RESP AGENCY file copy ເດ ເວ PENALTY ASSESSED COLLECTED DTHER ଁ CPL SCH MANIFEST L BAN NEVADA COMPLIANCE MONITORING AND ENFORCEMENT LOG - FY88 THE INSPECTION  $\sim$ COMPLIANCE DATES SCHEDULED ACTUAL 0 AGENCEY NO VIOLATIONS NOTED AT THE TIME OF Karr-McGee Chemical Corporation ⊄ 0 a Fa FIN REG DATE ACTION TAKEN Henderson NV 89015 NVD 008 290 330 Lake Mead Road GWM CL/PC P.O. Box 55 01/23/89 ENFORCEMENT ACTIONS AREA OF CLASS VIOLATION TYPE ENFORCEMENT COMMENTS.  $\geq$ FOLLOW-UP EVAL DATE: UPDATE MEM EVALUATION DATE( EVALUATION TYPE 7a EVAL COMMENTS: HANDLER NAME: CLASS OF VIOLATION DATA ENTRY ----|----\* ADDRESS. EPA ID 4. ੂ 0  $\mathbb{C}4$ 1 ហ <u>ى</u>،  $\sim$ O ڊ ميا

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Administration 70?/885-4670 Air Quality 885-5065 Construction Grants 885-5870 RICHARD H. BRYAN, Governor

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,

<u>On January 23, 1989</u> 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.

Since 'ely Aleňe oulson

Environmental Specialist Waste Managment Section

cc: US EPA Region IX enclosure

NEVADA DIVISION OF ENVIRONMENTAL PROTECTION GENERATOR INVESTIGATION REPORT NAC 444.8635 - 444.8700 Facility Name: Kerr-MC Gee Chemical Corp 1. EPA Identification Number: NVD 00 829 @330 2. Street: P.O. Box 55 Lake Mend Dr. 3. City: <u>Henderson</u> State: <u>NU</u> Zip Code: <u>89015</u> 4. Telephone Number: 702-565-8901 County: Clark 5. Inspection Date: /-23-89 6. 7. Weather Conditions: <u>HAZY / winds Calm 1 50°F +</u> 8. Facility Representative Telephone Number Title ALAN T. Gaddy Process Engineer 565-8901 9. NDEP\_Representative Title Telephone Number Alene Coulson EMST 702-885-5872 .. Dave Chesmore EMST 10. Type of Business: \_ Chemical Manufacture NO Land Band wastes produced at this time CLOSED LANDFILL NOT INSPECTED THIS DATE

(1)

Beatty M. Disposal Method US Ecology TSDE ley TONS/mo Amount Per Month Chlorate Recovery Mug Process Waste Bu-Product C18/01 :WMH:

#### <u>GENERATORS - GENERAL:</u> (262 Subpart A)

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NA

(<del>3</del>)

Yes	B 1	<b>—</b>
VDC	No	Comments
103		
	the second s	

X

X

NOT Excluded

Has the solid waste generator made a hazardous waste (HW) determination is the waste: 262.11-

(a) Excluded from regulation under 261.4?

(b) Listed as a H.W. in 261 Subpart D?

(c) Exhibits a characteristic identified in 261 Subpart C by either:

(1) Testing the waste?

(2) Applying knowledge of the hazard characteristic of the waste or the processes used?(d) Excluded or restricted under 264, 265, or 268, if determined hazardous?

Is the waste an exempt recyclable material: 261.5(a)(3)-

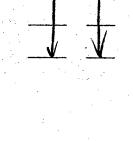
(i) Industrial ethyl alcohol that is reclaimed (unless provided otherwise in an international agreement)?
(ii) Used batteries or cells returned to the manufacturer for regeneration?
(iii) Used oil not burned for energy recovery?
(iv) Scrap metal?
(v-ix) Specific steel (KOB7) and petroleum refinery production wastes?

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#### (Cont.)

If the waste is any of the following recyclable materials, complete Parts 270 (permits and notifications), and 266 Subparts A-6 of the ISD checklists: 261.6(a)(2)-

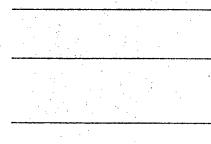
(i) Used in a manner constituting disposal (Subpart C)?
(ii) Burned for energy recovery in non regulated boilers industrial furnaces (Subpart D)?
(iii) HW characteristics used oil that is burned as above (Subpart E)?
(iv) Reclaimed for precious metals (Subpart F)?
(v) Reclaimed Spent lead-acid batteries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



(4)

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?

(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))?

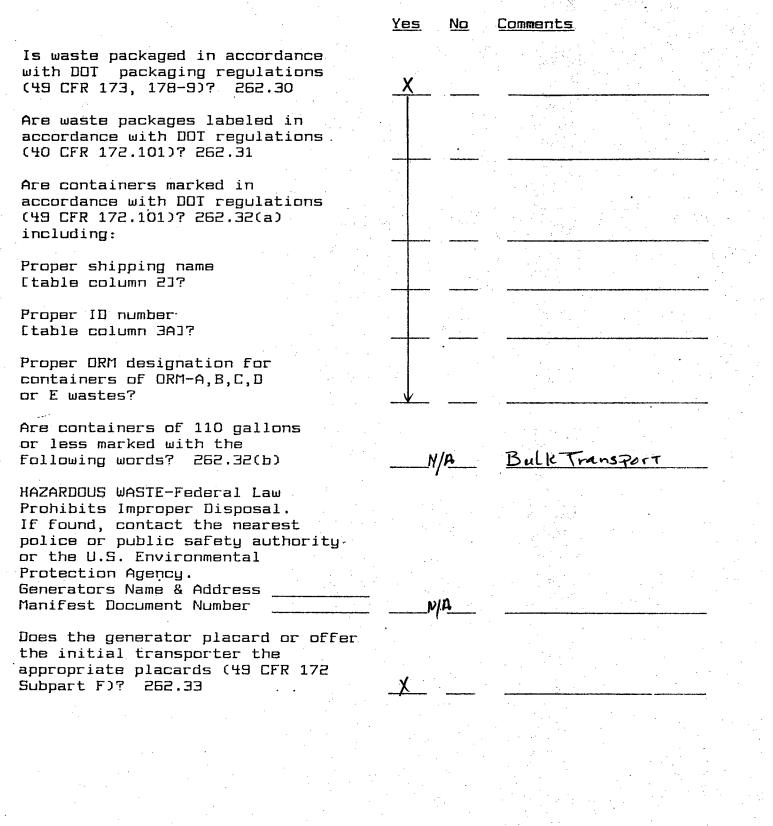
Did the generator give the remaining copies of the manifest to the transporter? 262.23(b)

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

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NA

#### PRE-TRANSPORT REQUIREMENTS: (262 Subpart c)



Accumulation Time:

(6)

## PRE - TRANSPORT REQUIREMENTS: - Continued

(7)

NIA

NIA

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? \_

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## IV. <u>PRE-TRANSPORT REQUIREMENTS:</u> (Part 262 Subpart C)

	Yes	No	Comments
If the generator does not have interim status (as a ISD storage facility), have they accumulated H.W. on-site for less than 90 days? 262.34(a)	<u>×</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)	 	NA	
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?	_X_		
Subpart J for tanks (except 264.197(c) closure of tanks without secondary containment, and 265.200)?	), _NJA	1 	
264.111 for tank closure performance standards?	NIA	. · · ·	
265.111 for tank decontamination after closure?	NIA		
Subpart C for preparedness and prevention?	<u>×</u>	<del></del>	
Subpart D for contingency plan and emergency procedures?	<u>×</u>		•
263.16 for personnel training?	*		
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:	?f 	NA	· · · · · · · · · · · · · · · · · · ·
Complied with 40 CFR Parts 264 and 265 and permitting requirements in Part 270 of RCRA?		V]A	

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(8)

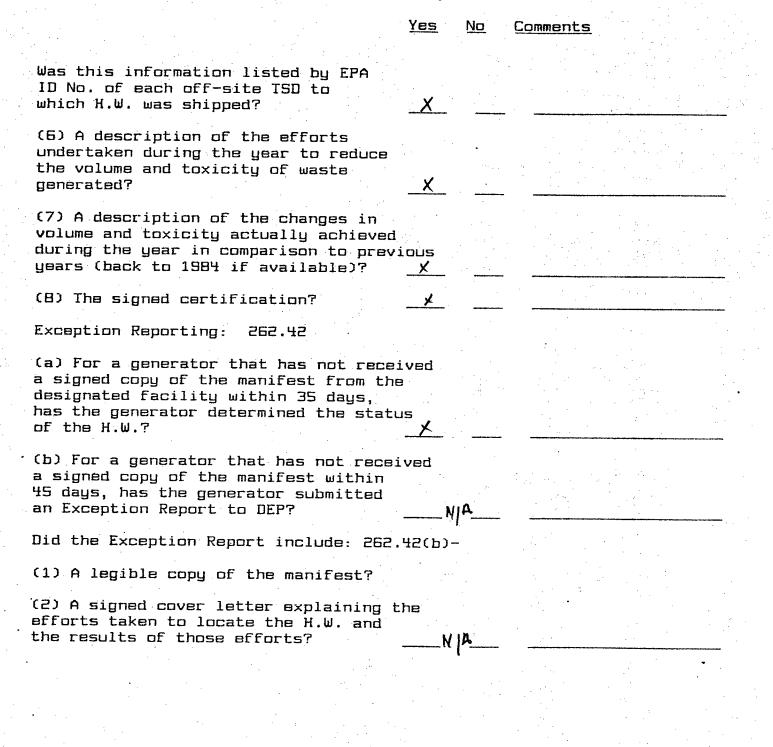
## RECORDKEEPING AND REPORTING: (Part 262 Subpart D)

	Yes	No Comment	5
Are the following kept for at least three years: 262.40-			
(a) Manifest signed by the receiving facility?	<u>   X   </u>		
(b) Annual Reports and Exception Reports?	<u> </u>	n an an an Anna an Ann An Anna an Anna Anna an Anna an	
(c) Test results, waste analysis or other determinations made in accordance with 262.11?	<u>    X    </u>		
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)	_ <u>X</u>		
Was the report submitted on EPA Form 8700-13A and cover generator activitin during the previous calendar year? 262.41(a).	es X	<u>\$71</u>	te form used
Does the report include the following information: 262.41(a)			
(1) EPA ID No., name and address of the generator?	<u>X</u>		
(2) Calendar yéar covered by the report?	<u> </u>		
(3) The EPA ID No., name, and address for each off-site TSD to which H.W. was shipped during the year?	_ <u>X_</u>		
(4) Name and EPA ID No. of each transporter used during the year to s to a U.S. ISD?	<u> </u>		
(5) Description, EPA hazardous waste N DDT hazard class and quantity of each shipped off-site to a U.S. TSD?			<u>5</u> k

(9)

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



(10)

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#### IMPORTS OF HAZARDOUS WASTE: (Part 262 Subpart F)

(11)

Yes

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

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NO

Comments

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)

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#### FARMERS (Part 262 Subpart G)

	Yes	No	<u>Comments</u>
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?	<b>/</b>	/(A	

(12)

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?

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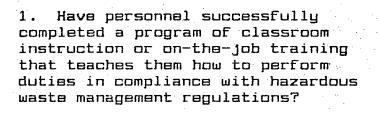
#### ATTACHMENT

#### PERSONNEL TRAINING (40 CFR 265.16)

Yes

ND

Remarks



2. Is the program directed by a person trained in hazardous waste management procedures?

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)?
  - Was the training program completed?
  - a. within 6 months after employment?
  - b. annually reviewed?

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4.

#### ATTACHMENT PERSONNEL TRAINING - Continued (40 CFR 265.16)

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

a job title/name of individual filling job?

a written job description?

written description of type/amount of training received?

Are records of current employees on-site?

> Are records of former employees kept for 3 years?

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#### ATTACHMENT .2 <u>PREPAREDNESS AND PREVENTION</u> (40 CFR Part 265.c)

Yes

No

Remarks

Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or HW release? X If require, does the facility have the following equipment: (265.32) internal communications or alarm systems? X telephone or 2-way radios at the scene of operations? X portable fire extinguishers, fire control, spill control equipment, and decontamination equipment? X Testing and maintenance of

(A-2)

Emergency Equipment: (265.33)

a. has the owner or operator established testing and maintenance procedures for emergency equipment?

b. is emergency equipment maintained in operable condition?

Has owner or operator provided immediate access to internal alarms (if needed)? (265.34)

Is there adequate aisle space for unobstructed movement? (265.35)

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c.

ATTACHMENT 3 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CRF Part 265.D)

Yes

Na

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Does the Contingency Plan contain the following information:

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)

Paging, horns etc

Remarks

- 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?
- 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.)
- 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)
  - 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)
    - Are copies of the Contingency Plan available at the site and local emergency organizations? (265.53)

(A-3)

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# ATTACHMENT 3 (Continued) CONTINGENCY PLAN AND EMERGENCY PROCEDURES

		<u>Yes</u>	No	Remarks
з.	Emergency Coordinator (265.55)		•	
а.	is the facility Emergency Coordinator identified?	_ <u>X</u>		
ь.	is the Emergency Coordinator familiar with all aspects of si operation and emergency procedures?	te X	• • • •	
С.	does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>×</u>		
4.	Emergency Procedures			
•	If an emergency situation has at this facility, has the Emer Coordinator followed the emerg procedures listed in 265.56?	gency Jency		
• • •			1	

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	,				Inspector: ddress:			
,			DRAFT RCRA LAND RESTR F- SOLVEN GENERATOR CHE	r	Telephc	me no:		
I.	KERE	DENTIFICATION 2 MCGEE	Chemical	Com pan	<u>y</u>	BMI COMPL	EX	
	A. Handler HENII		NEVADA	· · · · · · · · · · · · · · · · · · ·	./ Street (c 89015	or other ident CLA		
	C. City	DERSON	D. Sta	te E	· Zip Code		ounty Name	
		_	) WASTE Identification o	f Operations		<del></del>	<u></u>	
÷ .	H. EPA II		10 330	· · · · · · · · · · · · · · · · · · ·				
	ALA	N GAdd	ie and Phone Numb		8901			
II.	Generator	Compliance						
	A. F-Solven	nt Identificati	.on			Commen	ts	
	1. Does	s the handler o lowing wastes?						
	a.	F001	•	Yes	No No		·	
	<b>b</b> .	F002		Yes	<u>X</u> NO		· · ·	
	. C.	F003 _	Yes X No					
•	s W b	solely for igni with a non-rest nazardous waste	re exhibit the	el Yes	XNO		•	
	d.	F004		Yes	XNO			
	-	F005			<u>X</u> No			
	2. Sour	ce of the abov	e: Form 8700-12	; Part A	; Part	B; Other	(specify)	
	Appendix whether t the handl	A is intended the handler is ter previously.	to assist the in generating F-solv If you are cond Appendix A. Note	spector and expector and expector and expector set of the set of t	nforcement c if such wast -solvent was	official in de es were not id	termining dentified b	

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

Yes

No

Comments

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)

Are containers managed to prevent rupture or leakage? 265.173(b)

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)

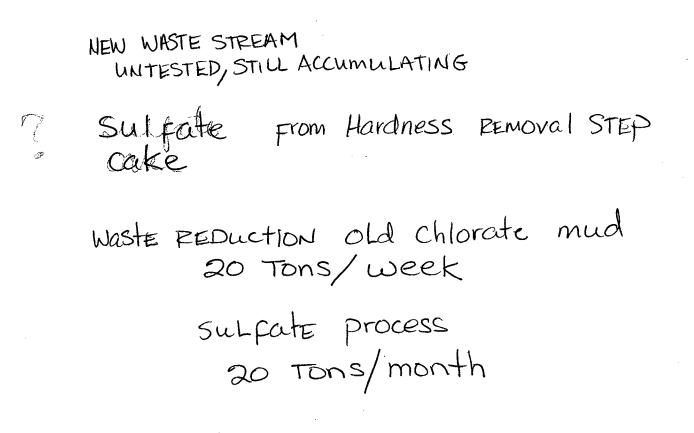
Are containers holding H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device? 265.177(c)

DACKS Ab 2 reagent BERMED CEMENT AREA Unit behind BERMS

## Use And Management Of Containers: (Part 265 Subpart I) Comments Yes No Are containers or inner liners that are not empty managed as H.W.? 261.7(a)(2) 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: (ii) One inch of residue on bottam of container or inner lining? or: (iii) (A) If the container is not over 110 gallons in size, 3% of weight when full? or: (iii)(B) If the container holds over 110 gallons, no more than 0.3% of weight when full? If holding compressed gas, is the container at atmospheric pressure? 261.7(b)(2) 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? (ii) Cleaned by another proven removal means? or: (iii) For the container, the liner prevented contact and has since been

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removed?



OLD CELLS CLOSED (9,000 Antphs) NEW CELLS in Operation (95,000 Antphs)