

**PUBLIC NOTICE**  
**LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)**  
**BASF CORPORATION, GEISMAR FACILITY**  
**PUBLIC HEARING AND REQUEST FOR PUBLIC COMMENT**  
**ON DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL**

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on a draft hazardous waste operating permit renewal for BASF Corporation, Post Office Box 457, Geismar, Louisiana 70734-0457 for the Geismar Facility. **The facility is located at 8404 River Road, Geismar, Louisiana 70734, Ascension Parish.**

**The hearing will be held on Thursday, September 21, 2006, beginning at 6:00 p.m., at the City of Gonzales, Council Meeting Room, 120 South Irma Boulevard, Gonzales, LA.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

BASF Corporation requested the renewal of its hazardous waste permit governing the operation of the hazardous waste boilers, incinerator, tanks and container storage areas at their Geismar Facility. The Geismar Facility is involved in the manufacture of a wide range of industrial chemicals used as catalysts or intermediates for the other manufacturing processes. BASF operates waste management facilities for the onsite storage and treatment of hazardous waste generated at the Geismar Facility.

BASF operates both hazardous waste treatment and storage facilities. BASF operates three boilers, three treatment tanks and one incinerator that combust liquid waste streams hardpiped from specific production units at the facility. BASF also has three container storage areas and twelve (12) tanks that hold designated waste prior to shipment off-site, incineration on-site, or waste heat recovery on-site.

Written comments or written requests for notification of the final permit decision regarding this permit may also be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests for notification must be received by 12:30 p.m., Monday, September 25, 2006.** Written comments will be considered prior to a final permit decision.

LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft hazardous waste permit renewal and the hazardous waste permit application are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5<sup>th</sup> Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). An additional copy may be reviewed at Ascension Parish Library, Gonzales Branch located at 708 South Irma Boulevard, Gonzales, LA 70737.

Previous notices have been published in The Donaldsonville Chief on September 14, 2000, The Advocate and The Gonzales Weekly on September 18, 2000 and January 18 and 19, 2001.

Individuals with a disability, who need an accommodation in order to participate in the public hearing, should contact Laura Ambeau at the above address or by phone at (225) 219-3277.

Inquiries or requests for additional information regarding this permit action should be directed to Mr. Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3134.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at [maillistrequest@ldeq.org](mailto:maillistrequest@ldeq.org) or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

**Permit public notices including electronic access to the draft permit renewal and associated information** can be viewed at the LDEQ permits public notice webpage at [www.deq.state.la.us/news/PubNotice/](http://www.deq.state.la.us/news/PubNotice/) and general information related to the public participation in permitting activities can be viewed at [www.deq.louisiana.gov/portal/tabid/2198/Default.aspx](http://www.deq.louisiana.gov/portal/tabid/2198/Default.aspx)

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://www.state.la.us/ldbc/listservpage/ldeq\\_pn\\_listserv.htm](http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm).

**All correspondence should specify AI Number 2049, Permit Number LAD 040776809, and Activity Number PER20000016.**

**Publication Date: August 4, 2006**

DRAFT HAZARDOUS WASTE OPERATING  
PERMIT  
BASF CORPORATION  
GEISMAR FACILITY  
COMBUSTION UNITS, TANKS  
AND CONTAINER STORAGE  
LAD 040776809-OP-RN-1  
AGENCY INTEREST 2049/PER20000016

PUBLIC RECORD COPY

# **FACT SHEET**

## **FACT SHEET**

**FOR THE DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL  
PREPARED FOR**

**BASF Corporation  
Geismar Facility**

**EPA ID# LAD 040776809  
Agency Interest # 2049**

**8404 River Road  
Geismar, Louisiana  
Ascension Parish  
70734**

**Permit Number LAD 040776809-OP-RN-1  
PER20000016**

### **I. INTRODUCTION**

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste permit for BASF Corporation, Geismar Facility, 8404 River Road, Geismar, Louisiana, Ascension Parish, 70734.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

BASF Corporation is seeking a hazardous waste permit to operate three boilers, three treatment tanks, one incinerator, nine storage tanks and three container storage areas and to govern corrective action at the BASF Geismar Facility.

### **II. THE PERMITTING PROCESS**

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ, Office of Environmental Services, Waste Permits Division is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. BASF Corporation submitted its Hazardous Waste Part B Permit Renewal Application, dated December 15, 2000, to comply with the Environmental Protection Agency (EPA) regulations requiring the ten year permit renewal for facilities that are permitted to treat, store or dispose

of hazardous waste under Subtitle C of the Resource Conservation and Recovery Act (RCRA).

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V, Subpart 1, and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft permit. The administrative authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the administrative authority shall be to issue, deny, modify, or revoke the draft permit in accordance with LAC 33:V.705.

**A. DRAFT HAZARDOUS WASTE RENEWAL PERMIT**

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operation of the listed facilities.

This draft hazardous waste permit is a tentative determination and is not the final decision of the administrative authority.

**B. PUBLIC COMMENT PERIOD**

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the BASF Geismar Facility must do so within the allotted forty-five (45) day comment period.

A public hearing for the draft permit will be held on the date, and at the location and time provided in the public notice (See the attached notice in the Public Participation Section of the Draft Permit). LDEQ will hold the hearing at least thirty (30) days after the date on which the public notice is given.

Public notice of the proposed permitting action and of the hearing shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

**C. LOCATIONS OF AVAILABLE INFORMATION**

The administrative record, including all supporting documents, is on file at the LDEQ Public Records Center, Room 1-127, 602 North 5<sup>th</sup> Street, Baton Rouge, Louisiana.

These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft permit, fact sheet, and supporting documents are available for review at the Ascension Parish Library, Gonzales Branch, 708 S. Irma Blvd., Gonzales, Louisiana, 70737.

**D. WRITTEN COMMENT SUBMISSION**

Interested persons may submit written comments on the draft permit to the administrative authority, at the address listed below, on the closing date of the comment period. All comments should include:

1. the name and address of the commenter,
2. a concise statement of the exact basis for any comment and supporting relevant facts upon which the comment is based,
3. identification of the facility commented on (the EPA Identification Number and AI number), and
4. supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Mr. Willard F. Steele  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Waste Permits Division  
Post Office Box 4313  
Baton Rouge, LA 70821-4313  
(225) 219-3134 or fax (225) 219-3158

### III. DESCRIPTION OF OVERALL SITE

The BASF Geismar Facility began operation in 1958. Currently, the plant employs 1,700 workers and is located on 2,640 acres of which 420 acres are occupied. The Geismar Facility is involved in the production of a wide range of catalysts and intermediates for use by a number of other manufacturing companies. An example of chemical products produced at the Geismar Facility include amines, used in the production of agricultural chemicals, rubber tires and shampoos, and Toluene Diisocyanate (TDI), a building-block for the production of urethane foam products and coatings.

### IV. HAZARDOUS WASTE FACILITIES

The BASF Geismar Facility operates three boilers, three treatment tanks, one incinerator, nine storage tanks and three container storage areas for the storage of waste generated on-site. These hazardous waste units are involved in the following permitted activities: on site treatment by blending of hazardous waste in tanks, on site treatment of hazardous waste by thermal destruction, on site storage of hazardous waste in containers and on site storage of hazardous waste in tanks. Waste that can not be treated on site is disposed of off-site at permitted hazardous waste treatment facilities according to the regulations.

### V. FINANCIAL AND LIABILITY REQUIREMENTS

The BASF Corporation has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V, Chapters 37 for the Geismar Facility.

### VI. IT QUESTION SUMMARY OF ANALYSIS

Pursuant to LA. R.S.30:2018.E.3, this draft hazardous waste permit is not subject to the requirements regarding environmental assessment statements or IT Analysis (Save Ourselves v. La. Env'tl. Control Comm'n, 452 So. 2d 1152, 1159. La. 1984). Nevertheless, the LDEQ has considered factors similar to the IT Analysis in preparing this draft permit. This is a preliminary analysis based on information currently available to the LDEQ.

#### A. **The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.**

BASF Corporation has submitted its Part B Permit Renewal Application for the existing Geismar Facility, which includes three boilers, three treatment tanks, one incinerator, nine storage tanks and three container storage areas. This permit application will consolidate the previously issued NVP permit, General Permit, Aniline Plant Permit and the submission of the Boiler Permit Application. This permit renewal does not propose the alteration of waste classifications, codes or characteristics.

In addition BASF Corporation has closed all units that were involved in the land application treatment and disposal of hazardous waste. The design and operation of all remaining storage units, tank treatment units, and combustion units will follow the regulations to prevent the unauthorized release of any stored material into the environment. These actions minimize the potential and real adverse environmental effects of handling hazardous waste to the maximum extent possible.

**B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**

This is an existing facility submitting an application for permitting of its existing, hazardous waste storage and combustion units. The BASF Geismar Facility has been in operation for several decades. BASF will operate the Geismar Facility waste management unit in accordance with the appropriate regulations and the approved final permit. In addition, any waste shipped off-site is disposed of at approved hazardous waste disposal facilities.

Over 1,700 area residents are employed at the BASF Geismar Facility. Both the state and local economies benefit from the provision of employment and tax revenue at the BASF Geismar Facility. The proposed permit is an important factor for the continued operation of the BASF Geismar Facility.

The proposed permit should have little or no affect on property values or public costs pertaining to the economics of the local community, since the BASF Geismar Facility is an existing facility. The proposed permit renewal should not promote the need for additional fire protection, police, medical facilities, or roads.

**C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

**1. ALTERNATIVE PROJECTS**

This draft permit renewal is for hazardous waste storage and combustion units that were operating under the terms of a previously issued hazardous waste permit. The three boilers operated under interim status rules. The permitted units are important to the operation of the BASF Geismar Facility. There appears to be no known alternative projects that would offer more protection to the environment than permitting the existing facilities without unduly curtailing non-environmental benefits.

2. ALTERNATIVE SITE

This draft permit renewal is for an existing facility. The hazardous waste units to be permitted will store and treat hazardous waste that is generated on-site and are necessary for the continued operation of the BASF Geismar Facility. Relocating these units to a different or new location could result in greater environmental impact due to siting and transportation considerations. In addition, relocating to a new site would require that the current facility be closed possibly increasing hazardous waste generation and transportation.

3. MITIGATING MEASURES

The BASF Geismar Facility is an existing facility that generates hazardous waste as a by-product from the manufacture of catalyst and chemical intermediates. No mitigating measures would offer more protection to the environment than permitting the existing treatment and storage units without unduly curtailing non-environmental benefits.

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**ON DRAFT HAZARDOUS WASTE OPERATING PERMIT RENEWAL**

The LDEQ, Office of Environmental Services, will conduct a public hearing to receive comments on a draft hazardous waste operating permit renewal for BASF Corporation, Post Office Box 457, Geismar, Louisiana 70734-0457 for the Geismar Facility. **The facility is located at 8404 River Road, Geismar, Louisiana 70734, Ascension Parish.**

**The hearing will be held on Thursday, September 21, 2006, beginning at 6:00 p.m., at the City of Gonzales, Council Meeting Room, 120 South Irma Boulevard, Gonzales, LA.** During the hearing, all interested persons will have an opportunity to comment on the draft permit.

BASF Corporation requested the renewal of its hazardous waste permit governing the operation of the hazardous waste boilers, incinerator, tanks and container storage areas at their Geismar Facility. The Geismar Facility is involved in the manufacture of a wide range of industrial chemicals used as catalysts or intermediates for the other manufacturing processes. BASF operates waste management facilities for the onsite storage and treatment of hazardous waste generated at the Geismar Facility.

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Inquiries or requests for additional information regarding this permit action should be directed to Mr. Will F. Steele, LDEQ, Waste Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3134.

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Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at [http://www.state.la.us/ldbc/listservpage/ldeq\\_pn\\_listserv.htm](http://www.state.la.us/ldbc/listservpage/ldeq_pn_listserv.htm).

**All correspondence should specify AI Number 2049, Permit Number LAD 040776809, and Activity Number PER20000016.**

Publication Date: August 4, 2006

**LDEQ  
RADIO ANNOUNCEMENT  
HAZARDOUS WASTE PUBLIC HEARING ANNOUNCEMENT**

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The Louisiana Department of Environmental Quality will conduct a public hearing to receive public comments on a draft hazardous waste operating permit renewal for the BASF Corporation, Geismar Facility. The facility is located at 8404 River Road, Geismar, Ascension Parish.

**The hearing will be conducted on Thursday, September 21, 2006 at the City of Gonzales, Council Meeting Room, 120 South Irma Boulevard, Gonzales, LA.**

Written comments may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, Louisiana. **Written comments must be received by 12:30 p.m., Monday, September 25, 2006.**

All information associated with this permit is available for review at LDEQ, Headquarters in Baton Rouge and at the Ascension Parish Public Library, Gonzales Branch, 708 South Irma Boulevard, Gonzales, LA.

The public notice with detailed information has been scheduled to publish in The Advocate and the Gonzales Weekly on August 4, 2006 and can be viewed on the LDEQ Permits Public Web page at [WWW.deq.state.la.us/news/PubNotice/](http://WWW.deq.state.la.us/news/PubNotice/).

For any inquiries contact LDEQ Customer Service Center at (225) 219-LDEQ, that is (225) 219-5337.

**SIGNATURE  
PAGE**

**DRAFT PERMIT****LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY****OPERATING PERMIT RENEWAL  
FOR HAZARDOUS WASTE STORAGE  
BASF GEISMAR FACILITY**

**PERMITTEE:** BASF CORPORATION

**PERMIT NUMBER:** LAD040776809-OP-RN-1  
Agency Interest # 2049/ Activity # 20000016

**FACILITY LOCATION:** 8404 RIVER ROAD  
GEISMAR, LOUISIANA, 70734

This permit is issued by the Louisiana Department of Environmental Quality (LDEQ) under the authority of the Louisiana Hazardous Waste Control Law R.S. 20:2171 et seq., and the regulations adopted thereunder and under the authority of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) to BASF Corporation, (hereafter called the Permittee), to operate a hazardous waste Treatment, Storage and Disposal (TSD) facility located at Geismar, Louisiana, at latitude 30° 11' 038" and longitude 90° 59' 041."

For the purposes of this permit, the "Administrative Authority" shall be the Secretary of the Louisiana Department of Environmental Quality, or his/her designee.

The permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein and the applicable regulations continued in the Environmental Regulatory Code, Title 33, Part V, Subpart 1 (or LAC 33:V. Subpart 1). Applicable regulations are those which are in effect on the effective date of issuance of this permit.

This permit is based on the assumption that the information provided to LDEQ by the Permittee is accurate. Further, this permit is based in part on the provisions of Sections 206, 212, and 224 of the HSWA of 1984, which modify Section 3004 and 3005 of RCRA. In particular, Section 206 requires corrective action for all releases of hazardous waste or constituents from any solid waste management unit at a treatment, storage or disposal facility seeking a permit, regardless of the time at which waste was placed in such unit.

Section 212 provides authority to review and modify the permit at any time. Any inaccuracies found in the submitted information may be grounds for the termination, modification, revocation, and reissuance of this permit (see LAC 33:V.323) and potential enforcement action. The Permittee must inform the LDEQ of any deviation from or changes in the information in the application which

would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

This permit shall be effective as of \_\_\_\_\_, and shall remain in effect until \_\_\_\_\_, unless revoked, reissued, modified or terminated in accordance with LAC 33:V.323 and 705 of the Louisiana Hazardous Waste Regulations. The Administrative Authority may issue any permit for a duration that is less than the maximum term of ten (10) years and the term shall not be extended beyond the maximum duration by modification in accordance with LAC 33:V.315.

Provisions of this permit may be appealed in writing pursuant to LA. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. A request for hearing must be sent to the following:

Louisiana Department of Environmental Quality  
Office of the Secretary  
Attention: Hearings Clerk, Legal Services Division  
Post Office Box 4302  
Baton Rouge, Louisiana 70821-4302

DRAFT

\_\_\_\_\_  
Chuck Carr Brown, Ph.D., Assistant Secretary  
Louisiana Department of Environmental Quality

\_\_\_\_\_  
Date

# **PART A**

# **APPLICATION**

**GENERAL HAZARDOUS WASTE PERMITTED FACILITY INFORMATION**

CATEGORY	INFORMATION
<b>FACILITY NAME</b>	BASF Corporation, Geismar Facility
<b>EPA IDENTIFICATION NUMBER</b>	LAD 040776809
<b>AGENCY INTEREST NUMBER</b>	AI 2049
<b>PERMIT ACTIVITY NUMBER</b>	PER 20000016
<b>PERMIT TYPE</b>	Operating Permit/Boilers, Incinerator, Tanks, Container Storage Units
<b>FACILITY LOCATION</b>	Latitude: 30 11 38      Longitude: 09 59 41
<b>NEW PERMIT, RENEWAL PERMIT OR CLASS 3 MODIFICATION</b>	Renewal Operating Permit (Including Interim Status Units)
<b>FACILITY OWNER INFORMATION (Legal Owner)</b>	Name: BASF Corporation
	Mailing Address: 3000 Continental Drive, Mt. Olive
	State: New Jersey      Zip Code: 07828-1234
	Physical Address:
	State:      Zip Code:
Phone Number: (973) 426-2600	
<b>FACILITY OPERATOR INFORMATION (If different from owner)</b>	Name:
	Mailing Address:
	State:      Zip Code:
	Physical Address:
	State:      Zip Code:
Phone Number:	
<b>FACILITY CONTACT INFORMATION</b>	Name: Robert M. Conger
	Mailing Address: P.O. Box 457, Geismar
	State: Louisiana      Zip Code: 70734-0457
	Physical Address:
	State:      Zip Code:
Phone Number: (225) 339-7941	
<b>FACILITY EXISTENCE DATE</b>	9/25/1990
<b>OTHER ENVIRONMENTAL PERMITS</b>	
<b>PERMIT TYPE</b>	<b>PERMIT NUMBER</b>
	Reference Section 6 of the Part A Application
<b>APPLICABLE WASTE CODES (See the Part A Application referenced in Table 1 of this permit)</b>	
<b>NATURE OF BUSINESS (Provide a brief description of site process or activities)</b>	
BASF is a manufacturer of organic chemicals. The production processes include inorganic dye and pigment and synthetic organic dye and pigment.	

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ATTACHMENT 1.....LIST OF FACILITY DOCUMENTS INCORPORATED  
IN THE PERMIT BY REFERENCE

# **BODY OF PERMIT**

**DRAFT  
HAZARDOUS WASTE OPERATING PERMIT**

**BASF Corporation  
EPA ID# LAD 040776809  
Agency Interest# 2049**

**Ascension Parish  
Geismar, Louisiana  
PER20000016  
Permit Number LAD 040776809-OP-RN-1**

**I. PERMIT PREAMBLE**

This permit is issued to BASF Corporation, hereinafter referred to as the Permittee, by the Louisiana Department of Environmental Quality (LDEQ) under authority of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et seq., and the regulations adopted thereunder.

For the purposes of the permit, "Administrative Authority" shall mean the Secretary of the Department of Environmental Quality, or his/her designee.

This permit is based on information submitted in the permit application, and all subsequent amendments, and on the applicant's certification that such information is accurate and that all facilities were or will be maintained and operated as specified in the application.

This permit is conditioned upon full compliance with all applicable provisions of the Louisiana Hazardous Waste Control Law, R.S. 30:2171 et. Seq., and the regulations adopted thereunder.

## GLOSSARY OF TERMS

For the purpose of this Permit, terms used herein shall have the same meaning as those in LAC 33:V.Subpart 1 unless the context of use in this Permit clearly indicates otherwise. Where terms are not otherwise defined, the meaning otherwise associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

**“Administrative Authority”** means the Louisiana Department of Environmental Quality (LDEQ).

**“Application”** refers to the RCRA Part B Permit Application and subsequent amendments submitted by the Permittee for obtaining a Permit.

**“Area of Concern” (AOC)** means any discernable unit or area, which, in the opinion of the Administrative Authority, may have received solid or hazardous waste or waste containing hazardous constituents at any time. The Administrative Authority may require investigation of the unit to determine if it is a Solid Waste Management Unit (SWMU). If shown to be a SWMU by the investigation, the AOC must be reported by the Permittee as a newly identified SWMU. If the AOC is shown not to be a SWMU by the investigation, the Administrative Authority may determine that no further action is necessary and notify the Permittee in writing.

**“Area of Investigation” (AOI)** is a zone contiguous to and including impacted media defined vertically and horizontally by the presence of one or more constituents in concentrations exceeding the limiting SS, MO-1 RS, or MO-2 RS (depending on the option being implemented).

**“Beneficial Resource”** describes a natural resource that is useful to human and ecological receptors. The state may establish statutes or regulations that identify certain environmental components, such as specific ground water or surface water sources, as a “Special Beneficial Resource,” or “Designated Beneficial Resource.” The beneficial resource then may be entitled to greater protection from contamination.

**“Constituents of Concern” (COC)** means the COPC’s that pose a significant risk.

**“Constituents of Potential Concern” (COPC)** means chemicals from hazardous waste and hazardous waste constituents that are potentially site related and have data of quality for use in the Screen or a site-specific risk assessment. The facility should compile a list of COPC’s for each release site based on existing sampling data, waste analysis reports, etc.

**“Conceptual Site Model” (CSM)** is part of the Data Quality Objective (DQO) process that presents a three-dimensional picture of site conditions at a discrete point in time that conveys what is known about the facility, releases, release mechanisms, contaminant fate and transport, exposure pathways, potential receptors, and risks. The information for the CSM is documented into six profiles. The CSM evolves as data gaps in the profiles become more complete, and will be refined based upon results of site characterization data. The final CSM is documented in the Risk Management Plan (RMP).

**“CWA”** means Clean Water Act.

**“Corrective Action”** is an activity conducted to protect human health and the environment.

**“DNAPL”** a dense liquid not dissolved in water, commonly referred to as “free product.”

**“Department”** means the Louisiana Department of Environmental Quality (LDEQ)

**“EPA”** means the United States Environmental Protection Agency.

**“HSWA”** means the 1984 Hazardous and Solid Waste Amendments to RCRA.

**“Hazardous Constituent”** means any constituent identified in LAC 33:V.Chapter 31, Table 1, or any constituent identified in LAC 33:V.3325, Table 4.

**“LDEQ”** means the Louisiana Department of Environmental Quality.

**“LNAPL”** a light liquid not dissolved in water, commonly referred to as “free product.”

**“Operating Record”** means written or electronic records of all maintenance, monitoring, inspection, calibration, or performance testing—or other data as may be required—to demonstrate compliance with this Permit, document noncompliance with this Permit, or document actions taken to remedy noncompliance with this Permit. A minimum list of documents that must be included in the operating record are identified at LAC 33:V.1529.B.

**“Permittee”** means BASF Corporation, Post Office Box 457, Geismar, Louisiana 70734-0457.

**“RCRA Permit”** means the full permit, with RCRA and HSWA portions.

**“RFA”** means RCRA Facility Assessment.

**“RFI”** means RCRA Facility Investigation.

**“Release”** means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping or disposing of hazardous wastes (including hazardous constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

**“SARA”** means Superfund Amendments and Reauthorization Action of 1986.

**“Solid Waste Management Unit” (SWMU)** means any discernable unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

**“Stabilization”** is an action taken for the purpose of controlling or abating threats to human health or the environment from releases or preventing or minimizing the further spread of contaminants while long-term remedies are pursued.

If, subsequent to the issuance of this Permit, regulations are promulgated which redefine any of the above terms, the Administrative Authority may, at its discretion, apply the new definition to this Permit.

All regulating citations are defined as being the regulations in effect on the date of issuance of this permit. New and/or amended regulations are not included as Permit requirements until permit modification procedures as specified in Condition II.C. of the permit and LAC 33:V.321 are completed.

## **II. GENERAL PERMIT CONDITIONS**

### **II.A. DURATION OF PERMIT**

This permit is effective as of the date indicated on the accompanying signature page and shall remain in effect for a maximum period of ten (10) years from the effective date, unless suspended, modified, revoked and reissued or terminated for just cause.

### **II.B. EFFECT OF PERMIT**

This permit authorizes the Permittee to store hazardous waste in accordance with the conditions of this permit. The Permittee is prohibited from any storage, treatment or disposal of hazardous waste not authorized by statute, regulation or this permit. Compliance with this permit, LAC 33:V.Subpart 1 and HSWA, constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA and Chapter 9 of the Louisiana Environmental Quality Act (Act). However, compliance with the terms of this permit does not constitute a defense to any order issued or any action brought under Condition 3013 or Condition 7003 of RCRA, or under Condition 106 (a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) {42 U.S.C. 9606 (a)}.

In accordance with LAC 33:V.307.B and C, issuance of this permit does not convey property rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, or any infringement of State or local law or regulations.

### **II.C. PERMIT ACTIONS**

Any inaccuracies found in the permit application may be cause for revocation or modification of this permit. The Permittee must inform the Administrative Authority of any deviation from, changes or inaccuracies in the information in the permit application.

The Administrative Authority may also suspend, modify, revoke and reissue, or terminate for cause when necessary to be protective of human health or the environment as specified in 40 CFR 270.41, 270.42, 270.43 or LAC 33:V.309.F, 311.A or 323. The Administrative Authority may modify the permit when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations, or by judicial decision after the permit was issued. The filing of a request for permit modification, revocation and reissuance, or termination or the notification of planned changes or anticipated

noncompliance on the part of Permittee does not stay the applicability or enforceability of any permit condition.

**II.D. SEVERABILITY**

The conditions of this permit are severable and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

**II.E. DUTIES AND REQUIREMENTS**

**II.E.1. Duty to Comply**

The Permittee shall comply with all conditions of this permit, except to the extent and for the duration such noncompliance may be authorized by an emergency permit. Any permit noncompliance, other than noncompliance authorized by an emergency permit (LAC 33:V.701), constitutes a violation of the LAC 33:V.Subpart 1 and the Environmental Quality Act and is grounds for enforcement action which may include permit termination, permit revocation and reissuance, permit modification, or denial of permit renewal application.

**II.E.2. Duty to Reapply**

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must reapply for the permit as required by the LAC 33:V.303.N and 309.B. Notification shall be at least 180 calendar days before the permit expires.

**II.E.3. Permit Extension**

This permit and all conditions herein will remain in effect beyond the permit's expiration date until the Administrative Authority issues a final decision on the re-application, provided the Permittee has submitted a timely, complete new permit application as provided in LAC 33:V.309.B and 315.A.

**II.E.4. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted

activity in order to maintain compliance with the conditions of this permit.

**II.E.5. Duty to Mitigate**

The Permittee shall immediately take all reasonable steps to minimize or correct any adverse impact on the environment resulting from noncompliance with this permit as required by LAC 33:V.309.D.

**II.E.6. Proper Operation and Maintenance**

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related ancillary equipment) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

**II.E.7. Duty to Provide Information**

The Permittee shall furnish to the Administrative Authority, within a reasonable time, any information which the Administrative Authority may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Administrative Authority upon request, copies of records required by this permit.

**II.E.8. Inspection and Entry**

The Permittee shall allow the Administrative Authority or an authorized representative, upon the presentation of credentials and other documents as may be required by law, to:

- II.E.8.a.** enter upon the Permittee's premises where a regulated activity is located or conducted, or where records must be maintained under the conditions of this permit;

- II.E.8.b.** have access to and copy, at reasonable times, any records that must be maintained under the conditions of this permit;
- II.E.8.c.** inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operation regulated or required under this permit; and
- II.E.8.d.** sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Administrative Authority any substances or parameters at any location.

#### **II.E.9. Sample Monitoring and Records**

**II.E.9.a.** Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from Appendix I of 40 CFR Part 261. Laboratory methods must be those specified in Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, "SW-846", latest revision; Manual of Ground Water Quality Sampling Procedures, 1981, EPA-600/2-81-160, as revised; Procedures Manual for Ground Water Monitoring at Solid Waste Disposal Facilities, 1977, EPA-530/SW-611, as revised; or an equivalent method as specified in the attached Waste Analysis Plan referenced in Attachment 1.

#### **II.E.9.b. Records of monitoring information shall include:**

- II.E.9.b.(1)** the date, exact place, and time of sampling or measurements;
- II.E.9.b.(2)** the name(s) and signature(s) of the individual(s) who performed the sampling or measurements;
- II.E.9.b.(3)** the date(s) analyses were performed;
- II.E.9.b.(4)** the name(s) and signature(s) of the individual(s) who performed the analyses;
- II.E.9.b.(5)** the analytical techniques or methods used;

**II.E.9.b.(6)** the results of such analyses; and

**II.E.9.b.(7)** associated quality assurance performance data.

**II.E.9.c. Laboratory Quality Assurance/Quality Control**

In order to ensure the accuracy, precision, and reliability of data generated for use, the Permittee shall submit a statement, certified as specified in LAC 33:V.513 and included in the annual report, indicating that:

**II.E.9.c.(1)** any commercial laboratory providing analytical results and test data to the Department required by this permit is accredited by the Louisiana Environmental Laboratory Accreditation Program (LELAP) in accordance with LAC 33:I. Subpart 3, Chapter 45. Laboratory data generated by commercial laboratories not accredited under LELAP will not be accepted by the Department.

LAC 33:I. Subpart 3 (Chapters 45-49) provides requirements for the accreditation program. Regulations and a list of labs that have applied for accreditation are available on the LDEQ website located at: <http://www.deq.state.la.us/laboratory/index.htm>.

In accordance with LAC 33:V.4501, the requirements for LELAP accreditation applies whenever data is:

- submitted on behalf of a facility;
- required as part of a permit application;
- required by order of the Department;
- required to be included in a monitoring report submitted to the Department;
- required to be submitted by contract; or
- otherwise required by the Department regulations.

This includes, but is not limited to data from RCRA Trial Burns, Risks Burns, Risk

Assessments, MACT Comprehensive Performance Tests, and data used for continuing compliance demonstrations.

**II.E.9.c.(2)** If the Permittee decides to use their own in-house laboratory for test and analysis, the laboratory is not required to be accredited by LELAP. However, the laboratory must document and submit for approval, quality assurance/quality control procedures that are commensurate with requirements in LAC 33:I. Subpart 3. Laboratory Accreditation.

**II.E.9.c.(3)** For approval of equivalent testing or analytical methods, the Permittee may petition for a regulatory amendment under LAC 33:V.105.I and LAC 33:I Chapter 9. In cases where an approved methodology for a parameter/analyte is not available or listed, a request to utilize an alternate method shall be submitted to the Administrative Authority for approval. Documentation must be submitted to the LDEQ that will verify that the results obtained from the alternate method are equal to or better than those obtained from EPA-accepted methods, as well as those deemed equivalent by the LDEQ.

#### **II.E.10. Retention of Records**

The Permittee shall maintain records through the active life of the facility (including operation, closure and post-closure periods) as required by LAC 33:V.309.J and LAC 33:V.1529.A, B, and C. All records, including plans, must be furnished upon request and made available at all reasonable times as required by LAC 33:V.1529.C.

File copies shall be kept for LDEQ inspection for a period of not less than three years as required by LAC 33:V.317.B.

The Permittee shall, for the life of the permit, maintain records of all data used to complete the application for this permit and any supplemental information submitted under the Louisiana Hazardous Waste Control Law (LA. R.S. 30:2171 et seq.).

**II.E.11. Notices of Planned Physical Facility Changes**

The Permittee shall give notice to the Administrative Authority, as soon as possible, of any planned physical alterations or additions to the permitted facility, in accordance with LAC 33:V.309.L.1.

**II.E.12. Physical Facility after Modification**

For any new or existing unit being modified, the Permittee may to manage hazardous waste in the modified portion of the unit until the unit is complete and:

**II.E.12.a.** the Permittee has submitted to and received approval from the Administrative Authority, by certified mail or hand delivery, a letter signed by the Permittee and an independent registered professional engineer stating that the unit is complete and has been constructed or modified in compliance with the permit; and

**II.E.12.b.** the Administrative Authority has inspected the modified unit following a request to make final inspection by the Permittee and finds it is in compliance with the conditions of the permit and all applicable Conditions of LAC 33:V.Subpart 1, and has issued an Order to Proceed. The Permittee may then commence treatment, storage, or disposal of hazardous waste.

**II.E.13. Anticipated Noncompliance**

The Permittee shall give advance notice to the Administrative Authority of any planned changes in the permitted facility or activity that may result in noncompliance with permit requirements.

**II.E.14. Transfer of Permits**

This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to LAC 33:V.309.L.4, 321.B, 321.C.4, and 1531.

**II.E.15. Compliance Schedules**

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than fourteen (14) days following each schedule date as required by LAC 33:V.309.L.6.

**II.E.16. Noncompliance Reporting**

The Permittee shall report orally within twenty-four (24) hours any noncompliance with the permit that may endanger human health or the environment, except where more immediate notification is required by LAC 33:I.3901, et seq. ("Notification Regulation and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended.) This report shall include the following:

**II.E.16.a.** information concerning the release of any hazardous waste that may endanger public drinking water supplies; and

**II.E.16.b.** information concerning the release or discharge of any hazardous waste, or of a fire or explosion at the facility, that could threaten the environment or human health outside the facility. The description of the occurrence and its cause shall include:

**II.E.16.b.(1)** name, address, and telephone number of the owner or operator;

**II.E.16.b.(2)** name, address, and telephone number of the facility;

**II.E.16.b.(3)** date, time, and type of incident;

**II.E.16.b.(4)** name and quantity of materials involved;

**II.E.16.b.(5)** the extent of injuries, if any;

**II.E.16.b.(6)** an assessment of actual or potential hazard to the environment and human health outside the facility, where this is applicable; and

**II.E.16.b.(7)** estimated quantity and disposition of recovered material that resulted from the incident.

**II.E.17. Follow-up Written Report of Noncompliance**

The Permittee shall provide a written submission within five (5) days after the time the Permittee becomes aware of any noncompliance which may endanger human health or the environment. However, where more immediate submission is required by LAC 33:I.3901, "Notification Regulations and Procedures for Unauthorized Discharges" dated November 19, 1985, as amended, the report shall be submitted in accordance with those regulations. The written submission shall contain a description of the noncompliance and its cause; the periods of noncompliance (including exact dates and times); whether the noncompliance has been corrected; and if not, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. If the Administrative Authority waives the requirement, then the Permittee submits a written report within fifteen (15) days after the time the Permittee becomes aware of the circumstances, as required by LAC 33:V.309.L.7.

**II.E.18. Other Noncompliance**

The Permittee shall report all other instances of noncompliance not otherwise required to be reported above, at the time required monitoring reports are submitted. The reports shall contain the information listed in Condition II.E.16 above.

**II.E.19. Other Information**

Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or that it submitted incorrect information in a permit application, or in any report to the Administrative Authority, the Permittee shall promptly submit such facts or information.

**II.E.20. Signatory Requirement**

All applications, reports or other information submitted to the Administrative Authority shall be signed and certified according to LAC 33:V.507, 509, 511, and 513.

**II.E.21. Schedule of Compliance**

- II.E.21.a** Within sixty (60) days of the effective date of this Permit, the Permittee shall submit for review and approval by the Administrative Authority, a testing plan for particulate matter emissions from the Amines, Utilities #3, and Utilities #6 boiler stacks. The purpose of this testing is to set an ash feed rate in compliance with LAC 33:V.3005.E.5.a.i.
- II.E.21.b** Within sixty (60) days of the effective date of this Permit, the Permittee shall submit for review and approval by the Administrative Authority, a testing plan to increase one or more of the operating parameters listed in Condition V.D. of this Permit for the Amines Boilers. This testing plan may be combined with the one in Condition II.E.21.a of this Permit. The operating parameters listed in Condition V.D of this Permit may be changed upon approval by the Administrative Authority and initiation of a permit modification of the Permittee.
- II.E.21.c** Within thirty (30) days of the effective date of this permit, the Permittee shall submit an updated list of equipment subject to LAC 33:V.536. The list must consist of all of the information required by LAC 33:V.536.A, including the percent by weight total organics in the hazardous waste stream and the method of compliance with the standard.
- II.E.21.d** Within thirty (30) days of the effective date of this permit, the Permittee shall submit an updated Waste Analysis Plan that meets the requirements of LAC 33:V.1519.
- II.E.21.e** Within ninety (90) days of the effective date of this permit, the Permittee shall submit a Preliminary Conditions Report as described in the HSWA Condition, Appendix 1, Summary of Corrective Action Activities to comply with LAC 33:V.305 and LAC 33: V.516.C.

**II.E.22. Additional Operating Standards**

(RESERVED)

**II.E.23. Updated Documents To Be Submitted Prior To Operation**

(RESERVED)

**II.E.24. Documents To Be Maintained at Facility Site**

**II.E.24.a.** The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and any amendments, revisions, and modifications to these documents. Any revision or changes shall be submitted with the annual report unless previously submitted.

**II.E.24.a.(1)** Waste Analysis Plan submitted in accordance with LAC 33:V.1519 (see Attachment 1).

**II.E.24.a.(2)** Personnel Training Plan and the training records as required by LAC 33:V.1515 (see Attachment 1).

**II.E.24.a.(3)** Contingency Plan prepared in accordance with LAC 33:V.1513 (see Attachment 1).

**II.E.24.a.(4)** Arrangements with local authorities in accordance with LAC 33:V.1511.G. (see Attachment 1).

**II.E.24.a.(5)** Closure Plan submitted in accordance with LAC 33:V.3511 and any post-closure care requirements that may be required initially or through permit modifications in accordance with LAC 33:V.3523 (see Attachment 1).

**II.E.24.a.(6)** Cost estimate for facility closure care submitted in accordance with LAC 33:V.3705 and any post-closure cost estimate that may be required initially or through permit modifications in accordance with LAC 33:V.3709 (see Attachment 1).

**II.E.24.a.(7)** Operating records as required by LAC 33:V.1529, 1911.D, and 2115.D.

**II.E.24.a.(8)** Inspection Plan developed in accordance with LAC 33:V.517.G and 1509.B (see Attachment 1).

**II.E.24.a.(9)** Security Plan developed in accordance with LAC 33:V.1507 (see Attachment 1).

**II.E.24.b.** All proposed amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Administrative Authority for approval.

**II.E.25. Annual Report**

An annual report shall be submitted covering all hazardous waste units and their activities during the previous calendar year as required by LAC 33:V.1529.D.

**II.E.26. Manifest**

The Permittee shall report manifest discrepancies and un-manifested waste as required by LAC 33:V.309.L.8 and 9.

**II.E.27. Emissions**

Emissions from any hazardous waste facility shall not violate the Louisiana Air Quality Regulations. If air quality standards are exceeded, the site will follow air regulation protocol.

**II.E.28. Waste Discharges**

Waste discharges from any hazardous waste facility shall not violate the Louisiana Water Quality Regulations. If water standards are exceeded, the site will follow water quality regulation protocol.

**II.E.29. Non-Listed Hazardous Waste Facilities**

This permit is issued for those hazardous waste facilities listed in Condition IV (Permitted Facilities). If the Permittee determines that an unpermitted hazardous waste facility exists, the Permittee must immediately notify the Administrative Authority in

accordance with Condition II.E.19 of the General Permit Conditions.

**II.E.30. Compliance With Land Disposal Restrictions**

The Permittee shall comply with those land disposal restrictions set forth in LA. R.S. 30:2193, all regulations promulgated thereunder, and the HSWA portion of this permit (Condition VII and VIII).

**II.E.31. Establishing Permit Conditions**

Permits for facilities with pre-existing groundwater contamination are subject to all limits, conditions, remediation and corrective action programs designated under LAC 33:V.311.D and LAC 33:V.3303.

**II.E.32. Obligation for Corrective Action**

Owners or operators of hazardous waste management units must have all necessary permits during the active life of the unit and for any period necessary to comply with the corrective action requirements in Condition VIII of this permit. The facility is obligated to complete facility-wide corrective action regardless of the operational status of the facility.

**II.E.33. Attachments and Documents Incorporated by Reference**

All attachments and documents required by this permit, including all plans and schedules, are incorporated, upon approval by the Administrative Authority, into this permit by reference and become an enforceable part of this permit. Since required items are essential elements of this permit, failure to submit any of the required items or submission of inadequate or insufficient information may subject the Permittee to enforcement action, which may include fines, suspension, or revocation of the permit.

Any noncompliance with approved plans and schedules shall be termed noncompliance with this permit. Written requests for extension of due dates for submittals may be granted by the Administrative Authority.

If the Administrative Authority determines that actions beyond those provided for, or changes to what is stated herein, are warranted, the Administrative Authority may modify this permit according to procedures in LAC 33:V.321.

### III. GENERAL FACILITY CONDITIONS

#### III.A. DESIGN AND OPERATION OF ALL UNITS

- III.A.1.** The Permittee must maintain and operate all facilities to minimize the possibility of a fire, explosion, or any unauthorized sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or water that could threaten human health or the environment.
- III.A.2.** The Permittee shall not receive for treatment, storage, or disposal any hazardous waste generated outside the United States or its territories, in accordance with LA. R.S. 30:2189 of the Louisiana Environmental Quality Act.
- III.A.3.** No off-site generated hazardous wastes may be shipped to the Geismar facility (LAD 040776809) for storage, treatment, and/or disposal.

#### III.B. REQUIRED NOTICE

(Reserved)

#### III.C. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the Waste Analysis Plan referenced in Attachment 1 and in accordance with LAC 33:V.1519.

- III.C.1.** The Permittee shall review the Waste Analysis Plan annually and report to the Administrative Authority in the annual report whether any revision is required to stay abreast of changes in EPA methods and/or State regulatory provisions.
- III.C.2.** Annually, the Permittee shall submit a certified statement that indicates that any laboratory (i.e., on-site laboratory or contract laboratory) that provides chemical analyses, analytical results, or other test data to the department, by contract or by agreement, is accredited in accordance with the laboratory accreditation requirements of LAC 33:I.Chapter 45. This written statement shall be certified as specified in LAC 33:V.513 and included in the annual report. This documentation shall be resubmitted when a different laboratory is contracted for services.

**III.C.3.** If there is reason to believe that the hazardous waste has changed or the operation generating the hazardous waste has changed, the Permittee shall review and re-characterize all hazardous waste streams generated by the Permittee on-site and treated, stored, or disposed on-site. The Permittee must re-characterize wastes in accordance with LAC 33:V.1519.A.3. This re-characterization shall include laboratory analyses which provide information needed to properly treat, store, and dispose of the hazardous waste, including physical characteristics and chemical components of the waste. The results of this re-characterization shall be summarized in the Permittee's Annual Report

**III.C.4.** In accordance with LAC 33:V.1519.B, the Waste Analysis Plan must meet all the sampling and QA/QC procedures of Condition II.E.9.c. All test procedures used by the Permittee shall be maintained on file by the Permittee and made available to the LDEQ upon request.

**III.D. SECURITY**

The Permittee must comply with the security provisions of LAC 33:V.1507, as referenced in Attachment 1.

**III.E. GENERAL INSPECTION REQUIREMENTS**

The Permittee must follow the Inspection Plan referenced in Attachment 1. The Permittee must remedy any deterioration or malfunction discovered by an inspection as required by LAC 33:V.1509.C. Records of inspections must be kept as required by LAC 33:V.1509.D. The inspection schedule must include the regulatory requirements of LAC 33:V.517.G, 1509.A and B, 1911, and 2109.

**III.F. PERSONNEL TRAINING**

The Permittee must conduct personnel training as required by LAC 33:V.1515.A, B, and C. The Permittee shall follow the outline referenced in Attachment 1. The Permittee shall maintain all training documents and records as required by LAC 33:V.1515.D and E.

**III.G. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE**

The Permittee must take precautions as required by LAC 33:V.1517 to prevent accidental ignition or reaction of ignitable or reactive wastes.

### **III.H. LOCATION STANDARDS**

**III.H.1.** The Permittee has furnished evidence that it is in compliance with seismic standards as required by LAC 33:V.517.T.

**III.H.2.** The Permittee must not manage any hazardous waste on any portion of the property that lies within the 100 year flood plain (as identified in the Flood Insurance Rating Map) unless such areas are raised above this flood level or other means (e.g., levees) are provided to protect such areas from washouts, overtopping by wave action, soil erosion or other effects of such a flood as required by LAC 33:V.1503.B.3. Such site improvements must be certified by independent licensed professional engineers and approved by the Administrative Authority prior to any hazardous waste and/or hazardous waste units being placed thereon.

### **III.I. PRECIPITATION RUN-ON AND RUN-OFF**

The Permittee must provide for the control by diversion or treatment of run-on and run-off resulting from a rainfall occurring during a period of twenty-four (24) hours as defined by local rainfall records and LAC 33:V.1503.B.2. The Permittee shall comply with the requirements of LAC 33:V.1907.E.1.b, 2111.B.4, B.5, and B.6.

### **III.J. HURRICANE EVENTS**

The Permittee must initiate those applicable portions of the Contingency Plan during a hurricane as well as appropriate actions required by LAC 33:V.1507, 1509 and 1511.

### **III.K. PREPAREDNESS AND PREVENTION**

#### **III.K.1. Required Equipment**

At a minimum, the Permittee must install and maintain the equipment set forth in the Contingency Plan, as required by LAC 33:V.1511.C.

#### **III.K.2. Testing and Maintenance of Equipment**

The Permittee must test and maintain the equipment specified in Condition III.K.1 to insure its proper operation

in time of emergency. The testing and maintenance of the equipment must be documented in the operating record.

**III.K.3. Access to Communications or Alarm Systems**

The Permittee must maintain access to the communications or alarm system as required by LAC 33:V.1511.E.1 and 1511.E.2.

**III.K.4. Required Aisle Space**

In no case shall aisle space be less than two (2) feet. In addition, the Permittee shall maintain adequate aisle space as required by LAC 33:V.1511.F and 2109.B.

**III.K.5. Arrangements with Local Authorities**

The Permittee shall document in the annual report that the requirements of LAC 33:V.1511.G have been met. This documentation shall include those state and local agencies involved and those facilities and operations covered. Documentation of written arrangements with state and local agencies shall also be included in this report. Where state or local authorities decline to enter into such arrangements, the Permittee must document the refusal in the operating record.

**III.L. CONTINGENCY PLAN**

**III.L.1. Implementation of Plan**

The Permittee must immediately carry out the provisions of the Contingency Plan, and follow the emergency procedures described by LAC 33:V.1513.F whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents that threaten or could threaten human health or the environment.

**III.L.2. Copies of Plan**

The Permittee must comply with the requirements of LAC 33:V.1513.C.

**III.L.3. Amendments to Plan**

The Permittee must review and immediately amend, if necessary, the Contingency Plan as required by LAC 33:V.1513.D.

**III.L.4. Emergency Coordinator**

The Permittee must comply with the requirements of LAC 33:V.1513.E concerning the emergency coordinator.

**III.M. MANIFEST SYSTEM**

The Permittee shall comply with the manifest requirements of LAC 33:V.Chapter 9 and 11.

**III.N. RECORD KEEPING AND REPORTING**

**III.N.1. Operating Record**

The Permittee shall maintain a written operating record at the facility in accordance with LAC 33:V.1529.A, B, and C and the Operations Plan referenced in Attachment 1.

**III.N.2. Annual Report**

The Permittee must comply with the annual report requirements of LAC 33:V.1529.D.

**III.N.3. Operations Manual**

The Permittee shall compile and keep current an operations manual covering all aspects of the Permittee's treatment and storage facilities.

**III.O. CLOSURE/POST-CLOSURE**

**CLOSURE**

The closure plan shall include the following responses by the Permittee to LAC 33:V.1915, 2117, 3005.I., 3503, 3505, 3507, 3509, 3511, 3513, and 3515.

**III.O.1. Closure Performance Standard.** The Permittee shall close the facility in accordance with the closure plan referenced

in Attachment 1 and in accordance with the applicable Conditions of LAC 33:V.3507.

- III.O.2. Amendment to Closure Plan. The Permittee shall amend the closure plan where necessary, in accordance with LAC 33:V.3511.C. Any modification shall be subject to LAC 33:V.321, 322 and 323, where applicable.
- III.O.3. Notification of Closure. The Permittee shall notify the Administrative Authority at least 45 days prior to the date he expects to begin closure in accordance with LAC 33:V.3511.D.
- III.O.4. Time Allowed For Closure. After receiving the final volume of hazardous waste, the Permittee shall treat or remove from the site all hazardous waste in accordance with the schedule specified in the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3513.
- III.O.5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and dispose all facility equipment in accordance with the closure plan referenced in Attachment 1 and in accordance with LAC 33:V.3515.
- III.O.6. Certification of Closure. The Permittee shall certify that the facility has been closed in accordance with the specifications in the closure plan as required by LAC 33:V.3517.
- III.O.7. Inventory at Closure. The Permittee shall be responsible for closure cost based upon the maximum permitted facility inventories listed below in Tables 1, 2, and 3.

**TABLE 1**  
**(15) Existing Hazardous Waste Tanks**

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
D-136	TDA Tar Residue Treatment Drum	Reference the Part A Application of this Permit for the waste codes	13,200
D-137	TDA Tar Residue Treatment Drum		13,200
D-138	TDA Tar/Alcohol Storage		85,216
D-216	NVP Heavy Ends Storage Drum		993
D-292	Storage of NVP Residue		27,468
TK-337 X	Light Ends Storage		37,337
D-465	Feed Tank for BD Light Ends		23,457
TK-501	Feed Tank for MNB Residue		27,000
TK-502	Feed Tank for Aniline Residue		27,000
D-721 A	Wet Toluene Storage		26,633
D-721 B	Toluene and Tar Residue Storage Drum		23,532
TK-796	Feed Tank for Poly THF		85,502
D-1400	Feed Tank for Light Ends Residue		27,154
D-1410	Feed Tank for Light Ends Residue		27,154
D-1420	Storage of Plant Wastes		91,402

**TABLE 2**  
**(3) Existing Container Storage Areas**

CONTAINER STORAGE	LOCATION	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)*
TDI Container Storage	ISO Shipping	TDI Waste Streams	28,600
Maintenance Container Storage	Utilities Plant	Miscellaneous Site-Wide Generated Wastes	22,000 Or 400 Containers (Drums)
Wastewater Container Storage	Utilities Plant	Wastewater Treatment Generated Solids*	26,100 Or 3 Sludge Boxes and 32 Containers (Drums)

\*The Wastewater Container Storage Unit contains no free liquids.

**TABLE 3**  
**(4) Existing Combustion Units**

Combustion Unit	Service	Location	Maximum Capacity
Amines Boiler	Light Ends Liquid Waste	Amines Process Plant	8,700,000 BTU/hr
Utilities Boiler #3	Liquid Waste	TDI Plant	285,000,000 BTU/hr
Utilities Boiler #6	Liquid Waste	TDI Plant	312,000,000 BTU/hr
Aniline Incinerator	Liquid Waste	Aniline Plant	0.978 Short Tons/hr

### **III.P. POST-CLOSURE**

The Permittee must attempt to clean close all hazardous waste units. If the facility cannot be clean closed, the Permittee shall submit a post-closure plan for approval by the Administrative Authority. If some waste residues or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519-3527, including maintenance and monitoring throughout the post-closure care period.

### **III.Q. COST ESTIMATE FOR CLOSURE/POST-CLOSURE**

- III.Q.1.** The Permittee must maintain cost estimates for closure of facilities in accordance with LAC 33:V.3705 and 3707.
- III.Q.2.** The Permittee shall maintain and adjust the closure cost estimate for inflation, as specified in LAC 33:3705.B, 3705.C, and for other circumstances that increase the cost of closure.
- III.Q.3.** The Permittee must adjust the closure cost estimate within thirty (30) days after approval by the administrative authority of any request to modify the closure plan in accordance with LAC 33:V.3705.C. The Permittee shall consider the impact of any inventory and or process changes on the closure cost estimate.
- III.Q.4.** The closure cost estimate must equal the cost of closure at the point in the facility's operating life when the extent and manner of its operation would make closure most expensive. The closure cost estimate shall be based on the maximum permitted inventory of each facility as specified in Condition III. Tables 1, 2, and 3 of this permit.
- III.Q.5.** If the Permittee is unable to complete closure of all facilities specified in Condition III. Tables 1, 2, and 3 of this permit as per LAC 33:V. Chapter 35 and as acceptable by the Administrative Authority, a Post-Closure Plan must be submitted for each facility failing to achieve clean closure within 90 days from the date that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

**III.R. FINANCIAL ASSURANCE FOR CLOSED UNITS**

The Permittee shall establish and maintain financial assurance for closure in accordance with LAC 33:V.3707 for all units listed under Condition III.O.7.

**III.S. LIABILITY REQUIREMENTS**

The Permittee shall have and maintain liability coverage for sudden accidental occurrences in the amounts of \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs, as required by LAC 33:V.3715.A. The Permittee shall have and maintain liability coverage for non-sudden accidental occurrences in the amounts of \$3,000,000 each occurrence and \$6,000,000 annual aggregate, exclusive of legal defense costs, as specified in LAC 33:V.3715.B.

**III.T. INCAPACITY OF THE PERMITTEE**

The Permittee must comply with LAC 33:V.3717 whenever bankruptcy is initiated for the Permittee or its institutions providing financial assurance. If insurance is used for compliance with LAC 33:V.3715, the Permittee must immediately notify the Administrative Authority if the insurance company is placed in receivership. The Permittee must establish other financial assurance or liability coverage within sixty (60) days after such an event.

**III.U. POST-CLOSURE NOTICES**

Reserved.

#### IV. PERMITTED FACILITIES

##### IV.A. TANKS

Details of the existing tanks listed in Table 4, including design and operational specifications, are contained in Permit Condition V.B.

**TABLE 4**  
**(1) Existing Hazardous Waste Tanks**

TANKS	SERVICE	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)
D-136	TDA Tar Residue Treatment Drum	Reference the Part A Application of this Permit for the waste codes	13,200
D-137	TDA Tar Residue Treatment Drum		13,200
D-138	TDA Tar/Alcohol Storage		85,216
D-216	NVP Heavy Ends Storage Drum		993
D-292	Storage of NVP Residue		27,468
TK-337 X	Light Ends Storage		37,337
D-465	Feed Tank for BD Light Ends		23,457
TK-501	Feed Tank for MNB Residue		27,000
TK-502	Feed Tank for Aniline Residue		27,000
D-721 A	Wet Toluene Storage		26,633
D-721 B	Toluene and Tar Residue Storage Drum		23,532
TK-796	Feed Tank for Poly THF		85,502
D-1400	Feed Tank for Light Ends Residue		27,154
D-1410	Feed Tank for Light Ends Residue		27,154
D-1420	Storage of Plant Wastes	91,402	

##### IV.B. CONTAINER STORAGE

The container storage areas listed in Table 5 below are permitted to store hazardous waste in properly labeled and sealed containers and roll-off boxes which have been specified for this purpose and are compatible with the contained waste. The 55-gallon drums and roll-off boxes shall be stored in accordance with LAC 33:V.2109.

The 55-gallon drums shall be stored on pallets stacked at a maximum of two (2) high and no more than four (4) large containers per tier on the pallet and conform to LAC 33.V.2109.B. The pallets shall be placed in rows with a minimum of two (2) feet of aisle space between rows.

The roll-off boxes shall be stored with a minimum of two (2) feet of aisle space between rows. The roll-off boxes must remain covered when not in use and must be clearly labeled in order to easily identify the hazardous contents.

**TABLE 5  
(2) Existing Container Storage Areas**

CONTAINER STORAGE	LOCATION	TOTAL AREA LIMITS (SQ. FT)	WASTE	MAXIMUM PERMITTED CAPACITY (GALLONS)*
TDI Container Storage	ISO Shipping	2700	TDI Waste Streams	28,600 Or 520 Containers (Drums)
Maintenance Container Storage	Utilities Plant	2700	Miscellaneous Site-Wide Generated Wastes	22,000 Or 400 Containers (Drums)
Wastewater Container Storage	Utilities Plant	3750	Wastewater Treatment Generated Solids*	26,100 Or 3 Sludge Boxes and 32 Containers (Drums)

\* The Wastewater Container Storage Unit contains no free liquids.

**IV.C. COMBUSTION UNITS**

Details of the existing tanks listed in Table 6, including design and operational specifications, are contained in Permit Condition V.B.

**TABLE 6  
(4) Existing Combustion Units**

Combustion Unit	Service	Location	Maximum Capacity
Amines Boiler	Light Ends Liquid Waste	Amines Process Plant	8,700,000 BTU/hr
Utilities Boiler #3	Liquid Waste	TDI Plant	285,000,000 BTU/hr
Utilities Boiler #6	Liquid Waste	TDI Plant	312,000,000 BTU/hr
Aniline Incinerator	Liquid Waste	Aniline Plant	0.978 Short Tons/hr

**V. PERMIT CONDITIONS APPLICABLE TO PERMITTED FACILITIES**

**V.A TANKS**

**V.A.1 Description of Tank Systems**

**V.A.1.a Operation**

- V.A.1.a.(1) All permitted tanks and associated piping, pumps, instruments, containments, and vent controls shall be operated and maintained in accordance with LAC 33:V.Chapter 19, the specification and design criteria submitted in the Part B Permit Application, and the design limits specified in Table 20.
- V.A.1.a.(2) The design temperature and pressure for each tank shall not change from the one listed in Table 20, unless a permit modification is approved by the Department.

**V.A.1.b Permitted Tanks**

- V.A.1.b.(1) The tank systems listed in Table 4 are permitted to be used for hazardous waste storage or treatment. These tanks have been certified by an independent, professional engineer licensed in the state of Louisiana to have sufficient structural integrity for storage of hazardous waste.
- V.A.1.b.(2) All of the tank systems listed in Table 4 and 20 must be clearly marked with the words "Hazardous Waste".
- V.A.1.b.(3) The Permittee is prohibited from storing or treating hazardous waste in any tank storage system not listed in Table 4 for greater than 90 days, unless an extension is granted by the Department, the activity is exempt from regulations, or an Emergency Permit is issued.
- V.A.1.b.(4) The Permittee is prohibited from storing any hazardous waste received from offsite in any tank storage system not listed in Table 4.

**V.A.1.c Proposed Tanks**

Tank TK-1420 is a new tank system. This tank shall not be placed in hazardous waste service until the Permittee has complied with LAC 33:V.303.I and the system is tested for tightness. The tank shall be installed in accordance with the requirements of LAC 33:V.1905.

**V.A.2 Permitted and Prohibited Wastes**

**V.A.2.a Permitted Waste**

Subject to the terms of this Permit, the Permittee is allowed to store or treat in the tanks described in Condition V.A.1.b of this Permit the hazardous wastes identified in the most current Part A Permit Application.

**V.A.2.b Prohibited Waste**

The Permittee is prohibited from storing hazardous waste that is not identified in Condition V.A.2.a of this Permit.

**V.A.3 Secondary Containment**

**V.A.3.a Duty to Comply with LAC 33:V.1907.B through F**

The Permittee shall design, construct, operate, and maintain the secondary containment system in accordance with LAC 33:V.1907.B-F, the Part B Permit Application, and Table 20 of this Permit.

**V.A.3.b Prevention of Migration**

**V.A.3.b.(1)** Secondary containment systems must be maintained and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, groundwater, or surface water at any time during the use of the tank system.

**V.A.3.b.(2)** Ancillary equipment must be provided with secondary containment, except as excluded by LAC 33:V.1907.F.

**V.A.3.b.(3)** Secondary containment systems must be free of cracks or gaps and other surface defects that would allow liquid to migrate out of the containment system.

**V.A.3.b.(4)** Spilled or leaked waste must be removed from the secondary containment system within 24 hours or in as timely a manner as is possible to prevent harm to human health and the environment if it can be demonstrated that removal cannot be accomplished within 24 hours.

**V.A.3.b.(5)** Accumulated precipitation must be removed from the secondary containment system within 24 hours or in as timely a manner as is possible.

**V.A.4 Operating Requirements**

**V.A.4.a Duty to Comply with LAC 33:V.1909.A**

The Permittee shall comply with LAC 33:V.1909.A. Hazardous wastes or treatment reagents must not be placed in a tank system if they could cause the tank, its ancillary equipment, or the containment system to rupture, leak, corrode, or otherwise fail.

**V.A.4.b Duty to Comply with LAC 33:V.1909.B**

The Permittee shall comply with LAC 33:V.1909.B and Table 20 of this Permit. The Permittee must use appropriate controls and practices to prevent spills and overflows from tanks and containment systems.

**V.A.4.c Tank Covers**

All hazardous waste storage tanks shall be covered and shall not be vented directly to the atmosphere if the tanks are used to store, or if a possibility exists that they may be used to store, volatile or malodorous waste.

**V.A.4.d Maintenance**

The Permittee shall maintain the permitted tank systems according to the design code specified for each tank as listed in Table 20 and not exceed the listed operating conditions.

**V.A.5 Ignitable, Reactive, and Incompatible Wastes**

The Permittee shall store ignitable, reactive, or incompatible wastes only in accordance with LAC 33:V.1517.B, 1917 and 1919.

## **V.A.6 Inspections**

### **V.A.6.a Inspection Schedule**

The Permittee shall comply with LAC 33:V.1911.A through C by following the inspection schedule submitted in the Part B Permit Application.

### **V.A.6.b Daily Inspection**

**V.A.6.b.(1)** At least once per day while the tank is operating in hazardous waste service, the Permittee shall inspect the following:

**V.A.6.b.(1)(a)** Aboveground portions of the tank system, including the tank, ancillary piping, valves, and vent controls, to detect corrosion, cracks or releases of waste.

**V.A.6.b.(1)(b)** Data gathered from monitoring and leak detection equipment.

**V.A.6.b.(1)(c)** The construction materials and area immediately surrounding the externally accessible portion of the tank system and ancillary equipment, e.g. secondary containment system, to detect erosion, cracks and signs of hazardous waste releases.

**V.A.6.b.(3)** All deficiencies noted during daily inspections must be recorded and remedied in a timely manner.

### **V.A.6.c External Inspection**

At a minimum, external inspection of each tank covered by this Permit shall be performed as often as required by the inspection standard in Table 20. The required frequency of inspection with reference to the applicable Condition of the standard shall be kept on site and available for review by the Department upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 20. The inspection checklist shall be comparable to that in Appendix C of API Standard 653.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

#### **V.A.6.d Internal Inspection**

Internal inspection of each tank covered by this Permit shall be performed as often as required by the inspection standard in Table 20. The required frequency of inspection with reference to the applicable Condition of the standard shall be kept on site and available for review by the Department upon request. The inspection shall be performed by a person meeting the minimum qualifications required under the inspection standard in Table 20. The inspection checklist shall be comparable to that in Appendix C of API Standard 653.

If the result of such an inspection reveals that the tank is unfit for continued service, the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

#### **V.A.6.e Thickness Testing**

**V.A.6.e.(1)** Thickness testing of each metallic tank covered by this Permit shall be performed biennially.

**V.A.6.e.(2)** Tank thickness measurements shall be taken on the tank top and shell for each vertical tank and on the tank shell and heads for each horizontal tank and shall be taken at least on each tank quadrant. Tank thickness readings shall be taken in the same place during each testing event in order to form a comparison of readings for corrosion rate determination.

**V.A.6.e.(3)** Thickness testing of the tank bottom shall occur as often as the internal inspection or more often if required by the appropriate inspection standard in Table 20. The required frequency of inspection with reference to the applicable Condition of the standard shall be kept on site and available for review by the Department upon request.

V.A.6.e.(4) Tank thickness readings shall also be taken at any spot where visual corrosion or compromised integrity is evident.

V.A.6.e.(5) When any tank shell thickness measurement at a single point is less than that required in Table 20, the Permittee shall immediately comply with either V.A.6.e.(5)(a) or (b) below. Condition V.A.6.e.(5)(b) shall not be used for any tank where the shell thickness measurement is less than 0.100 inches.

V.A.6.e.(5)(a) The tank shall be deemed unfit for use, and the Permittee shall immediately stop the flow of hazardous waste into the tank and comply with LAC 33:V.1913. The tank shall be repaired or replaced and the certification required by LAC 33:V.1913.F shall be obtained before the tank is put back into service.

V.A.6.e.(5)(b) An engineering evaluation shall be performed, conforming to the appropriate standard or standards, as allowed by the design or inspection standard in Table 20. If the evaluation determines that the tank is unfit for service, the Permittee shall comply with Condition V.A.6.e.(5)(a) of this Permit immediately. The evaluation must be submitted to the Waste Permits Division for approval within forty-five (45) days of the initial measurement.

V.A.6.e.(6) Tank thickness measurements shall not be averaged, unless allowed under the tank inspection standard in Table 20.

**V.A.6.f Overfill Controls**

Overfill controls shall be inspected daily to ensure that they are in working order.

**V.A.7 Response to Leaks or Spills**

**V.A.7.a Duty to Comply with LAC 33:V.1913.A through E**

In the event of a leak or spill from a tank system, secondary

containment system, or if a system becomes unfit for use, the Permittee shall comply with LAC 33:V.1913.A through E.

**V.A.7.b Leaks and Spills**

**V.A.7.b.(1)** Upon discovering a leak or spill, the Permittee must immediately stop the flow of hazardous waste into the tank system or secondary containment system and inspect the system to determine the cause of the release.

**V.A.7.b.(2)** Within 24 hours of detecting a leak from the tank system, or in as timely a manner as is practical if the Permittee demonstrates that is not possible to remove the waste within 24 hours, the Permittee must remove as much waste as necessary to prevent further release from the tank or secondary containment system and to allow inspection and repair of the tank system.

**V.A.7.b.(3)** Any spilled material or material trapped in sumps that is a hazardous waste or that will be disposed of as a hazardous waste must be cleaned up in a timely manner, as required by LAC 33:V.1505.C.3.

**V.A.7.b.(3)(a)** If the collected material is discharged through a point source to United States water or to a Publicly Owned Treatment Works, it is subject to the requirements of the Clean Water Act.

**V.A.7.b.(3)(b)** If the collected material is released to the environment, it may be subject to reporting under applicable requirements of LAC 33:V.1505, LAC 33:I.Chapter 39, and 40 CFR Part 302.

**V.A.7.b.(4)** When a leak or spill occurs, the Permittee shall remove and properly dispose of any visible contamination of the soil or surface water.

**V.A.7.b.(5)** A tank system from which a leak or spill has occurred must be closed in accordance with the approved Closure Plan and LAC 33:V.1915, unless the requirements of LAC 33:V.1913.E.2-3 are satisfied.

**V.A.7.b.(5)(a)** For a release caused by a spill that has not damaged the integrity of the system, the Permittee shall remove the released waste and make any necessary repairs to fully restore the integrity of the system before returning the tank system to service.

**V.A.7.b.(5)(b)** For a release caused by a leak from the primary tank system to the secondary containment system, the Permittee shall repair the primary system prior to returning the tank to service.

**V.A.7.b.(6)** If the Permittee replaces a component of the tank system to eliminate a leak, that component must satisfy the requirements for new tank systems or components in LAC 33:V.1905 and 1907.

**V.A.7.b.(7)** All leaks and spills shall be documented in the daily inspection log.

**V.A.7.c Major Repairs**

**V.A.7.c.(1)** The Permittee shall comply with LAC 33:V.1913.F when performing major repairs to a tank system.

**V.A.7.c.(2)** Major repairs shall include, but not be limited to, installation of an internal liner, repair of a ruptured tank, repair of a ruptured secondary containment area, and removal of a tank from its foundation for any reason.

**V.A.7.c.(3)** The Permittee shall conform to the appropriate portion of the most recent inspection code listed in Table 20 for maintenance, inspection, re-rating, repair, and alteration of all tanks.

**V.A.7.c.(4)** The tank shall not be returned to service unless the Permittee has obtained a certification by an independent, registered professional engineer that the system is capable of handling hazardous waste without release for the intended life of the system. The certification of repairs shall include an inspection in accordance with the requirements of any applicable codes, such as API 510 or API 653. The certification shall be submitted to the Department within seven (7)

days of returning the tank system to use.

**V.A.8 Air Emission Control Equipment Standards**

The Permittee shall comply with the applicable requirements for air emission control equipment for hazardous waste tanks in LAC 33:V.1747-1799 and Condition V.I of this Permit.

**V.A.9 Recordkeeping**

**V.A.9.a New Tanks**

The Permittee shall obtain, and keep on file at the facility, the written statements by those persons required to certify the design and installation of new tank systems, in accordance with LAC 33:V.1905.G.

**V.A.9.b Written Assessment**

The Permittee shall keep on file at the facility, written assessments of the tank systems' integrity. Assessments shall be updated at the time of submittal of the Permit Renewal Application and at any other time deemed necessary by the Department.

**V.A.9.c Inspections**

**V.A.9.c.(1)** The Permittee shall document in the operating record for the facility inspection of those items in Condition V.A.6.(a)-(b) of this Permit.

**V.A.9.c.(1)(a)** The daily log sheets shall include all monitored parameters for the prevention of spills and overflows, including temperature, pressures, levels, and pump flows into and out of the tanks.

**V.A.9.c.(1)(b)** The Permittee shall note all deficiencies discovered during the inspection in the inspection log.

**V.A.9.c.(1)(c)** Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

**V.A.9.c.(2)** The Permittee shall document in the operating record all tests and inspections of overfilling controls.

**V.A.9.c.(3)** The Permittee shall keep on file at the facility the results of the internal and external inspections required by Condition V.A.6.(c)-(d) of this Permit. The Permittee shall note all deficiencies discovered during the inspection in the inspection log. Corrective action taken in response to deficiencies must be included as part of the operating record for the facility.

**V.A.9.c.(4)** The Permittee shall keep on file all information related to tank thickness testing required under Condition V.A.6.(e) of this Permit.

**V.A.9.c.(4)(a)** This information shall include, at a minimum, the date(s) of assessment, the location where measurement readings are taken, the raw measurement data, comparison of actual reading to minimum thickness requirements, the corrosion rate, and calculation of remaining tank life.

**V.A.9.c.(4)(b)** If an engineering evaluation is performed in accordance with Condition V.A.6.e.(5)(b) of this Permit, the results of such an evaluation shall be kept in the operating record. The engineering evaluation must include, at a minimum, details on how the evaluation was performed, references to applicable tank codes, raw data, calculations performed, and an explanation of why the tank is or is not fit for continued service.

**V.A.9.c.(4)(c)** Any tank thickness measurements that are averaged under Condition V.A.6.e.(6) of this Permit must be supported by documentation with references to the applicable tank codes. The documentation shall include all raw measurement data, calculations, and results of averaging. This information shall be kept as a part of the operating record for the facility.

**V.A.9.d Releases**

**V.A.9.d.(1)** The Permittee shall keep on file at the facility, notification reports submitted under LAC 33:V.1913.D.

**V.A.9.d.(2)** Within twenty-four (24) hours of detecting a reportable leak or spill from a tank system or secondary containment system to the environment, the Permittee shall report the leak or spill to the Department's Single Point of Contact.

**V.A.9.d.(3)** Within thirty (30) days of detecting a reportable release to the environment from a tank system or secondary containment system, the Permittee shall report the following information to the Department's Single Point of Contact:

**V.A.9.d.(3)(a)** Likely route of migration of the release,

**V.A.9.d.(3)(b)** Characteristics of the surrounding soil, including soil composition, geology, hydrogeology, and climate,

**V.A.9.d.(3)(c)** Results of any monitoring or sampling conducted in connection with the release (if available). If the Permittee finds it will be impossible to meet this time schedule, the Permittee must provide the Department with a schedule of when the results will be available. This schedule must be provided before the required thirty day submittal period expires,

**V.A.9.d.(3)(d)** Proximity of downgradient drinking water, surface water, and populated areas, and

**V.A.9.d.(3)(e)** A description of response actions taken or planned.

**V.A.9.e Repairs**

The Permittee shall keep on file at the facility all certifications required by Condition V.A.7.c of this Permit.

**V.A.10 Closure and Post-Closure Care**

**V.A.10.a Duty to Comply with LAC 33:V.1915.A**

The Permittee shall comply with LAC 33:V.1915.A by following the procedures specified in the Closure Plan, Attachment 1.

**V.A.10.b Duty to Comply with LAC 33:V.1915.B**

If the Permittee demonstrates that not all contaminated soils can be practicably removed or decontaminated in accordance with Condition V.A.10.a of this Permit, the Permittee shall comply with LAC 33:V.1915.B.

**V.A.10.c Post-Closure**

The Permittee shall attempt to clean close all tank systems. If a tank cannot be clean closed and the Permittee has not demonstrated through a risk assessment approved by the Department that closure with the remaining contaminant levels is protective of human health and the environment, the Permittee shall present a post-closure plan to the Department for approval. If any waste residue or contaminated materials are left in place at final closure, the Permittee must comply with all post-closure requirements contained in LAC 33:V.3519 and 3527, including maintenance and monitoring throughout the post-closure care period.

**V.B. CONTAINER STORAGE**

The permit conditions as set forth under this Condition shall apply where applicable, to the permitted container storage facilities as designated in Condition IV.A. BASF does not currently receive waste via truck or railcar.

- V.B.1. The permittee shall be in compliance with all appropriate conditions set forth in LAC 33:V.2101.
- V.B.2. The Permittee shall maintain all containers in accordance with LAC 33:V.2107.A.
- V.B.3. The Permittee will assure the integrity of the containers in accordance with LAC 33:V.2105.
- V.B.4. The Permittee must manage the containers in accordance with LAC 33:V.2107.A and B.
- V.B.5. The Permittee must inspect the containers and storage areas in accordance with LAC 33:V.2109 and LAC 33:V.1509. Results of such inspections must be placed in the operating record in accordance with LAC 33:V.1529.B.8. Any incident involving leaking containers and spilled materials reportable under applicable regulations (RCRA, CWA, SARA) shall be detailed in the annual report due by March 1 of each year.
- V.B.6. The Permittee shall store all wastes in containers that are compatible with the hazardous wastes and in accordance with DOT standards listed in 49 CFR 173 and 178
- V.B.7. The Permittee must maintain the containment storage area as required by LAC 33:V.2111.A, B.1, 2 and 3.
- V.B.8. The Permittee must manage spilled or leaked waste and accumulated precipitation according to LAC 33:V.2111.B.5.
- V.B.9. The Permittee must manage any collected material as required by LAC 33:V.2111.B.6. Stormwater shall be contained until analysis establishes that it meets permit limitation criteria for discharge through the NPDES treatment system, or other authorized disposal methods.
- V.B.10. The Permittee must place and store incompatible, ignitable, and reactive wastes only in accordance with LAC 33:V.1517, 2113, and 2115.

- V.B.11. The Permittee shall store hazardous waste in accordance with LAC 33:V.2109 and Condition IV.B of this permit.
- V.B.12. The Contingency Plan shall be activated when warranted by an emergency and reported as required by LAC 33:V.1513.
- V.B.13. The Permittee must insure that all hazardous waste personnel receive initial and continued training to insure compliance with LAC 33:V.1515, and maintain an emergency response program in compliance with LAC 33:V.1525.
- V.B.14. The Permittee must control and report all point source discharges according to LAC 33:V.1505.
- V.B.15. Where applicable, all trucks and railcars containing hazardous waste shall be managed only in areas designed and utilized for managing such vehicles. These areas must meet the requirements of LAC 33:V.1527 and 2111. All container truck transfer and container rail transfer facilities shall be designed with sufficient spill containment and in accordance with the applicable regulations to protect human health and environment.
- V.B.16. Any trucks or railcars loaded with hazardous wastes shall remain on-site for no more than twenty-four (24) hours. Hazardous waste remaining in a truck trailer, truck tanker, or railcar beyond the twenty-four (24) hour time frame without being off-loaded will constitute storage and thus require a hazardous waste storage permit from the Department.
- V.B.17. A representative sample of the hazardous waste in any waste shipment must be analyzed in accordance with the Waste Analysis Plan to verify pertinent information on the manifest. The quantity of waste received must be recorded and chemical and physical characteristics identified with regard to ignitability, reactivity, and incompatibility in accordance with LAC 33:V.2113 and 2115.
- V.B.18. The Permittee shall not exceed the maximum capacity listed under Part IV, Condition B, of this permit for each container storage area listed.
- V.B.19. At closure, the Permittee shall adhere to the procedures detailed in the approved closure plan referenced in Attachment 1 of this permit and as required by LAC 33:V.2117 and Chapter 35, Closure Requirements. If the facility cannot be clean closed, a Post-Closure Plan must be submitted for each container storage area failing to achieve clean closure (or an alternate closure standard approved under LAC 33:V.3501.D.2. or LAC 33:V.3507.B.) within 90 days from the date

that the Permittee or Administrative Authority determines that the unit must be closed as a landfill. The Post-Closure Plan must meet the requirements of LAC 33:V.3523.B.

**V.B.20.** The Permittee shall always maintain enough secondary containment capacity to contain at least ten percent (10%) of the total volume of containers or the volume of the largest container, whichever is greater in accordance with LAC 33:V.2111.B.3. Containers that do not contain free liquids (per the Paint Filter Liquids Test) do not need to be considered in this determination.

## **V.C GENERAL REQUIREMENT FOR BOILERS**

### **V.C.1 Inspections**

#### **V.C.1.a Requirements**

**V.C.1.a.(1)** The Permittee shall inspect the boilers and instrumentation in accordance with Table 7 of this Permit.

**V.C.1.a.(2)** The boilers and associated equipment (pumps, valves, pipes, fuel storage tanks, and other ancillary equipment) will be subject to a daily thorough, visual inspection, when they contain hazardous waste. The purpose of these inspections will be to identify leaks, spills, fugitive emissions, and signs of tampering. The automatic waste feed cut off system and associated alarms must be tested at least once every 7 calendar days when hazardous waste is burned to verify operability, unless the applicant demonstrates to the Administrative Authority that weekly inspections will unduly restrict or upset operations and that less frequent inspections are adequate. Support for this demonstration shall be included in the operational record. At a minimum, operational testing of the automatic waste feed cut off system must be conducted at least monthly, (LAC 33:V.3005 F.3 and F.4).

#### **V.C.1.b Records**

**V.C.1.b.(1)** Written inspection records shall be part of the operating record for this Permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection, (2) inspector's name, (3) any inspection observations, and (4) date and nature of corrective action. The inspection record shall be completed in accordance

with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

- V.C.1.b.(2) A written record of the automatic waste feed cut-off system tests shall be part of the operating record for this Permit and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

**V.C.2 Monitoring and Calibration**

**V.C.2.a Requirements**

- V.C.2.a.(1) The Permittee shall maintain, calibrate, and operate continuous monitors that monitor and record the operating conditions specified in Conditions V.D, V.E, and V.F of this Permit. The continuous monitoring requirements shall be as specified in Tables 6-10 of this Permit. (LAC 33:V.3005.F)

- V.C.2.a.(2) The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

- V.C.2.a.(3) Monitoring samples and measurements shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V. Chapter 49.Appendix D or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised; *Standard Methods for the Examination of Water and Wastewater*, current edition, or equivalent methods.

- V.C.2.a.(4) The Permittee must calibrate the equipment specified in Tables 12-14 according to the manufacturer's specifications. Calibration procedures shall be included in the operating record of the facility and available at all times for review by the Administrative Authority.

**V.C.2.a.(5)** Hazardous waste may continue to be introduced into the boilers during daily continuous emission monitoring system (CEMS) calibration check periods. The CEMS shall be maintained according to the following schedule: (1) at least daily, a calibration check of the instrument; (2) at least daily, a system audit; (3) at least quarterly, a calibration error test; and (4) at least annually, a performance specification test. The procedures for CEMS maintenance are outlined in 40 CFR 266 Appendix IX Condition 2.0, "Performance Specifications for Continuous Emission Monitoring Systems."

### **V.C.2.b Records**

In the operating record, the Permittee shall record and maintain in accordance with LAC 33:V.1529 all monitoring data compiled to satisfy the permit requirements. Minimum monitoring requirements are summarized in LAC 33:V.3005.F. In accordance with LAC 33:V.3005.F.2, all continuous monitors shall record data in units corresponding to the permit limit unless otherwise specified in the permit.

*Electronic records may be maintained, in lieu of paper copies.*

## **V.C.3 Performance Standards**

### **V.C.3.a Requirements**

The Permittee shall comply with the performance standards specified in this Permit when hazardous waste is burned in the boilers.  
(LAC 33:V.3009-3015)

**V.C.3.a.(1)** The boilers shall achieve a Destruction and Removal Efficiency (DRE) of 99.99 percent for each principal organic hazardous constituent (POHC). The DRE shall be determined by using the method specified in LAC 33:V.3009.A.

**V.C.3.a.(2)** The Permittee shall control hydrogen chloride (HCl) emissions such that the rate of emission from the stack is no greater than that specified in LAC 33:V.3015.

**V.C.3.a.(3)** The emissions of particulate matter shall not exceed 0.08 grains per dry standard cubic foot of stack gas, corrected to 7 percent oxygen by volume, in accordance with the formula specified in LAC 33:V.3011.

**V.C.3.a.(4)** The emissions of carbon monoxide, corrected to 7 percent oxygen, shall not exceed 100 parts per million by volume on an hourly rolling average in accordance with LAC 33:V.3009.B.

**V.C.3.b Records**

The Permittee shall record in the facility operating record all occasions on which waste is fed to the boilers and when the operating limits specified in this Permit are exceeded.

Electronic records may be maintained, in lieu of paper copies.

**V.C.4 Automatic Waste Feed Cut Off**

**V.C.4.a Requirements**

**V.C.4.a.(1)** The Permittee shall operate the systems specified in Tables 8-10 of this Permit to automatically cut off the hazardous waste feed when the monitored operating conditions deviate from the set points specified in the permit.

**V.C.4.a.(2)** Operating parameters for which permit limits are established must continue to be monitored following the cut off, and the hazardous waste feed shall not be restarted until the levels of those parameters that caused the automatic waste feed cut off are restored to permit limits. All other parameters must also be within permit limits.

**V.C.4.a.(3)** In the event of a malfunction of the automatic waste feed cut off system, the Permittee shall immediately cut off and/or lock out the waste feed.

**V.C.4.b Records**

**V.C.4.b.(1)** The Permittee shall record in the facility operating record the date and time of all automatic waste feed cut off events. The records shall also include the known or suspected cause of the automatic waste feed cut off, the triggering parameters, the corrective actions taken, the duration of the event, and the date and time of restarting waste feed following the automatic waste feed cut off.

Electronic records may be maintained, in lieu of paper copies.

V.C.4.b.(2) The Permittee shall record in the facility operating record all failures of the automatic waste feed cut off system, including the date and time of the failure, a description of the failure, root cause of the failure, and corrective actions taken.

V.C.4.b.(3) The operating record shall be maintained in an organized manner for a period of not less than 3 years and be available at all times for inspection by the Administrative Authority. (LAC 33:V.3005.H)

#### **V.C.5 Reports**

The date, cause, and remedial action for each waste feed cut off activation shall be documented in the operating record. A summary of such occurrences must be included in the annual report. The Permittee shall report in writing to the Administrative Authority if there are more than 50 Permit required waste feed cut offs per month. This report shall include cause and remedial actions taken.

#### **V.C.6 Regulation Of Residues**

The Permittee shall regulate all hazardous waste combustion residues in accordance with LAC 33:V.3025.

**TABLE 7  
COMBUSTION UNIT INSPECTIONS**

<b>Equipment/Instrument</b>	<b>Inspection Elements</b>	<b>Inspection Frequency</b>
Burner system	Leaks in manifold	Daily
Waste feed system	Atomizing fluid pressure transducer	Daily
	Waste feed pressure transducer	Daily
	Waste feed flowmeter	Daily
Waste tank system	Tank integrity	Daily
	Level controls	Daily
	Overflow alarms and controls	Daily
	Secondary containment	Daily
Boilers	Fugitive emissions	Daily
	Refractory	During each turnaround
Continuous process monitors	Out-of-tolerance operational data	Daily
Automatic waste feed cut off system	Operability	Amines Boiler – Weekly Utilities #3 and #6 Boilers - Monthly

**TABLE 8  
GROUP A PARAMETER LIMITS FOR THE AMINES BOILER  
(AUTOMATIC WASTE FEED CUT OFFS)**

<b>Control Parameter</b>	<b>Final Operating Limits Automatic Waste Feed Cut Off Point</b>
Maximum hazardous waste feed rate	1206 lb/hr, hourly rolling average
Minimum combustion zone temperature	Minimum Oxidizer temperature: 1990°F, instantaneous  Minimum ReOxidizer temperature: 1596°F, instantaneous
Maximum combustion zone pressure	0 inches water column, instantaneous
Maximum ID fan flue gas flow rate	3588 scfm, hourly rolling average
Maximum stack gas carbon monoxide	100 ppmv, corrected to 7% oxygen on a dry gas basis, hourly rolling average

**TABLE 9  
GROUP A PARAMETER LIMITS FOR THE UTILITIES #3 BOILER  
(AUTOMATIC WASTE FEED CUT OFFS)**

<b>Control Parameter</b>	<b>Final Operating Limits Automatic Waste Feed Cut Off Point</b>
Maximum hazardous waste feed rate	20 lb/hr, hourly rolling average
Maximum and Minimum steam production rate	Minimum steam production rate: 87,400 lb/hr, instantaneous  Maximum steam production rate: 172,533 lb/hr, instantaneous
Maximum forced draft fan flow	86% of scale, hourly rolling average
Maximum stack gas carbon monoxide	100 ppmv, corrected to 7% oxygen on a dry gas basis, hourly rolling average

**TABLE 10  
GROUP A PARAMETER LIMITS FOR THE UTILITIES #6 BOILER  
(AUTOMATIC WASTE FEED CUT OFFS)**

<b>Control Parameter</b>	<b>Final Operating Limits Automatic Waste Feed Cut Off Point</b>
Maximum hazardous waste feed rate	11 lb/hr, hourly rolling average
Maximum and Minimum steam production rate	Minimum steam production rate: 95,833 lb/hr, instantaneous  Maximum steam production rate: 210,000 lb/hr, instantaneous
Maximum forced draft fan flow	70% of scale, hourly rolling average
Maximum stack gas carbon monoxide	100 ppmv, corrected to 7% oxygen on a dry gas basis, hourly rolling average

**TABLE 11  
GROUP B AND C PARAMETER LIMITS FOR THE AMINES BOILER**

<b>Control Parameter</b>	<b>Final Operating Limit</b>
Minimum atomizing fluid pressure	79.60 psig, instantaneous
Maximum ash feed rate	0.704 lb/hr, hourly rolling average
Maximum total chlorine and HCl feed rate (Adjusted Tier 1)	96 g/hr, hourly rolling average
Maximum heat input from all streams	8,700,000 Btu/hr, hourly rolling average
Maximum feed rate of Antimony (Adjusted Tier 1)	153.01 g/hr, hourly rolling average
*Maximum feed rate of Arsenic (Adjusted Tier 1)	0.16 g/hr, hourly rolling average
Maximum feed rate of Barium (Adjusted Tier 1)	25,458 g/hr, hourly rolling average
*Maximum feed rate of Beryllium (Adjusted Tier 1)	0.12 g/hr, hourly rolling average
*Maximum feed rate of Cadmium (Adjusted Tier 1)	0.15 g/hr, hourly rolling average
*Maximum feed rate of Chromium (Adjusted Tier 1)	0.34 g/hr, hourly rolling average
Maximum feed rate of Lead (Adjusted Tier 1)	40 g/hr, hourly rolling average
Maximum feed rate of Mercury (Adjusted Tier 1)	36 g/hr, hourly rolling average
Maximum feed rate of Silver (Adjusted Tier 1)	1500 g/hr, hourly rolling average
Maximum feed rate of Thallium (Adjusted Tier 1)	253.01 g/hr, hourly rolling average

\* Carcinogenic Metal - Feed rate is further limited to a level such that the sum, of the actual feed rate divided by the allowable feed rate, for all carcinogenic metals shall be less than or equal to 1.00.

**TABLE 12  
GROUP B AND C PARAMETER LIMITS FOR THE UTILITIES #3 BOILER**

<b>Control Parameter</b>	<b>Final Operating Limit</b>
Minimum atomizing fluid pressure	45 psig, instantaneous
Maximum ash feed rate	11.2 lb/hr, hourly rolling average
Maximum total chlorine and HCl feed rate (Adjusted Tier 1)	483.8 g/hr, hourly rolling average
Maximum heat input from all streams	285,000,000 Btu/hr, hourly rolling average
Maximum feed rate of Antimony (Adjusted Tier 1)	196 g/hr, hourly rolling average
*Maximum feed rate of Arsenic (Adjusted Tier 1)	1.3 g/hr, hourly rolling average
Maximum feed rate of Barium (Adjusted Tier 1)	29,381 g/hr, hourly rolling average
*Maximum feed rate of Beryllium (Adjusted Tier 1)	0.34 g/hr, hourly rolling average
*Maximum feed rate of Cadmium (Adjusted Tier 1)	0.64 g/hr, hourly rolling average
*Maximum feed rate of Chromium (Adjusted Tier 1)	1.95 g/hr, hourly rolling average
Maximum feed rate of Lead (Adjusted Tier 1)	218.1 g/hr, hourly rolling average
Maximum feed rate of Mercury (Adjusted Tier 1)	218.1 g/hr, hourly rolling average
Maximum feed rate of Silver (Adjusted Tier 1)	3017 g/hr, hourly rolling average
Maximum feed rate of Thallium (Adjusted Tier 1)	409.8 g/hr, hourly rolling average

\* Carcinogenic Metal - Feed rate is further limited to a level such that the sum, of the actual feed rate divided by the allowable feed rate, for all carcinogenic metals shall be less than or equal to 1.00.

**TABLE 13  
GROUP B AND C PARAMETER LIMITS FOR THE UTILITIES #6 BOILER**

<b>Control Parameter</b>	<b>Final Operating Limit</b>
Minimum atomizing fluid pressure	45 psig, instantaneous
Maximum ash feed rate	9.5 lb/hr, hourly rolling average
Maximum total chlorine and HCl feed rate (Adjusted Tier 1)	400 g/hr, hourly rolling average
Maximum heat input from all streams	312,000,000 Btu/hr, hourly rolling average
Maximum feed rate of Antimony (Adjusted Tier 1)	160 g/hr, hourly rolling average
*Maximum feed rate of Arsenic (Adjusted Tier 1)	0.81 g/hr, hourly rolling average
Maximum feed rate of Barium (Adjusted Tier 1)	29,380 g/hr, hourly rolling average
*Maximum feed rate of Beryllium (Adjusted Tier 1)	0.24 g/hr, hourly rolling average
*Maximum feed rate of Cadmium (Adjusted Tier 1)	0.36 g/hr, hourly rolling average
*Maximum feed rate of Chromium (Adjusted Tier 1)	1.25 g/hr, hourly rolling average
Maximum feed rate of Lead (Adjusted Tier 1)	199 g/hr, hourly rolling average
Maximum feed rate of Mercury (Adjusted Tier 1)	150 g/hr, hourly rolling average
Maximum feed rate of Silver (Adjusted Tier 1)	2000 g/hr, hourly rolling average
Maximum feed rate of Thallium (Adjusted Tier 1)	300.5 g/hr, hourly rolling average

\* Carcinogenic Metal - Feed rate is further limited to a level such that the sum, of the actual feed rate divided by the allowable feed rate, for all carcinogenic metals shall be less than or equal to 1.00.

**TABLE 14 - AMINES BOILER  
INSTRUMENTATION TO BE CALIBRATED ACCORDING TO MANUFACTURER'S SPECIFICATIONS**

<b>Control Parameter</b>	<b>Instrument Description</b>	<b>Location</b>	<b>Calibration frequency</b>
Hazardous waste feed rate	Mass flow meter	In feed line, upstream from the waste burner	Annually
Combustion temperature	Thermocouple	Combustion Zone 1 and Combustion Zone 3 Exhaust	Annually
Flue gas flow rate	Pitot tubes	Downstream of stack blower	Annually
Stack gas oxygen	Zirconium oxide cell	Combustion Zone 3 Exhaust	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Stack gas carbon monoxide	Infrared cell	Combustion Zone 3 Outlet	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Atomizing steam and air pressures	Differential, diaphragm-type transducer (steam), no local PI for air)	In atomizing steam	Annually

**TABLE 15 - UTILITIES #3 BOILER  
INSTRUMENTATION TO BE CALIBRATED ACCORDING TO MANUFACTURER'S SPECIFICATIONS**

<b>Control Parameter</b>	<b>Instrument Description</b>	<b>Location</b>	<b>Calibration frequency</b>
Hazardous waste feed rate	Differential, diaphragm-type transducer, Orifice	In feed line, upstream from the waste burner	Every 1.5 years
Forced draft fan flow rate	Differential, diaphragm-type transducer, Averaging Pitot Tube	Forced draft fan inlet	Every 1.5 years
Stack gas oxygen	Paramagnetic	Extracted sample from exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Stack gas carbon monoxide	Infrared cell	Extracted sample from exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Atomizing fluid pressure	Pressure Switch	In atomizing stream	Every 1.5 years
Steam production rate	Differential, diaphragm-type transducer	In steam header	Every 1.5 years

**TABLE 16 UTILITIES #6 BOILER  
INSTRUMENTATION TO BE CALIBRATED ACCORDING TO MANUFACTURER'S SPECIFICATIONS**

<b>Control Parameter</b>	<b>Instrument Description</b>	<b>Location</b>	<b>Calibration frequency</b>
Hazardous waste feed rate	Differential, diaphragm-type transducer, Orifice	In feed line, upstream from the waste burner	Every 1.5 years
Forced draft fan flow rate	Differential, diaphragm-type transducer, Air Foil	Forced draft fan outlet duct	Every 1.5 years
Stack gas oxygen	Paramagnetic	Extracted sample from exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Stack gas carbon monoxide	Infrared cell	Extracted sample from exhaust stack	Daily calibration check, calibrate per 40 CFR 266 Appendix IX specifications
Atomizing fluid pressure	Pressure Switch	In atomizing stream	Every 1.5 years
Steam production rate	Differential, diaphragm-type transducer, Orifice	In steam header	Every 1.5 years

## **V.D SPECIFIC OPERATING CONDITIONS FOR THE AMINES BOILER**

The Amines Boiler shall be subject to the following provisions until such time as the Department issues a Finding of Compliance on the results of the initial Comprehensive Performance Test.

### **V.D.1 Permitted and Prohibited Wastes**

**V.D.1.a** The Permittee may only burn hazardous wastes with EPA waste codes listed in the current Part A Permit Application except as prohibited in Condition V.D.1.b.

**V.D.1.b** The burning of the following waste is prohibited:

**V.D.1.b.(1)** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

**V.D.1.b.(2)** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.

**V.D.1.b.(3)** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

**V.D.1.b.(4)** Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

**V.D.1.b.(5)** Municipal Waste.

**V.D.1.b.(6)** Containerized Gases.

**V.D.1.b.(7)** Medical/Infectious wastes as defined in 40 CFR 60.51c.

**V.D.1.b.(8)** Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 14, except as described in LAC 33:V.2207.C.

**V.D.1.b.(9)** Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

**V.D.1.c** Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

**V.D.2 Process Operating Conditions**

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c)

**V.D.2.a Group A Parameter Limits**

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below.

- V.D.2.a.(1) Whenever hazardous waste is in the unit, the instantaneous combustion chamber temperature in the Oxidizer shall be maintained above the minimum value of 1990°F. The instantaneous combustion chamber temperature in the ReOxidizer shall be maintained above the minimum value of 1596°F.
- V.D.2.a.(2) Whenever hazardous waste is in the unit, the hourly rolling average ID fan flue gas flow rate shall be maintained below a maximum of 3588 standard cubic feet per minute.
- V.D.2.a.(3) Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the boiler shall be maintained below the maximum value of 1206 pounds per hour.
- V.D.2.a.(4) Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily
- V.D.2.a.(5) Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven percent oxygen, dry gas basis in accordance with LAC 33:V.3009.B-C.

**V.D.2.b Group B Parameter Limits**

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.D.2.b.(1)** The hourly rolling average total ash feed rate shall be no greater than 0.704 pounds per hour.

**V.D.2.b.(2)** The combined total chloride and chlorine feed rate from all feedstreams shall be no greater than 96 grams per hour, hourly rolling average. (Adjusted Tier 1)

**V.D.2.b.(3)** O<sub>2</sub> shall be monitored continuously whenever hazardous waste is in the boiler, in accordance with CEMS regulations. O<sub>2</sub> level is provided as a correction factor, and as such, no limit is provided under this condition.

**V.D.2.b.(4)** The hourly rolling average metal feed rates from all feedstreams to the boiler's combustion chamber shall not exceed the following limits.

Antimony (Adjusted Tier 1) 153.01 g/hr

\*Arsenic (Adjusted Tier 1) 0.16 g/hr

Barium (Adjusted Tier 1) 25,458 g/hr

\*Beryllium(Adjusted Tier 1) 0.12 g/hr

\*Cadmium (Adjusted Tier 1) 0.15 g/hr

\*Chromium (Adjusted Tier 1) 0.34 g/hr

Lead (Adjusted Tier 1) 40 g/hr

Mercury (Adjusted Tier 1) 36 g/hr

Silver (Adjusted Tier 1) 1500 g/hr

Thallium (Adjusted Tier 1) 253.01 g/hr

\*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in **V.D.2.b.(4)** shall not exceed 1.0, as

$$\sum_{i=1}^n \frac{AFR_{(i)}}{FRL_{(i)}} \leq 1.0$$

provided by the following equation:

$AFR_{(i)}$  = **Actual Feed Rate (AFR)**  
The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

$n$  = Number of Carcinogenic Metals.

$FRL_{(i)}$  = **Feed Rate Limit (FRL)**  
The regulatory feed limit of carcinogenic metal (i) listed in **V.D.2.b.(4)**

### **V.D.2.c Group C Parameter Limits**

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.D.2.c.(1)** Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

**V.D.2.c.(2)** The hourly rolling average total heat input to the boiler from all feed streams shall not exceed 8,700,000 British Thermal Units (BTUs) per hour.

**V.D.2.c.(3)** The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

**V.D.2.c.(4)** At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate

compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

**V.D.2.c.(5)** For a Continuous Process Monitoring System (CPMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

**V.D.2.c.(6)** At a minimum, the Permittee shall analyze values from the Continuous Process Monitoring System (CPMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

## **V.E SPECIFIC OPERATING CONDITIONS FOR THE #3 UTILITIES BOILER**

The #3 Utilities Boiler shall be subject to the following provisions until such time as the Department issues a Finding of Compliance on the results of the initial Comprehensive Performance Test.

### **V.E.1 Permitted and Prohibited Wastes**

**V.E.1.a** The Permittee may only burn hazardous wastes with EPA waste codes listed in the current Part I (EPA Part A) Permit Application except as prohibited in Condition V.E.1.b.

**V.E.1.b** Burning the following wastes in the boiler is prohibited:

**V.E.1.b.(1)** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

**V.E.1.b.(2)** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.

**V.E.1.b.(3)** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

**V.E.1.b.(4)** Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

**V.E.1.b.(5)** Municipal Waste.

**V.E.1.b.(6)** Containerized Gases.

**V.E.1.b.(7)** Medical/Infectious wastes as defined in 40 CFR 60.51.c.

**V.E.1.b.(8)** Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 14, except as described in LAC 33:V.2207.C.

**V.E.1.b.(9)** Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

**V.E.1.c** Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

**V.E.2 Process Operating Conditions**

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c)

**V.E.2.a Group A Parameter Limits**

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below.

**V.E.2.a.(1)** Whenever hazardous waste is in the unit, the hourly rolling average forced draft fan flue flow rate shall be maintained below a maximum of 86% of scale.

**V.E.2.a.(2)** Whenever hazardous waste is in the boiler, the hourly rolling average steam production rate shall be at least 87,400 pounds per hour, not to exceed 172,533 pounds per hour.

**V.E.2.a.(3)** Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the boiler shall be maintained below the maximum value of 20 pounds per hour.

**V.E.2.a.(4)** Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the

escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily.

- V.E.2.a.(5)** Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven percent oxygen, dry gas basis in accordance with LAC 33:V.3009.B-C.

#### **V.E.2.b Group B Parameter Limits**

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

- V.E.2.b.(1)** The hourly rolling average total ash feed rate shall be no greater than 11.2 pounds per hour.

- V.E.2.b.(2)** The combined total chloride and chlorine feed rate from all feedstreams shall be no greater than 483.8 grams per hour, hourly rolling average. (Adjusted Tier 1)

- V.E.2.b.(3)** O<sub>2</sub> shall be monitored continuously whenever hazardous waste is in the boiler, in accordance with CEMS regulations. O<sub>2</sub> level is provided as a correction factor, and as such, no limit is provided under this condition.  
(LAC 33:V.3009.B-D)

- V.E.2.b.(4)** The hourly rolling average metal feed rates from all feedstreams to the boiler's combustion chamber shall not exceed the following limits.

Antimony (Adjusted Tier 1) 196 g/hr

\*Arsenic (Adjusted Tier 1) 1.3 g/hr

Barium (Adjusted Tier 1) 29,381 g/hr

\*Beryllium(Adjusted Tier 1) 0.34 g/hr

\*Cadmium (Adjusted Tier 1) 0.64 g/hr

\*Chromium (Adjusted Tier 1) 1.95 g/hr

Lead (Adjusted Tier 1) 218.1 g/hr

Mercury (Adjusted Tier 1) 218.1 g/hr

Silver (Adjusted Tier 1) 3017 g/hr

Thallium (Adjusted Tier 1) 409.8 g/hr

\*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in V.E.2.b.(4) shall not exceed 1.0, as

$$\sum_{i=1}^n \frac{AFR_{(i)}}{FRL_{(i)}} \leq 1.0$$

provided by the following equation:

$AFR_{(i)}$  = Actual Feed Rate (AFR)  
The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

$n$  = Number of Carcinogenic Metals.

$FRL_{(i)}$  = Feed Rate Limit (FRL)  
The regulatory feed limit of carcinogenic metal (i) listed in V.E.2.b.(4)

### V.E.2.c Group C Parameter Limits

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

V.E.2.c.(1) Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

V.E.2.c.(2) The hourly rolling average total heat input to the boiler from all feed streams shall not exceed 285,000,000 British Thermal Units (BTUs) per hour.

- V.E.2.c.(3)** The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.
- V.E.2.c.(4)** At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.
- V.E.2.c.(5)** For a Continuous Process Monitoring System (CPMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.
- V.E.2.c.(6)** At a minimum, the Permittee shall analyze values from the Continuous Process Monitoring System (CPMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

## **V.F SPECIFIC OPERATING CONDITIONS FOR THE #6 UTILITIES BOILER**

The #6 Utilities Boiler shall be subject to the following provisions until such time as the Department issues a Finding of Compliance on the results of the initial Comprehensive Performance Test.

### **V.F.1 Permitted and Prohibited Wastes**

- V.F.1.a** The Permittee may only burn hazardous wastes with EPA waste codes listed in the current Part A Permit Application except as prohibited in Condition V.F.1.b.
- V.F.1.b** Burning the following wastes in the boiler is prohibited:
- V.F.1.b.(1)** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

- V.F.1.b.(2)** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.
- V.F.1.b.(3)** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.
- V.F.1.b.(4)** Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.
- V.F.1.b.(5)** Municipal Waste.
- V.F.1.b.(6)** Containerized Gases.
- V.F.1.b.(7)** Medical/Infectious wastes as defined in 40 CFR 60.51.c.
- V.F.1.b.(8)** Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 14, except as described in LAC 33:V.2207.C.
- V.F.1.b.(9)** Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

**V.F.1.c** Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

**V.F.2 Process Operating Conditions**

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit. (LAC 33:V.3005.E.1 and LAC 33:V.3005.E.2.c)

**V.F.2.a Group A Parameter Limits**

The Permittee shall operate the boiler with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below.

- V.F.2.a.(1)** Whenever hazardous waste is in the unit, the hourly rolling average forced draft fan flue flow rate shall be maintained below a maximum of 70% of scale.
- V.F.2.a.(2)** Whenever hazardous waste is in the boiler, the

hourly rolling average steam production rate shall be at least 95,833 pounds per hour, not to exceed 210,000 pounds per hour.

- V.F.2.a.(3)** Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the boiler shall be maintained below the maximum value of 11 pounds per hour.
- V.F.2.a.(4)** Whenever hazardous waste is in the boiler, the unit must be kept totally sealed to protect against the escape of fugitive emissions. In accordance with LAC 33:V.3005.E.7, the Permittee must monitor the outside of the combustion unit for signs of fugitives at least daily.
- V.F.2.a.(5)** Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven percent oxygen, dry gas basis in accordance with LAC 33:V.3009.B-C.

**V.F.2.b Group B Parameter Limits**

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

- V.F.2.b.(1)** The hourly rolling average total ash feed rate shall be no greater than 9.5 pounds per hour.
- V.F.2.b.(2)** The combined total chloride and chlorine feed rate from all feedstreams shall be no greater than 400 grams per hour, hourly rolling average. (Adjusted Tier 1)
- V.F.2.b.(3)** O<sub>2</sub> shall be monitored continuously whenever hazardous waste is in the boiler, in accordance with CEMS regulations. O<sub>2</sub> level is provided as a correction factor, and as such, no limit is provided under this condition.
- V.F.2.b.(4)** The hourly rolling average metal feed rates from all feedstreams to the boiler's combustion chamber shall not exceed the following limits.

Antimony (Adjusted Tier 1) 160 g/hr

\*Arsenic (Adjusted Tier 1) 0.81 g/hr

Barium (Adjusted Tier 1) 29,380 g/hr

\*Beryllium(Adjusted Tier 1) 0.24 g/hr

\*Cadmium (Adjusted Tier 1) 0.36 g/hr

\*Chromium (Adjusted Tier 1) 1.25 g/hr

Lead (Adjusted Tier 1) 199 g/hr

Mercury (Adjusted Tier 1) 150 g/hr

Silver (Adjusted Tier 1) 2000 g/hr

Thallium (Adjusted Tier 1) 300.5 g/hr

\*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in V.F.2.b.(4) shall not exceed 1.0, as

$$\sum_{i=1}^n \frac{AFR_{(i)}}{FRL_{(i)}} \leq 1.0$$

provided by the following equation:

$AFR_{(i)}$  = **Actual Feed Rate (AFR)**  
 The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

$n$  = Number of Carcinogenic Metals.

$FRL_{(i)}$  = **Feed Rate Limit (FRL)**  
 The regulatory feed limit of carcinogenic metal (i) listed in V.F.2.b.(4)

**V.F.2.c Group C Parameter Limits**

The Permittee shall operate the boiler without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

**V.F.2.c.(1)** Whenever hazardous waste is in the unit, the Permittee shall maintain the waste feed in a flowable form.

**V.F.2.c.(2)** The hourly rolling average total heat input to the boiler from all feed streams shall not exceed 312,000,000 British Thermal Units (BTUs) per hour.

**V.F.2.c.(3)** The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.

**V.F.2.c.(4)** At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements in accordance with 40 CFR 266 Appendix IX Condition 2.1.2.1.

**V.F.2.c.(5)** For a Continuous Process Monitoring System (CPMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.

**V.F.2.c.(6)** At a minimum, the Permittee shall analyze values from the Continuous Process Monitoring System (CPMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

## **V.G OPERATING CONDITIONS FOR THE ANILINE INCINERATOR**

The Aniline Incinerator shall continue to be subject to the following provisions until such time as the Department issues a Finding of Compliance on the results of the Comprehensive Performance Test. The Permittee shall also be subject to the requirements outlined in 40 CFR 63 Subpart EEE and the Notification of Compliance.

### **V.G.1 Inspections**

#### **V.G.1.a Requirements**

**V.G.1.a.(1)** The incinerator and associated equipment (pumps, valves, pipes, fuel storage tanks, and other ancillary equipment) will be subject to a daily thorough, visual inspection, when they contain hazardous waste. The purpose of these inspections will be to identify leaks, spills, fugitive emissions, and signs of tampering.

**V.G.1.a.(2)** The Permittee shall conduct simulated trips to test the following waste feed cut-off systems and the corresponding alarms at a minimum of once per month. The vent control feed system may be test for cut-off response through control valve movement or simulated trips to determine the operational capability in the event of an emergency situation:

**V.G.1.a.(2)(a)** Low combustion temperature cut-off;

**V.G.1.a.(2)(b)** High carbon monoxide cut-off;

**V.G.1.a.(2)(c)** Low oxygen cut-off;

**V.G.1.a.(2)(d)** Low scrubber flow to the hydrosonic unit cut-off;

**V.G.1.a.(2)(e)** Loss of combustion air to either the reduction or reoxidation zones of the incinerator cut-off;

**V.G.1.a.(2)(f)** Loss of atomization steam pressure cut-off;

**V.G.1.a.(2)(g)** Loss of steam flow from the combustion gas economizer cut-off.

**V.G.1.b Records**

**V.G.1.b.(1)** Written inspection records shall be part of the operating record for this Permit and are hence subject to LAC 33:V.1529 requirements. At a minimum, the record shall include the following information: (1) the date and time of the inspection, (2) inspector's name, (3) any inspection observations, and (4) date and nature of corrective action. The inspection record shall be completed in accordance with LAC 33:V.1509 and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

**V.G.1.b.(2)** A written record of the automatic waste feed cut-off system tests shall be part of the operating record for this Permit and shall be available at all times to the Administrative Authority.

Electronic records may be maintained, in lieu of paper copies.

**V.G.2 Monitoring and Calibration**

**V.G.2.a Requirements**

**V.G.2.a.(1)** The Permittee shall maintain, calibrate, and operate continuous monitors that monitor and record the operating conditions specified in Condition V.G.3 of this Permit. The continuous monitoring requirements shall be as specified in Tables 15 and 16 of this Permit.

**V.G.2.a.(2)** The Administrative Authority may request data be submitted in any format or units that facilitates the completion of air modeling, risk assessment, or compliance procedures.

**V.G.2.a.(3)** Monitoring samples and measurements shall be representative of the monitored activity. The

method used to obtain a representative sample of the waste to be analyzed shall be the appropriate method specified in LAC 33:V. Chapter 49. Appendix D or an equivalent method approved by the Administrative Authority.

Other sampling and analytical methods shall be those specified in *Test Methods for Evaluating Solid Waste: Physical/Chemical Methods*, SW-846, as revised; *Standard Methods for the Examination of Water and Wastewater*, current edition, or equivalent methods.

**V.G.2.a.(4)** The Permittee must calibrate continuous process monitors according to the manufacturer's specifications. Calibration procedures shall be included in the operating record of the facility and available at all times for review by the Administrative Authority.

**V.G.2.a.(5)** Hazardous waste may continue to be introduced into the incinerator during daily continuous emission monitoring system (CEMS) calibration check periods, for a period of up to twenty (20) minutes a day. If dual CEMS are installed, this requirement shall not apply, as long as one CEMS is online. The CEMS shall be maintained according to the following schedule: (1) at least daily, a calibration check of the instrument; (2) at least daily, a system audit; (3) at least quarterly, an absolute calibration audit; and (4) at least annually, a relative accuracy test. The procedures for CEMS maintenance are outlined in 40 CFR 63 Subpart EEE Appendix.

#### **V.G.2.b Records**

In the facility's operating record, the Permittee shall record and maintain in accordance with LAC 33:V.1529, all monitoring data compiled to satisfy the permit requirements.

Electronic records may be maintained, in lieu of paper copies.

### **V.G.3 Performance Standards**

#### **V.G.3.a Requirements**

The Permittee shall comply with the performance standards specified in this Permit when hazardous waste is burned in the incinerator.

**V.G.3.a.(1)** The incinerator shall achieve a Destruction and Removal Efficiency (DRE) of 99.99 percent for each principal organic hazardous constituents (POHC). The DRE shall be determined by using the method specified in LAC 33:V.3111.A.1.

**V.G.3.a.(2)** The Permittee will limit hydrogen chloride (HCl) emissions to less than 100 ppm of the stack gas volumetric flow and STP condition. Any chlorine emissions shall be converted to HCl equivalents and included in the emissions calculations.

**V.G.3.a.(3)** The emissions of particulate matter shall not exceed 0.08 grains per dry standard cubic foot (90 milligrams per dry standard cubic meter) of stack gas, corrected to 7 percent oxygen by volume, in accordance with the formula specified in LAC 33:V.3011.

**V.G.3.a.(4)** The emissions of carbon monoxide, corrected to 7 percent oxygen, shall not exceed 100 parts per million by volume on an hourly rolling average.

**V.G.3.b** Compliance with the operating requirements specified in this permit will be regarded as compliance with LAC 33:V.3111. However, any evidence of noncompliance with these performance standards may be grounds for suspension, modification or revocation and reissuance and termination of this permit pursuant to LAC 33:V.323.

#### **V.G.3.c Records**

The Permittee shall record in the facility operating record all occasions on which waste is fed to the incinerator and when the operating limits specified in this Permit are exceeded.

Electronic records may be maintained, in lieu of paper copies.

## **V.G.4 Automatic Waste Feed Cut Off**

### **V.G.4.a Requirements**

- V.G.4.a.(1)** The Permittee shall operate the systems specified in Table 17 of this Permit to automatically cut off the hazardous waste feed when the monitored operating conditions deviate from the set points specified in the permit.
- V.G.4.a.(2)** Operating parameters for which permit limits are established must continue to be monitored following the cut off, and the hazardous waste feed shall not be restarted until the levels of those parameters that caused the automatic waste feed cut off are restored to permit limits. All other parameters must also be within permit limits.
- V.G.4.a.(3)** In the event of a malfunction of the automatic waste feed cut off system, the Permittee shall immediately cut off and/or lock out the waste feed.

### **V.G.4.b Records**

- V.G.4.b.(1)** The Permittee shall record in the facility operating record the date and time of all automatic waste feed cut off events. The records shall also include the known or suspected cause of the automatic waste feed cut off, the triggering parameters, the corrective actions taken, the duration of the event, and the date and time of restarting waste feed following the automatic waste feed cut off.

Electronic records may be maintained, in lieu of paper copies.

- V.G.4.b.(2)** The Permittee shall record in the facility operating record all failures of the automatic waste feed cut off system, including the date and time of the failure, a description of the failure, root cause of the failure, and corrective actions taken.
- V.G.4.b.(3)** The operating record shall be maintained in an organized manner for a period of not less than 3 years and be available at all times for inspection by the Administrative Authority.

**V.G.5 Reports**

The date, cause, and remedial action for each waste feed cut off activation shall be documented in the operating record. A summary of such occurrences must be included in the annual report. The Permittee shall report in writing to the Administrative Authority if there are more than fifty (50) Permit required waste feed cut offs per month. This report shall include cause and remedial actions taken.

**V.G.6 Permitted and Prohibited Wastes**

**V.G.6.a** The Permittee may only burn hazardous wastes with EPA waste codes listed in the current Part A Permit Application except as prohibited in Condition V.G.5.b.

**V.G.6.b** Burning the following wastes in the incinerator is prohibited:

**V.G.6.b.(1)** Dioxin-containing wastes identified by EPA as F020, F021, F022, F023, F026, F027, and F028 wastes in LAC 33:V.4901.

**V.G.6.b.(2)** Polychlorinated biphenyl (PCB) waste, as defined in 40 CFR Part 761.3.

**V.G.6.b.(3)** Source material, special nuclear material, mixed waste, or naturally occurring radioactive materials (NORM) that is not exempt pursuant to LAC 33:XV.

**V.G.6.b.(4)** Explosive material, as defined by the Department of Transportation under 49 CFR Part 173.

**V.G.6.b.(5)** Municipal Waste.

**V.G.6.b.(6)** Containerized Gases.

**V.G.6.b.(7)** Medical/Infectious wastes as defined in 40 CFR 60.51.c.

**V.G.6.b.(8)** Metal bearing wastes listed in LAC 33:V.Chapter 22.Table 14, except as described in LAC 33:V.2207.C.

**V.G.6.b.(9)** Wastes displaying the characteristic of reactivity as defined in LAC 33:V.4903.D.

**V.G.6.b.(10)** Non-liquid hazardous wastes.

**V.G.6.c** Before burning any wastes not authorized under this Permit, the Permittee shall obtain approval for a permit modification, as required under LAC 33:V.321.

**V.G.6.d** Prior to feeding liquid hazardous waste feeds into the incinerator, the waste in the feed tanks shall be uniform and consistent to insure proper atomization and incinerator operation.

### **V.G.7 Process Operating Conditions**

The unit must be operated within the conditions prescribed below at all times while hazardous waste is in the unit.

#### **V.G.7.a Group A Parameter Limits**

The Permittee shall operate the incinerator with a functioning system to automatically cut off waste feed to the combustion unit when operating conditions deviate from those established below.

**V.G.7.a.(1)** Whenever hazardous waste is in the unit, the five-minute rolling average combustion chamber temperature in the Reduction Furnace shall be maintained above the minimum value of 1800°F. The five-minute rolling average combustion chamber temperature in the Reoxidation Furnace shall be maintained above the minimum value of 1615°F.

**V.G.7.a.(2)** Whenever hazardous waste is in the unit, the hourly rolling average Reduction/Reoxidation combustion air flow rate shall be maintained below the maximum value of 4300 dry standard cubic feet per minute. The indicator of this flow shall be the measurement and recording of the combustion air flow as indicated by the combustion air blower and the Reoxidation air blower. The combined flow from these sources shall be recorded and totalized and maintained below 12,200 pounds per hour (5534 kilograms per hour).

- V.G.7.a.(3)** Whenever hazardous waste is in the unit, the hourly rolling average waste feed rate to the incinerator shall be maintained below the maximum value of 645 pounds per hour (292.7 kilograms per hour).
- V.G.7.a.(3)(a)** The liquid waste feeds from the MNB production process shall be fed to the incinerator through a nozzle dedicated to this service.
- V.G.7.a.(3)(a)** The liquid waste feeds from the MNB production process shall be fed to the incinerator through a nozzle dedicated to this service.
- V.G.7.a.(4)** Whenever hazardous waste is in the unit, the hourly rolling average vent gas feed rate to the incinerator shall be maintained below the maximum value of 3785 pounds per hour.
- V.G.7.a.(5)** Whenever hazardous waste is in the unit, the instantaneous pressure in the Reduction furnace shall be maintained below the maximum value of 0 inches of water (0 millibar) with respect to atmospheric.
- V.G.7.a.(6)** Whenever hazardous waste is in the unit, the hourly rolling average carbon monoxide (CO) level shall be maintained below the maximum value of 100 parts per million volume, continuously corrected to seven percent oxygen, dry gas basis.
- V.G.7.a.(7)** Whenever hazardous waste is in the unit, the hourly rolling average pressure drop across the hydrosonic scrubber shall be maintained above a minimum value of 36 inches of water column (90 millibar).
- V.G.7.a.(8)** Whenever hazardous waste is in the unit, the hourly rolling average scrubber water flow rate to the hydrosonic scrubber shall be maintained above 22,500 pounds per hour in the first stage and 12,500 pounds per hour in the second stage.
- V.G.7.a.(9)** The hazardous waste feed to the incinerator shall stop immediately under the following conditions:

- V.G.7.a.(9)(a) There is a loss of power to the combustion air or exhaust gas blowers.
- V.G.7.a.(9)(b) There is a power outage.
- V.G.7.a.(9)(c) There is a loss of instrument air.
- V.G.7.a.(9)(d) There is a loss of quench gas flow between the Reduction and Reoxidation Conditions of the incinerator.
- V.G.7.a.(9)(e) There is a loss of scrubber water flow to the hydrosonic unit.
- V.G.7.a.(9)(f) There is a loss of steam flow from the heat recovery supercharger.

**V.G.7.b Group B Parameter Limits**

The Permittee shall operate the incinerator without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

- V.G.7.b.(1) The hourly rolling average total ash feed rate shall be no greater than 1.1 pounds per hour (500 grams per hour).
- V.G.7.b.(2) The halide content of the hazardous waste feeds shall be below 100 parts per million.
- V.G.7.b.(3) O<sub>2</sub> shall be monitored continuously whenever hazardous waste is in the incinerator, in accordance with CEMS regulations. O<sub>2</sub> level is provided as a correction factor, and as such, no limit is provided under this condition.
- V.G.7.b.(4) The hourly rolling average metal feed rates from all feedstreams to the incinerator's combustion chamber shall not exceed the following limits:

Antimony 176 g/hr

\*Arsenic 0.04 g/hr

Barium 29,372 g/hr

\*Beryllium 0.10 g/hr

\*Cadmium 0.14 g/hr

\*Chromium 0.33 g/hr

Lead 52.0 g/hr

Mercury 46.0 g/hr

Silver 1762 g/hr

Thallium 293 g/hr

\*The feed rate of arsenic, beryllium, cadmium, and chromium is limited to a level such that the sum of the ratios of the actual feed rate to the feed rate limit specified in V.G.7.b.(4) shall not exceed 1.0, as

$$\sum_{i=1}^n \frac{AFR_{(i)}}{FRL_{(i)}} \leq 1.0$$

provided by the following equation:

$AFR_{(i)}$  = Actual Feed Rate (AFR)  
 The actual feed rate of carcinogenic metal (i) introduced into the combustion chamber from all boiler feedstreams.

$n$  = Number of Carcinogenic Metals.

$FRL_{(i)}$  = Feed Rate Limit (FRL)  
 The regulatory feed limit of carcinogenic metal (i) listed in V.G.7.b.(4)

### V.G.7.c Group C Parameter Limits

The Permittee shall operate the incinerator without exceeding these limits, although these limits are not part of the automatic waste feed cut off set points.

V.G.7.c.(1) Whenever hazardous waste is in the unit, the Permittee shall maintain a minimum atomizing fluid pressure of 75 psig (5.2 bar) and a maximum viscosity of 100 centipoise at feed conditions.

- V.G.7.c.(2) The hourly rolling average total heat input to the incinerator from all feed streams shall not exceed 13,900,000 British Thermal Units (BTUs) per hour.
- V.G.7.c.(3) The Permittee shall immediately stop the flow of hazardous waste into the combustion unit should sample flow to the Continuous Emissions Monitoring System (CEMS) cease, outside of normal calibration periods.
- V.G.7.c.(4) At a minimum, the Permittee shall analyze values from the Continuous Emissions Monitoring System (CEMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.
- V.G.7.c.(5) For a Continuous Process Monitoring System (CPMS) operated to ensure compliance with these regulations, the Permittee must maintain and operate the monitors consistent with the manufacturer's specifications.
- V.G.7.c.(6) At a minimum, the Permittee shall analyze values from the Continuous Process Monitoring System (CPMS) every 15 seconds. The Permittee must record these values every 60 seconds to demonstrate compliance with the monitoring requirements.

**V.G.8 Special Conditions**

- V.G.8.a Upon request to or by the Department, sampling and analysis of the waste feeds and exhaust emissions must be conducted to verify that the operating requirements established in this the Permit achieve the performance standards of LAC 33:V.3111.
- V.G.8.b The Permittee shall compile and keep current an operating manual covering all aspects of the incinerator facility.
- V.G.8.c The Permittee shall staff the incinerator operations with sufficiently trained and technical personnel to insure that the incinerator and all related support facilities are operated to minimize any adverse impact on human health, the environment, and safety considerations. In addition, management shall provide written instructions to achieve the performance operational process permit conditions.

**TABLE 17**  
**GROUP A PARAMETER LIMITS FOR THE ANILINE INCINERATOR**  
**(AUTOMATIC WASTE FEED CUT OFFS)**

Control Parameter	Final Operating Limits Automatic Waste Feed Cut Off Point
Maximum hazardous waste feed rate	645 lb/hr (292.7 kg/hr), hourly rolling average
Maximum vent gas feed rate	3785 lb/hr, hourly rolling average
Minimum combustion temperature	Reduction Furnace: 1800°F, 5-minute rolling average Reoxidation Furnace: 1615°F, 5-minute rolling average
Maximum Reduction zone pressure	0 inches of water column (0 mbar), instantaneous
Maximum air flow	12,200 lb/hr (5534 kg/hr), hourly rolling average
Minimum pressure drop across hydrosonic scrubber	36 inches of water column (90 mbar), hourly rolling average
Minimum scrubber water flow rate	First stage: 22,500 lb/hr, hourly rolling average Second stage: 12,500 hourly rolling average
Maximum stack gas carbon monoxide	100 ppmv, corrected to 7% oxygen on a dry gas basis, hourly rolling average

**TABLE 18**  
**GROUP B AND C PARAMETER LIMITS FOR THE ANILINE INCINERATOR**

Control Parameter	Final Operating Limit
Minimum atomizing fluid pressure	75 psig (5.2 bar), instantaneous
Maximum viscosity	100 centipoise at feed conditions
Maximum ash feed rate	1.1 lb/hr (500 g/hr), 12-hour rolling average
Maximum halide content	100 ppm
Maximum heat input from all streams	13,900,000 Btu/hr, hourly rolling average
Maximum feed rate of Antimony	176 g/hr, hourly rolling average
*Maximum feed rate of Arsenic	0.04 g/hr, hourly rolling average
Maximum feed rate of Barium	29,372 g/hr, hourly rolling average
*Maximum feed rate of Beryllium	0.10 g/hr, hourly rolling average
*Maximum feed rate of Cadmium	0.14 g/hr, hourly rolling average
*Maximum feed rate of Chromium	0.33 g/hr, hourly rolling average
Maximum feed rate of Lead	42.0 g/hr, hourly rolling average
Maximum feed rate of Mercury	46.0 g/hr, hourly rolling average
Maximum feed rate of Silver	1762 g/hr, hourly rolling average
Maximum feed rate of Thallium	293 g/hr, hourly rolling average

\* Carcinogenic Metal - Feed rate is further limited to a level such that the sum, of the actual feed rate divided by the allowable feed rate, for all carcinogenic metals shall be less than or equal to 1.00.

## **V.H RISK-BASED CONDITIONS**

(Reserved)

## **V.I EMISSION STANDARDS**

### **V.I.1 Performance Standards For Equipment Leaks**

#### **V.I.1.a Operating Requirements**

The permittee shall comply with the applicable requirements under LAC 33:V.1717 to 1745 for all equipment associated with operations that treat, store, or dispose of hazardous waste with organic concentrations equal to or greater than 10 percent by weight for equal to or greater than 300 hours per calendar year.

#### **V.I.1.b Monitoring Requirements**

The permittee shall monitor equipment for proper operation of: pumps in light service, LAC 33:V.1719.A; compressors, LAC 33:V.1721; pressure relief devices in gas/vapor service, LAC 33:V.1723; open-ended valves or lines, LAC 33:1727; valves in gas/vapor service or in light liquid service, LAC 33:V.1737; and pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors, LAC 33:V.1731.

#### **V.I.1.c Recordkeeping Requirements**

The permittee shall maintain an up-to-date list identifying each piece of equipment to which LAC 33:V.Chapter 17.Subchapter B applies, and record all information required by LAC 33:V.1743.

#### **V.I.1.d Reporting Requirements**

A semiannual report shall be submitted to the Administrative Authority in accordance with the requirements of LAC 33:V.1745, based on the date of submittal of the annual report for the facility. A report is not required for a 6-month period during which all pumps in light service, compressors, pressure relief devices in gas/vapor service, open-ended valves or lines, valves in gas/vapor service or in light liquid service, pumps and valves in heavy liquid service, pressure relief devices in light liquid or heavy liquid service, and flanges and other connectors are operated such that during no period of 24 hours or longer did the devices operate continuously in noncompliance with the

applicable operating conditions defined in LAC 33:V.Chapter 17.Subchapter B.

**V.I.2 Standards For Container Storage Areas**

**V.I.2.a** The permittee shall comply with the applicable requirements under LAC 33:V.1747 to 1767 for each container/container storage area listed in Table 17.

**V.I.2.b Operating Requirements**

**V.I.2.b.(1)** The Permittee shall comply with the applicable requirements of LAC 33:V, Chapter 17, Subchapter C.

**V.I.2.b.(2)** The Permittee shall install and maintain all regulated units and associated emission control technology in accordance with the detailed plans, schedules, information, and reports as contained in the Part B application.

**V.I.2.b.(3)** The Permittee shall, upon request, identify all less than ninety (90) day container storage areas with containers that contain hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements under LAC 33:V.1703 to 1715.

**V.I.2.c Monitoring Requirements**

**V.I.2.c.(1)** Containers shall be monitored to ensure the controls are properly used.

**V.I.2.c.(2)** The pollution control methods used for containers shall be inspected on a periodic basis.

**V.I.2.c.(2).(a)** Level 1 controls shall be inspected in accordance with LAC 33:V.1759.C.4.

**V.I.2.c.(2).(b)** Level 2 controls shall be inspected in accordance with LAC 33:V.1759.D.4.

**V.I.2.d Recordkeeping Requirements**

- V.I.2.d.(1)** Air emission control design documentation shall be maintained in the facility operating record until the equipment is no longer in service.
- V.I.2.d.(2)** Records must be prepared and maintained for the various equipment and systems used at the facility.
  - V.I.2.d.(2).(a)** Facilities exempted by LAC 33:V.1751.C must meet the LAC 33:V.1765.F requirements.
  - V.I.2.d.(2).(b)** Facilities that are governed by this Chapter and use alternate control systems meeting the emission control standards of 40 CFR 60, Subpart VV or 40 CFR 61, Subpart V must meet LAC 33:V.1765.H requirements.
  - V.I.2.d.(2).(c)** All containers not using air emission controls in accordance with LAC 33:V.1747.D must meet LAC 33:V.1765.I requirements.

**V.I.2.e Reporting Requirements**

- V.I.2.e.(1)** For each container that manages hazardous waste that is exempted from using air emission controls, a written report shall be submitted to the Administrative Authority within fifteen (15) days of each occurrence when hazardous waste is placed in the waste management unit in noncompliance with the conditions of LAC 33:V.1751.C, as applicable. The written report shall contain the EPA identification number, facility name and address, a description of the noncompliance event and the cause, the dates of the noncompliance, and the actions taken to correct the noncompliance and prevent reoccurrence of the noncompliance.
- V.I.2.e.(2)** All reports shall be signed and dated by an authorized representative of the BASF Corporation as per LAC 33:V.507.

**V.I.3 Standards for Tanks**

**V.I.3.a Duty to Comply with LAC 33:V.Chapter 17.Subchapter C**

- V.I.3.a.(1) The Permittee shall comply with the applicable requirements of LAC 33:V.1747-1767 for each tank listed in Table 21.
- V.I.3.a.(2) The Permittee shall install and maintain all tanks and associated emission control technology in accordance with the detailed plans, schedules, information, and reports as contained in the Part B Permit Application.
- V.I.3.a.(3) The Permittee shall, upon request, identify all less than 90-day accumulation tanks which contain hazardous wastes with organic concentrations equal to or greater than 10 percent by weight and identify the emission control system requirements.

**V.I.3.b Operating Requirements**

- V.I.3.b.(1) The tank shall be covered by a fixed roof and vented directly through a closed-vent system to a control device.
- V.I.3.b.(2) The fixed roof and its closure devices shall be designed to form a continuous barrier over the entire surface of the liquid in the tank.
- V.I.3.b.(3) Each opening in the fixed roof not vented to the control device shall be equipped with a closure device. Each closure device shall be secured in the closed position and the vapor headspace underneath the fixed roof vented to the control device whenever hazardous waste is in the tank, except for periods of routine inspection, maintenance, sampling, residue removal, or the opening of a safety device to avoid unsafe conditions.
- V.I.3.b.(4) Periods of planned routine maintenance of the control device during which the control device does not meet the specifications of LAC 33:V.1761.C.1 shall not exceed 240 hours per year. Compliance with this time requirement must be documented in the operating record.

**V.I.3.b.(5)** The vent stream flow from each affected process vent to the control device shall be recorded at least once every hour.

**V.I.3.b.(6)** The Permittee shall record data from a heat-sensing monitoring device indicating the continuous ignition of the pilot light any time the vent streams are sent to the flare.

**V.I.3.c Transfer of Waste**

Transfer of hazardous waste from a tank listed in Table 21 to another tank listed in Table 21 shall be conducted using continuous hard-piping or another closed system that does not allow exposure of the hazardous waste to the atmosphere, unless otherwise exempted under LAC 33:V.1755.J.

**V.I.3.d Inspection Requirements**

**V.I.3.d.(1)** The fixed roof and its closure devices shall be visually inspected by the Permittee to check for defects that could result in air pollutant emissions, including, but not limited to, cracks, holes, gaps, damaged seals or gaskets, and broken or missing closure devices.

**V.I.3.d.(2)** The air pollution control equipment shall be inspected initially and annually thereafter.

**V.I.3.d.(3)** The readings from each monitoring device required by Condition V.I.3.b.(5)-(6) shall be inspected at least once each operating day to check control device operation.

**V.I.3.d.(4)** The Permittee shall inspect each closed vent system in accordance with the requirements of LAC 33:V.1709.L.

**V.I.3.d.(5)** The Permittee shall make first efforts at repair of defects noted during inspections conducted under Condition V.I.3.d of this Permit no later than five calendar days after detection. The repair shall be completed as soon as possible, but no later than forty-five (45) calendar days after detection, unless the repair requires emptying or temporarily

removing from service the tank and no alternative tank capacity is available at the site to accept the hazardous waste normally managed in the tank.

**V.I.3.e Recordkeeping Requirements**

- V.I.3.e.(1)** The Permittee shall keep on file at the facility the results of all inspections conducted under Condition V.I.3.d of this Permit. Inspection records must include: the date of inspection, the location of all defects found, a description of the defects, and the corrective action taken to repair the defects. If a repair is delayed in accordance with Condition V.I.3.d.(5) of this Permit, the Permittee shall also record the reason for the delay and the date that completion of repair of the defect is expected.
- V.I.3.e.(2)** Air emission control equipment design documentation shall be maintained in the facility operating record until the equipment is no longer in service.
- V.I.3.e.(3)** The Permittee shall keep on file at the facility a signed and dated certification that the control device is designed to operate at the performance level documented by the design analyses or by the performance test when the tank is operating at capacity or the highest level reasonably expected to occur.
- V.I.3.e.(4)** The Permittee shall keep on file at the facility the semiannual report of planned routine maintenance operations that require the control device not to meet the requirements of LAC 33:V.1761C.1.
- V.I.3.e.(5)** For unexpected malfunctions that require the control device not to meet the requirements of LAC 33:V.1761.C.1, the Permittee must document the occurrence and duration of each malfunction; the duration of each period during a malfunction when gases, vapors, or fumes are vented from the tank through the closed vent system to the control device while the control device is not properly functioning; and actions taken to restore the control device to its normal or usual manner of operation.

**V.I.3.e.(6)** The Permittee shall keep on file at the facility the semiannual reports required under LAC 33:V.1767.C.

**TABLE 19**  
**EMISSION CONTROLS FOR CONTAINERS**

<b>Container Storage Area Identification</b>	<b>LAC Reference(s)</b>	<b>Air Emission Controls</b>	<b>Visual Inspection</b>
TDI Container Storage Area	LAC 33:V.1759.C-D	Level 1 or Level 2 Controls	Initially and Annually
Maintenance Container Storage Area	LAC 33:V.1759.C-D	Level 1 or Level 2 Controls	Initially and Annually
WWTP Container Storage Area	LAC 33:V.1759.C-D	Level 1 or Level 2 Controls	Initially and Annually

**TABLE 20  
DESIGN AND OPERATING PARAMETERS FOR RCRA TANK SYSTEMS**

Tank No.	Year Put Into Service	Service	Materials of Construction	Dimensions and Permitted Capacity	Design Standard	Inspection Standard	Design Temp. And Pressure	Nominal Built Thickness	Minimum Thickness	Secondary Containment Type and Capacity
D-136	2001	TDA Tar Residue Treatment Drum	SA240-316L SS	D=6.5' H=8' 2400 gal	ASME Condition VIII, Div. 1	API 510 ASME NB23	450 F at 59 psig	Shell=0.25" Top and Bottom =0.3125"	Shell=0.219" Top and Bottom=0.249"	External Liner 13,200 gal
D-137	2001	TDA Tar Residue Treatment Drum	SA 240-2205 SS	D=3.5' H=6.6' 393 gal	ASME Condition VIII, Div. 1	API 510 ASME NB23	400 F at 47 psig	Shell=0.25" Top=0.5" Bottom=0.188"	Shell=0.167" Top=0.320" Bottom=0.114"	External Liner 13,200 gal
D-138	2001	TDA Tar/Alcohol Storage	CS SA-516-70N	D=14' H=47'1" 51,500 gal	ASME Condition VIII, Div. 1	API 510 ASME NB23	300 F at 82 psig	Shell=0.625" Top and Bottom=0.563"	Shell=0.497" Top and Bottom=0.436"	External Liner 85,216 gal
D-216	1989	NVP Heavy Ends Storage Drum	CS SA-516-70	D=5.5' H=5' 975 gal	ASME Condition VIII, Div. 1	API 510 ASME NB23	450 F at 60 psig	Shell=0.50" Top and Bottom =0.4375"	Shell=0.250" Top=0.280" Bottom=0.226"	External Liner 993 gal
D-292	1989	Storage of NVP Residue	CS SA-285-C	D=12' H=25' 20000 gal	API 650 App. F & J	API 510 and 653 API 579, as allowed by API 653	250 F at 2.0 psig	Shell=0.1875" Top and Bottom=0.25"	Shell and Bottom=0.100" Top=0.184"	External Liner 27,468 gal

TK-337 X	1987	Light Ends Storage	SS 304L	D=10' H=25'7" 14,930 gal	API 650 9 <sup>th</sup> ed.	API 510 and 653 API 579, as allowed by API 653	200 F at 15" wc	Shell, Top and Bottom=0.25"	Shell and Bottom= 0.100" Top= 0.155"	External Liner 37,337 gal
D-465	1980	Feed tank for BD Light Ends	CS SA-36	D=8' H=16' 6000 gal	API 650 App. J, F, M	API 510 and 653 API 579, as allowed by API 653	300 F at 0.25 psig	Shell and Top=0.25" Bottom= 0.375"	Shell and Bottom= 0.100" Top= 0.13"	External Liner 23,457 gal
TK-501	1989	Feed tank for MNB Residue	SS 316L	D=10' H=9' 5000 gal	API 620	API 510 and 653 API 579, as allowed by API 653	200 F at 5 psig	Shell and Top= 0.1875" Bottom= 0.250"	Shell and Bottom= 0.100" Top= 0.168"	External Liner 27,000 gal
TK-502	1989	Feed tank for Aniline Residue	SS 316L	D=10' H=9' 5000 gal	API 620	API 510 and 653 API 579, as allowed by API 653	425 F at 5 psig	Shell and Top= 0.1875" Bottom= 0.250"	Shell and Bottom= 0.100" Top= 0.168"	External Liner 27,000 gal
D-721 A	2003	Wet Toluene Storage	SA-240-2205	D=9' L=21' 10,950 gal	ASME 2001 Condition VIII Div. 1	API 510 ASME NB23	300 F at 75 psig	Shell and Heads= 0.3125"	Shell and Heads= 0.263"	External Liner 26,633 gal
D-721 B	2001	Toluene and Tar Residue Storage Drum	CS SA-285-C	D=9' L=24'2" 11,500 gal	ASME Condition VIII, Div. 1	API 510 ASME NB23	150 F at 25 psig	Shell= 0.3125" Heads= 0.375"	Shell= 0.188" Heads= 0.25"	External Liner 23,532 gal

TK-795	1986	Feed tank for Poly THF	SS 304L	D=16' H=9' 7624 gal	API 650 App. J & F	API 510 and 653 API 579, as allowed by API 653	200 F at 2 psig	Shell and Bottom=0.1875" Top=0.164" Bottom=0.25"	Shell=0.100" Top=0.164" Bottom=0.134"	External Liner 85,502 gal
D-1400	2001	Feed tank for Light Ends Residue	CS SA-36	D=12' H=16' 13,200 gal	API 650 App. J & F	API 510 and 653 API 579, as allowed by API 653	200 F at 1.5 psig	Shell=0.25" Top=0.3125" Bottom=0.375"	Shell and Bottom=0.100" Top=0.186"	External Liner 27,154 gal
D-1410	2001	Feed tank for Light Ends Residue	CS SA-36	D=12' H=16' 13,500 gal	API 650 App. J & F	API 510 and 653 API 579, as allowed by API 653	250 F at 1.5 psig	Shell=0.25" Top=0.3125" Bottom=0.375"	Shell and Bottom=0.100" Top=0.187"	External Liner 27,154 gal
D-1420	To be installed	Storage of plant wastes	CS SA-36	D=18.5' H=30' 62,021 gal	API 650	API 510 and 653 API 579, as allowed by API 653	250 F at 2.5 psig	Shell courses 1 and 2=0.25" Shell courses 3 and 4=0.188" Top=0.313" Bottom=0.375"	Shell and Bottom=0.100" Top=0.174"	External Liner 91,402 gal

**TABLE 21  
EMISSION CONTROLS FOR TANKS**

<b>Tank No.</b>	<b>LAC Reference</b>	<b>Air Emission Controls</b>	<b>Visual Inspection Frequency</b>	<b>Monitoring Frequency</b>
D-136	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-137	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-138	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-216	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-292	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
TK-337X	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-465	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
TK-501	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
TK-502	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-721A	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
D-721B	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
TK-795	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
TK-1400	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously
TK-1410	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously

Tank No.	LAC Reference	Air Emission Controls	Visual Inspection Frequency	Monitoring Frequency
TK-1420	LAC 33:V.1755.G	Level 2 closed vent control system	Physical: Initially and Annually Readings from monitoring devices: Daily	Vent flow rate: Hourly Ignition of pilot flame: Continuously

## **VI. GROUND WATER PROTECTION**

### **VI.A. APPLICABILITY**

The regulations of Louisiana Administrative Code (LAC), Title 33, Part V, Chapter 3, 5, 15, 25, 27, 29, 30, 33, 35, and 37, and the Louisiana Hazardous Waste Control Law Revised Statute (R.S.) 30:2171 et seq., of the Environmental Quality Control Act, R.S. 30:2001 et seq., and the provisions of this Condition shall apply to ground water protection programs for facilities that are used to treat, store, and dispose hazardous wastes at BASF Corporation in Geismar, LA. NO active regulated units are identified in this permit which are subject to Ground Water monitoring at this time.

**VI.B.** The Permittee shall comply with the monitoring, response, and corrective action provisions for the existing and any new systems in accordance with LAC 33:V.Chapter 33 and as outlined in this permit (i.e., Condition VII, HSWA).

**VI.C.** If ground waster contamination is confirmed as a result of operations related to past or present hazardous waste management facilities associated with this site, the Permittee shall establish, expand, or continue assessment and corrective action programs in accordance with the requirements of LAC 33:V.Chapter 33 and as subsequently directed by the Administrative Authority.

**HAZARDOUS  
AND  
SOLID  
WASTE  
AMENDMENTS**

**VII. GENERAL CONDITIONS PURSUANT TO THE HAZARDOUS AND SOLID WASTE AMENDMENTS**

**VII.A. STANDARD CONDITIONS**

**VII.A.1. Waste Minimization**

Annually, by March 1, for the previous year ending December 31, the Permittee shall enter into the operating record as required by LAC 33:V.1529.B.19, a statement certified according to LAC 33:V.513.A specifying that the Permittee has a program in place to reduce the volume and toxicity of hazardous wastes generated by the facility's operation to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or practicable disposal method that is currently available to the Permittee which minimizes the present and future threat to human health and the environment. A current description of the program shall be maintained in the operating record and a copy of the annual certified statement shall be submitted to the Administrative Authority. The following criteria should be considered for the program:

- VII.A.1.a.** Any written policy or statement that outlines goals, objectives, and/or methods for source reduction and recycling of hazardous waste at the facility;
- VII.A.1.b.** Any employee training or incentive programs designed to identify and implement source reduction and recycling opportunities;
- VII.A.1.c.** An itemized list of the dollar amounts of capital expenditures (plant and equipment) and operating costs devoted to source reduction and recycling of hazardous waste;
- VII.A.1.d.** Factors that have prevented implementation of source reduction and/or recycling;
- VII.A.1.e.** Sources of information on source reduction and/or recycling received at the facility (e.g., local government, trade associations, suppliers, etc.);
- VII.A.1.f.** An investigation of additional waste minimization efforts that could be implemented at the facility. This investigation would analyze the potential for reducing the quantity and toxicity of each waste stream through production reformulation, recycling, and all other appropriate means. The analysis would include an assessment of the technical feasibility, cost, and potential waste reduction for each option;

- VII.A.1.g. A flow chart or matrix detailing all hazardous wastes the facility produces by quantity, type, and building/area;
- VII.A.1.h. A demonstration of the need to use those processes that produce a particular hazardous waste due to a lack of alternative processes or available technology that would produce less hazardous waste;
- VII.A.1.i. A description of the waste minimization methodology employed for each related process at the facility. The description should show whether source reduction or recycling is being employed;
- VII.A.1.j. A description of the changes in volume and toxicity of waste actually achieved during the year in comparison to previous years; and
- VII.A.1.k. The Permittee may meet the requirements for waste minimization by developing an Environmental Management System according to the EPA document, Integrated Environmental Management System Implementation Guide, EPA 744-R-00-011, October 2000, found on [www.epa.gov/opptintr/dfe/pubs/iems/iems\\_guide/index.htm](http://www.epa.gov/opptintr/dfe/pubs/iems/iems_guide/index.htm).

**VII.A.2. Dust Suppression**

Pursuant to LAC 33:V.4139.B.4, and the Toxic Substances Control Act, the Permittee shall not use waste or used oil or any other material which is contaminated with dioxin, polychlorinated biphenyls (PCBs), or any other hazardous waste (other than a waste identified solely on the basis of ignitability), for dust suppression or road treatment.

**VII.A.3. Failure to Disclose**

The Permittee's failure in the application or during the permit issuance process to disclose fully all relevant facts at any time may be cause for termination or modification of this Permit in accordance with LAC 33:323.B.2 and 3.

**VII.A.4. Suspension, Modification, or Revocation and Reissuance, and Termination of Permit**

This Permit may be modified, revoked and reissued, or terminated for cause as specified in LAC 33:V.323. The filing of a request by the Permittee for a permit modification, revocation and reissuance, termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability or enforceability of any permit condition.

**VII.A.4.a.** If the Administrative Authority tentatively decides to modify or revoke and reissue a permit under LAC 33:V.321.C. or 323, a draft permit shall be prepared incorporating the proposed changes. The Administrative Authority may request additional information and, in the case of a modified permit, may require the submission of an updated permit application.

**VII.A.4.b.** The Permittee may initiate permit modification proceedings under LAC 33:V.321.C. All applicable requirements and procedures as specified in LAC 33:V.321.C shall be followed.

**VII.A.4.c.** Modifications of this Permit do not constitute a reissuance of the Permit.

**VII.A.5. Permit Review**

This Permit may be reviewed by the Administrative Authority five years after the date of permit issuance and may be modified as necessary as provided for in LAC 33:V.321.C. Nothing in this Condition shall preclude the Administrative Authority from reviewing and modifying the Permit at any time during its term.

**VII.A.6. Compliance with Permit**

Compliance with a RCRA permit during its term constitutes compliance, for purposes of enforcement, with Subtitle C of RCRA except for those requirements not included in the permit which:

**VII.A.6.a.** Become effective by statute;

**VII.A.6.b.** Are promulgated under LAC 33:V.Chapter 22 restricting the placement of hazardous wastes in or on the land; or

**VII.A.6.c.** Are promulgated under LAC 33:V.Chapters 23, 25 and 29 regarding leak detection systems for new and replacement surface impoundment, waste pile, and landfill units, and lateral expansions of surface impoundment, waste pile, and landfill units. The leak detection system requirements include double liners, construction quality assurance (CQA) programs, monitoring action leakage rates, and response action plans, and will be implemented through the procedures of LAC 33:V.321.C Class 1 permit modifications.

**VII.A.7. Specific Waste Ban**

**VII.A.7.a.** The Permittee shall not place in any land disposal unit the wastes specified in LAC 33:V. Chapter 22 after the effective

date of the prohibition unless the Administrative Authority has established disposal or treatment standards for the hazardous waste and the Permittee meets such standards and other applicable conditions of this Permit.

**VII.A.7.b.** The Permittee may store wastes restricted under LAC 33:V.Chapter 22 solely for the purpose of accumulating quantities necessary to facilitate proper recovery, treatment, or disposal provided that it meets the requirements of LAC 33:V.2205 including, but not limited to, clearly marking each tank or container.

**VII.A.7.c.** The Permittee is required to comply with all applicable requirements of LAC 33:V.2245 as amended. Changes to the Waste Analysis Plan will be considered permit modifications at the request of the Permittee, pursuant to LAC 33:V.321.C.

**VII.A.7.d.** The Permittee shall review the Waste Analysis Plan and analyze the waste when a process changes to determine whether the waste meets applicable treatment standards. Results shall be maintained in the operating record pursuant to Condition III.C.1 and 2.

**VII.A.8. Information Submittal for the Corrective Action Strategy**

Failure to comply with any condition of the Permit, including information submittal, constitutes a violation of the Permit and is grounds for enforcement action, permit amendment, termination, revocation, suspension, or denial of permit renewal application. Falsification of any submitted information is grounds for termination of this Permit (LAC 33:V.323.B.3).

The Permittee shall ensure that all plans, reports, notifications, and other submissions to the Administrative Authority required by this Permit using the Corrective Action Strategy are signed and certified in accordance with LAC 33:V.Chapter 5, Subchapter B. All submittals required under the corrective action strategy must conform to those requirements outlined in RECAP (see Condition VIII of this permit). Variance from content and/or formatting guidelines provided under RECAP shall be requested by the permittee prior to submittal to the Administrative Authority. Approval or disapproval of such a request with further guidance on content and formatting will be provided by the Administrative Authority, as deemed necessary. . Five (5) copies each of these plans, reports, notifications or other submissions and one (1) electronic copy (3.5" IBM compatible disk or CD-ROM) of all portions thereof which are in word processing format shall be submitted to the Administrative Authority by Certified Mail or hand delivered to:

Louisiana Department of Environmental Quality  
Office of Environmental Assessment  
Environmental Technology Division  
P.O. Box 4314  
Baton Rouge, LA 70821-4314

A summary of the planned reporting milestones pursuant to the corrective action requirements of this Permit is found in Table 1, Condition VIII.

#### **VII.A.9. Data Retention**

All raw data, such as laboratory reports, drilling logs, bench-scale or pilot-scale data, and other supporting information gathered or generated during activities undertaken pursuant to this Permit shall be maintained at the facility during the term of this Permit, including any reissued Permits.

#### **VII.A.10. Management of Wastes**

All solid wastes which are managed pursuant to a remedial measure taken under the corrective action process or as an interim measure addressing a release or the threat of a release from a solid waste management unit shall be managed in a manner protective of human health and the environment and in compliance with all applicable Federal, State and local requirements. As a response to the Louisiana legislature mandate La. R.S. 30:2272 (Act 1092 of the 1995 Regular Session) to develop minimum remediation standards, the LDEQ promulgated the Risk Evaluation Corrective Action Program (RECAP). RECAP's tiered approach to risk evaluation and corrective action establishes not only across the board numerical standards for most media, but also allows for the development of more site-specific numerical standards, as warranted. The Permittee is required to comply with all applicable requirements of RECAP. Approval of units for managing wastes and conditions for operating the units shall be granted through the permitting process.

#### **VII.B. EMISSION STANDARDS - PROCESS VENTS, EQUIPMENT LEAKS, TANKS, SURFACE IMPOUNDMENTS, AND CONTAINERS (AA-BB AIR REGULATIONS)**

The emission standards for process vents, equipment leaks, tanks, surface impoundments, and containers in LAC 33:V. Chapter 17 is detailed in Permit Condition V.I.

### **VII.C. SPECIFIC CONDITION - CLOSURE**

Pursuant to Condition 3005(j)(1) of the Hazardous and Solid Waste Amendments of 1984, the Permittee shall close any closing units in accordance with the following provisions:

- VII.C.1.** Other than consolidation of any wastes from the sites in conformance with LAC 33:V.Chapter 22, Land Disposal Restrictions, the Permittee shall not place waste prohibited by LAC 33:V.Chapter 22 into any closing units;
- VII.C.2.** The Permittee shall perform unit closures in accordance with the Closure Plan(s) as approved at the time of closure, and which meet(s) all relevant State and Federal closure requirements at the time of closure; and
- VII.C.3.** The Permittee shall notify the Administrative Authority in writing at least sixty (60) days prior to commencement of closure.

**III. SPECIAL CONDITIONS PURSUANT TO HAZARDOUS AND SOLID WASTE AMENDMENTS—CORRECTIVE ACTION STRATEGY**

Corrective Action for Releases: Condition 3004(u) of RCRA, as amended by the Hazardous and Solid Waste Amendments (HSWA), and LAC 33:V.3322 require that permits issued after November 8, 1984, address corrective action for releases of hazardous waste or hazardous constituents from any solid waste management unit (SWMU) at the facility, regardless of when the waste was placed in the unit.

EPA's traditional RCRA corrective action approach is structured around several elements common to most activities. In the first phase, RCRA facility assessment (RFA), EPA or the authorized state assesses the facility to identify releases and determine the need for corrective action. In the second phase, RCRA facility investigation (RFI), the facility conducts a more detailed investigation to determine the nature and extent of contaminants released to ground water, surface water, air, and soil. If remedial action is needed, a third phase, corrective measures study (CMS), is started. During this phase, the facility conducts a study, which when completed, describes the advantages, disadvantages, and costs of various cleanup options. After selection of a final remedy, the fourth phase, corrective measures implementation (CMI), is initiated. The facility is required to design, construct, operate, maintain, and monitor the final remedy(s).

The Corrective Action Strategy (CAS) is an alternate corrective action approach that can be implemented during any phase of corrective action. The Permittee shall use the CAS approach as the framework for corrective action to clarify, facilitate and provide guidance to expedite the process, and shall use the RECAP for screening and media-specific cleanup standards.

**VIII.A. ALTERNATE CORRECTIVE ACTION**

**VIII.A.1.** This Permit will utilize the CAS Guidance Document ([www.epa.gov/Arkansas/6pd/rcra\\_c/pd-o/riskman.htm](http://www.epa.gov/Arkansas/6pd/rcra_c/pd-o/riskman.htm)) developed by the U.S. Environmental Protection Agency (EPA) Region 6 whenever the Administrative Authority determines that it will serve to facilitate the corrective action. The CAS Guidance Document shall be utilized to the fullest extent practicable for planning and implementation of the corrective action. The CAS in this Permit shall not supersede existing Federal, State, and local regulations. The two primary objectives are to prioritize corrective action at the facility, and streamline corrective action administrative procedures, resulting in the protection of human health and the environment.

The CAS is a performance-based approach; using data quality objectives, investigations begin with the endpoint in mind. The CAS is a risk management strategy that will be implemented during any phase of corrective action. However, the CAS need not be applied to work that has already been completed to the satisfaction of the Administrative Authority. Performance standards are established at the beginning of the corrective

action process, allowing earlier and more focused implementation. Releases are screened using RECAP screening numbers to determine the priority of corrective action, and remedial alternatives are selected on the basis of their ability to achieve and maintain the established performance standards.

There is no one specific path through the CAS process. The CAS is a facility-wide approach, focusing corrective action on releases that pose the greatest risk first. Screening releases will also enable some areas of interest to qualify for no further action at this time (Condition VIII.A.3.a.), thus resources can be used to best benefit the protection of human health and the environment.

The traditional RCRA corrective action process and reports (i.e., RFIs, CMSs, CMIs, etc.) are not elements of the CAS. However, the use of information and reports from the traditional corrective action process, if available, is encouraged, in addition to new site-specific information.

The Administrative Authority, through an agency-initiated permit modification, may remove the Corrective Action Strategy as the means of facility-wide corrective action in the case of the failure of the Permittee to disclose information, adhere to agreed schedules, or show adequate progress; or should an impasse occur between the Permittee and the Administrative Authority. The Administrative Authority will institute other means of corrective action (such as traditional corrective action) at the facility through modification of this permit.

#### **VIII.A. 2. Performance Standards**

Expectations for the outcome of corrective action at a facility are established in the CAS by three performance standards. The Permittee's proposed performance standards shall be presented during the scoping meeting. The Permittee must justify the proposed performance standards through evaluation and documentation of land use, ground water designation (current and reasonably expected future use), types of receptors present, exposure pathways, etc.; as described in RECAP, Chapter 2. Through the application of the performance standards and RECAP, the Permittee and Administrative Authority shall determine whether a release must be addressed through corrective action, and whether implemented corrective actions are protective of human health and the environment.

As directed by the Administrative Authority following the scoping meeting, the Permittee will submit the performance standards in writing for approval. The Administrative Authority may either approve the performance standards proposed by the Permittee or establish performance standards that the Administrative Authority deems necessary to protect human health and the environment.

The three CAS performance standards are defined below. The order in which the performance standards are listed does not indicate that one performance standard takes priority over another. All applicable performance standards must be achieved by the Permittee.

**VIII.A.2.a. Source Control Performance Standard**

Source control refers to the control of materials that include or contain hazardous wastes or hazardous constituents that act as a reservoir for migration of contamination to soil, sediment, ground water, surface water, or air, or as a source for direct exposure.

The facility must determine if source material is present. Removal, containment, treatment, or a combination of the three, must be evaluated on a case-by-case basis. Controlling source material is a predominating issue in the CAS, and must be addressed to ensure protectiveness over time. Prioritization of the SWMUs does not mean avoidance of controlling source materials.

**VIII.A.2.b. Statutory and Regulatory Performance Standard**

Applicable statutory and regulatory requirements (Federal, State, and local) must be identified. These requirements may dictate media-specific contaminant levels (e.g., maximum contaminant levels (MCLs) in drinking water) that must be achieved and may become a performance standard for the Permittee.

**VIII.A.2.c. Final Risk Goal Performance Standard**

The final risk goal is the level of protection to be achieved and maintained by the Permittee. The final risk goal shall be based on site-specific issues including land use, special subpopulations, contaminant concentrations based on acceptable risk, location at which the levels are measured, and the remediation time frame, as specified by RECAP.

One final risk goal may apply to the entire facility, but it is more likely that different releases will require different final risk goals due to variations in location of releases, land use, proximity of receptors, etc. The final risk goal will be based on sound risk assessment methodologies (Permit Condition VIII.A.3).

### VIII.A.3. Use of RECAP

The Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP), dated October 20, 2003 (or the latest edition referenced in LAC 33:I.Chapter 13) shall be used by the Permittee to determine the need for further corrective actions under this permit. The RECAP consists of a tiered framework comprised of a Screening Option (SO), and three Management Options (MO). The tiered management options allow site evaluation and corrective action efforts to be tailored to site conditions and risks. As the MO level increases, the approach becomes more site-specific and hence, the level of effort required to meet the objectives of the Option increases.

The RECAP shall be used by the Permittee to evaluate data quality and data usability (RECAP Condition 2.4 and 2.5), to determine the identity of an area of investigation (AOI) as described in RECAP Condition 2.6, and for estimations of Area of Investigation Concentrations and Groundwater Compliance Concentrations for each media as defined in RECAP Condition 2.8.

The RECAP shall be used by the Permittee to evaluate land use as described in RECAP Condition 2.9, and groundwater/aquifer use as described in RECAP Condition 2.10.

The RECAP shall be used by the Permittee to prioritize area of concern (AOCs), SWMUs, and AOIs that require remediation so site investigations are focused on the release areas that pose the greatest risk. As the CSM is compiled, the Permittee shall assess historical data (RECAP Condition 2.5) and use the following management options, as appropriate, to address each release site.

**VIII.A.3.a. Use of the Screening Option** - The Permittee shall use the Screening Standards (SS) which are LDEQ-derived screening numbers for soil and groundwater for non-industrial and industrial land use scenarios. The SS shall be used to demonstrate that an AOI does not pose a threat to human health and the environment and, hence does not require further action at this time (NFA-ATT) or that further evaluation is warranted under a higher Management Option.

**VIII.A.3.b. Use of Management Option 1** - The Permittee shall use Management Option 1 (MO-1) which provides a RECAP standard (RS) derived for non-industrial and industrial exposure scenarios using currently recommended default exposure parameters and toxicity

values. Under MO-1, an AOI may warrant no further action at this time (NFA-ATT), or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-1 limiting RS, then the Permittee may; (1) remediate to the MO-1 limiting RS (and comply with closure/post closure requirements for MO-1), or (2) proceed with a MO-2 or MO-3 evaluation.

**VIII.A.3.c. Use of Management Option 2** – The Permittee shall use Management Option 2 (MO-2) which provides for the development of soil and groundwater RS using site-specific data with specified analytical models to evaluate constituent fate and transport at the AOI. The results of this evaluation shall be used in conjunction with standard reasonable maximum exposure (RME) assumptions to identify site-specific MO-2 RS. Under MO-2, an AOI may warrant no further action at this time (NFA-ATT), or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-2 limiting RS, then the Permittee may; (1) remediate to the MO-2 limiting RS (and comply with closure/post closure requirements for MO-2), or (2) proceed with a MO-3 evaluation.

**VIII.A.3.d. Use of Management Option 3** – The Permittee shall use Management Option 3 (MO-3) which provides the option of using site-specific data for the evaluation of exposure and the evaluation of environmental fate and transport at the AOI. The results of the site-specific evaluation may be to develop site-specific MO-3 RS. Under MO-3, an AOI may warrant no further action at this time (NFA-ATT), or if an exposure, source, or compliance concentration detected at the AOI exceeds a MO-3 limiting RS, then the Permittee shall; (1) remediate to the MO-3 RS, (2) conduct confirmatory sampling, and (3) comply with closure/post closure requirements for MO-3.

**VIII.A.4. Corrective Action for Releases Beyond Facility Boundary:** Condition 3004(v) of RCRA as amended by HSWA, and State regulations promulgated as LAC 33:V.3322.C require corrective actions beyond the facility property boundary, where necessary to protect human health and the environment, unless the Permittee demonstrates that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such actions. The Permittee is not relieved of all responsibility to clean up a release that has migrated beyond the facility boundary where offsite access is denied.

**VIII.A.5. Financial Responsibility:** Assurances of financial responsibility for corrective action shall be provided by the Permittee as specified in the Permit following major modification for remedy selection.

**VIII.A.6. Summary of Corrective Action Activities:** A summary of the corrective action activities associated with the facility is provided in Appendix 1 of Condition VIII of this permit. AOCs and SWMUs that are currently being managed or proposed for management under a prescribed corrective action program (e.g., groundwater order, corrective action order, CERCLA) are identified in Appendix 1, Table 1 of this permit.

## **VIII.B. PROJECT DEVELOPMENT AND SCOPING MEETING**

### **VIII.B.1. Notice of Intent**

To begin a Corrective Action Strategy (CAS) project, the Permittee must submit to the Administrative Authority a notice of intent to conduct corrective action using the CAS. The timing of the submission of the notification of intent may be determined at the discretion of the Administrative Authority. The notice of intent should state the following in a concise manner:

**VIII.B.1.a.** Commitment to conduct corrective action under a formal agreement (i.e., under this permit);

**VIII.B.1.b.** Request to conduct corrective action using the CAS;

**VIII.B.1.c.** General information regarding site location;

**VIII.B.1.d.** General information regarding the facility's operational history;

**VIII.B.1.e.** General discussion on how the Permittee will proceed through the CAS;

**VIII.B.1.f.** Brief description of proposed performance standards for corrective action; and

**VIII.B.1.g.** Request for a scoping meeting between the Permittee and the Administrative Authority.

**VIII.B.2.** The scoping meeting will serve as the first CAS milestone where the Permittee and the Administrative Authority identify expectations concerning CAS implementation. The length and extent of the meeting will depend on the complexity of the site. Agreements on land use, groundwater classification, and expectations for remediation goals will be

discussed during the scoping meeting(s). During the scoping meeting the Permittee should present the following information to the Administrative Authority:

- VIII.B.2.a.** Preliminary conceptual site model or any existing conceptual site model;
- VIII.B.2.b.** Discussions on history of corrective action at the facility, including site investigations, risk evaluations or risk assessments, interim measure/stabilizations and final remedies implemented;
- VIII.B.2.c.** Proposed performance standards for the facility with justification, and potential risk management approaches;
- VIII.B.2.d.** Discussions on how the Permittee plans to use the CAS to meet its corrective action obligations, including permitting and compliance issues;
- VIII.B.2.e.** *Communication strategy (i.e., how the Permittee and Administrative Authority will share information about the site);*
- VIII.B.2.f.** Site-specific concerns (i.e., sensitive environments or special subpopulations);
- VIII.B.2.g.** Need for interim measures or stabilization activities, if necessary;
- VIII.B.2.h.** Schedule for submittal of the CAS workplan and proposed schedule for conducting and completing CAS requirements, including public participation; and
- VIII.B.2.i.** A plan for dissemination of information to the public regarding site investigation activities and results prepared in accordance with the guidelines in LAC 33:V. Chapter 7 to be submitted to the Administrative Authority for review and approval. The plan must detail the minimum public participation that will occur during the corrective action process. At a minimum public participation should include the final remedy approval and final closure approval. In addition to the requirements above the plan should assess the need for further public participation on a case-by-case basis.

Information, plans, and reports that have already been developed by the Permittee during the corrective action process can be referenced during the scoping meeting. Unless otherwise specified by the Administrative Authority, the scoping meeting will be held at the facility.

**VIII.C. REPORTING REQUIREMENTS**

**VIII.C.1.** The Permittee shall submit, in accordance with Condition VII.A.8, signed reports of all activities conducted pursuant to the provisions of this Permit as required by this Administrative Authority. The reporting schedule shall be determined on a case by case basis by the Administrative Authority. These reports shall contain the information required by CAS, as well as the following:

- VIII.C.1.a.** A description of the work completed and an estimate of the percentage of work completed;
- VIII.C.1.b.** Summaries of all findings, including summaries of laboratory data;
- VIII.C.1.c.** Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;
- VIII.C.1.d.** Projected work for the next reporting period;
- VIII.C.1.e.** Summaries of contacts pertaining to corrective action or environmental matters with representatives of the local community, public interest groups or State government during the reporting period;
- VIII.C.1.f.** Changes in key project personnel during the reporting period; and;
- VIII.C.1.g.** Summaries of all changes made in implementation during the reporting period.

**VIII.C.2.** Copies of other reports relating to or having bearing upon the corrective action work (e.g., inspection reports), drilling logs and laboratory data shall be made available to the Administrative Authority upon request.

**VIII.C.3.** In addition to the written reports as required in Condition VIII.C.1 and VIII.C.2. above, at the request of the Administrative Authority, the Permittee shall provide status review through briefings with the Administrative Authority.

VIII.C.4. The determination and approval of remedy selections, schedules of submittals and minor changes to any corrective action workplans may be made by the Administrative Authority during scoping or status review briefings as described in Condition VIII.C.3.

**VIII.D. SPECIFIC CONDITION – CONCEPTUAL SITE MODEL**

At the discretion and within the time frame specified by the Administrative Authority, the Permittee shall submit to the Administrative Authority a preliminary Conceptual Site Model (CSM) which will cover background information and current conditions at the facility. The Permittee may propose the exclusion of information previously submitted to the Administrative Authority from the CSM. The Administrative Authority must approve the exclusion of any previously submitted information. At the discretion of the Administrative Authority, the CSM may be required for on-going corrective action or for newly identified SWMU(s) or AOC(s) according to Condition VIII.L of this permit (See Appendix 1, Ongoing Corrective Action) and based on new information and information not previously considered by the Administrative Authority. **Any requirements for a CSM would be specified in Appendix 1 and Condition VIII, Table 1 of the HSWA Condition by the Administrative Authority.**

The CSM shall consider and identify all data gaps. The CSM shall identify the known or potential constituent source(s) (primary as well as secondary and tertiary sources if applicable), routes of constituent migration, exposure media, exposure points and pathways, receptors and source media to be evaluated under the RECAP. The CSM shall be considered as the “base document” to be prepared and updated by the facility as new information is gathered during investigations. The CSM shall be used by the facility to make decisions regarding risk management options, ecological risk, and monitored natural attenuation determinations (RECAP Condition 2.12), or technical impracticability (TI) waiver determinations, when appropriate. The CSM shall be divided into Profiles as listed below.

**VIII.D.1. Facility Profile**

The Permittee shall include in the CSM a Facility Profile which shall summarize the regional location, pertinent boundary features, general facility structures, process areas, and locations of solid waste management units or other potential sources of contaminant migration from the routine and systematic releases of hazardous constituents to the environment (e.g., truck or railcar loading/unloading areas). The Permittee shall also include historical features that may be potential release areas because of past waste management practices. The Facility Profile shall include:

- VIII.D.1.a. Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of

sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.1.a.(1)** General geographic location;

**VIII.D.1.a.(2)** Property lines with the owners of all adjacent property clearly indicated;

**VIII.D.1.a.(3)** Facility structures, process areas and maintenance areas;

**VIII.D.1.a.(4)** Any other potential release areas shall be delineated, such as railcar loading/unloading areas or any other AOI as described in RECAP Condition 2.6; and ;

**VIII.D.1.a.(5)** Locations of historical features that may be potential release areas or any areas of past solid and hazardous waste generation, treatment, storage or disposal activities.

**VIII.D.1.b.** The Facility Profile shall also include a description of ownership and operation of the facility.

**VIII.D.1.c.** Approximate dates or periods of past waste spills, identification of the materials spilled, the amount spilled, the location where spilled, and a description of the response actions conducted (local, state, federal, or private party response units), including any inspection reports or technical reports generated as a result of the response.

**VIII.D.2. Land Use and Exposure Profile**

The Permittee shall include in the CSM a Land Use and Exposure Profile which includes surrounding land uses (industrial and non-industrial, as described in RECAP Conditions 2.9.1 and 2.9.2), resource use locations (water supply wells, surface water intakes, etc.), beneficial resource determinations (groundwater classifications as described in RECAP Condition 2.10), natural resources (wetlands, etc.), sensitive subpopulation types and locations (schools, hospitals, nursing homes, day care centers, etc.), applicable exposure scenarios, and applicable exposure pathways identifying the specific sources, releases, migration mechanisms, exposure media, exposure routes and receptors. The Land Use and Exposure Profile shall include:

**VIII.D.2.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.2.a.(1)** Surrounding land uses, resource use locations, and natural resources/wetlands;

**VIII.D.2.a.(2)** Locations of sensitive subpopulations; and

**VIII.D.2.a.(3)** An exposure pathway flowchart which outlines sources, migration pathways, exposure media and potential receptors as depicted in Figure 8 (Conceptual Model Example) of RECAP.

### **VIII.D.3. Physical Profile**

The Permittee shall include in the CSM a Physical Profile which shall describe the factors that may affect releases, fate and transport, and receptors, including; topography, surface water features, geology, and hydrogeology. The Physical Profile shall include:

**VIII.D.3.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V.Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.3.a.(1)** Topographic maps with a contour interval of five (5) or ten (10) feet, a scale of one inch to 100 feet (1:100), including hills, gradients, and surface vegetation or pavement;

**VIII.D.3.a.(2)** Surface water features including routes of all drainage ditches, waterways, *direction of flow*, and how they migrate to other surface water bodies such as canals and lakes;

**VIII.D.3.a.(3)** Regional geology including faulting and recharge areas, as well as local geology depicting surface features such as soil types, outcrops, faulting, and other surface features;

**VIII.D.3.a.(4)** Subsurface geology including stratigraphy, continuity (locations of facies changes, if known), faulting and other characteristics;

**VIII.D.3.a.(5)** Maps with hydrogeologic information identifying water-bearing zones, hydrologic parameters such as transmissivity, and conductivity. Also locations and thicknesses of aquitards or impermeable strata; and

**VIII.D.3.a.(6)** Locations of soil borings and production and groundwater monitoring wells, including well log information, and construction of cross-sections which correlate substrata. Wells shall be clearly labeled with ground and top of casing elevations (can be applied as an attachment).

#### **VIII.D.4. Release Profile**

The Permittee shall include in the CSM a Release Profile which shall describe the known extent of contaminants in the environment, including sources, contaminants of concern (COC), areas of investigations, distribution and magnitude of known COCs with corresponding sampling locations, and results of fate and transport modeling depicting potential future extent/magnitude of COCs. The Release Profile shall include:

**VIII.D.4.a.** Map(s) and other documents depicting the following information (all maps shall be consistent with the requirements set forth in LAC 33:V. Chapter 5 and be of sufficient detail and accuracy to locate and report all current site conditions):

**VIII.D.4.a.(1)** Estimations of source concentrations, exposure concentrations and compliance concentrations for each affected media as defined in Condition 2.8 of RECAP;

**VIII.D.4.a.(2)** Isopleth maps depicting lateral extent and concentrations of COCs;

**VIII.D.4.a.(3)** Results of fate and transport modeling showing potential exposure concentrations and locations; and

**VIII.D.4.a.(4)** Locations of potential sources including past or present waste units or disposal areas and all SWMUs.

**VIII.D.4.b.** Table(s) depicting the following information. Unit/disposal area characteristics, including but not limited to: location of unit/disposal area; type of unit/disposal area; design features; operating practices (past and present); period of operation; age of unit/disposal area; general physical condition; and method used to close the unit/disposal area.

**VIII.D.4.c.** Table(s) depicting waste characteristics, including but not limited to: type of waste placed in the unit (hazardous classification, quantity, chemical composition), physical and chemical characteristics (physical form, description, temperature, pH, general chemical class, molecular weight, density, boiling point, viscosity, solubility in water, solubility in solvents, cohesiveness, vapor pressure); and migration and dispersal characteristics of the waste (sorption coefficients, biodegradability, photodegradation rates, hydrolysis rates, chemical transformations).

**VIII.D.5. Ecological Profile**

The Permittee shall include in the CSM an Ecological Profile that shall describe the physical relationship between the developed and undeveloped portions of the facility, the use and level of disturbance of the undeveloped property, and the type of ecological receptors present in relation to completed exposure pathways. When compiling data for the Ecological Profile, current as well as future impacts to receptors and/or their habitats shall be considered. The Ecological Profile shall include:

**VIII.D.5.a.** A history and description of the developed property on the facility, including structures, process areas, waste management units, and property boundaries.

- VIII.D.5.b.** A history and description of the undeveloped property, including habitat type (wetland, grassy area, forest, ponds, etc.). Include a description of the primary use, degree and nature of any disturbance, along with proximity to drainage ditches, waterways and landfill areas.
- VIII.D.5.c.** A description of the site receptors in relation to habitat type, including endangered or protected species, mammals, birds, fish, etc.
- VIII.D.5.d.** A description of the relationship between release areas and habitat areas, specifically relating chemicals of potential ecological concern (COEC) to ecological receptors.
- VIII.D.5.e.** An ecological checklist as described in Condition 7.0 of RECAP. An ecological checklist (presented in Appendix C, Form 18 of the RECAP) shall be used to determine if a tier 1 (screening level) Ecological Risk Assessment (ERA) is warranted.

**VIII.D.6. Risk Management Profile**

The Permittee shall include in the CSM a Risk Management Profile that shall describe how each AOI at the facility will be managed for the protection of human health and the environment. The Risk Management Profile will serve as documentation of the results of the site ranking system (described in Condition 2.2 of RECAP). The Risk Management Profile will also document the criteria and verify that the SO, MO-1, MO-2 or MO-3 is appropriate for application at each AOI. The Risk Management Profile shall include:

- VIII.D.6.a.** A table for tracking the management options for each AOI, and the determination made, whether an AOI is deemed for no further action (NFA) or is going to use either the SO, MO-1, MO-2 or MO-3 management option.
- VIII.D.6.b.** A list of identified site-wide data gaps for further investigation.
- VIII.D.6.c.** Documentation of all interim measures which have been or are being undertaken at the facility, including under State or Federal compliance orders, other than those specified in the Permit. This documentation shall include the objectives of the interim measures and how

the measure is mitigating a potential threat to human health or the environment and/or is consistent with and integrated into requirements for a long term remedial solution.

**VIII.D.7. Conceptual Site Model – Ongoing Activities**

The Administrative Authority can direct the Permittee to submit a CSM for any new or existing release. Alternatively, the Administrative Authority can request that the Permittee revise the CSM for an existing release should the CSM not meeting the requirements of this Permit or LAC 33:I. Chapter 13.

**VIII.E. INTERIM MEASURES**

**VIII.E.1.** If during the course of any activity initiated under this Permit, the Administrative Authority determines that a release or potential release of hazardous constituents from a SWMU poses a threat to human health and the environment, the Administrative Authority may require interim measures. The Administrative Authority shall determine the specific measure(s) or require the Permittee to propose a measure(s). The interim measure(s) may include a permit modification, a schedule for implementation, and a written plan. The Administrative Authority may modify this Permit according to LAC 33:V.321 to incorporate interim measures into the Permit. However, depending upon the nature of the interim measure, a permit modification may not be required.

**VIII.E.2.** The Permittee may propose interim measures at any time. The proposal shall include a written plan and a schedule for implementation.

**VIII.E.3.** The Administrative Authority may determine the need for an interim measure at any time during the corrective action process. The Administrative Authority shall notify the Permittee in writing of the requirement to perform an interim measure. The following factors will be considered by the Administrative Authority in determining the need for interim measures and the need for permit modification:

- VIII.E.3.a.** Time required developing and implementing a final remedy;
- VIII.E.3.b.** Actual and potential exposure to human and environmental receptors;
- VIII.E.3.c.** Actual and potential contamination of drinking water supplies and sensitive ecosystems;

- VIII.E.3.d. The potential for further degradation of the medium in the absence of interim measures;
  - VIII.E.3.e. Presence of hazardous wastes in containers that may pose a threat of release;
  - VIII.E.3.f. Presence and concentration of hazardous waste including hazardous constituents in soil that has the potential to migrate to ground water or surface water;
  - VIII.E.3.g. Weather conditions that may affect the current levels of contamination;
  - VIII.E.3.h. Risks of fire, explosion, or accident; and
  - VIII.E.3.i. Other situations that may pose threats to human health and the environment.
- VIII.E.4. Upon approval of the Interim Measure(s) workplan and completion of the Interim Measure implementation, the Permittee will submit a report to the Administrative Authority describing the completed work.
- VIII.E.5. At anytime during or after the Interim Measures, including the issuance of an NFA-ATT, the Administrative Authority may require the Permittee to submit the SWMU(s) for further corrective action.

**VIII.F. CAS (CORRECTIVE ACTION STRATEGY) WORKPLAN**

- VIII.F.1. The CAS workplan that describes site investigation activities for corrective action shall be submitted to the Administrative Authority within 180 calendar days after the scoping meeting between the Permittee and the Administrative Authority. The CAS workplan must address releases of hazardous waste or hazardous constituents to all media, unless otherwise indicated on Appendix 1, Table 1 for those SWMUs listed in Appendix 1, Table 1. The focus of the site investigation phase for corrective action is to collect data to fill in data gaps identified in the CSM. The corrective action investigations may be conducted in phases if warranted by site conditions, contingent upon approval by the Administrative Authority.
- VIII.F.1.a. The CAS workplan shall describe the management options (MO) for each AOI/release area, data quality objectives for achieving each management option, and proposals for release characterizations (sampling and analysis/quality assurance plans) to support the data quality objectives (DQO's). (DQOs are determined

based on the end use of the data to be collected, and the DQO development process should be integrated into project planning and refined throughout the CAS implementation. DQOs shall be used to 1) ensure that environmental data are scientifically valid, defensible, and of an appropriate level of quality given the intended use, and 2) expedite site investigations. The CAS Work Plan is required to have DQOs that are developed to support the performance standard for each release.) The CAS workplan shall detail all proposed activities and procedures to be conducted at the facility, the schedule for implementing and completing such investigations, the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the site investigations. The scope of work for the site investigation can be found in RECAP Appendix B.

**VIII.F.1.b.** The CAS workplan shall describe sampling, data collection quality assurance, and data management procedures, including formats for documenting and tracking data and other results of investigations, and health and safety procedures.

**VIII.F.1.c.** Development of the CAS workplan and reporting of data shall be consistent with the following EPA and State guidance documents or the equivalent thereof:

**VIII.F.1.c.(1)** Guidance for the Data Quality Assessment, Practical Methods for Data Analysis. QA97 Version EPA QA/G-9. January 1998;

**VIII.F.1.c.(2)** Guidance for the Data Quality Objectives Process. EPA QA/G-4. September 1994;

**VIII.F.1.c.(3)** Data Quality Objectives Remedial Response Activities. EPA/540/G87-003. March 1987;

**VIII.F.1.c.(4)** Guidance on Quality Assurance Project Plans. EPA QA/G-5. February 1998;

**VIII.F.1.c.(5)** Interim EPA Data Requirements for Quality Assurance Project Plans. EPA Region 6, Office of Quality Assurance. May 1994;

**VIII.F.1.c.(6)** 29 CFR 1910.120 (b) for the elements to Health and Safety plans;

**VIII.F.1.c.(7)** RCRA Groundwater Monitoring: Draft Technical Guidance EPA/530-R-93-001 November 1992;

**VIII.F.1.c.(8)** Test Methods for Evaluating Solid Waste, Physical/Chemical Methods; SW-846, 3<sup>rd</sup> Edition. November 1992, with revisions;

**VIII.F.1.c.(9)** LDEQ Handbook - **Construction of Geotechnical Boreholes and Groundwater Monitoring Systems,** prepared by the LDEQ and the Louisiana Department of Transportation and Development, dated May, 1993. This document is printed by and available from the Louisiana Department of Transportation and Development, Water Resources Condition, P. O. Box 94245, Baton Rouge, Louisiana 70804-9245; and

**VIII.F.1.c.(10)** LAC 33:I. Chapter 13 and Louisiana Department of Environmental Quality Risk Evaluation/Corrective Action Program (RECAP), October 20, 2003 with revisions.

**VIII.F.2.** After the Permittee submits the CAS workplan, the Administrative Authority will approve, disapprove, or otherwise modify the CAS workplan in writing.

If the Administrative Authority approves the workplan, the Permittee shall begin implementation of the plan within two weeks (14 days) of receipt of approval, and implement it according to the schedule contained in the plan. All approved workplans become incorporated into this Permit as per Permit Condition VII.A.9.

In event of disapproval (in whole or in part) of the workplan, the Administrative Authority shall specify deficiencies in writing. The Permittee shall modify the CAS workplan to correct these within the time frame specified in the notification of disapproval by the Administrative Authority. The modified workplan shall be submitted in writing to the Administrative Authority for review. Should the Permittee take exception to all or part of the disapproval, the Permittee shall submit a written statement of the ground for the exception within fourteen (14) days of receipt of the disapproval.

**VIII.F.3.** The Administrative Authority shall review for approval as part of the CAS workplan or as a new workplan any plans developed pursuant to Permit Condition VIII.L. addressing further investigations of newly-identified SWMUs or AOIs, or Permit Condition VIII.M. addressing new releases from previously-identified SWMUS or AOIs.

**VIII.G. IMPLEMENTATION OF SITE INVESTIGATION ACTIVITIES UNDER CAS**

No later than fourteen (14) calendar days after the Permittee has received written approval from the Administrative Authority for the CAS workplan, the Permittee shall implement the site investigation activities according to the schedules and in accordance with the approved CAS workplan and the following:

**VIII.G.1.** The Permittee shall notify Administrative Authority at least 10 working days prior to any field sampling, field-testing, or field monitoring activity required by this Permit to give LDEQ personnel the opportunity to observe investigation procedures and/or split samples.

**VIII.G.2.** Deviations from the approved CAS workplan, which are necessary during implementation, must be approved by the Administrative Authority and fully documented and described in the progress reports (Permit Condition VIII.C.) and the final Risk Management Plan, Condition VIII.J.

**VIII.H. RECAP REPORT**

Within ninety (90) days after completion of the site investigation the Permittee shall submit a RECAP Report to the Administrative Authority for Approval. The RECAP Report shall document the results of the site investigation activities, and the evaluation of the impacts from releases. If the Administrative Authority determines the RECAP Report does not fully meet the objectives stated in the CAS workplan (Permit Condition VIII.F.), the Administrative Authority shall notify the Permittee in writing of the report's deficiencies, and specify a due date for submittal of a revised Final Report to the Administrative Authority.

**VIII.H.1.** The Permittee shall screen site-specific data using the appropriate RECAP standard (RS) for each AOI (depending on the MO), evaluate impacts from releases with exposure scenario evaluations, and update the Risk Management Profile of the CSM.

**VIII.H.2.** The report shall include, but not be limited to, the following:

**VIII.H.2.a.** Documentation of site investigation activities and results;

**VIII.H.2.b.** Evaluation of exposure scenarios to document impacts from releases;

**VIII.H.2.c.** Results of screening activities using RECAP standards (RS), including SO, MO-1, MO-2, or MO-3 RS for each media;

**VIII.H.2.d.** The revised CSM with updated profiles which incorporate investigation and screening results; and

**VIII.H.2.e.** Proposed revisions to performance standards based on new information (e.g., change in land use, difference in expected receptors and/or exposure, or other differences in site conditions), if warranted.

**VIII.I. REMEDY EVALUATION/SELECTION**

Upon completion and approval of the RECAP Report, the Permittee shall proceed with the evaluation of remedial alternatives to complete corrective action for each AOI. Remediation standards for each AOI are described in Permit Condition VIII.A.2. The remedy selections will be presented to the Administrative Authority in the Risk Management Plan.

**VIII.I.1.** The Permittee shall select remedies for each AOI that shall:

**VIII.I.1.a.** attain compliance with corrective action objectives for releases of hazardous waste and/or hazardous constituents, as established in the Conceptual Site Model or in later investigations approved by the Administrative Authority;

**VIII.I.1.b.** control sources of releases;

**VIII.I.1.c.** meet acceptable waste management requirements; and

**VIII.I.1.d.** protect human health and the environment.

**VIII.I.2.** The Permittee shall evaluate the use of presumptive remedies and innovative technologies to achieve the appropriate remediation standards for each AOI.

- VIII.I.3.** The Permittee shall review the current interim measures/ stabilization activities to evaluate if these measures meet all the criteria for final remedy.
- VIII.I.4.** If under certain site-specific conditions, or when it is not technically or economically feasible to attain the corrective action objectives, the Permittee may propose to use institutional controls to supplement treatment or containment-based remedial actions upon approval of the Administrative Authority (Condition 2.15 of RECAP).
- VIII.I.5.** The Permittee shall propose corrective action remedies in accordance with Chapter IV of the RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3 -2A or as directed by the Administrative Authority.

**VIII.J. RISK MANAGEMENT PLAN**

After the evaluation of remedial alternatives, the remedy selections shall be documented in the Risk Management Plan and Summary. The plan shall be submitted within a timeframe to be determined by the Administrative Authority in the approval of the RECAP Report.

- VIII.J.1.** The Risk Management Plan shall at a minimum include:
  - VIII.J.1.a.** A summary of the remedial alternatives for each AOI and the rationale used for remedy selection;
  - VIII.J.1.b.** The final conceptual site model (CSM) with remedies, including locations of AOIs addressed by a risk management activity, constituent of concern (COC) concentrations that represent the long-term fate and transport of residual COC's and the exposure pathways affected by the risk management activity;
  - VIII.J.1.c.** Cost estimates and implementation schedules for final remedies;
  - VIII.J.1.d.** Remedy design and implementation precautions, including special technical problems, additional engineering data required, permits and regulatory requirements, property access, easements, and right-of-way, special health and safety requirements, and community relations activities;

**VIII.J.1.e.** Remedy performance criteria and monitoring:

The Permittee shall identify specific criteria (such as land use changes, fate and transport model verification and constructed remedy performance) that will be evaluated to demonstrate that the risk management activity implemented will remain protective. A schedule for periodic performance review (such as monitoring data summaries, possibly including graphical and statistical analyses) shall be established to demonstrate that the implemented activities are consistently achieving and maintaining desired results. Further, a mechanism shall be established to re-evaluate risk management activities in the event the implemented action does not achieve and maintain the performance standards;

**VIII.J.1.f.** Contingency plans; and

**VIII.J.1.g.** Description and schedules for performance reviews.

**VIII.J.2.** After the Permittee submits the Risk Management Plan and Summary, the Administrative Authority will either approve or disapprove them in writing. Should the Permittee take exception to the disapproval, decision, or directive, the Permittee shall notify the Administrative Authority.

**VIII.J.3.** If the Administrative Authority determines the Risk Management Plan and Summary do not fully meet the remedial objectives, the Administrative Authority may disapprove the Risk Management Plan and Summary. In addition the Administrative Authority may require the Permittee to evaluate additional remedies or particular elements of one or more proposed remedies. If the Administrative Authority disapproves the report, the Administrative Authority shall notify the Permittee in writing of the report's deficiencies and specify a due date for submittal of a revised Final Risk Management Plan and Summary.

**VIII.J.4.** Within thirty (30) calendar days after approval of the Risk Management Plan and Summary, the Administrative Authority shall initiate modification of the Permit according to LAC 33:V.321.C, for remedy selection, based on the approved Risk Management Plan. The resultant modified permit will include schedules for remedy implementation.

**VIII.K. DETERMINATION OF NO FURTHER ACTION**

**VIII.K.1.** Based on the results of the site investigations, screening, risk evaluations and risk management activities, the Permittee may submit an application to the Administrative Authority for a Class 3 permit modification under LAC 33:V.321.C.3. to terminate further corrective action for a specific unit. This permit modification application must contain information demonstrating that there are no releases of hazardous constituents from a particular SWMU at the facility that pose threats to human health and/or the environment, as well as additional information required in LAC 33:V.321.C.3.

The basis for the determination of no further action shall follow the guidelines as described in the RECAP for each AOI, depending on the MO used.

If, based upon review of the Permittee's request for a permit modification, the results of the site investigations, and other information, including comments received during the sixty (60) day public comment period required for Class 3 permit modifications, the Administrative Authority determines that releases or suspected releases which were investigated either are non-existent or do not pose a threat to human health and/or the environment, the Administrative Authority may grant the requested modification.

**VIII.K.2.** If necessary to protect human health and/or the environment, a determination of no further action shall not preclude the Administrative Authority from requiring continued monitoring of air, soil, groundwater, or surface water, when site-specific circumstances indicate that releases of hazardous waste or hazardous constituents are likely to occur.

**VIII.K.3.** A determination of no further action shall not preclude the Administrative Authority from requiring further investigations, studies, or remediation at a later date, if new information or subsequent analysis indicates a release or likelihood of a release from a SWMU at the facility that is likely to pose a threat to human health and/or the environment. In such a case, the Administrative Authority shall initiate a modification to the Permit according to LAC 33:V.321.

**VIII.L. NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF NEWLY-IDENTIFIED SWMUs AND POTENTIAL AOCs**

**VIII.L.1.** The Permittee shall notify the Administrative Authority, in writing, of any newly-identified SWMU(s) and potential AOC(s) (i.e., a unit or area not specifically identified during previous corrective action assessments, RFA, etc.), discovered in the course of ground water

monitoring, field investigations, environmental audits, or other means, no later than thirty (30) calendar days after discovery. The Permittee shall also notify the Administrative Authority of any newly-constructed land-based SWMUs (including but not limited to, surface impoundments, waste piles, landfills, land treatment units) and newly-constructed SWMUs where any release of hazardous constituents may be difficult to identify (e.g., underground storage tanks) no later than thirty (30) days after construction. The notification shall include the following items, to the extent available:

**VIII.L.1.a.** The location of the newly-identified SWMU or potential AOC on the topographic map required under LAC 33:V.517.B. Indicate all existing units (in relation to other SWMUs);

**VIII.L.1.b.** The type and function of the unit;

**VIII.L.1.c.** The general dimensions, capacities, and structural description of the unit (supply any available drawings);

**VIII.L.1.d.** The period during which the unit was operated;

**VIII.L.1.e.** The specifics, to the extent available, on all wastes that have been or are being managed at the SWMU or potential AOC; and

**VIII.L.1.f.** Results of any sampling and analysis required for the purpose of determining whether releases of hazardous waste including hazardous constituents have occurred, are occurring, or are likely to occur from the SWMU or whether the AOC should be considered a SWMU.

**VIII.L.2.** Based on the results of this Notification the Administrative Authority will designate the newly-identified AOC(s). Further, the Administrative Authority will determine the need for further investigations or corrective measures at any newly identified SWMU(s) or AOC(s). If the Administrative Authority determines that such investigations are needed, the Administrative Authority may require the Permittee to prepare a plan for such investigations. The plan for investigation of SWMU(s) or AOC(s) will be reviewed for approval as part of the current CAS Workplan or a new CAS Workplan. Appendix 1, Table 1 of this permit will be modified to incorporate the investigation requirements for the newly-identified SWMUs and potential AOC(s) identified pursuant to Condition VIII.L.1.

**VIII.M.****NOTIFICATION REQUIREMENTS FOR NEWLY-DISCOVERED  
RELEASES AT SWMU(S) AND AOC(S)**

The Permittee shall notify the Administrative Authority in writing, no later than fifteen (15) calendar days after discovery, of any release(s) from a SWMU or AOC of hazardous waste or hazardous constituents discovered during the course of ground water monitoring, field investigation, environmental auditing, or other means. Such newly-discovered releases may be from newly-identified SWMUs or AOCs, newly-constructed SWMUs, or from SWMUs or AOCs for which, based on the findings of the, CSM, completed RER, or investigation of an AOC(s), the Administrative Authority had previously determined no further investigation was necessary. The notification shall include information concerning actual and/or potential impacts beyond the facility boundary and on human health and the environment, if available at the time of the notification. The Administrative Authority may require further investigation and/or interim measures for the newly-identified release(s), and may require the Permittee to prepare a plan for the investigation and/or interim measure. The plan will be reviewed for approval as part of the CAS Work Plan or a new CAS Work Plan. The Permit will be modified according to LAC 33:V.321 to incorporate the investigation, if required.

**Table 1: Corrective Action Strategy Notification and Reporting Requirements**

Below is a summary of the major notifications and reports that must be submitted by the Permittee to the Administrative Authority under the Corrective Action Strategy of this Permit in the event of releases requiring RCRA corrective action.

<u>Actions</u>	<u>Due Date</u>
Submit Notification of Intent to request use of the CAS to the Administrative Authority for review and comment (Condition VIII.B.1)	Within the timeframe specified by the Administrative Authority
CAS Scoping Meeting held between facility and Administrative Authority (Condition VIII.B.2)	Within the timeframe specified by the Administrative Authority
Submit Progress Reports on all activities to the Administrative Authority (Condition VIII.C.1)	Schedule to be determined by the Administrative Authority on a case by case basis
Make available other reports relating to corrective action to the Administrative Authority (Condition VIII.C.2)	Upon request of the Administrative Authority
Provide briefings to the Administrative Authority (Condition VIII.C.3)	As necessary and upon request by the Administrative Authority
Submit preliminary Conceptual Site Model (CSM) to the Administrative Authority (Condition VIII.D)	Within the timeframe specified by the Administrative Authority
Perform Interim Measures (Condition VIII.E)	As determined by the Administrative Authority on a case by case basis
Submit Corrective Action Strategy (CAS) Workplan to the Administrative Authority (Condition VIII.F)	Within 180 calendar days after the CAS Scoping Meeting
Implement site investigation activities under CAS Workplan according to approved schedule (Condition VIII.G)	Within fourteen (14) days of receipt of approval by the Administrative Authority
Submit RECAP Report and Summary to the Administrative Authority (Condition VIII.H)	Within ninety (90) days of completion of the site investigation
Submit Risk Management Plan and Summary to the Administrative Authority (Condition VIII.J)	Within sixty (60) days of approval of the RECAP Report
Submit NFA (and Permit Modification) request to the Administrative Authority (Condition VIII.K)	As necessary
Notification of newly-identified SWMUs and potential AOCs (Condition VIII.L)	Thirty (30) calendar days after discovery
Notification of newly-discovered releases (Condition VIII.M)	Fifteen (15) calendar days after discovery

## APPENDIX 1

### SUMMARY OF CORRECTIVE ACTION ACTIVITIES

BASF's original RCRA Facility Investigation (RFI) addressed fifteen solid waste management units (SWMU) and three areas of concern. Since the implementation of the investigative activities, BASF has discovered and reported three additional SWMUs described in Table 1 of the HWSA section.

BASF originally organized the SWMUs/AOCs into three groups (A, B, and C) for investigative and reporting purposes. In the RFI Report and subsequent submittals, BASF has recommended no further action for a number of SWMUs/AOCs. This Hazardous Waste Operating Permit will serve as the corrective action vehicle for these requests. BASF will submit to the administrative authority a Preliminary Conditions Report summarizing and updating the site-wide corrective action activities. The report will include documentation of any no further action determinations issued by the administrative authority. Permit Section II.E.21.e details the requirement for this report.

Two SWMUs/AOCs not covered under this permit include the Secondary Treatment Facility (SWMU 1) for which BASF submitted a RCRA Post-Closure Permit Application on January 5, 1993 and the EDC Spill Area (AOC 1) managed by Vulcan Chemicals. Vulcan Chemicals has implemented assessment and corrective action at AOC 1 and reports these activities to the administrative authority.

TABLE 1. SUMMARY OF CORRECTIVE ACTION ACTIVITIES

<i>SWMU/AOC Number/Group</i>	<i>SWMU/AOC Description &amp; Comments</i>	<i>Corrective Action Vehicle</i>	<i>Status of CA Activity</i>	<i>Document Dates<sup>1</sup></i>	<i>EDMS Document ID #<sup>2</sup></i>
1	Secondary Treatment Facility	Proposed Post-Closure Permit	No further activities under HSWA	N/A	5311044 5311116 5311334
2	Former TDI Incinerator	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334
3	Former TDI Burn Pit	HSWA Permit	Corrective Measure Implementation Recommended	6/13/1991	5311044 5311116 5311334
4	Former Basagran Area	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334
5	Amines Boiler	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334
6	MDI Plant Process and Storm water Sump	HSWA Permit	Proposed Removal From HSWA Requirements	6/13/1991	5311044 5311116 5311334
7	EO/EG Plant Process and Storm water Sump	HSWA Permit	Proposed Removal From	6/13/1991	5311044 5311116

<sup>1,2</sup> - Documents that reflect appropriate corrective action milestones should be included in this column (e.g., CAS workplan, RECAP Report, Risk Management Plan, and No Further Action Approval.)

<i>SWMU/AOC Number/Group</i>	<i>SWMU/AOC Description &amp; Comments</i>	<i>Corrective Action Vehicle</i>	<i>Status of CA Activity</i>	<i>Document Dates</i>	<i>EDMS Document ID #</i>
			HSWA Requirements		5311334
8	Former Sludge Thickening Beds	HSWA Permit	Interim Measures	6/13/1991	5311044 5311116 5311334
9	Mercury and Asbestos Landfill	HSWA Permit	Complete Corrective Action Strategy Workplan	6/13/1991	5311044 5311116 5311334
10	Former G-2 Electrolytics Area	HSWA Permit	Complete Corrective Action Strategy Workplan	6/13/1991	5311044 5311116 5311334
11	Brine Muds and Biosludge Landfill	HSWA Permit	Complete Corrective Action Strategy Workplan	6/13/1991	5311044 5311116 5311334
12	Electrolytics Brine Muds Pond and Storage Area	HSWA Permit	Complete Corrective Action Strategy Workplan	6/13/1991	5311044 5311116 5311334
13	Former Fire Protection Training Area	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334
14	Construction Debris Landfill	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116/5311334
15	Sandblasting Area	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116

<i>SWMU/AOC Number/Group</i>	<i>SWMU/AOC Description &amp; Comments</i>	<i>Corrective Action Vehicle</i>	<i>Status of CA Activity</i>	<i>Document Dates</i>	<i>EDMS Document ID #<sup>2</sup></i>
16	D-100 Area	HSWA Permit	NFAAT Proposed	6/13/1991	5311334 5311044 5311116 5311334
17	EO/EG Kerosene Tank Farm	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334
18	DNT Contamination Area	HSWA Permit	Complete Corrective Action Strategy Workplan	9/5/2000	22816117
AOC 1	EDC Spill Area	Corrective Action Assumed by Third Party	Not Applicable	Not Applicable	Not Applicable
AOC 2	TCE Contamination Area	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334
AOC 3	TDA Loading Area	HSWA Permit	NFAAT Proposed	6/13/1991	5311044 5311116 5311334

# ATTACHMENT 1

**ATTACHMENT 1**  
**LIST OF FACILITY DOCUMENTS INCORPORATED**  
**IN THE PERMIT BY REFERENCE**  
**LAD040776809**

**AI#2049**

DOCUMENT TYPE	APPLICATION /DOCUMENT DATE	ELECTRONIC DATABASE MANAGEMENT SYSTEM (EDMS) DOCUMENT ID	COMMENTS
Arrangement with local authorities	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 3
Closure cost estimates	12/1/2000	14867204,14867711	Vol. IX, Appendix J, Attachment 1
Closure Plan	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 4
Contingency Plan	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 3
Inspection Plan	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 5
Security Plan	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 3
Personnel Training Plan	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 2
Waste Analysis Plan	12/1/2000	14871898,14872266	Vol. IV, Appendix A, Attachment 1