendix D-1, sheet 2) shall be inspected for the presence of free liquids in accordance with Attachments 3 and 9. If liquids are discovered in the sumps or other containment area, the Permittee shall record the location of the release in the inspection log. Any liquids discovered shall be removed and managed according to the spill contingency plan outlined in Attachment 9.
- III.F.3. For purposes of inspections, all containers stored in the liquid hazardous waste storage area shall be considered full to their respective capacities with liquid hazardous waste.
- III.G. **SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTE**
- III.G.1. The Permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the Facility boundary (R315-8-9.7).

III.G.2. The Permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste and follow the procedures specified in Attachment 9 and Attachment 10 and R315-8-2.8(a).

**III.H. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE**

III.H.1. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material as specified in R315-8-9.8(a).

III.H.2. The Permittee shall not place incompatible wastes, or incompatible wastes and materials, as specified in R315-8-9.8(b), in a container unless the container is washed, or the container is empty and is fitted with a disposable liner.

III.H.3. Where wastes are placed into a container not fitted with a disposal liner and the container previously held an incompatible waste or material, the Permittee must document compliance with Condition III.H.2. as required by R315-8-2-8.(c) and must place this documentation in the Operating Record.

**III.I. IDENTIFICATION OF LOCATION OF CONTAINERS IN THE OPERATING RECORD**

The Permittee shall record, in the operating log, the location of each container accepted in the container storage areas. The location records shall be maintained until a container is either removed for processing, or manifested off-site. The Permittee shall follow the plan for tracking of waste as presented in Attachment 9, Section D-1a (2).

III.I.1. The Permittee shall follow the plans in Attachment 9 for identification and labelling of containers.

**III.J. MAINTENANCE OF THE CONTAINER MANAGEMENT AREA**

The Permittee shall maintain the container management areas in accordance with the details located in the drawings provided in Attachment 11 and in accordance with Attachments 3 and 9. The Permittee shall comply with Condition II.B.2.

**III.K. INSPECTION SCHEDULES AND PROCEDURES**

III.K.1. The Permittee shall inspect the container storage area weekly, as specified in the Inspection Schedule, Attachment 3. The purpose of this inspection shall be to detect leaking containers, for deterioration of containers, and to detect deterioration of the secondary containment system caused by corrosion and other factors as specified in R315-8-9.5.

III.K.2. If problems are observed during the inspections described in Condition II.L.1, the Permittee must correct the problem as specified in R315-8-2.6(c) and (d) and Attachment 9, Section D-1a(2), subheading Corrective Action, page D-1-15.

III.K.3. When loading and unloading activities are occurring, the container storage area shall be inspected daily. The Permittee shall document inspections.

III.L. **RECORDKEEPING**

The Permittee shall place the results of all waste analyses and trial tests and any other documentation showing compliance with the requirements of Conditions III.K.1 and III.K.2 and R315-8-9.8 and R315-8-2.8(b) in the facility operating record as specified in R315-8-5.3. The Permittee shall maintain compliance with Condition II.E as it provides the basis for correcting problems identified during inspections of container management areas.

III.M. **CLOSURE**

At closure of the container area, the Permittee shall remove all hazardous waste and hazardous waste residues from the containment system, in accordance with the procedures in the Closure Plan, Attachment 8 and as specified in R315-8-7 and R315-8-9.9.

