

US EPA ARCHIVE DOCUMENT

INSPECTION REPORT

PURPOSE:

CFR Section 6(e), PCB Inspection

INSPECTION DATE:

April 14 - 15, 2004

FACILITY:

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

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INSPECTION REPORT

A. Facility Data

Facility Name: Chemical Waste Management, Inc.
Kettleman Hills Facility
35251 Old Skyline Road
Kettleman City, California 93239

Phone: (509) 386-9711

EPA I.D.: CAT000646117 (Issued in 1980)

SIC Code: 3764

Corporate Affiliation: Chemical Waste Management, Inc.
Subsidiary of Waste Management, Inc.
1001 Fannin St
Houston, TX 77002
(713) 512-6200

B. Inspection Date April 14 - 15, 2004

C. Inspection Participants

Chemical Waste Management, Inc.: Dave Bearden, Compliance Manager
Cecilia Canoja, Senior Waste Approvals Chemist
Carol Carollo, Environmental Compliance
Specialist
Sam Cerveny, District Manager
Tracy Reddick, PCB Records Clerk
Jovita Vincent, Records Clerk

US EPA: Max Weintraub, Region 9 PCB Coordinator
Yoshiro Tokiwa, PCB Specialist

D. Facility Background

Chemical Waste Management, Inc. is a subsidiary of Waste Management, Inc. (Appendix CFR). The Chemical Waste Management, Inc - Kettleman Hills Facility (KHF) is located just north of State Highway 41 in Kings County, CA approximately two and a half miles west of Interstate Highway 5. The nearest population center is Kettleman City (population 1500), approximately one mile east of the junction of S-41 and CFR-5, and four miles from 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 and municipal solid 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. 499 acres within that area is permitted for hazardous waste storage and disposal. The facility employs 75 individuals. The approval for CFR activities at the facility expired in 1997, but continues in effect pending an EPA decision on the coordinated approval 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

US EPA representatives Max Weintraub and Yoshiro Tokiwa arrived at the facility at 1:00 pm on April 14 and met with Carol Carollo, Environmental Compliance Specialist, Sam Cerveney, District Manager, and Dave Bearden, Compliance Manager. During the initial meeting, Mr. Weintraub present Ms. Carollo with the Notice of Inspection (Appendix II) and CFR Inspection Confidentiality Notice (Appendix III) and explained each notice. Ms. Carollo signed the forms.

Mr. Weintraub also asked that the KHF records staff join them for a discussion about the list of documents that would be reviewed during the inspection. During a discussion with Jovita Vincent, Records Clerk, and Tracy Reddick, PCB Records Clerk, Mr. Weintraub requested the following:

- 1) Incoming Manifests for 2002 - 2003
with an emphasis on the PCB storage unit
- 2) Outgoing Manifests for 2002 - 2003
with an emphasis on the PCB storage unit
- 3) Certificates of Disposal for 2002 - 2003
with an emphasis on the PCB storage unit
- 4) Exception Reports for 2002 - 2003
- 5) Remedial Work Orders for 2002 - 2003
with an emphasis on the PCB storage unit
- 6) Leachate Monitoring and Analytical Data for 2001 - 2003
with an emphasis on active CFR landfills B-16 and B-18
- 7) Maintenance Records for the PCB storage unit

After submitting the request, Ms. Carollo, Mr. Cerveney, Mr. Weintraub, and Mr. Tokiwa went on a tour of the facility.

F. Facility Inspection

The first unit inspected was the PCB storage unit. The unit stores PCB waste destined for off-site disposal (e.g., liquid that will be incinerated) as well as PCB equipment that will undergo draining and/or flushing (e.g., transformers). Non-CFR PCB liquids are included in the PCB waste stored in the storage unit and are sometimes added to the liquids in the PCB storage tank.

A visual inspection of the interior of the PCB storage unit (Appendix XIII, Photos #1 - #2) found that the walls and ceilings were intact, the berms measured 18 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. Mr. Weintraub tested the eyewash and shower in the unit and found they operated properly. There were two fire extinguishers in the unit with labels indicating they had undergone maintenance in 2004.

The drums in the PCB 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 (Appendix XIII, Photos #3 - #5).

The PCB storage unit also contains three cabinets that hold up to 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 flushing activities (Appendix XIII, Photos #6).

The PCB storage unit also held a vacuum pump and absorbent material (Appendix XIII, Photos #7) that led to a large storage tank. If the PCB concentration in the liquid inside electrical equipment is greater than 500 ppm, the equipment is drained, diesel fuel is pumped into the equipment, allowed to sit for at least 18 hours, and then pumped out. If the PCB concentration is less than 500 ppm, the equipment is just drained. All liquids from the draining and flushing activities (including the diesel solvent) go into the PCB storage tank for off-site incineration. The review of the remedial work orders is being performed to determine whether a decrease in the number of work orders has resulted since the installation of the new pump for draining and flushing activities.

A visible inspection of the exterior of the PCB storage unit (Appendix XIII, Photos # 8 - #12) found marking labels are present at each entrance to the unit. Wood pallets and metal secondary container equipment dedicated to the PCB storage unit is outside the unit and available for handling large pieces of equipment.

We then went to the CFR and RCRA landfill disposal unit B-18 (Appendix XIII, Photos #13 - #14). Since the last CFR inspection, the unit has filled up dramatically. The unit will likely become full by the end of the decade. Thus, there is discussion about creating another landfill unit on the site to handle CFR and RCRA waste. Activity in the unit was focused in a small area while soil cover on the remainder of the unit minimized the potential of waste to be released outside the unit.

After B-18, we went to CFR landfill disposal unit B-16 (Appendix XIII, Photos #15 - #21). B-16 is a near capacity unit that is scheduled to close this year. We saw 3 lysimeters that pulled leachate from the sides of the unit, a leachate monitoring well that pulled leachate from the bottom of the unit, and a groundwater monitoring well downgradient from the unit.

Ms. Carollo expressed a need to extend the closure date noted in EPA's approval of the B-16 closure plan to December 2004. She also pointed out that EPA approval is being sought to allow non-hazardous, non-putrescible, industrial solid waste as well as non-liquid CFR waste to be disposed of as a means to ensure timely closure of the unit with the proper final grade.

According to Ms. Carollo, limiting the waste that could be disposed of in the unit to non-liquid CFR waste will require the addition of clean soil in order to meet the final grade requirements by December 2004. The quantity of non-liquid CFR waste alone is apparently insufficient to meet the grade requirements in that timeframe.

Mr. Weintraub informed Ms. Carollo that EPA would consider the NNISW option and that EPA would likely grant an extension until December 2004. However, Mr. Weintraub also told Ms. Carollo that whatever action is necessary should be taken to ensure the closure of the unit at that time.

Before ending the inspection, we went to the front gate of the facility. Mr. Weintraub informed Ms. Carollo that EPA had concerns about the trucks that stopped in the 1000 foot by 50 foot area in front of the gate after KHF closed at 6:00 pm each evening and before the gate was unlocked in the morning. Ms. Carollo explained that the facility did not control that waiting area. However, she and Mr. Cerveny noted that KHF keeps the area clean and that the trucks who use the area are hazardous waste transporters. We then went to the administrative office and concluded the initial portion of the inspection.

At 11:30 pm Mr. Weintraub visited the facility. No trucks were in the waiting area and the front gate was open. Mr. Weintraub drove up to the security guard station. The guard explained that the gate was often kept open until midnight. However, if waste transporters came in, they were directed to exit the facility and stay in the waiting area.

At 7:30 am on April 15, Mr. Weintraub and Mr. Tokiwa returned to KHF. We stopped at the waiting area. The area (Appendix XIII, Photos #22 - #23) looked like it had been graded and had a large number of truck tracks. Mr. Tokiwa and Mr. Weintraub then traveled on the road from the front gate, through the buffer zone to the security office, and then went to administrative area (Appendix XIII, Photos #24 - #26). The inspectors spent the remainder of the morning reviewing the records requested on the previous day.

G. Record Review

During the record review performed at KHF, several hundred manifests, certificates of disposal, exception reports, and maintenance records were reviewed by Mr. Tokiwa and Mr. Weintraub. Copies of some of the documents were requested and sent to EPA on April 29, 2004. The record review includes comments on materials reviewed at KHF as well as records subsequently reviewed at EPA.

Several hundred manifests for 2002 - 2003 were reviewed. The system for tracking the manifests is, overall, well-organized and thorough. However, the review identified several instances that may require further action.

40 CFR 761.65(a) requires disposal of PCB waste within one year of when it is taken out of services. 40 CFR 761.215(c) requires the generation of an exception report when the disposal timeline requirements are not met.

In the first instance, 1 drum of waste from Arrogate with an inbound manifest number of 2115517406 was taken out of service on January 14, 2002, received at KHF on June 21, 2002, sent from KHF on outbound manifest 0025835 (Appendix IV) to Onyx Environmental on January 24, 2003, and underwent disposal on February 28, 2003. On March 10, 2003, Onyx Environmental created a certificate of destruction for the waste. The certificate is marked as received by KHF on March 10, 2003, the only such instance identified by the reviewer when a certificate of disposal is marked as received by KHF on the same date it was created. A second copy of the same certificate of disposal is marked as received by KHF on April 9, 2003.

In the second instance, 1 drum of waste from Hawaiian Electric with an inbound manifest number of 2182387702 was taken out of service on May 10, 2002, received at KHF on March 17, 2003, sent from KHF on outbound manifest 0025844 (Appendix V) to Onyx Environmental on April 18, 2003, and underwent disposal on May 14, 2003. On May 15, 2003, Onyx Environmental created a certificate of destruction for the waste. The certificate is marked as received by KHF on May 27, 2003.

40 CFR 761.211 requires that PCB waste be manifested and, if not within 15 days after receipt, that a report be submitted to EPA. A review of the manifests also identified a manifest 02501387 (Appendix VI) with a KHF off-site shipment compliance checklist that indicated PCB waste was sent to Onyx Environmental on September 30, 2003. However, neither the manifest description or certificate of disposal included such material nor is there a record of an unmanifested waste report submitted to EPA.

The review of remedial work orders from 2002 and 2003 for the PCB storage area (Appendix VII) identified more than 60 adjustments to the waste labels, 16 spill cleanup actions in response to releases from containers or transformers, 6 instances when non-leaking transformers or containers needed to be sealed, 3 instances when the epoxy sealant cracked and required repair, 2 instances when the PCB jug and trash did not undergo disposal within 30 days, 1 instance when boxes were stacked on top of each other and were crushed, and 1 instance where waste was stored outside the unit although there was capacity inside the unit. The maintenance records for the same period did not identify whether the epoxy coating had been reapplied.

40 CFR 761.75(b)(7) requires monthly monitoring of leachate for PCBs. A review of the monitoring records (Appendix VIII) for landfills B-16 and B-18 conducted after the facility inspection reconfirmed that no records exist of B-16 lysimeters monitoring since 1995, found annual leachate analysis for PCBs in B-18, and identified a leachate sample with a PCB concentration of .0013 mg/l in a letter dated July 14, 1995.

40 CFR 761.75(b)(6)(iii) requires analysis of all water samples for PCBs. The March 20, 2001 revised groundwater monitoring plan (Appendix IX) from the California Regional Water Quality Control Board requires PCB analysis once every five years.

H. Closing Conference

During the closing conference, Mr. Weintraub and Mr. Tokiwa met with Ms. Carollo, Mr. Bearden, Mr. Cerveny, Ms. Canoza, Ms. Reddick, and Ms. Vincent. Mr. Weintraub informed the KHF personnel that the facility appeared to be operating well. After raising several questions with Ms. Reddick, Ms. Vincent, and Ms. Canoza about how CFR profiles, generator waste profiles, manifests, certificate of disposal, and exception reports are tracked (Appendix X), Mr. Weintraub and Mr. Tokiwa commended them for the strong recordkeeping system in place to ensure proper disposition of the large quantities of PCB waste received at KHF.

Mr. Weintraub also provided a Receipt for Samples and Documents form listing records EPA sought copies of as part of the inspection (Appendix XI). The documents were provided on April 29, 2004 (Appendix XII).

Mr. Weintraub then went on to raise several issues of concern. He noted that EPA strongly supported closure of landfill unit B-16 as soon as possible and provided reassurance that EPA would review any materials submitted to facilitate such action in a timely fashion. Mr. Weintraub also discussed the waiting area outside the facility gates where trucks park before KHF opens each morning and the stacking of waste in the PCB storage unit.

Mr. Bearden and Ms. Carollo confirmed their intent to close B-16 by the end of 2004. The meeting concluded at 3:30 pm.