

RCRA CLOSURE/POST CLOSURE INSPECTION REPORT

INSPECTION OF:

KERR-MCGEE CHEMICAL CORPORATION  
Lake Mead Drive  
Henderson, NV 89015  
(702) 565-8901

EPA ID #: NVD 008290330

FACILITY TYPE: STORAGE, TREATMENT AND DISPOSAL

DATE: September 22, 1982

TIME: 1:00 P.M.

PARTICIPANTS:

Chuck Armstrong, Kerr-McGee - Plant Manager  
Richard Wohletz, Kerr-McGee - Technical Superintendent  
Frank Steinberg, Nevada Dept. of Environmental Protection  
Harry Takach, Mittelhauser Corporation

OVERVIEW:

This inspection report covers Kerr-McGee - Chemical Corporation's Henderson, Nevada Plant's:

- Facility Description
- Part A Application
- Closure Plan
- Post-Closure Plan
- Cost Estimates

The Kerr-McGee representatives stated that revised closure plan was being prepared but was not a significant change. The revisions basically brought the plan up to consistency with the revised RCRA Part A application dated 7/12/82 and general procedures and costs revisions or updates.

This staff also proposed that EPA might consider a different sampling strategy when performing these inspections. They suggested a percentage of an EPA region rather than a fixed number per state. That action would minimize the number of Kerr-McGee's inspections since Nevada is not a very representative state (Note - only six RCRA sites are located in Nevada).

More detailed information can be obtained from the attached checklist.

FACILITY DESCRIPTION

The Henderson, Nevada plant manufactures industrial chemicals including sodium chlorate, ammonium perchlorate, potassium perchlorate, manganese dioxide, boron trichloride, boron tribromide and elemental boron. The source of wastes sent to the landfill are filtercake solids produced during the sodium chlorate production step. Liquids sent to the surface impoundments are produced during the production of potassium perchlorate.

Chromate-bearing wastes constitute the key component which makes their wastes fall under RCRA. They are closely following the developments of EPA's proposals to delist trivalent chromium from the hazardous constituent list.

#### REVIEW OF THE PART A APPLICATION

This plant is handling the type of wastes listed in the facilities noted in their Part A RCRA Application.

#### CLOSURE PLAN

The closure plan is part of a larger, more encompassing environmental document. Although addressing most of the necessary closure details, it is lacking in others, such as security and cap design and support details. Kerr-McGee staff noted that all these data are covered and found in other sections of this other document.

Information and data to support the adequacy of the cap design is not found in the closure plan. Discussion during the meeting presented adequate general support such that I feel that this data is available and the design is adequate. This type of information should be documented in the plan sufficient to support the design basis.

Due to continuing industrial operations, there is no date projected for final closure. Therefore, some of the RCRA items are not presented such as Maximum Extent of Operation and Maximum Inventory or lacking in detail such as groundwater monitoring and decontamination.

The surface impoundments are evaporated to dryness prior to closing operations. The schedule for closure is not provided but may take longer than 180 days to complete. Understanding and complying to this maximum time schedule should be discussed.

#### POST-CLOSURE PLAN

The section of the plan does not contain a great deal of narrative or information. Comments at the inspection visit noted that further information were contained in other sections of the existing larger scope environmental document, especially groundwater monitoring and existing security. Site inspection noted the groundwater monitoring wells in place as well as fencing although these items were not mentioned in the plans. Also, they gave me two figures referenced in their closure/post-closure plan but not included in my file from EPA which were extremely helpful in understanding their RCRA facilities and uses.

#### COST ESTIMATES

At our meeting, Kerr-McGee staff exhibited clear understanding that supporting documentation and past experience would demonstrate the adequacy of the cap design for the landfill and surface impoundment areas. This information should be placed in their plan revision to assist the acceptance of this design. Therefore, the associated cost estimate for filling and capping these areas is probably adequate.

The only mention of groundwater monitoring in this entire plan is in the Financial Requirements section as one of the cost entries. This figure did not have units but was said to represent the total cost projected for analytical work over the 30-year period. They have just drilled the one upgradient and three downgradient wells and have just initiated a baseline sampling program, analyzing for pH, conductance and chromium.

The plans estimate the number of landfill cells and surface impoundments that may be required to be closed over the next 30 years. The closure costs present the respective costs to close either a landfill cell or an impoundment basin. The total cost over the next thirty years can then be estimated in current dollars as \$170,000.