

2510-FM-BWM0085 Rev. 3/2007

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

Permit
For
Hazardous Waste Treatment, Storage, and/or Disposal Facility

Permit No. PA0890090004
Date Issued FEBRUARY 26, 2009
Date Expired FEBRUARY 2, 2016

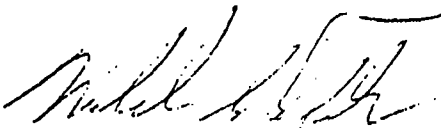
Under the provisions of the Pennsylvania Solid Waste Management Act of July 7, 1980, Act 97, a permit for hazardous waste treatment, storage, and/or disposal facility in (municipality) W MIFFLIN BOROUGH in the County of ALLEGHENY is granted to (applicant) U.S. DEPARTMENT OF ENERGY, NAVAL REACTORS LABORATORY FIELD OFFICE (address) B14 PITTSBURGH-MCKEESPORT BLVD
WEST MIFFLIN PA 15122

This permit is applicable to the facility named as BETTIS ATOMIC POWER LABORATORY and described as:

HAZARDOUS WASTE CONTAINER STORAGE FACILITY AND MIXED WASTE CONTAINER STORAGE FACILITY

This permit is subject to modification, amendment and supplement by the Department of Environmental Protection and is further subject to revocation or suspension by the Department of Environmental Protection for any violation of the applicable laws or the rules and regulations adopted thereunder, for failure to comply in whole or in part with the conditions of this permit and the provisions set forth in the application no. PA0890090004 which is made a part hereof, or for causing any condition inimical to the public health, safety or welfare.

See attachment for waste limitations and/or special conditions



FOR THE DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
PERMIT
FOR HAZARDOUS AND MIXED WASTE FACILITY STORAGE

Permittee: U. S. Department of Energy
Naval Reactors Laboratory Field Office **Permit Number:** PA0890090004

Facility: Bettis Atomic Power Laboratory

This permit is issued by the Commonwealth of Pennsylvania, Department of Environmental Protection (DEP), under authority of the Pennsylvania Solid Waste Management Act, the Act of July 7, 1980, Act 97, 35 P.S. Section 6018.101, et seq. (the Act) and DEP hazardous waste regulations to the U. S. Department of Energy, Naval Reactors Laboratory Field Office, Bettis Atomic Power Laboratory (hereafter called the Permittee), to operate a hazardous waste management facility located in West Mifflin, Allegheny County, Pennsylvania, at Latitude 40° 21' 37" North and Longitude 79° 53' 55" West.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (Parts I – III consisting of Pages 1 through 19 and Attachments 1 through 6) and the applicable regulations contained in 25 Pa. Code Chapters 260a-270a as specified in the permit.

This permit is based on the assumption that the information submitted in the permit application attached to the Permittee's letter dated August 20, 2004 as modified by subsequent amendments dated January 12, 2005, August 30, 2005 and the Class 1 minor modification requests dated July 6, 2006, and January 30, 2009 (hereafter referred to as the Application) is accurate and that the facility will be constructed and/or operated as specified in the Application. Any inaccuracies found in this information may be grounds for the revocation or modification of this permit and potential enforcement action. The Permittee must inform DEP 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 is conditioned upon full compliance with all applicable provisions of the Act; DEP regulations contained in 25 Pa. Code Chapters 260a-270a; the Clean Streams Law, 35 P.S. § 691.1, et seq.; the Air Pollution Control Act, 35 P.S. § 4001, et seq.; the Dam Safety and Encroachments Act, 32 P.S. § 693.1, et seq.; the Surface Mining Conservation and Reclamation Act, 52 P.S. § 1396.1, et seq.; the Coal Refuse Disposal Control Act, 52 P.S. § 30.51, et seq. all other Pennsylvania statutes related to the protection of the environment; and all Pennsylvania statutes related to the protection of public health, safety, and welfare. This permit is further conditioned upon full compliance with the EPA Final Administrative Order on Consent issued pursuant to Section 3008(h) of the Resource Conservation and Recovery Act.

This permit is effective as of February 26, 2009, and shall remain in effect until February 2, 2016, unless modified, terminated or revoked in accordance with 25 Pa. Code §§ 270a.41, 270a.42 and 270a.43, or continued.

PART I - STANDARD CONDITIONS

A. EFFECT OF PERMIT

This permit authorizes only the management of hazardous waste and mixed (hazardous and radioactive) waste expressly described in this permit and does not authorize any other management of hazardous or mixed waste. 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 laws or regulations. Compliance with the terms of this permit does not constitute a defense to any action brought under the Act or any other law governing protection of public health or the environment.

B. PERMIT ACTIONS

This permit may be modified, terminated or revoked for cause as specified in 25 Pa. Code §§ 270a.41, 270a.42, and 270a.43 or suspended in accordance with the Act. The filing of a request for a permit modification, termination, or revocation or the notification of planned changes or anticipated noncompliance on the part of the Permittee does not stay or supersede the applicability or enforceability of any permit condition.

C. SEVERABILITY

The provisions 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 to be invalid, the application of such provision to other circumstances and the remaining provisions of this permit shall not be affected thereby.

D. DEFINITIONS

For the purpose of this permit, terms used herein shall have the same meaning as those in Title 25 of the Pennsylvania Code (25 Pa. Code Chapters 260a-270a), unless this permit specifically states otherwise; where terms are not otherwise defined, the meaning associated with such terms shall be as defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term. "The Department" is the Department of Environmental Protection of the Commonwealth of Pennsylvania.

E. REPORTS, NOTIFICATIONS AND SUBMISSIONS TO THE DEPARTMENT

All reports, notifications or other submissions which are required by this permit to be sent or given to the Department should be sent certified mail or given to:

Department of Environmental Protection
Waste Management
400 Waterfront Drive
Pittsburgh, PA 15222-4745
Attn: Regional Manager

F. SIGNATORY REQUIREMENTS

All reports or other information requested by the Department shall be signed and certified as required by 40 CFR § 270.11 (incorporated by reference at 25 Pa. Code Chapter 270a).

G. DOCUMENTS TO BE MAINTAINED AT THE FACILITY SITE

The Permittee shall maintain at the facility, until closure is completed and certified by an independent registered professional engineer, the following documents and amendments, revisions and modifications to these documents as required by 40 CFR Part 264 (incorporated by reference at 25 Pa. Code Chapter 264a) and this permit:

1. Waste analysis plan.
2. Personnel training documents and records.
3. Contingency plan.
4. Closure plan.
5. Annually-adjusted cost estimate for facility closure.
6. Operating record.
7. Inspection schedules and logs.
8. Documents required by Part I, Sections H.8, 12, 14, and Part II, Sections D, E, G, H, J of this permit.

H. DUTIES AND REQUIREMENTS

1. Duty to Comply. The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and the regulations promulgated thereunder and is grounds for enforcement action; for permit revocation, revocation and reissuance, or modification; or for denial of a permit renewal application.

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 submit a complete application for a new permit at least 180 days before this permit expires.
3. Permit Expiration. This permit and all conditions therein will remain in effect beyond the permit's expiration date if the Permittee has submitted a timely, complete application and through no fault of the Permittee, the Department has not issued a new permit.
4. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action to argue that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
5. Proper Operation and Maintenance. The Permittee shall at all times properly operate and maintain all facilities and systems of storage, treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the Act, the regulations, and the conditions of this permit. Proper operation and maintenance shall include effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. The Permittee shall operate back-up or auxiliary facilities or similar systems if necessary to achieve compliance with the Act, the regulations and the conditions of the permit.
6. Duty to Provide Information. The Permittee shall furnish to the Department within a reasonable time, any relevant information which the Department may request to determine whether cause exists for modifying, terminating or revoking this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Department, upon request, copies of records required to be kept by the Permittee pursuant to the Act, the regulations, or any permit condition.
7. Inspection and Entry. The Permittee shall allow the Department, its agents and authorized representatives, upon the presentation of credentials and other documents as may be required by law, or without advance notice or a search warrant to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records concerning the regulated facility or activity are kept;

- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the Act, the regulations, or this permit;
 - d. Sample or monitor any substances or parameters at any location for the purposes of assuring permit compliance or as otherwise authorized by the Act or the regulations;
 - e. Respond to emergencies at the hazardous waste and mixed waste storage facilities without the need to obtain DOE access authorization under the Atomic Energy Act; and
 - f. Engage in any other activities necessary or appropriate to the documentation of events or conditions at any locations.
8. Monitoring and Records.
- 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 or an equivalent method approved by the Department. Laboratory methods must be those specified in Appendix III of 40 CFR Part 261; Test Methods for Evaluating Solid Waste: Physical/Chemical Methods (U.S. EPA Document SW-846, most recent edition); Standard Methods for Examination of Water and Wastewater; Methods for Chemical Analysis of Water and Wastes (U.S. EPA - 600/4 - 79-020); or an equivalent method approved by the Department and as specified in the attached waste analysis plan (40 CFR Part 261 incorporated by reference at 25 Pa. Code Chapter 261a).
 - b. The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by the Act, the regulations, or this permit, and all records of all data used to complete the Application for this permit for a period of at least 3 years from the date of the sample, measurement, report or record, or application. These periods may be extended by request of the Department at any time and are automatically extended during the course of any unresolved enforcement action regarding this facility.
 - c. The Permittee shall, at a minimum, keep monitoring records which include the following information:

- (1) The dates, exact place, and times of sampling or measurements;
 - (2) The individuals who performed the sampling or measurements;
 - (3) The dates analyses were performed;
 - (4) The individuals who performed the analyses;
 - (5) The analytical techniques or methods used;
 - (6) The results of such analyses.
9. Reporting Planned Changes. The Permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility. This notice must include a description of all incidents of noncompliance reasonably expected to result from the proposed changes. The Permittee shall not modify the facility without first obtaining a permit from the Department.
10. Anticipated Noncompliance. The Permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
11. Transfer of Permits. This permit shall not be transferred or assigned to any other person or municipality.
12. Twenty-Four Hour Reporting. The Permittee shall report to the Department any noncompliance with the Act, the regulations or any condition of this permit or any occurrence or event at the facility which may endanger health or the environment.
- a. Information shall be provided orally within twenty-four (24) hours from the time the Permittee becomes aware of the circumstances. This report shall include the following:
 - (1) Information concerning release or potential release of any hazardous waste from the facility that may endanger public drinking water supply sources.
 - (2) Any information of a release, potential release, or discharge of hazardous waste from the facility, or information of a potential or actual fire or explosion at the facility, which may threaten the environment or human health.
 - b. The description of the occurrence and its cause shall include:
 - (1) Name, address, and telephone number of the owner or operator;

- (2) Name, address, and telephone number of the facility;
- (3) Date, time, and type of incident;
- (4) Name and quantity of material(s) involved;
- (5) The extent of injuries, if any;
- (6) An assessment of actual or potential hazards to the environment and human health at or near the facility; and
- (7) Estimated quantity and disposition of recovered material that resulted from the incident.

c. A written submission shall also be provided to the Department within five (5) days of the time the Permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of non-compliance (including exact dates and times); if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. The Permittee need not comply with the five (5) day written notice requirement if the Department extends it to fifteen (15) days.

13. Other Noncompliance. The Permittee shall report to the Department all other instances of noncompliance not otherwise required to be reported above, at the time monitoring reports are submitted. The reports shall contain the information listed in Permit Condition I.H.12.
14. Other Information. Whenever the Permittee becomes aware that it failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Department, or whenever the Permittee becomes aware of circumstances which require a modification or clarification of any fact or representation made to the Department in connection with a permit application, it shall promptly submit such facts or information to the Department.

PART II - GENERAL FACILITY CONDITIONS

A. DESIGN AND OPERATION OF FACILITY

The Permittee shall maintain and operate the facility to minimize the possibility of a fire, explosion, or release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater which could threaten human health or the environment.

B. GENERAL WASTE ANALYSIS

The Permittee shall follow the procedures described in the attached waste analysis plan, Attachment 1. The Permittee shall verify its waste analysis as part of its quality assurance program, in accordance with current EPA practices (Test Methods for Evaluating Solid Waste: Physical/Chemical Methods SW-846, most recent edition) or equivalent methods approved by the Department in accordance with procedures in 40 CFR §260.21 (incorporated by reference at 25 Pa. Code Chapter 260a); and at a minimum maintain proper functional instruments, use approved sampling and analytical methods, verify the validity of sampling and analytical procedures, and perform correct calculations. The Permittee shall recharacterize its waste at least annually unless it is certified that the waste generation process has not changed. Module 1 applications for treated mixed waste from other Naval Nuclear Propulsion Program facilities shall be submitted to the Department at least 10 days prior to acceptance of such waste for storage by the Permittee.

C. SECURITY

The Permittee shall comply with the security provisions of 40 CFR § 264.14 (incorporated by reference at 25 Pa. Code Chapter 264a).

D. GENERAL INSPECTION REQUIREMENTS

The Permittee shall follow the inspection plan set out in the Inspection Schedule, Attachment 2. The Permittee shall remedy any deterioration or malfunction discovered by an inspection and maintain records of inspections as required by 40 CFR § 264.15 (incorporated by reference at 25 Pa. Code Chapter 264a).

E. PERSONNEL TRAINING

The Permittee shall conduct personnel training as required by 40 CFR § 264.16 (incorporated by reference at 25 Pa. Code Chapter 264a). This training program shall follow the attached outline, Attachment 3. The Permittee shall maintain training documents and records.

F. PREPAREDNESS AND PREVENTION

1. Required Equipment. At a minimum, the Permittee shall equip the facility with the equipment set forth in the PPC Plan, Attachment 4.
2. Testing and Maintenance of Equipment. The Permittee shall test and maintain the equipment specified in the previous permit condition and in Attachment 4 as necessary to assure its proper operation in time of emergency.
3. Access to Communications or Alarm System. The Permittee shall maintain access to the communications or alarm system as required by 40 CFR § 264.34 (incorporated by reference at 25 Pa. Code Chapter 264a).
4. Required Aisle Space. At a minimum, the Permittee shall maintain aisle space as required by 40 CFR § 264.35 (incorporated by reference at 25 Pa. Code Chapter 264a) and as shown on the Plans and Specifications, Attachment 5.
5. Arrangements with Local Authorities. The Permittee shall maintain arrangements with State and local authorities as required by 40 CFR § 264.37 (incorporated by reference at 25 Pa. Code Chapter 264a). If State or local officials refuse to enter into or renew existing preparedness and prevention arrangements with the Permittee, the Permittee must document this refusal in the operating record.

G. PREPAREDNESS, PREVENTION AND CONTINGENCY (PPC) PLAN

1. Implementation of PPC Plan. The Permittee shall immediately carry out the provisions of the PPC Plan, Attachment 4, whenever there is a fire, explosion, emission or discharge of hazardous waste or hazardous waste constituents which could threaten human health or the environment. Off-site response personnel shall be allowed access to the hazardous waste storage facility or mixed waste storage facility without the need to obtain DOE access authorization under the Atomic Energy Act.
2. Copies of Plan. The Permittee shall comply with the requirements of 40 CFR § 264.53 (incorporated by reference at 25 Pa. Code Chapter 264a).
3. Amendments to Plan. The Permittee shall review and immediately amend, if necessary, the PPC Plan, as required by 40 CFR § 264.54 (incorporated by reference at 25 Pa. Code Chapter 264a).
4. Emergency Coordinator. The Permittee shall comply with the requirements of 40 CFR § 264.55 (incorporated by reference at 25 Pa. Code Chapter 264a).
5. Emergency Procedures. The Permittee shall comply with the requirements of 40 CFR § 264.56 (incorporated by reference at 25 Pa. Code Chapter 264a) and 25 Pa. Code § 264a.56.

H. RECORDKEEPING AND REPORTING

1. Operating Record. The Permittee shall maintain a written operating record at the facility in accordance with 40 CFR § 264.73 (incorporated by reference at 25 Pa. Code Chapter 264a).
2. Biennial Report. The Permittee shall comply with all applicable biennial report requirements of 40 CFR § 264.75 (incorporated by reference at 25 Pa. Code Chapter 264a).
3. Required Reports. The Permittee shall comply with all applicable reporting requirements as described in Part I, Sections E, F, H and Part II, Sections G, H, I and M of this permit.

I. CLOSURE

1. Performance Standard. The Permittee shall close the facility as required by 40 CFR § 264.111 (incorporated by reference at 25 Pa. Code Chapter 264a) and in accordance with the Closure Plan, Attachment 6.
2. Amendment to Closure Plan. The Permittee shall amend the Closure Plan in accordance with 40 CFR § 264.112(c) (incorporated by reference at 25 Pa. Code Chapter 264a) whenever necessary.
3. Notification of Closure. The Permittee shall notify the Department in writing at least 45 days prior to the date he expects to begin final closure of the facility.
4. Time Allowed for Closure. After receiving the final volume of hazardous waste, the Permittee shall remove from the site all hazardous waste and shall complete closure activities in accordance with the schedules specified in the Closure Plan, Attachment 6.
5. Disposal or Decontamination of Equipment. The Permittee shall decontaminate and/or dispose of all facility equipment and structures as required by the Closure Plan, Attachment 6.
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 40 CFR § 264.115 (incorporated by reference at 25 Pa. Code Chapter 264a) and 25 Pa. Code § 264a.115.

J. COST ESTIMATE FOR FACILITY CLOSURE

1. Annual Adjustment. The Permittee shall adjust the cost estimate for closure and management of the mixed wastes identified in the Site Treatment Plan as described in Permit Condition II.M for inflation within 30 days after each anniversary of the date on which the first cost estimate was provided to the Department.

2. Adjustment for Changed Conditions. The Permittee shall revise the cost estimate whenever there is a change in the facility's closure plan or in the measures necessary to prevent adverse effects upon the environment.
3. Availability. The Permittee must keep the latest cost estimate at the facility.

K. GENERAL REQUIREMENTS FOR IGNITABLE, REACTIVE, OR INCOMPATIBLE WASTE

The Permittee shall comply with the requirements of 40 CFR § 264.17 (incorporated by reference at 25 Pa. Code Chapter 264a).

L. CONTRACTORS

1. Independent contractors and agents who are to operate under this permit shall be subject to the applicable provisions of the Solid Waste Management Act and Clean Streams Law. Such independent contractors, agents and the permittee shall be jointly and severably liable without regard to fault for violations of the Solid Waste Management Act and the Clean Streams Law which occurred during the course of facility operations.
2. Any independent contractors or agents retained by the Permittee to construct or operate this site shall be subject to prior compliance history review by the Department as specified in Section 503 of the Solid Waste Management Act.

M. MIXED WASTE SITE TREATMENT PLAN

1. The Permittee shall submit to the Department for review and approval an annual Site Treatment Plan by April 30 each year addressing:
 - a. Amount of mixed waste in storage at the end of the calendar year and estimated amount of mixed waste anticipated to be stored in the next 5 years,
 - b. status of treating the mixed waste identified in the Plan,
 - c. schedules for shipping mixed waste to off-site treatment facilities,
 - d. status of extensions, permit applications, treatment variances or no migration petitions of any off-site treatment facilities identified in the Plan,
 - e. new mixed wastes and changes to existing mixed wastes generated by the facility.

- f. disposition of post-treatment residuals from off-site treated mixed wastes,
- g. identification of problems in implementing the Plan and actions taken to resolve the problems,
- h. summary of manifests, bills of lading and other shipping papers and land disposal restriction notices reflecting offsite shipment of mixed waste.

- 2. Department approval of the annual Site Treatment plan will be considered an approved plan under this permit.

N. LAND DISPOSAL RESTRICTIONS

The Permittee shall comply with standards under 40 CFR Part 268 (incorporated by reference at 25 Pa. Code Chapter 268a, except where stated at 25 Pa. Code § 268a.1) applicable to hazardous waste storage facilities.

PART III - STORAGE IN CONTAINERS

A. WASTE IDENTIFICATION

The Permittee may store the hazardous and mixed wastes identified in Attachment 1 to this permit in containers at the facility subject to the terms of this permit.

B. DURATION OF STORAGE

The Permittee shall notify the Department in writing of its intent to store containers of hazardous waste at this facility in excess of one year. The Permittee shall submit the notice on or before the date on which the waste will have been stored for one year. The notice shall describe the containers by identification number (referring to Figure PPCP.8), waste type and efforts made to arrange for off site transportation of the waste. The Permittee shall continue to notify the Department in writing of the status of the containers being stored in excess of one year every six months after the initial notification. The Permittee shall notify the Department after the waste has been transported off site.

The Permittee may store mixed wastes at the mixed waste storage facility in excess of one year as long as such storage is in accordance with the approved Site Treatment Plan as described in Permit Condition II.M.

C. CONDITION OF CONTAINERS

If a container holding hazardous or mixed waste is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the waste from such container to a container that is in good condition or otherwise manage the waste in compliance with the conditions of this permit.

D. PLACEMENT REQUIREMENTS

1. The Permittee shall store all hazardous waste containers in accordance with the following content and location requirements in Building M:

a. Area I

- 1) Maximum Storage Allowed - 935 gallons in containers (17 - 55 gallon drums or equivalent)
- 2) A total volume for containers in Storage Cabinet 6 of 45-gallons
- 3) A total volume for containers in Storage Cabinet 7 of 45 gallons

b. Area II

Maximum Storage Allowed - 1,320 gallons in containers (24 - 55 gallon drums or equivalent)

c. Area III

Maximum Storage Allowed - 110 gallons in containers (e.g. 55-gallon drums) in each Storage Cabinet 1 through 3 and a total additional volume of 15 gallons for all smaller containers in each storage cabinet.

d. Area IV

- 1) Maximum Storage Allowed - 1,650 gallons in containers (30 - 55-gallon drums or equivalent)
- 2) A total volume for containers in Storage Cabinet 4 of 45 gallons

e. Area V

- 1) Maximum Storage Allowed - 715 gallons in containers (13 - 55-gallon drums or equivalent)
- 2) A total volume for containers in Storage Cabinet 5 of 45 gallons

2. The Permittee shall store all mixed waste containers (including treated mixed waste from other DOE Naval Nuclear Propulsion Program facilities) in Building D in accordance with the following:

a. Storage and Loading Area

Maximum Storage Allowed - 8,360 gallons in containers (152 - 55 gallon drums or equivalent)

b. Mixed Waste Storage Area

- 1) Maximum Storage Allowed - 29,590 gallons in containers (538 - 55 gallon drums or equivalent)
- 2) A total volume for two small container flammable storage cabinets of 60 gallons of flammable liquid.

- 3) A total volume for the drum flammable storage cabinet of 120 gallons of combustible and flammable liquids, with a limit of 60 gallons of flammable liquids.
- 4) A total volume for the small container waste storage cabinet of 55 gallons.

E. COMPATIBILITY OF WASTES WITH CONTAINERS

The Permittee shall ensure that the ability of the container to contain the waste is not impaired as required by 40 CFR § 264.172 (incorporated by reference at 25 Pa. Code Chapter 264a).

F. MANAGEMENT OF CONTAINERS

The Permittee shall manage containers as required by 40 CFR § 264.173 (incorporated by reference at 25 Pa. Code Chapter 264a).

G. CONTAINMENT

The Permittee shall construct and/or maintain the containment system as required by 40 CFR § 264.175 (incorporated by reference at 25 Pa. Code Chapter 264a) and the attached Plans and Specifications, Attachment 5.

H. CONTAINER STACKING HEIGHT, WIDTH, AND DEPTH

The Permittee shall store containers of hazardous waste as required by 25 Pa. Code § 264a.173 and the attached Plans and Specifications, Attachment 5. Containers may not be stacked in the hazardous waste storage facility. Containers may be stacked no higher than 9 feet in the mixed waste storage facility.

I. SPECIAL REQUIREMENTS FOR IGNITABLE OR REACTIVE WASTES

1. The Permittee shall not locate containers holding ignitable or reactive wastes within 15 meters (50 feet) of the facility's property line. Ignitable and reactive (cyanide) wastes may only be stored as indicated in Attachment 5.
2. The Permittee shall document compliance with Section 1. of this condition as required by 40 CFR § 264.17(c) (incorporated by reference at 25 Pa. Code Chapter 264a) and place this documentation in the operating record (Permit Condition II.H.1).

J. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTES

1. **Placement of Incompatible Wastes.** The placement of incompatible wastes and/or materials in the same container is prohibited. Acids and bases must be placed in separate areas. Containers with Waste Code D002 labels should be identified as an acid or base (alkaline).
2. **Incompatible Wastes in Unwashed Containers.** The Permittee shall not place hazardous or mixed waste in an unwashed container that previously held an incompatible waste or material.
3. **Storage of Incompatible Wastes.** The Permittee shall store containers of incompatible wastes as indicated in the attached plans, Attachment 5, as required by 40 CFR § 264.177 (incorporated by reference at 25 Pa. Code Chapter 264a).
4. **Documentation.** The Permittee must document compliance with Sections 1. and 2. of this condition as required by 40 CFR § 264.17(c) (incorporated by reference at 25 Pa. Code Chapter 264a) and place this documentation in the operating record (Permit Condition ILH.1.).

K. AIR EMISSION STANDARD

The Permittee shall comply with the applicable provisions of 40 CFR §§ 264.1086(c)(1) through (c)(5) (incorporated by reference at 25 Pa. Code Chapter 264a), relating to controlling volatile organic air emissions from containers, for hazardous waste stored in containers.

L. ON-SITE TREATMENT

Treatment of on-site generated mixed waste to change one or more characteristic of hazardous waste (defined at 40 CFR Part 261, Subpart C which is incorporated by reference at 25 Pa. Code Chapter 261a) is covered by the permit by rule provisions of 25 Pa. Code §§ 270a.60(a) and (b)(2) as long as the Permittee complies with those provisions and the Mixed Waste Management Plan, effective on September 29, 1995 and as may be modified, and notifies the Department of any new types of treatment and mixed wastes to be treated.

M. INSPECTIONS

The Permittee shall inspect each storage area subject to this permit as required by 40 CFR § 264.174 (incorporated by reference at 25 Pa. Code Chapter 264a) and Attachment 2.

LIST OF ATTACHMENTS

- Attachment 1 Waste Analysis Plan**
- Attachment 2 Inspection Schedule**
- Attachment 3 Personnel Training Outline**
- Attachment 4 Contingency Plan**
- Attachment 5 Plans and Specifications of Container Storage Areas**
- Attachment 6 Closure Plan**

Attachment C

Environmental Monitoring Schedule

Media	Location (see map)	Analysis Parameters ¹	Frequency
Sediment	NPDES Outfall 001 stilling basin	VOCs	Annually
	NPDES Outfall 002 stilling basin ²	VOCs	Annually
	Bull Run Stream location BR1	VOCs	Annually
	Bull Run Stream location BR5	VOCs	Annually
Groundwater	Benwood Limestone Zone: Well 35, 57, 68, 80, 92, and 100	VOCs	Annually
	Sewickley Sandstone Zone: Well 36, 51, 65, and 98.	VOCs	Annually
	Pittsburgh Sandstone Zone: Well 60, 61, 75, and 96.	VOCs	Annually
	Pittsburgh Coal Zone: Well 44a, and 95	VOCs	Annually
Surface water	Bull Run Stream location BR1	VOCs	Annually
	Bull Run Stream location BR5	VOCs	Annually

¹ Samples will be analyzed by a National Environmental Laboratory Accreditation Conference certified laboratory (or equivalent) will be used for the analysis for volatile organic compounds using EPA Method 8260B (or subsequent revision). VOCs are chlorinated volatile organic compounds.

² Outfall 002 is planned to be eliminated in June 2013. No sampling will occur at this location after elimination of the outfall.