INSPECTION REPORT

PURPOSE:

TSCA Section 6 (e), PCB Inspection

INSPECTION DATE

October 25-26, 2001

FACILITY:

Chemical Waste Management, Inc
Kettleman Hills Facility
35251 Old Skyline Road
Kettleman City, CA 93239

TABLE OF CONTENTS

A. Facility data

B. Inspection Date

C. Inspection participants

D. Facility background

E. Opening conference

F. Facility Inspection

G. Record Review

H. Closing conference

ATTACHMENTS

1. Notice of Inspection
2. TSCA Inspection Confidentiality Notice
3. Receipt for Samples and Documents
4. Inspection Photos

INSPECTION REPORT

A. FACILITY DATA

Facility Name:	Chemical Waste Management, Inc. Kettleman Hills Facility 35351 Old Skyline Road Kettleman City, California 93239
Phone:	(209) 386-9711
EPA I.D.	CAT 000646117
SIC Code:	3764
Responsible Official: Corporate Affiliation:	Robert Henry, General Manager Waste Management, Inc.

B. INSPECTION DATE: October 25 - 26, 2001

C. INSPECTION PARTICIPANTS:

Chemical Waste Management, Inc:	Robert Henry, General Manager Jim Sook, Technical Manager Paul Turek, Environmental Manager
US EPA:	Max Weintraub, Region IX PCB Coordinator

D. FACILITY BACKGROUND

Chemical Waste Management, Inc. is a division of Waste Management, Inc in Houston, TX. The Chemical Waste Management, Inc Kettleman Hills Facility (KHF) is located just north of State Highway 41 in Kings County, CA, approximately two and one half miles west of Interstate Highway 5. The nearest population center is Kettleman City (pop. 1200), approximately one mile east of the junction of S-41 and I-5 and four miles from the KHF.

The KHF property is geographically situated west of the San Joaquin Valley in the Kettleman Hills of the California Coastal Range. In the past, the Kettleman Hills were extensively explored for oil and were characterized by the widespread, unregulated disposal of oil field waste. Except for Kettleman City, land within a five-mile radius of the KHF is currently used for oil and gas production and as rangeland for cattle grazing. 499 acres of the KHF's 1,600 acre parcel are currently used for the management of hazardous waste.

The arid climate of the region has an average annual precipitation of six inches and an average annual evaporation rate of 103 inches. There are no natural surface water bodies on or adjacent to the KHF. The nearest natural surface water is the Kings River, approximately 11 miles east. The California Aqueduct is 3.5 miles east of KHF but has no connection with local surface drainage. The infrequent precipitation in the area is collected in on-site retention impoundments for subsequent evaporation or results in stream flows which are quickly absorbed by the dry soils.

The facility covers approximately 1600 acres. 449 acres within that area is permitted for hazardous waste storage and disposal. The facility employs approximately 80 individuals. The approval for TSCA activities at the facility expired in 1997, but continues in effect pending an EPA decision on the approval renewal application.

The inspection was conducted "for cause" to assess 1) whether the facility was in compliance with the conditions of the existing PCB approvals, and 2) to determine if any conditions had changed since the previous inspection which may require further consideration as part of the approval renewal evaluation process.

E. OPENING CONFERENCE

Max Weintraub, EPA inspector arrived at the facility and met with Bob Henry, District Manager, and Jim Sook, Technical Manager. During the initial meeting, Mr. Weintraub presented Mr. Henry with the Notice of Inspection and TSCA Inspection Confidentiality Notice and explained each notice. Mr. Henry signed the forms (see Attachments #1 and #2). Mr. Weintraub also presented Mr. Henry with a list of documents which he sought to review as part of the inspection (see Attachment #3). The list consisted of the following:

1) Incoming manifests for PCB waste during 2000
2) Certificates of disposal for PCB waste disposed on-site during 2000
3) Outgoing manifests for PCB waste during 2000
4) Certificates of disposal for PCB waste sent off-site for disposal during 2000
5) Exception reports for 2000
6) Remedial work orders involving the PCB flushing/storage unit during 2000 and 2001
7) PCB Flushing Storage Unit Operation Plan (if version more recent than 2/4/94 exists)
8) PCB Tracking User Guide (if version more recent than 7/92 exists)
9) Mitigation and Monitoring Plan (if version more recent than 4/26/91 exists)
10) Spill Prevention Control and Countermeasure Plan (most recent version)
11) EPA approval of construction certification reports for B-14, B-16, B-18, and B-19

Mr. Henry assigned a staff person to retrieve the documents. Mr. Weintraub, Mr. Sook, and Mr. Henry then went on a tour of the facility.

F. FACILITY INSPECTION

The first unit inspected was unit B-16 (see Attachment #4, photos #1 & #2). The unit has an interim cover for the entire unit that appears intact. Mr. Henry informed Mr. Weintraub that in the draft renewal of the RCRA permit, DTSC is giving the facility one year to close the unit. Mr. Henry explained that EPA comment and/or approval on the closure plan for B-16 was needed before such action could be taken. Mr. Weintraub responded that EPA supports closure of the unit and will respond to Mr. Henry's concerns soon.

Mr. Henry, Mr. Sook, and Mr. Weintraub then drove by B-19. The unit is undergoing TSCA closure. Mr. Henry explained the current status of the TSCA closure and the municipal solid waste disposal activities that are also taking place in the unit. The actions appear to be consistent with the TSCA closure plan for B-19 submitted by the facility.

Mr. Henry, Mr. Sook, and Mr. Weintraub then drove to the PCB flushing/storage unit (see Attachment #4, photos #3 - #5). The unit handles PCB liquid waste as well as PCB equipment that will undergo draining and flushing activities (e.g., transformers) or PCB waste destined for off-site disposal (e.g., fluorescent light ballasts generators wish to have recycled). A visual inspection found that the walls and ceilings were intact, the berms measured eighteen inches around the perimeter of the unit, the berm and floor were completely sealed by an epoxy coating, and the PCB storage tank is intact (see Attachment #4, photos #6 & #7). Mr. Weintraub tested the eyewash and shower in the unit and found they operated properly.

The drums in the PCB flushing/storage unit were stacked in rows two drums high and two drums wide with about three feet of separation between each row. Transformers and/or gaylord boxes were also stacked (see Attachment #4, photo #8).

The PCB flushing storage unit also held a metal container with a vacuum pump and bags of absorbent material. According to a worker who described the draining/flushing process, the transformer is placed in the container with the vacuum pump, absorbent material is laid down, and the transformer is drained. Then diesel fuel is pumped into the unit and allowed to sit for twenty-four hours before being drained. The vacuum pump ensures that almost all liquids are removed during the draining procedures. Mr. Henry informed Mr. Weintraub that, as a result of a number of remedial work orders related to leaks from the vacuum pump in 1998 and 1999, the vacuum pump was replaced with a unit that produces far fewer leaks (see Attachment #4, photo #9).

The PCB flushing/storage unit also contains three cabinets that are allowed to hold a total of sixty gallons of flammable PCB liquid. The only other flammable material in or adjacent to the unit is the diesel fuel tank outside the unit that contains the solvent used during draining and flushing activities (see Attachment #4, photo #10).

The worker also explained that the epoxy coating is applied on an annual basis to ensure the seal remains intact. Mr. Henry also noted that plans were in place to replace the siding of the flushing/storage unit but were on hold until EPA provided guidance on whether draining of large PCB equipment outside the bermed area would require changes in the structure of the unit. Mr. Weintraub informed Mr. Henry that EPA did not plan to require any changes in the structure of the unit.

Mr. Henry, Mr. Sook, and Mr. Weintraub then went to unit B-18. Unlike B-16 and B-19, B-18 is an active TSCA landfill unit. Phase one of B-18 was covered with an interim cap (see Attachment #4, photo #11). Phase two was currently active (see Attachment #4, photos #12 - #13). Monitoring of the leachate from the unit occurs on a daily basis. Personnel in the unit assign the location where different waste loads are placed. A portable eyewash unit is also kept in the unit. The unit appears to be intact.

Mr. Henry, Mr. Sook, and Mr. Weintraub then returned to the administrative office. Some of the documentation requested by Mr. Weintraub had been compiled. Mr. Weintraub then modified his request to include exception reports for 1999 through 2001 and incoming manifests and certificates of disposal for PCB waste on-site to include only the first six months of 2000. The daytime inspection for 10/25/01 was complete at that point.

Mr. Weintraub returned to the facility at 9:10 pm that evening and found the gate closed and locked. Three hazardous waste transport trucks were waiting outside the gate at that time.

Mr. Weintraub returned to the facility at 7:20 am on 10/26/01. The trucks had been allowed inside the gates and were lined up for processing that began at 8:00 am (see Attachment #4, photos #14 - #16). Mr. Weintraub entered the administrative building and began to review the records requested the previous day.

G. RECORD REVIEW

A review of 2000 and 2001 remedial work orders for the PCB flushing/storage unit found that the daily inspections identified drums without barcodes for on-site tracking every few weeks. Within twenty-four hours after the work order, the barcodes were placed on the drums. The second most common problem were oil stains created by the acceptance of leaking drums. The oil was cleaned up on the same day and the drum was overpacked to prevent further leaking.

A review of the 1999 through 2001 exception reports found that they were being sent to EPA, but not to the TSCA program. Mr. Weintraub asked that the exception reports be sent to the TSCA program.

A review of the 2000 outgoing manifests and certificates of disposals for PCB waste found that the waste was either sent to Onyx (Port Arthur, TX) for incineration or Superior Special Services for recycling or disposal. The information on the manifests and certificates of disposal was consistent and certificates of disposal were provided for each outbound shipment.

A review of the January, March, and June incoming manifests for 2000 found that all contained either certificates of disposal or notation indicating that the material was sent off-site for disposal. The documentation was well organized enabling quick access.

Mr. Turek indicated that no more recent versions of the PCB Flushing Storage Unit Operation Plan or PCB Tracking User Guide existed. He also provided copies of EPA approval letters for contruction certification reports for B-18 and B-19.

H. CLOSING CONFERENCE

Mr. Weintraub met with Mr. Henry and Mr. Turek and reviewed the issues discussed during the prior two days.