

NEVADA COMPLIANCE MONITORING AND ENFORCEMENT LOG - FY88

1 EPA ID # NVD 008 290 330  
 2 HANDLER NAME: Kerr-McGee Chemical Corporation  
 3 ADDRESS: Lake Mead Road  
 P.O. Box 55  
 Henderson NV 89015

4. DATA ENTRY NEW X  
 UPDATE

5 EVALUATION DATE 01/23/89 SA AGENCY S

6 EVALUATION TYPE 1

7 FOLLOW-UP EVAL DATE:

7a EVAL COMMENTS: NO VIOLATIONS NOTED AT THE TIME OF THE INSPECTION

8 CLASS OF VIOLATION GWM CL/PC FIN RES PT B CPL SCH MANIFEST L BAN OTHER  
 I 0 0 0  
 II

9 ENFORCEMENT ACTIONS AREA OF VIOLATION DATE ACTION TAKEN COMPLIANCE DATES SCHEDULED ACTUAL ASSESSED COLLECTED RESP AGENCY  
 S S

10 ENFORCEMENT COMMENTS:

File copy

RICHARD H. BRYAN, Governor

Administration 702/885-4670  
Air Quality 885-5065  
Construction Grants 885-5870

STATE OF NEVADA

Groundwater 702/885-4670  
Waste Management 885-5872  
Water Pollution 885-4670



DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES  
**DIVISION OF ENVIRONMENTAL PROTECTION**

201 South Fall Street  
Carson City, Nevada 89710

February 8, 1989

Alan Gaddy  
Kerr-McGee Chemical Corporation  
PO Box 55  
Henderson NV 89015

Dear Alan Gaddy,

On January 23, 1989 a Hazardous Waste Investigation was conducted at your Kerr-McGee Chemical Corporation facility by the Nevada Division of Environmental Protection. The Information was gathered in accordance with Section 459.560 of the Nevada Revised Statutes (NRS) and a copy of the investigation report is enclosed for your information. No major violations were noted at the time of the investigation.

If you have any questions regarding this letter, please contact me at (702) 885-5872.

Sincerely,

Handwritten signature of Alene Coulson in black ink.  
Alene Coulson  
Environmental Specialist  
Waste Management Section

cc: US EPA Region IX  
enclosure

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

GENERATOR INVESTIGATION REPORT  
NAC 444.8635 - 444.8700

1. Facility Name: Kerr-McGee Chemical Corp
2. EPA Identification Number: NVD 00 829 0330
3. Street: P.O. Box 55 Lake Mead Dr.
4. City: Henderson State: NV Zip Code: 89015
5. Telephone Number: 702-565-8901 County: CLARK
6. Inspection Date: 1-23-89
7. Weather Conditions: HAZY / winds Calm / 50°F ±

<u>Facility Representative</u>	<u>Title</u>	<u>Telephone Number</u>
<u>ALAN J. Gaddy</u>	<u>Process Engineer</u>	<u>565-8901</u>

<u>NDEP Representative</u>	<u>Title</u>	<u>Telephone Number</u>
<u>Alene Coulson</u>	<u>EMS II</u>	<u>702-885-5872</u>
<u>DAVE Chesmore</u>	<u>EMS II</u>	<u>"</u>

10. Type of Business: Chemical Manufacture  
NO Land Based wastes produced at this  
time.

CLOSED LANDFILL NOT INSPECTED THIS DATE

11. Process Waste By-Product

Chlorate Recovery Mud

Amount Per Month

± 64 TONS/mo

Disposal Method

US Ecology TSPF

Beatty Nu.

GENERATORS - GENERAL:  
(262 Subpart A)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Has the solid waste generator made a hazardous waste (HW) determination is the waste: 262.11-			
(a) Excluded from regulation under 261.4?		<u>X</u>	<u>NOT Excluded</u>
(b) Listed as a H.W. in 261 Subpart D?		<u>X</u>	
(c) Exhibits a characteristic identified in 261 Subpart C by either:			
(1) Testing the waste?	<u>X</u>		
(2) Applying knowledge of the hazard characteristic of the waste or the processes used?	<u>X</u>		
(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?		<u>NA</u>	
Is the waste an exempt recyclable material: 261.5(a)(3)-			
(i) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement)?		<u>X</u>	
(ii) Used batteries or cells returned to the manufacturer for regeneration?			
(iii) Used oil not burned for energy recovery?			
(iv) Scrap metal?			
(v-ix) Specific steel (K087) and petroleum refinery production wastes?			

(Cont.)

If the waste is any of the following recyclable materials, complete Parts 270 (permits and notifications), and 266 Subparts A-G of the ISD checklists: 261.6(a)(2)-

- (i) Used in a manner constituting disposal (Subpart C)?
- (ii) Burned for energy recovery in non regulated boilers industrial furnaces (Subpart D)?
- (iii) HW characteristics used oil that is burned as above (Subpart E)?
- (iv) Reclaimed for precious metals (Subpart F)?
- (v) Reclaimed Spent lead-acid batteries (Subpart G)?

	NA	NA	
	↓	↓	_____
	↓	↓	_____
	↓	↓	_____
	↓	↓	_____

GENERATORS:  
(Part 262)

Yes    No    Comments

Manifests: 262.20-

(a) Does the generator prepare a complete manifest before transporting H.W. off-site?

X

(b) Does the generator designate on the manifest one facility which is permitted to handle HW?

(c) Has the facility designated an emergency alternate facility? or:

(d) Instructed the transporter to return the waste in the event an emergency prevents delivery?

Did the manifest consist of enough copies? 262.22

Did the generator: 262.23(a)

(1) Sign the manifest by hand?

(2) Obtain the signature of initial transporter and date of acceptance on manifest?

(3) Keep one copy of the manifest (262.40(a))?

X

Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)

X

If the shipment was sent by water or rail, was 262.23 complied with?

NA

PRE-TRANSPORT REQUIREMENTS:  
(262 Subpart c)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Is waste packaged in accordance with DOT packaging regulations (49 CFR 173, 178-9)? 262.30	X		
Are waste packages labeled in accordance with DOT regulations (40 CFR 172.101)? 262.31			
Are containers marked in accordance with DOT regulations (49 CFR 172.101)? 262.32(a) including:			
Proper shipping name [table column 2]?			
Proper ID number [table column 3A]?			
Proper ORM designation for containers of ORM-A,B,C,D or E wastes?			
Are containers of 110 gallons or less marked with the following words? 262.32(b)		N/A	Bulk Transport
HAZARDOUS WASTE-Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency. Generator's Name & Address _____ Manifest Document Number _____		N/A	
Does the generator placard or offer the initial transporter the appropriate placards (49 CFR 172 Subpart F)? 262.33	X		

Accumulation Time:



PRE - TRANSPORT REQUIREMENTS: - Continued

The generator may accumulate at or near the point of initial generation up to 55 gals. of HW, or one quart of acutely hazardous waste, provided: 262.34(c)(1)-

(i) HW from containers not in good condition or leaking were transferred into good containers?

Containers are compatible with the HW stored in them?

Containers are stored closed?

(ii) The containers are marked either with the words "Hazardous Waste" or labels that identify the contents?

N/A	N/A

**IV. PRE-TRANSPORT REQUIREMENTS:**  
(Part 262 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
IF the generator does not have interim status (as a TSD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a)	<u>X</u>		
Are containers visibly marked with the date accumulation started? 262.34(a)(2)	<u>X</u>		
Is each container or tank clearly marked with the words "Hazardous Waste"? 262.34(a)(3)		<u>N/A</u>	
Does the generator comply with the requirements of 40 CFR Part 265: 262.34 (a)(1), -(4)			
Subpart I for the use and management of containers?	<u>X</u>		
Subpart J for tanks (except 264.197(c), closure of tanks without secondary containment, and 265.200)?		<u>N/A</u>	
264.111 for tank closure performance standards?		<u>N/A</u>	
265.111 for tank decontamination after closure?		<u>N/A</u>	
Subpart C for preparedness and prevention?	<u>X</u>		
Subpart D for contingency plan and emergency procedures?	<u>X</u>		
263.16 for personnel training?	<u>X</u>		
IF the generator has stored H.W. on-site for more than 90 days, have they: 262.34(b)			
Been granted an extension from the EPA? or:		<u>N/A</u>	
Complied with 40 CFR Parts 264 and 265 and permitting requirements in Part 270 of RCRA?		<u>N/A</u>	

RECORDKEEPING AND REPORTING:  
(Part 262 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are the following kept for at least three years: 262.40-			
(a) Manifest signed by the receiving facility?	X	_____	_____
(b) Annual Reports and Exception Reports?	X	_____	_____
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	X	_____	_____
Annual Report:			
If the facility has shipped any waste off-site to a U.S. ISD, have they submitted a Annual Report to the DEP by March 1 of each year? 262.41(a)	X	_____	_____
Was the report submitted on EPA Form B700-13A and cover generator activities during the previous calendar year? 262.41(a).	X	_____	<u>STATE form used</u>
Does the report include the following information: 262.41(a)			
(1) EPA ID No., name and address of the generator?	X	_____	_____
(2) Calendar year covered by the report?	X	_____	_____
(3) The EPA ID No., name, and address for each off-site ISD to which H.W. was shipped during the year?	X	_____	_____
(4) Name and EPA ID No. of each transporter used during the year to ship to a U.S. ISD?	X	_____	_____
(5) Description, EPA hazardous waste NO., DOT hazard class and quantity of each H.W. shipped off-site to a U.S. ISD?	X	_____	<u>ok</u>

RECORDKEEPING AND REPORTING: - Continued  
(Part 262 Subpart D)

Yes    No    Comments

Was this information listed by EPA ID No. of each off-site TSD to which H.W. was shipped?

X    \_\_\_\_\_

(6) A description of the efforts undertaken during the year to reduce the volume and toxicity of waste generated?

X    \_\_\_\_\_

(7) A description of the changes in volume and toxicity actually achieved during the year in comparison to previous years (back to 1984 if available)?

X    \_\_\_\_\_

(8) The signed certification?

X    \_\_\_\_\_

Exception Reporting: 262.42

(a) For a generator that has not received a signed copy of the manifest from the designated facility within 35 days, has the generator determined the status of the H.W.?

X    \_\_\_\_\_

(b) For a generator that has not received a signed copy of the manifest within 45 days, has the generator submitted an Exception Report to DEP?

\_\_\_\_\_ N/A \_\_\_\_\_

Did the Exception Report include: 262.42(b)-

(1) A legible copy of the manifest?

(2) A signed cover letter explaining the efforts taken to locate the H.W. and the results of those efforts?

\_\_\_\_\_ N/A \_\_\_\_\_

IMPORTS OF HAZARDOUS WASTE:  
(Part 262 Subpart F)

Yes      NO      Comments

Does the facility import H.W. from a Foreign country into the U.S.?  
262.60(a)

\_\_\_\_\_ *N/A* \_\_\_\_\_

Does the Facility comply with all manifest requirements except that: 262.60(b)-

(1) The name, address, and EPA ID No. of the importer is used instead of the generator?

\_\_\_\_\_

(2) The U.S. importer or his agent signs and dates the certification and obtains the signature of the initial transporter?

\_\_\_\_\_

Did the importer use the manifest supplied and required by the consignment State? 262.60(c)

\_\_\_\_\_

FARMERS  
(Part 262 Subpart G)

Yes    No    Comments

A farmer disposing of waste pesticides is not required to comply with Part 262 generator standards or Parts 270, 264, or 265 provided he: 262.70

The pesticides are from his own use? \_\_\_\_\_

*NIA*

Triple-rises each pesticide container in accordance with 261.7(b)(3)? \_\_\_\_\_

Disposes of the residues on his own farm in a manner consistent with the disposal instruction on the pesticide label? \_\_\_\_\_

ATTACHMENT

PERSONNEL TRAINING  
(40 CFR 265.16)

	<u>Yes</u>	<u>NO</u>	<u>Remarks</u>
1. Have personnel successfully completed a program of classroom instruction or on-the-job training that teaches them how to perform duties in compliance with hazardous waste management regulations?	<u>X</u>	_____	_____
2. Is the program directed by a person trained in hazardous waste management procedures?	<u>X</u>	_____	_____
3. Does the program include training in:			
a. emergency procedures and equipment?	_____	_____	_____
b. emergency communication systems?	_____	_____	_____
c. responses to fire/explosion?	_____	_____	_____
d. responses to groundwater contamination problems?	_____	_____	_____
e. Facility shutdown (if necessary)?	_____	_____	_____
4. Was the training program completed?			
a. within 6 months after employment?	_____	_____	_____
b. annually reviewed?	_____	_____	_____

ATTACHMENT  
PERSONNEL TRAINING - Continued  
(40 CFR 265.16)

5. Are the following documents,  
records (for personnel in  
hazardous waste related jobs)  
at the site:

a. a job title/name of individual  
filling job?

b. a written job description?

c. written description of  
type/amount of training  
received?

6. Are records of current  
employees on-site?

7. Are records of former  
employees kept for 3 years?

X	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____
	_____	_____



ATTACHMENT 2  
PREPAREDNESS AND PREVENTION  
(40 CFR Part 265.c)

	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
1. Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or HW release?	_____	<u>X</u>	_____
2. If require, does the facility have the following equipment: (265.32)			
a. internal communications or alarm systems?	<u>X</u>	_____	_____
b. telephone or 2-way radios at the scene of operations?	<u>X</u>	_____	_____
c. portable fire extinguishers, fire control, spill control equipment, and decontamination equipment?	<u>X</u>	_____	_____
3. Testing and maintenance of Emergency Equipment: (265.33)			
a. has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>X</u>	_____	_____
b. is emergency equipment maintained in operable condition?	<u>X</u>	_____	_____
4. Has owner or operator provided immediate access to internal alarms (if needed)? (265.34)	<u>X</u>	_____	_____
5. Is there adequate aisle space for unobstructed movement? (265.35)	<u>X</u>	_____	_____

ATTACHMENT 3  
CONTINGENCY PLAN AND EMERGENCY PROCEDURES  
(40 CFR Part 265.0)

	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
1. Does the Contingency Plan contain the following information:	<u><del>NO</del></u>	<u>X</u>	
a. the actions facility personnel must comply with 40 CFR 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (265.52)	<u>X</u>		<u>Paging, horns etc</u>
b. arrangements with local police and, fire departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to 40 CFR 265.37?	<u>X</u>		
c. names, addresses, and telephone numbers (office and home) of all persons qualified to act as emergency coordinators? (265.52) (Listed in order of responsibility.)	<u>X</u>		
d. a list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities? (265.52)	<u>X</u>		
e. an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes.) (265.52)	<u>X</u>		
2. Are copies of the Contingency Plan available at the site and local emergency organizations? (265.53)	<u>X</u>		

ATTACHMENT 3 (Continued)  
CONTINGENCY PLAN AND EMERGENCY PROCEDURES

	<u>Yes</u>	<u>No</u>	<u>Remarks</u>
3. Emergency Coordinator (265.55)			
a. is the facility Emergency Coordinator identified?	<u>X</u>		
b. is the Emergency Coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>		
c. does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>		
4. Emergency Procedures			
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			
		<u>N/A</u>	

Inspector: \_\_\_\_\_  
Address: \_\_\_\_\_

Telephone no: \_\_\_\_\_

DRAFT

RCRA LAND RESTRICTION  
F- SOLVENT  
GENERATOR CHECKLIST

I. HANDLER IDENTIFICATION

KEPP MCGEE Chemical Company BMI COMPLEX  
A. Handler Name B. Street (or other identifier)  
HENDERSON NEVADA 89015 CLARK  
C. City D. State E. Zip Code F. County Name  
CHLORATE MUD WASTE  
G. Nature of business; Identification of Operations  
NVD 008 290 330  
H. EPA ID #  
ALAN Gaddy (702) 565-8901  
I. Handler Contact (Name and Phone Number)

II. Generator Compliance

A. F-Solvent Identification

Comments

1. Does the handler generate the following wastes?

- a. F001  Yes  No
- b. F002  Yes  No
- c. F003  Yes  No

If an F003 wastestream listed solely for ignitability was mixed with a non-restricted solid or hazardous waste, does the resultant mixture exhibit the ignitability characteristic?

- d. F004  Yes  No
- e. F005  Yes  No

2. Source of the above: Form 8700-12 ; Part A ; Part B ; Other (specify)

Appendix A is intended to assist the inspector and enforcement official in determining whether the handler is generating F-solvent wastes, if such wastes were not identified by the handler previously. If you are concerned that F-solvent wastes may be misclassified or mislabeled, turn to Appendix A. Note concerns below:

Use And Management Of Containers:  
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition? 265.171	✓	—	_____
Are containers compatible with the H.W. stored in them? 265.172	✓	—	_____
Are containers stored closed? 265.173(a)	✓	—	2 REAGENT LAB PACKS _____
Are containers managed to prevent rupture or leakage? 265.173(b)	✓	—	CEMENT BERMED AREA behind unit 2 _____
Are containers inspected weekly for leaks and deterioration? 265.174	✓	—	_____
Are ignitable or reactive wastes stored at least 50 feet from the facility's property line? 265.176	✓	—	_____
Are incompatible wastes stored in separate containers? 265.177(a)	✓	—	_____
Is H.W. not placed in unwashed containers that previously held an incompatible waste or material? 265.177(b)	✓	—	_____
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)	✓	—	BERMS _____

Use And Management Of Containers:  
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
Are containers or inner liners that are not empty managed as H.W.? 261.7(a)(2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
For a container to be considered empty the facility must ensure that no more remains than: 261.7(b)(1)-			
(i) Can be removed by conventional means (e.g., pouring, pumping, etc.)? and:	<input type="checkbox"/>	<input type="checkbox"/>	
(ii) One inch of residue on bottom of container or inner lining? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(iii)(A) If the container is not over 110 gallons in size, 3% of weight when full? or:	<input type="checkbox"/>	<input type="checkbox"/>	
(iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full?	<input type="checkbox"/>	<input type="checkbox"/>	
If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2)	<input type="checkbox"/>	<input type="checkbox"/>	N/A
If a container (or liner removed from the container) has held an acute H.W., it is empty if: 261.7(b)(3)-			
(i) It has been triple rinsed using a solvent capable of removing the contents?	<input type="checkbox"/>	<input type="checkbox"/>	N/A
(ii) Cleaned by another proven removal means? or:	<input type="checkbox"/>	<input type="checkbox"/>	↓
(iii) For the container, the liner prevented contact and has since been removed?	<input type="checkbox"/>	<input type="checkbox"/>	

NEW WASTE STREAM  
UNTESTED, STILL ACCUMULATING

? Sulfate From Hardness Removal STEP  
cake

WASTE REDUCTION old chlorate mud  
20 Tons/week

sulfate process  
20 Tons/month

OLD CELLS CLOSED (9,000 Amphis)

NEW CELLS in OPERATION (95,000 Amphis)