RECEIVED
EPA REGION VI
1982 MAY 13 PM 4:21
SUPERFUND BRANCH

RCRA INSPECTION

I. SITE IDENTIFICATION

ARD 000023440 7-29-81

A. Site Name | B. Street (or other identifier)

Vertac Chemical Co. | Box 69

C. City | D. State | E. Zip Code | F. County Name

Jacksonville | Ar | 72076 | Pulaski

G. Site Operator Information

1. Name | 2. Telephone Number

Ken Howard | 501-982-9451

3. Street | 4. City | 5. State | 6. Zip Code

H. Site Description

Manufacture of Agricultural Chemicals

I. Latitude (deg.-min.-sec.) | Longitude (deg.-min.-sec.)

J. Type of Ownership

__1. Federal __2. State __3. County __4. Municipal X5. Private

K. X1. Generator __2. Transporter __3. Treatment X4. Storage __5. Disposal

INSPECTION INFORMATION

A. Principal Inspector Information

1. Name | 2. Title

Richard McDuffee | Hazardous Waste Inspector

3. Organization | 4. Telephone No. (area code & No.)

Dept. of Pollution Control & Ecology | 501-371-1701

B. Inspection Participants

Ken Howard - Chemical Engineer

VT3.1.13

03108178

6941100

Vertac Jacksonville

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

Note: On multiple part questions, circle those not in compliance.

Section A - EPA Identification No.

1. Does Generator have EPA I.D. No.? (262.12 - EPA I.D. No.) X Yes ___ No

   a. If yes, EPA I.D. No. A R D 0 0 0 0 2 3 4 4 0

Section B - Hazardous Waste Determination

1. Does generator generate hazardous waste(s) listed in Subpart D (261.30 - 261.33 - List of Hazardous Waste)? X Yes ___ No

   a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste No.) (Provide waste name and description.)

2. Does generator generate solid waste(s) that exhibit hazardous characteristics? (corrosovity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous waste.)

   X Yes ___ No

   a. If yes, list wastes and quantities on attachment. (Include EPA Hazardous Waste No.) (Provide waste name and description)

   b. Does generator determine characteristics by testing or by applying knowledge of processes?

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? NA Yes ___ No

      2. If equivalent test methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by generators? i.e.(process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.)

   ___ Yes X No

   a. If yes, did generator determine non-hazardous characteristics by testing or knowledge of process? NA

      1. If determined by testing, did generator use test methods in Part 261, Subpart C (or Equivalent)? NA Yes ___ No

      2. If equivalent test methods used, attach copy of equivalent methods used.

   b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet.)

001470

03108179

Section C - Manifest

1. Does generator ship hazardous waste off-site? (Subpart B - The Manifest) ___ Yes X No

   a. If no, do not fill out Section C and D.

   b. If yes, identify primary off-site facility(s). Use narrative explanations sheet.)

2. Has generator shipped hazardous waste off-site since November 19, 1980? ___ Yes X No

3. Is generator exempted from regulation because of:

   Small quantity generator (261.5 - Special requirements) ___ Yes X No

   OR

   Produces non-hazardous waste at this time (261.4 - Exclusions) ___ Yes X No

4. If not exempted does generator use manifest? (262.20 - General requirements) ___ Yes X No

   a. If yes, does manifest include the following information (262.21 - Required information) (Break up items or circle ones not on manifest)

      1. Manifest Document No. NA Yes ___ No
      2. Generators Name, Mailing Address, Tele. No. NA Yes ___ No
      3. Generator EPA I.D. No. NA Yes ___ No
      4. Transporter(s) Name and EPA I.D. No. NA Yes ___ No
      5. a. Facility Name, Address and EPA I.D. No. NA Yes ___ No
         b. Alternate Facility Name, Address and EPA I.D. No. NA Yes ___ No
         c. Instructions to return to generator if undeliverable? NA Yes ___ No
      6. DOT description of the waste NA Yes ___ No
      7. a. Quantity (weight or volume) NA Yes ___ No
         b. Containers (type and number) NA Yes ___ No
      8. Emergency Information (optional) (special handling instructions, Phone No.) NA Yes ___ No

001471

03108180

9. Is the following certification on each manifest form? NA Yes ___ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

5. Does generator retain copies of manifests? NA Yes ___ No
(262.40 - Recordkeeping)
(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

If yes, complete a through e. If questions contain more than one item, circle those not in compliance.

a. (1) Did generator sign and date all manifests inspected? NA Yes ___ No
(2) Who signed for generator? Name _____ Title _____

b. (1) Did generator obtain handwritten signature and date of acceptance from initial transporter? NA Yes ___ No
(2) Who signed and dated for transporter? Name _____ Title _____

c. Does generator retain one copy of manifest signed by generator and transporter? NA Yes ___ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? NA Yes ___ No

e. If copy of manifest from facility was not returned within 45 days, did generator file an exception report? (262.42 - Exception reporting) NA Yes ___ No

(1) If yes, did it contain the following information?

Legible copy of manifest NA Yes ___ No
AND
Cover letter explaining generators efforts to locate waste. NA Yes ___ No

f. Does (will) generator retain copies for 3 years? X Yes ___ No

Section D - Pre-Transport Requirements

1. Does generator package waste? X Yes ___ No

   If no, skip the rest of Section D.
   If yes, complete the following questions.

2. Does generator package waste in accordance with 49 CFR 173, 178, and 179? (DOT requirements) (262.30 - Packaging) N/A Yes ___ No

3. Inspect containers to be shipped.
   a. Are containers to be shipped leaking or corroding or bulging? N/A Yes ___ No
   b. Use narrative explanations sheet to describe containers and condition. N/A Yes ___ No
   c. Is there evidence of heat generation from incompatible wastes in the containers? N/A Yes ___ No

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172? (262.31 - Labeling) N/A Yes ___ No

5. Does the generator mark each package in accordance with 49 CFR 172? (262.32 - Marking) N/A Yes ___ No

6. Is each container of 110 gallons or less marked with the following label? (262.32 - Marking) N/A Yes ___ No

   Label saying: 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 and Address _____

   _____

   Manifest Document Number _____

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

8. Accumulation Time (262.34 - Accumulation Time)
   a. Is facility a permitted storage facility? X Yes ___ No

   If yes, skip to question #9.
   If no, answer rest of question #8.

   b. Are containers used to store waste? X Yes ___ No

      (1) If yes, visually inspect containers. Is the beginning date of accumulation time clearly indicated? N/A Yes ___ No

0014735

03108182

c. (1) Does generator inspect containers for leakage or corrosion? (265.174 - Inspections) X Yes ___ No

(2) If yes, with what frequency? daily

d. (1) Does generator handle ignitable or reactive waste? ___ Yes X No

(2) If yes, does generator locate containers holding ignitable or reactive waste at least 15 meters (50 feet) inside facility's property line? (265.176 - Special Requirements for Ignitable or Reactive Wastes) NA Yes ___ No

NOTE: If tanks used, fill out checklist for tanks.

NOTE: If generator accumulates waste on-site for less than 90 days fill out checklist for Facilities, Part 265 - Subparts C and D (Sections B and C of Facilities Checklist) and Section A, Question #7 (Personnel Training).

9. Describe storage area. Use photos and narrative explanation sheet.

001474

Section E - Recordkeeping and Records

1. Is generator keeping the following reports? (262.40 - Recordkeeping) (Note: The following must be kept for a minimum of three (3) years.)

   a. Manifests and signed copies from designated facilities? NA Yes ___ No
   b. Annual reports (Not applicable until March 1982) NA Yes ___ No
   c. Exception Reports NA Yes ___ No
   d. Test results where applicable. ___ Yes X No

2. Where are records kept (at facility or elsewhere)? Facility
3. Who is in charge of keeping the records? Name Dale Colleys Title Superintendent of manufacturing

Section F - Special Condition

1. Has generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments)
   a. If yes, has he filed a notice with the Regional Administrator? ___ Yes X No
   b. Is this waste manifested and signed by Foreign consignee? NA Yes ___ No
   c. If generator transported wastes out of the country has he received confirmation of delivered shipment? NA Yes ___ No

03108183

Vertac Jacksonville Plant ARD000023440

Generators Checklist

Section B

K043	Approximately 8 drums day (2-6-Dichlorophenol)
K042	No longer generating, have 2750 drums in storage
K099	Treated for PH and discharged to Jacksonville POTW Approximately 120,000 gal. per. day
D016	lime sludge from pre treatment approximately 10 drums per. month (2,4-D)
D000	Dalipon 240,000 lbs. SO2 (solid)

A revised EPA form 3510-3 will be submitted to reflect the above wastes

001475

03108184

Vertac

Fachgeville

RCRA COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

Section A - General Facility Standards

1. Does facility have EPA Identification No.? (265.11 - Identification Number) X Yes ___ No

   A. If yes, EPA I.D. No. ARD000023440
   If no, explain _____

2. Has facility received hazardous waste from a foreign source? (265.12 - Required notices) ___ Yes X No

   A. If yes, has he filed a notice with the Reg. Admin. NA Yes ___ No

Waste Analysis

3. Does the facility have a written waste analysis plan? (265.13 - General Waste Analysis) ___ Yes X No

   A. If yes, is a copy maintained at the facility? NA Yes X No

   B. If no, question #4 not applicable.

4. If yes, does it include:

   A. Parameters for which each waste will be analyzed? NA Yes X No

   B. Test methods used to test for these parameters? NA Yes X No

   C. Sampling method used to obtain sample? NA Yes X No

   D. Frequency with which the initial analysis will be reviewed or repeated? NA Yes X No

      1. If yes, does it include requirements to re-test when the process or operation generating the waste has changed? NA Yes X No

   E. (For off-site facilities) Waste analyses that generators have agreed to supply? NA Yes ___ No

   F. (For off-site facilities) Procedures which are used to inspect and analyze each movement of hazardous waste including:

      1. Procedures to be used to determine the identity of each movement of waste? NA Yes ___ No

      2. Sampling method to be used to obtain representative sample of the waste to be identified? NA Yes ___ No

0014760

03108185

5. Does the facility provide adequate security to minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of the facility? (265.14 - Security) X Yes ___ No

If no, describe inadequacies. (Use narrative explanations sheet.)

If yes, is security provided through:

A. 24-hour surveillance system? (e.g. television monitoring or guards) ___ Yes X No

OR

B. 1. Artificial or natural barrier around facility (e.g. fence or fence and cliff)? X Yes ___ No
Describe type of security
Entire plant fenced with locked gate

AND

2. Means to control entry through entrances (e.g. attendant, television monitors, locked entrance, controlled roadway access)? X Yes ___ No
Describe type of security.
locked entrance at night Guard on duty during day

Include a drawing indicating any inadequacies in the facility's security system..

6. Is a sign with the legend, "Danger-Unauthorized Personnel Keep Out," posted at the entrance to the active portion of the facility? (265.14 - Security) X Yes ___ No

Is it written in English and legible from at least 25 feet? X Yes ___ No

(NOTE: The sign must be written in any other language predominant in the area surrounding the facility (e.g. In New Mexico and Texas areas bordering Mexico, the sign must be in Spanish).

If an existing sign with a legend other than "Danger-Unauthorized Personnel Keep Out," what does that legend say?

_____

_____

General Inspection Requirements

7. A. Does the owner/operator maintain a written schedule for inspecting: (265.25 - General Inspection Requirements) ___ Yes X No

0014777

03108186

1. Monitoring equipment? (If applicable) ___ Yes X No

2. Safety and emergency equipment? ___ Yes X No

3. Security devices? ___ Yes X No

4. Operating and structural equipment (if applicable) ___ Yes X No

5. Does the schedule or plan identify the types of problems to be looked for during inspection? ___ Yes X No

   a. Malfunction or deterioration (e.g. inoperative sump pump, leaking fitting, eroding dike, corroded pipes or tanks, etc.) ___ Yes X No

   b. Operator error ___ Yes X No

   c. Discharges (e.g. leaks from valves or pipes joint breaks, etc.) ___ Yes X No

B. Is a written schedule for these inspections maintained at the facility? ___ Yes X No

   1. Are these inspections conducted? X Yes ___ No

      a. Is a record of these inspections maintained in the inspection log? X Yes ___ No

8. Does the owner/operator have an inspection log? (265.15 - General Inspection Requirements) X Yes ___ No

A. If yes, does it include:

   1. Date and time of inspection? Date only ___ Yes X No

   2. Name of inspector? X Yes ___ No

   3. Notation of observations? X Yes ___ No

   4. Date and nature of repairs or remedial action? ___ Yes X No

B. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected? (Use narrative explanation sheet). ___ Yes X No

C. Are records of the inspection log maintained at the facility for three (3) years? X Yes ___ No

Personnel Training

9. Does the owner/operator have Personnel Training Records? (265.16 - Personnel Training)

   A. If yes, do they include:

      1. Job title and written job description of each position? X Yes ___ No

      2. Description of type and amount of training? X Yes ___ No Safety

      3. Records of training given to facility personnel? ___ Yes X No

   B. Are these records maintained at the facility? X Yes ___ No

Requirements for Ignitable, Reactive or Incompatible Waste

10. Does facility handle ignitable or reactive wastes? (265.17 - Ignitable, Reactive, Incompatible Wastes) ___Yes X No

    (Circle appropriate type(s) of waste(s).

    A. If yes, is waste separated and confined from sources of ignition or reaction, (open flames, smoking, cutting and welding, hot surfaces, frictional heat) sparks (static, electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? NA Yes ___ No

    B. Are smoking and open flame confined to specifically designated locations? X Yes ___ No

    C. Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled? NA Yes ___ No

11. Check containers (265.17 - Ignitable, Reactive, Incompatible Wastes)

    A. Are containers leaking or corroding or bulging? (Use narrative explanation sheet to explain containers in this condition.) NA Yes ___ No

    B. Has the facility ever placed incompatible wastes together? ___ Yes X No
    If yes, what were the results? (Use narrative explanation sheet). (Look for signs of mixing of incompatible wastes. e.g., fire, toxic mist, heat generation, bulging containers, etc.)

001479

03108188

Section B - Preparedness and Prevention

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility) ___ Yes X No

If yes, use narrative explanations sheet to explain.

2. Is the facility equipped with (265.32 - Required equipment)

   A. Internal communications or alarm system? X Yes ___ No

      1. Is it easily accessible in case of emergency? X Yes ___ No

   B. Telephone or two-way radio to call emergency response personnel? X Yes ___ No

   C. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? X Yes ___ No

      1. Is this equipment tested to assure its proper operation? X Yes ___ No

   D. Water of adequate volume for hoses, sprinklers or water spray system? X Yes ___ No
      1. Describe source of water Jacksonville
      2. Indicate flow rate and/or pressure and storage capacity if applicable. 90 ltr. PSI on six inch line

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g. adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) (265.35 - Required aisle space) X Yes ___ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities) X Yes ___ No

If no, has the owner/operator attempted to make such arrangements? NA Yes ___ No

001480

03108189

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities) X Yes ___ No

   If yes, indicate primary authority Jacksonville P.D. & F.D.

   A. Is the fire department a city or volunteer fire department? City

6. Does the owner/operator have phone numbers of and agreements with State emergency response teams, emergency response contractors and equipment suppliers? X Yes ___ No
   Are they readily available to the emergency coordinator? X Yes ___ No

(265.37 - Arrangements with local authorities)

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? X Yes ___ No

   If no, has the owner/operator attempted to do this? NA Yes ___ No

(265.37 - Arrangements with local authorities)

8. If the State, or local authorities decline to enter into the above referenced agreements, has this situation been entered in the operating record? (265.37 - Arrangements with local authorities) NA Yes ___ No

Section C - Contingency Plan and Emergency Procedures

1. Does the facility have a contingency plan? (265.51 - Purpose and implementation of contingency plan.) Plant only not for waste ___ Yes X No

2. Is it maintained at the facility? (265.53 - Copies of contingency plan.) ___ Yes X No

3. Is the contingency plan a revised SPCC Plan? (265.52 - Content of Contingency plan) ___ Yes X No

4. Is there an emergency coordinator on site or within short driving distance of the plant at all times? (265.55 - Emergency coordinator) X Yes ___ No

5. Who is the emergency coordinator? Ken Howard Alternates Bob Fisher & Dale Colleps (265.55 - Emergency coordinator)

6. Has the facility supplied local police and fire departments with a copy of the contingency plan? (265.52 - Content of contingency plan.) ___ Yes X No

0014481

Section D - Manifest System, Recordkeeping and Reporting

1. Has facility received hazardous waste from off-site since November 19, 1980? (265.71 - Use of manifest system) ___ Yes X No

   a. If no, questions 1, 2 and 3 not applicable.

   b. If yes, does the facility retain copies of all manifests? NA Yes ___ No

      1. Are the manifests signed and dated and returned to the generator? NA Yes ___ No

      2. Is a signed copy given to the transporter? NA Yes ___ No

2. Has the facility received any hazardous waste from a rail or water (bulk shipment) transporter since Nov. 19, 1980? (265.71 - Use of manifest system) ___ Yes X No

   a. If yes, is it accompanied by a shipping paper NA Yes ___ No

      1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? NA Yes ___ No

      2. Is a signed copy given to the transporter? NA Yes ___ No

3. Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest? (265.72 - Manifest discrepancies) ___ Yes X No

   a. If yes, has he attempted to reconcile the discrepancy with the generator and transporter? NA Yes ___ No

      1. If no, has Regional Administrator been notified? NA Yes ___ No

4. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? (265.76 - Unmanifested waste report) NA Yes ___ No

   a. If yes, has he submitted an unmanifested waste report to the Regional Administrator? NA Yes ___ No

5. Does the facility have a written operating record? (265.73 - Operating record) incomplete X Yes ___ No

   a. Is a copy maintained at the facility? X Yes ___ No

0014482

5. b. Does the record include:

1.	Description and quantity of each hazardous waste received and the methods and dates of its treatment, storage or disposal at the facility?	X Yes ___ No
2.	Location and quantity of each hazardous waste at each location?	X Yes ___ No
	a. Is this information cross-referenced with the manifest which was included with that hazardous waste shipment?	NA Yes ___ No
3.	(For disposal facilities only) Is the location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area?	NA Yes ___ No
4.	Record and results of waste analyses?	X Yes ___ No
5.	Reports of incidents involving implementation of the contingency plan? (If applicable)	NA Yes ___ No
6.	Records and results of required inspections since November 19, 1980?	___ Yes X No
7.	Monitoring, testing or analytical data where required?	X Yes ___ No
8.	Closure cost estimates and for disposal facilities, post-closure cost estimates? (effective May 19, 1981.)	___ Yes X No
9.	Handling codes for treatment, storage and disposal methods?	___ Yes X No
10.	Physical forms of the wastes?	X Yes ___ No
11.	Processes that produce the wastes?	X Yes ___ No
12.	For wastes containing more than one listed waste or waste characteristic, all applicable EPA Hazardous Waste Numbers and the quantities of each constituent waste?	X Yes ___ No

0014483

Section E - Plans and Reports

1. Have all plans and reports been visually inspected and /or been made available for inspection? (265.74 - Availability, retention and disposition of records) ___ Yes X No

List plans and/or reports not made available for inspection.

Incomplete files on Personnel Training, General Waste Analysis, Inspection Schedule + logs, Contingency plan and operating record

2. Did operator provide inspector with a drawing of the facility? X Yes ___ No

   a. If yes, please indicate which are hazardous waste facilities on the drawing. *See map on part A Application*

3. Indicate types of hazardous waste facilities.

   X Containers
   X Tanks
   ___ Surface Impoundments - *closing out*
   ___ Waste Piles
   ___ Land Treatment
   ___ Landfill
   ___ Incinerator
   ___ Thermal Treatment
   ___ Chemical, Physical and Biological Treatment

Section F - Groundwater Monitoring

1. Are there any ground water monitoring wells? (265.90 Applicability) X Yes ___ No

   a. Is owner/operator aware that prior to 11/19/81 he must install, operate and maintain a groundwater monitoring system (unless waived in writing)? NA Yes ___ No
   more wells are to be installed

001484

2 tanks K043 1 holds 20,000 Gal
240 8,000

1 Dalipon -

1 equalization 20,000

1 neutralization -

TANKS CHECKLIST
(Subpart J - Tanks, 265.190)

NOTE: If multiple tanks exist, list each tank and specify compliance or non-compliance. Complete an individual checklist for each tank not in compliance and a collective checklist for those in compliance.

1. Are there any tanks which are not being used which the facility no longer plans to use? ___ Yes X No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from these tanks, discharge control equipment, and discharge confinement structures? N/A Yes ___ No

2. Are tanks presently used to treat or store waste? X Yes ___ No

   a. If no, do not complete rest of form.
   b. If yes, check tanks.

3. Is there evidence that wastes placed in the tank are incompatible with the tank or liner? ___ Yes X No

   NOTE: Any evidence of ruptures, leaks or corrosion. (Use narrative explanations sheet.)

4. Are there any uncovered tanks? X Yes ___ No

   a. If no, do not complete 4b.-c.
   b. If yes, do they have 2 feet (60cm) freeboard? X Yes ___ No

   or

   c. A containment structure? (e.g. dike or trench) or X Yes ___ No

   d. A drainage control system? X Yes ___ No

   or

   e. A diversion structure? (e.g. standby tank) ___ Yes ___ No
   (NOTE: The structure in c, d or e must have a capacity that equals or exceeds the volume of the top 2 feet (60 cm) of the tank.

If the answers to 4b.-e. are "no", explain current conditions using narrative sheets.

5. Are any of the tanks continuous feed? X Yes ___ No

   a. If yes, is it equipped with a means to stop inflow (e.g. waste feed cutoff or by-pass to a stand-by tank)? ___ Yes X No

Continuous overflow

001485

Waste Analysis

6. Is the tank used to store one waste exclusively? X Yes ___ No

   a. If no, what are the different wastes stored in the tank? (Use narrative explanations sheet).

      1. Are waste analyses and trail tests conducted on these wastes X Yes ___ No

         OR

         Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? NA Yes ___ No

      2. Is this information retained in the operating record? X Yes ___ No

Inspections (Note: This section does not exclude underground tanks)

7. Does the owner/operator inspect the following at least daily, where present? X Yes ___ No

   (Indicate which items are present in 7 and 8.)

   a. Discharge control equipment (e.g. waste feed cut-off, by pass and/or drainage systems)? X Yes ___ No

   b. Monitoring equipment (e.g. pressure and temperature gages)? NA Yes ___ No

   c. Level of waste in each uncovered tank? X Yes ___ No

8. Does the owner/operator inspect the following at least weekly? X Yes ___ No

   a. Construction materials of tanks for corrosion or leaks? X Yes ___ No
   b. Construction materials of and area surrounding discharge confinement structures for erosion or signs of leakage? X Yes ___ No

9. What is the procedure for assessing the condition of the tank(s)? Explain in narrative. (e.g. How does the procedure allow for detection of cracks, leaks or corrosion or procedures for emptying the tank to allow entrance, etc.)

10. Does the facility have a closure plan? (effective May 19, 1981). ___ Yes X No

    a. Does the plan address the closure of each tank? If no, explain in narrative. ___ Yes X No

    b. Is the plan maintained at the facility? ___ Yes X No

0014860

11. Are ignitable or reactive wastes placed in tanks? ___ Yes X No

    a. If yes, are they treated, rendered or mixed before or immediately after placement in the tank so it no longer meets the definition of ignitable or reactive? ___ Yes X No

    OR

    b. Is the waste protected from sources of ignition or reaction? Glass lined, no smoking pumped in lines X Yes ___ No

        1. If yes, use narrative explanations sheet ot describe separation and confinement procedures.

        2. If no, use narrative explanations sheet to describe sources of ignition or reaction

        OR

    c. Is the tank used solely for emergencies? ___ Yes X No

12. Has the facility ever placed incompatible wastes in the impoundment? ___ Yes X No

    a. If yes, what were the results. (Use narrative explanations sheet). (Look for signs of mixing of incompatible wastes, e.g. fire, toxic mist, heat generation, bulging containers, etc.)

13. If a waste is to be placed in a tank that previously held an incompatible waste, was that tank washed? NA Yes ___ No

    a. If yes, describe washing procedures (Use narrative explanation sheet.)

    Describe how it is possible for incompatible wastes to be placed in the same tank. (Use narrative explanations sheet.)

001487

Vertac Jacksonville Plant HKD 000 C 23 4 0

Tanks Checklist

Five Tanks

2 storage tanks holding K043 one holding 20,000 gal. and one holding 8,000 gal. These two tanks are together and are glass lined.

1 tank holding D000 Dalapon. This tank has solidified and is probably [redacted] in no danger of leaking.

1 equalization tank holding K099 prior to treating for P.H. This tank is contained [redacted].

1 neutralization tank (concrete) which receives the flow from the equalization tank and is discharged to the city of Jacksonville POTW.

0014888

Virtac Jacksonville

CONTAINERS STORAGE CHECKLIST
(Subpart I - Use and Management of Containers 265.170)

1. Does the facility store hazardous waste in containers? X Yes ___ No

   If no, do not complete this form.

2. Are the containers in good condition? (check for leaks, corrosion, bulges, etc.) ___ Yes X No

   If no, explain in narrative and document with photograph.

3. If a container is found to be leaking, does the operator transfer the hazardous waste from the leaking container? X Yes ___ No

4. Is the waste compatible with the containers and/or its liner? ___ Yes X No

   If no, explain in narrative. under present conditions

5. Are the stored containers closed? Bungs loose X Yes ___ No

   If no, explain in narrative.

6. Are containers holding hazardous waste opened, handled or stored in such a manner as to cause the container to rupture or leak? ___ Yes X No

   If yes, explain in narrative.

7. Are each of the containers inspected at least weekly? X Yes ___ No

   If no, explain in the narrative the frequency of inspection.

8. Are containers holding ignitible or reactive wastes located at least 15 meters (50 feet) from the facility property line? X Yes ___ No

   If no, explain in narrative and document with photograph.

9. Are incompatible wastes stored in the same containers? ___ Yes X No

   If yes, explain in narrative.

10. Are containers holding incompatible wastes kept apart by physical barrier or sufficient distance? NA Yes ___ No

    If no, explain in narrative.

001489

03108198

Vertac Jacksonville Plant ARD 000023440

Containers Storage Checklist

Waste 24D being stored is very corrosive and being unable to ship this waste, the plant has employees hired to look for leakers and repack as necessary. This is also true for all the drummed 245T waste. Most drums are in good condition but because of the corrosive nature of the waste, leakers occur frequently.

001490

Inspector Richard McDuffee

Date & Time of Inspection 7-27-81 7-31-81 9:30 AM

Facility Vertac Chemical

Facility Representative [redacted]

Address PO Box 69
Jacksonville, Ark. 72076

Address Meeting held 7-21-81 outlining deficiencies

Telephone 982-9851

Telephone 901-767-6851

NOTICE OF DEFICIENCY

The following is a list of deficiencies noted by the above-named inspector on July 31, 1981 during the RCRA inspection.

1. Incomplete General Waste Analysis 265.13
2. Update Personnel Training requirements 265.16
3. Incomplete inspection Schedule and log 265.15
4. Incomplete Contingency plan. Subpart D 265.50 - 265.56

0014491

COPIED FROM
POOR QUALITY
ORIGINAL

Completion Date November 21 1981

The above described deficiencies must be corrected on or before the above-stated completion date. The above-named facility must reply in writing to the Department concerning the correction of these deficiencies on or before the completion date. This reply should be sent to Arkansas Department of Pollution Control and Ecology, Hazardous Waste Division, P.O. Box 9583, Little Rock, Arkansas 72219. Telephone (501) 371-1701.

Department of Pollution Control and Ecology
By [redacted]

DEPARTMENT'S ORIGINAL

03108200

Inspector _____ Date & Time of Inspection _____

Facility _____ Facility Representative _____

Address _____ Address _____

_____ _____

Telephone _____ Telephone _____

NOTICE OF DEFICIENCY

The following is a list of deficiencies noted by the above-named inspector on _____, 1981 during the RCRA inspection.

001492

Completion Date _____

The above described deficiencies must be corrected on or before the above-stated completion date. The above-named facility must reply in writing to the Department concerning the correction of these deficiencies on or before the completion date. This reply should be sent to Arkansas Department of Pollution Control and Ecology, Hazardous Waste Division, P.O. Box 9583, Little Rock, Arkansas 72219. Telephone (501) 371-1701.

Department of Pollution Control and Ecology
By _____

DEPARTMENT'S COPY ENFORCEMENT

03108201

VERTAC CHEMICAL CORPORATION
24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851 TELEX 53927

August 11, 1981

Mr. Richard MacDuffy
Arkansas Department of Pollution
Control and Ecology
8001 National Drive
Little Rock, Arkansas 72209

Dear Mr. MacDuffy:

I tried to reach you late Friday afternoon but suspect the Department phones were malfunctioning.

I have attached my sketchy "Standards and Plans for Compliance" for the Jacksonville plant. I have also attached a notice from the Federal Register on "Reduction of Paperwork Requirements Associated With The Hazardous Waste System" that might be applicable.

I think it would be helpful if we could meet at the plant in the near future. I can amplify most sections of my sketchy plan; however, the plant will have to carry out the personnel training and coordination with the community. Perhaps between us we can give some guidance on that.

Best regards,

Dick Karkkainen

Dick Karkkainen
Director of Environment & Safety

DK:ew

Attachments

CC: Mr. T. Bennett, Jr.

0001493

03108202

VT3.1.13

40 CFR PART 265

(INTERIM STATUS STANDARDS REQUIRED FOR FACILITIES ENGAGED IN TREATMENT, STORAGE, OR DISPOSAL OF HAZARDOUS WASTES)

THE STANDARDS AND PLANS FOR COMPLIANCE

AS THEY APPLY TO THE JACKSONVILLE PLANT OF VERTAC CHEMICAL CORPORATION

I. SECTION 265.13 - GENERAL WASTE ANALYSIS

A. Requirement

A detailed chemical and physical analysis of a representative sample of all hazardous wastes to be treated, stored or disposed of must be obtained. A written waste analysis plan must be developed and implemented. The plan must be kept at the facility. The plan must detail sampling and analysis methods and frequencies.

B. The Plan

For wastes discharged to an NPDES permitted privately-owned treatment facility or discharged to an NPDES permitted publicly-owned treatment works, the plan is to sample and analyze as per standard in place practice or at six-month intervals, whichever is most frequent. The method of analysis is in each case the EPA method and/or that specified in "Standard Methods of Wastewater Analysis", or if not found in either of the above, by methods developed in-house by Vertac or that company for which custom chemical manufacture is in progress.

2,4-D solid wastes will be analyzed every 6 months

II. SECTION 265.14 - SECURITY

A. Requirement

Alternative security devices including surveillance, fencing or barriers and controlled access must be instituted to prevent unauthorized entry to the active portion of the hazardous waste facility by humans or livestock, unless physical contact with the wastes by such humans or animals will not cause injury or disturb the operations of said facility.

B. The Plan

Fences or combinations of fences and natural or artificial barriers, in conjunction with controlled roadways, are used to control entry to the active portion of the

hazardous waste facility. Signs with the legend "Danger - Unauthorized Personnel Keep Out" are posted in sufficient numbers so as to be seen from any approach to this active portion. A guard is on duty at the main gate all the time or the gate is locked.

III. SECTION 265.15 - INSPECTIONS

A. Requirement

Inspections must be performed on a schedule sufficient to detect and correct problems which may cause a release of hazardous waste to the environment. Inspections and their results must be recorded in an inspection log which must be retained for a period of three years.

B. The Plan

1. Drums - Will be inspected weekly for leaks if the drums will be stored ninety (90) days or longer.

2. Tanks - Automatic shutdown systems, by-pass systems, and drainage systems will be inspected daily. Monitoring gauges and instruments will be inspected daily. The level will be inspected daily. The structural and functional integrity of the tank itself and surrounding dikes and/or other means of secondary containment will be inspected weekly.

3. Surface Impoundments - There will be a daily check that a minimum freeboard level of two feet exists and a weekly inspection for structural and functional integrity.

IV. SECTION 265.16 - PERSONNEL TRAINING

A. Requirement

There must be a job title and written job description for each position related to hazardous waste management. The written description must describe the training required to function in the job and ensure ability to respond to Preparedness and Prevention Plans, and Contingency and Emergency Procedure Plans. Training must be completed by May 19, 1981. Records that document initial training and annual reviews must be maintained until site closure.

B. The Plan

Personnel are trained in classrooms and on the job in:

1. Procedures for Using Emergency and Monitoring Equipment

2. Operating Waste Feed Cut-off Systems

3. Communications Systems

4. Response to Emergencies

Don't have written plan at present. Will do.

Job descriptions are attached.

V. SECTION 265.30 - PREPAREDNESS AND PREVENTION

A. Requirement

Hazardous waste facilities must be maintained and operated to minimize the possibility of fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste. As appropriate for the type of wastes handled, facilities must make emergency response arrangements with local services such as fire, police and hospital.

B. The Plan

Telephones are available to summon help; portable fire extinguishers are available or water at adequate volume and pressure to supply water hose is such that emergency response plans or familiarization of local authorities with facts specific and exclusive to hazardous wastes is not necessary or desirable. There does exist instead coordination of information and emergency responses pursuant to the entire manufacturing facility, raw materials and products, as well as wastes.

VI. SECTION 265.50 - CONTINGENCY PLAN AND EMERGENCY PROCEDURES

A. Requirement

Designate an employee as the "emergency coordinator" to be on the premises or on call at all times; designate alternatives and list them in the order in which they should be contacted. An emergency contingency plan must be prepared; copies of the plan must be maintained at the facility and submitted to all local service organizations which may be requested to respond.

B. The Plan

The designated emergency coordinator is Ken Howard. The duties of the emergency coordinator is to carry out requirements of 40 CFR Section 265.56, 45 Federal Register 33237; a copy is attached. Alternates are Bob Fisher and Dale Colleps.

VII. SECTION 265.70 - MANIFEST SYSTEM, RECORDKEEPING AND REPORTING

A. Requirement

All hazardous waste treatment, storage and disposal facilities, including those which treat wastes generated on-site, must maintain an operating record at the facility which describes the quantity and quality of all hazardous wastes received, the location of each hazardous waste within the facility, the results of waste analyses, reports of all incidents requiring implementation of the contingency plan, records of all inspections, required monitoring, testing or analytical data, and all closure and post-closure cost estimates. In addition, all hazardous waste treatment, storage and disposal facilities must submit an annual report summarizing the above-cited information.

B. The Plan

Do as required.

VIII. SECTION 265.90 - GROUNDWATER MONITORING

A. Requirement

By November 19, 1981, those operating surface impoundments or active landfills as part of hazardous waste treatment storage or disposal facilities must install and operate an extensive groundwater monitoring system.

B. The Plan

Groundwater monitoring of inactive landfill sites is in place. The one surface impoundment in use will be closed out prior to November 19, 1981.

IX. SECTION 265.110 - CLOSURE AND POST-CLOSURE

A. Requirement

Each facility must have a written closure plan which identifies the steps necessary to completely close the facility at any point during its intended life and at the planned closure time. Each facility must also have a post-closure plan which provides for thirty (30) years of post-closure care.

B. The Plan

Upon closure, all above-ground drums of hazardous waste are to be brought to a permitted landfill. Upon closure, all surface impoundments are to be drained and filled with absorbent clays. After a period of drying, a clay cap is added to the top. Groundwater monitoring will be continued for a period of thirty (30) years.

X. SECTION 265.140 - FINANCIAL REQUIREMENTS

A. Requirement

Each facility must have a written estimate of both the cost of closing the facility at the point at which closure would be the most expensive and the annual cost of post-closure care. These estimates must be updated as necessary to keep them current with the closure and post-closure plans. In addition, both estimates must be updated annually to adjust for inflation.

B. The Plan

Drums will be disposed at an estimated cost of $50 per drum (1981 costs). Surface impoundments will be closed out prior to November, 1981. Groundwater monitoring will be maintained at an estimated cost of $500 per well, per year (1981 costs).

RDK:ew

Attachment

Memo To: Vertac H.W. File (Jacksonville)

From: Richard McDuffee Hazardous Waste Inspector

Subject: Compliance meeting with Dick Kankkainen 8/21/81

I met with Dick Kankkainen, Director of Environment & Safety for all of the Arkansas Vertac plants, to go over the deficiencies I noted on my inspection of 7-29-81. I had Mr Kankkainen sign the notice of deficiency which had all of the deficiencies listed. The ~~plan~~ facility was given untill 11-21-81 to correct these deficiencies.

0014499

03108208

Memo TO: Vertac H.W. File Jacksonville Plant

From: Richard McDuffee, H.W. Inspector

Subject: Review of Corrected deficiencies 11-10-81

I met with Mr. Dick Kahlbaum on the above date and reviewed the corrected deficiencies as noted on the notice of deficiency signed by Mr Kahlbaum on 8-21-81. The paperwork ~~was~~ is in order and the Department was to be sent copies prior to 11-21-81. The contingency plan will be sent to Dick Kale for his review.

001500

03108209

VERTAC CHEMICAL CORPORATION
24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

REPLY TO: P. O. BOX 69
JACKSONVILLE, AR 72076
(501) 982-9481

November 20, 1981

Mr. Richard McDuffy
State of Arkansas
Department of Pollution Control
and Ecology
8001 National Drive
Little Rock, AR 72209

Dear Mr. McDuffy:

Following your RCRA inspection of our facility on July 29 and July 31 of this year, we believe that we have completed all items necessary to bring our plant into compliance with the RCRA regulations.

An Emergency Response Contingency Plan has been completed following the guideline which you provided for us. This plan has been mailed to all the designated agencies.

A Waste Analysis Plan has been prepared detailing the parameters to be analyzed, the analytical methods to be used, sampling methods, and the frequency of analysis. A log of all waste analyses is being kept of sample identification, parameters, results, date, time, and initialed by the analyst.

Hazardous Waste Handling Instructions are available which include a written job description for each person handling hazardous wastes and their job title. We have completed training of all of our operators and have on record copies of the lesson plans, instructor's name, date, time, place of instruction, operators' names, and initialed by the trainees.

We have a written Waste Inspection Plan which describes in detail inspection frequency for tanks and drums, the monitoring, safety, and emergency equipment available, security measures, and problems to be looked for during the inspections. Our inspection log book is kept up to date daily with what is inspected, found, and corrected by date, and time with entries initialed by the inspector.

An Operating Record is available which describes the types of wastes, their location on maps, the quantities, analyses,

001501

03108210

VT3.1.13

monitoring and handling codes, physical forms, and descriptions of the processes producing the wastes.

Copies of any of these items are available for your inspection.

Sincerely yours,

VERTAC CHEMICAL CORPORATION
Jacksonville Plant

Kenneth J. Howard

Kenneth J. Howard
Director of Technology

KJH:ew

001502

03108211

SCHEDULE FOR ANALYZING HAZARDOUS WASTE

2,4-D hazardous waste will be sampled and analyzed annually.

Material currently being stored on the plant has been analyzed and the composition of this material should not change.

The 2,4,5-T waste stored on the plant site has been analyzed. The composition of this material will not change in storage. Since we are no longer manufacturing 2,4,5-T waste, 2,4,5-T waste will only be analyzed by specific request.

VERTAC CHEMICAL CORPORATION
24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851

REPLY TO: P. O. BOX 69
JACKSONVILLE, AR 72076
(501) 982-9481

ANALYZING HAZARDOUS WASTE

To ensure the proper labeling, handling, and storage of chemical waste as defined, adequate laboratory support is needed. Procedures have been developed and outlined which will allow analysis of samples of recovered 2,4-D and 2,4,5-T still bottoms. These large volume wastes are currently maintained on the plant site awaiting further disposition. Such disposition may include reprocessing, detoxification, or eventual burial.

Knowledge of the content is currently required under effective rules and regulations that are concerned with hazardous chemical waste. By definition those chemical wastes mentioned above are hazardous and must be handled as such. The content of the waste will vary, but if several samples are taken, a reasonable average composition of the major components may be obtained.

The analysis of the waste will consist of several steps. These may include extraction, distillation, titration, and GLC or HPLC. Samples of the material may be handled individually or a composite sample made up for analysis. An outline of each of the procedures for recovered 2,4-D and 2,4,5-T still bottoms is attached.

JLCounts:ew
11/9/81

RECOVERED 2,4-D ANALYSIS

Discussion:

The analysis of the recovered 2,4-D is performed to determine the approximate water content, phenolic content and component make-up. The water content will be determined by a distillation process; the phenolic and phenoxy acid content by titration; and the component make-up by GLC and/or HPLC as necessary.

Procedure for Analysis:

I. Water Content

A. Weigh out 100 grams of the sample into a 500 ml round-bottom flask.

B. Add approximately 125-150 ml of toluene to the flask to dissolve sample.

C. Distill over water into a side arm receiver by reflux.

D. Determine the amount of water collected.

E. Calculate the percent of water by dividing the ml collected by the sample weight.

II. Phenolic and Phenoxy Acid Content

A. Weigh out approximately 3 grams of the sample into a 250 ml beaker.

B. Add approximately 50-75 ml of neutral 91% isopropyl alcohol.

C. Titrate on the Metrohm using 0.5 N NaOH and the pH scale.

D. Determine the endpoint for the phenoxy acid portion (approximate pH of 7.6) and the endpoint for the phenolic portion (approximate pH of 10.3).

E. Calculate the percent of phenoxy acid using the first endpoint and sample weight. Calculate the percent of the phenolic component using the difference between the first and second endpoint and sample weight.

III. Phenolic Component Analysis (GLC)

A. Dissolve a few mg of the sample in chloroform-ether in a 1 dram vial.

B. Using a 3% FFAP column, complete the analysis using the GLC and computer method for phenols.

C. Order of elution:

1. Orthochlorophenol
2. Phenol
3. 2,6-Dichlorophenol
4. 2,4-Dichlorophenol
5. 2,4,6-Trichlorophenol
6. Parachlorophenol
7. 2,4,5-Trichlorophenol

IV. Phenoxy Acid Component Analysis (GLC)

A. Dissolve a few mg of the sample in chloroform-ether in a 1 dram vial (or use the sample for

phenolic analysis after completed).

B. Methylate the sample as described in the procedure for methylation of organic acids.

C. Using a 3% OV-1 column, complete the analysis using the GLC and computer method for 2,4-D acid.

D. Order of elution:

1. Phenols
2. Orthochlorophenoxyacetic Acid
3. 2,6-Dichlorophenoxyacetic Acid
4. 2,4-Dichlorophenoxyacetic Acid
5. 2,4,6-Trichlorophenoxyacetic Acid
6. 2,4,5-Trichlorophenoxyacetic Acid

V. Phenoxy Acid Analysis (HPLC)

A. Weigh approximately 0.2 grams of the sample into a 20 ml vial.

B. Pipet 10 ml of internal standard solution and dissolve the sample.

C. Complete analysis by HPLC using the appropriate procedure and computer method. (See method for 2,4-D analysis by HPLC.)

JLCounts:ew
11/2/81

2,4,5-T STILL BOTTOMS ANALYSIS

Discussion:

The analysis of the 2,4,5-T still bottoms is performed to determine the approximate anisole content, phenolic content, and phenoxyacetic acid content. The anisole content will be determined by solvent extraction and taking the extract to dryness; and the phenolic and phenoxy acid content by titration. A GLC analysis may also be completed to determine the component make-up.

Procedure for Analysis:

I. Anisole Content

A. Weigh out approximately 10 grams of the sample in a 250 ml beaker.

B. Add NaOH to form a slurry with pH 12 or higher to form phenoxy and phenolic salts.

C. Filter excess water through filter paper. Transfer to filter paper quantitatively.

D. Place filter paper containing the sample in a Soxhlet and extract with methylene chlorine into a flask taken to constant weight.

E. After 4-6 hours, take flask content to dryness on rotating evaporator. Save the residue and take to constant weight.

F. Weigh flask with residue and determine weight of anisole. Calculate percentage.

II. Phenolic and Phenoxy Acid Content

A. Quantitatively transfer residue from filter (step I., D. above) into a 250 ml beaker with water. Total volume should be around 75 ml.

B. Titrate sample on Metrohm using 0.5 N HCl.

C. Determine volume for each endpoint as follows:

1st	pH 10	NaOH
2nd	pH 7	Phenolic Content
3rd	pH 4	Phenoxy Acid Content

D. Calculate percent phenolic and percent phenoxy acid. Use initial sample weight before extraction.

III. Phenolic Component Make-Up

A. Transfer sample (step II., B.) to separatory funnel.

B. Using chloroform-ether, extract three times using 10-15 ml portions.

C. Using a 3% FFAP column and appropriate computer method, complete GLC analysis.

IV. Phenoxy Acid Component Make-Up

A. Methylate part of the sample (step II, B).

B. Using a 3% OV-1 column and appropriate computer method, complete GLC analysis for phenoxy acid make-up.

V. TCDD Analysis

Samples requiring such analysis will be sent to other laboratories as needed.

JLCounts:ew
11/4/81

INSPECTION SCHEDULE

Waste Storage Tanks

Scope:

Inspect the waste storage tanks for leaks, rupture, or deterioration.

Inspection Procedure:

1. Inspect the waste storage tanks each day.
2. Inspect each tank for leaks in the tank seams or fixtures.
   A. If a leak is found, report it and initiate proper corrective action to prevent the escape of the waste material.
   B. Initiate emergency work orders for the repair of the leaks.
3. Inspect the dikes around the waste tanks for breaks and cracks.
4. Record the inspection and corrective action taken, if any, in the proper log book. Also, record the date and time of the inspection, the date and time of the corrective action, and sign the log book.

DFColleps:ew
11/18/81

INSPECTION SCHEDULE

2,4,5-T Still Bottoms

Scope:

Inspect the 2,4,5-T Still Bottoms waste for leaking and deteriorated drums.

Inspection Procedure:

1. Inspect the storage area where 2,4,5-T Still Bottoms waste is stored on Monday or Tuesday of each week.
2. Inspect all containers for leaking and deteriorated drums, making note of their location.
   A. Place all leaking or deteriorated drums in a yellow salvage drum the same day they are found.
   B. Put the proper date and label on each salvage drum.
3. Inspect the concrete dike wall around the drum storage area for breaks.
4. Record the inspection and corrective action taken in the proper log book. Also, record the date and time of the inspection, the date and time of the corrective action, and sign the log book.

0015111

DFColleps:ew
11/18/81

03108220

SAFETY EQUIPMENT
FOR
STILL BOTTOM STORAGE FACILITY

Required personal protection for visual inspection of toluene still bottom drums in the new storage facility:

1. Respirator
2. Hard Hat

Required personal protection for placing toluene still bottom drums in recovery drums at the new storage facility:

1. Hard Hat
2. Goggles
3. Respirator
4. Boots (Neoprene)
5. Gloves (Neoprene)
6. Apron (Neoprene)
7. Coveralls

After working in this area, employees must shower and change clothes before taking a break, eating, or returning to normal duty.

INSPECTION SCHEDULE

2,4-D WASTE DRUMS

Scope:

Inspect the drums of 2,4-D waste for leaking and deteriorated drums.

Inspection Procedure:

1. Inspect all areas where 2,4-D waste is stored each working day, Monday through Friday, of each week.
2. Inspect all containers for leaking and deteriorated drums, making note of their location.
   A. Place all leaking or deteriorated drums in a yellow salvage drum the same day they are found.
   B. Put the proper date and label on each salvage drum.
3. Record the inspection and corrective action taken in the proper log book. Also, record the date and time of the inspection, the date and time of the corrective action, and sign the log book.

0015113

DFColleps:ew
11/16/81

03108222

SAFETY EQUIPMENT
FOR 2,4-D WASTE STORAGE

Required personal protection for placing 2,4-D waste drums in recovery drums:

1. Hard Hat
2. Goggles
3. Rubber Gloves
4. Blue Work Coveralls
5. Boots (Neoprene)

After working redrumming the 2,4-D waste, employees must shower and change clothes before leaving the plant.

DFC:ew

VERTAC CHEMICAL CORPORATION
24th Floor • 5100 Poplar • Memphis, TN 38137 • 901-767-6851 TELEX 53927

September 2, 1981

RCRA Activities
Region VI-6AEG
U.S. Environmental Protection Agency
First International Building
Dallas, Texas 75270

Dear Sir:

Attached is a revised copy of page 3 of Form 3 RCRA (EPA Form 3510-3(6-80)). We had used a series of hazardous waste numbers (noted on lines 3-13 of voided page 3) to describe what is properly described by Number K099.

Very truly yours,

Richard D. Karkkainen
Director of Environment & Safety

RDK:ew

Attachment

CC: [redacted]
Arkansas Department of Pollution
Control and Ecology
8001 National Drive
Little Rock, AR 72209

001515

03108224

VT3.1.13

EPA I.D. NUMBER (enter from page 1)

A	R	D	0	0	0	0	2	3	4	4	0		

FOR OFFICIAL USE ONLY

W	DUP	2	DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	K 0 4 3	3,000,000 (1)	P	S 0 1	
2	F 0 0 5				included with above
3	K 0 9 9	438,000	T	T 0 1 T 0 2	
4	D 0 0 0	240,000	P	S 0 2	
5					
6					
7					
8					
9					
10					
11					
12					
13		(1) NOTES:			
14		In mid 1982 a process modification will have been completed			
15		which will cut the rate of generation of these wastes by 90%;			
16		i.e., to 300,000 pounds per year.			
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

001516

03108225

TE. Photocopy this page before completing if you have more than 26 wastes to list. Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1): A R D 0 0 0 0 2 3 4 4 0

FOR OFFICIAL USE ONLY: W DUP 2 DUP

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F005	3,000,000	P	S01	
2	K043				included with above
3	P035	438,000	T	T01 T02	
4	U048				included with above
5	U081				included with above
6	U188				included with above
7	U232				included with above
8	U233				included with above
9	U220				included with above
10	U230				included with above
11	U031				included with above
12	U092				included with above
13	U207				included with above
14	D000	240,000	P	S02	
15					
16					

A Form 3510-3 (6-80) CONTINUE ON REVERSE

03108226

I.D. – FOR OFFICIAL USE ONLY

WAD000623717

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F005					
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
K043	U048				
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
P035	U081	U188	U232	U233	U220
37	**38**	**39**	**40**	**41**	**42**
U230	U031	U092	U207		
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

☐ 1. IGNITABLE (D001) ☐ 2. CORROSIVE (D002) ☐ 3. REACTIVE (D003) ☐ 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Thurman Bennett	Thurman Bennett, Jr., Plt. Mgr.	Aug. 6, 1980

EPA Form 8700-12 (6-80) REVERSE

03108227

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER: A R D 0 0 0 0 2 3 4 4 0 | T/A: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

I. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
4 8	– –	– –

Approximate

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

II. PROCESSES – CODES AND DESIGN CAPACITIES

PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	(T01)	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	(T02)	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP | T/A | 1

LINE NUMBER	A. PROCESS CODE *(from list above)*	B. PROCESS DESIGN CAPACITY 1. AMOUNT *(specify)*	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE *(enter code)*	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	1,000,000	G	
2	T 0 1	288,000	U	
3	T 0 2	288,000	U	
4	T 0 2	288,000	U	
5	S 0 2	28,000	G	
6				
7				
8				
9				
10				

03108228

OCESSES (continued)

CE FOR ADDITIONAL PROCESS CODES OR F LUDE DESIGN CAPACITY.

)ESCRIBING OTHE! PROCESSES (code "T04").

EACH PROCESS ENTERED HERE

ESCRIPTION OF HAZARDOUS WASTES

HAZARDOUS WASTE NUMBER — Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you dle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristand/or the toxic contaminants of those hazardous wastes.

IMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual s. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled h possess that characteristic or contaminant.

T OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate s are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

cility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into unt the appropriate density or specific gravity of the waste.

)CESSES

ROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III o indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess hat characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the xtreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

ROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by an one EPA Hazardous Waste Number shall be described on the form as follows:

Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

PLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes osive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated nds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
X 0 5 4	900	P	T 0 3 D 8 0	
0 0 0 2	400	P	T 0 3 D 8 0	
0 0 0 1	100	P	T 0 3 D 8 0	
0 0 0 2				included with above

03108229

EPA I.D. NUMBER (enter from page 1)

A	R	D	0	0	0	0	2	3	4	4	0	T/A	C
													1

FOR OFFICIAL USE ONL

																						T/A	C						
W	D	U	P																				2	D	U	P			

. DESCRIPTION OF HAZARDOUS WASTES (continued)

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	~~P 0 0 5~~	Spent (Salt Bath Solv. 3,000,000	P	S 0 1	
2	K 0 4 3	2,6 Dichlorophenol waste from production of			included with above
	~~K 0 9 9~~ ~~P 0 3 5~~	POTW 438,000 2,4-D	T	T 0 1 T 0 2	
	U 0 4 8	2-Chlorophenol			included with above
	U 0 8 1	2-4 Dichlorophenol			included with above
	U 1 8 8	Phenol			included with above
	U 2 3 2	2,4,5 Trichlorophenoxyacetic acid			included with above
	~~U 2 3 3~~	2,4,5 Trichlorophenoxy propionic acid Silvex			included with above
	U 2 2 0	Toluene			included with above
0	U 2 3 0	2,4,5 Trichlorophenol			included with above
1	U 0 3 1	2,4,6 " "			included with above
2	U 0 9 2	Dimethylamine			included with above
3	U 2 0 7	1,2,4,5 Tetrachlorobenzene			included with above
4	D 0 0 0	Sodium Salts 240,000	P	S 0 2	
5					
6					
7					
8					
9					
0					
1					
2					
3					
4					
5					
6					

0152100

03108230

(a) Whenever there is an imminent or actual emergency situation, the emergency coordinator (or his designee when the emergency coordinator is on call) must immediately:

(1) Activate internal facility alarms or communication systems, where applicable, to notify all facility personnel; and

(2) Notify appropriate State or local agencies with designated response roles if their help is needed.

(b) Whenever there is a release, fire, or explosion, the emergency coordinator must immediately identify the character, exact source, amount, and a real extent of any released materials. He may do this by observation or review of facility records or manifests and, if necessary, by chemical analysis.

(c) Concurrently, the emergency coordinator must assess possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment must consider both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effects of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).

(d) If the emergency coordinator determines that the facility has had a release, fire, or explosion which could threaten human health, or the environment, outside the facility, he must report his findings as follows:

(1) If his assessment indicates that evacuation of local areas may be advisable, he must immediately notify appropriate local authorities. He must be available to help appropriate officials decide whether local areas should be evacuated; and

(2) He must immediately notify either the government official designated as the on-scene coordinator for that geographical area (in the applicable regional contingency plan under Part 1510 of this Title), or the National Response Center (using their 24-hour toll free number 800/424-8802). The report must include:

(i) Name and telephone number of reporter;

(ii) Name and address of facility;

(iii) Time and type of incident (e.g., release, fire);

(iv) Name and quantity of material(s) involved, to the extent known;

(v) The extent of injuries, if any; and

(vi) The possible hazards to human health, or the environment, outside the facility.

(e) During an emergency, the emergency coordinator must take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility. These measures must include, where applicable, stopping processes and operations, collecting and containing released waste, and removing or isolating containers.

(f) If the facility stops operations in response to a fire, explosion or release, the emergency coordinator must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.

(g) Immediately after an emergency, the emergency coordinator must provide for treating, storing, or disposing of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the facility.

[*Comment:* Unless the owner or operator can demonstrate, in accordance with § 261.3(c) or (d) of this Chapter, that the recovered material is not a hazardous waste, the owner or operator becomes a generator of hazardous waste and must manage it in accordance with all applicable requirements of Parts 262, 263, and 265 of this Chapter.]

(h) The emergency coordinator must ensure that, in the affected area(s) of the facility:

(1) No waste that may be incompatible with the released material is treated, stored, or disposed of until cleanup procedures are completed; and

(2) All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

(i) The owner or operator must notify the Regional Administrator, and appropriate State and local authorities, that the facility is in compliance with paragraph (h) of this Section before operations are resumed in the affected area(s) of the facility.

(j) The owner or operator must note in the operating record the time, date, and details of any incident that requires implementing the contingency plan. Within 15 days after the incident, he must submit a written report on the incident to the Regional Administrator. The report must include:

(1) Name, address, and telephone number of the owner or operator;

(2) Name, address, and telephone number of the facility;

(3) Date, time, and type of incident (e.g., fire, explosion);

(4) Name and quantity of material(s) involved;

(5) The extent of injuries, if any;

(6) An assessment of actual or potential hazards to human health or the environment, where this is applicable; and

(7) Estimated quantity and disposition of recovered material that resulted from the incident.

VERTAC CHEMICAL CORPORATION

001522

03108231

ENVIRONMENTAL PROTECTION AGENCY

40 CFR Parts 122, 262, 263, 264, and 265

[SWH-FRL-1888-5]

Reduction of Paperwork Requirements Associated With the Hazardous Waste System

AGENCY: Environmental Protection Agency.

ACTION: Notice of preliminary decision concerning changes to rules.

SUMMARY: In May and June of 1980, the Environmental Protection Agency (EPA) received a conditional clearance under the Federal Reports Act from the Office of Management and Budget (OMB) for the reporting and recordkeeping requirements associated with the Resource Conservation and Recovery Act (RCRA) standards for generators, transporters, and treatment, storage and disposal (TSD) facilities. The condition for this clearance was to evaluate and review the paperwork requirements for possible burden reductions. The clearance was scheduled to expire on June 30, 1981. EPA has partially completed this required evaluation and review, and has made certain preliminary decisions concerning changes to information-related requirements. As a result of this activity, the clearance has been extended to September 30, 1981. The purpose of this notice is to alert the public to the nature of these proposed changes and to EPA's continuing activities to further reduce the paperwork burdens associated with the hazardous waste regulatory system.

ADDRESS: A single copy of EPA's preliminary report is available from Ed Cox, Solid Waste Information, USEPA, 5 West St. Clair Street, Cincinnati, Ohio 45268; (513) 684–5362.

FOR FURTHER INFORMATION CONTACT: Jeffrey Goodman, Chief, Analysis Branch, Office of Solid Waste, (WH–562), U.S. EPA, 401 M Street, SW, Washington, D.C. 20460, (202) 755–9180.

SUPPLEMENTARY INFORMATION:

Background

Pursuant to Subtitle C of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (RCRA), 42 U.S.C. 6901 *et seq.*, EPA promulgated regulations on May 19, 1980, establishing a comprehensive regulatory program for the management and control of hazardous wastes (see 40 CFR Parts 260–265 and 122–124, 45 FR 33066).

The paperwork requirements under the RCRA standards for generators, transporters, and treatment, storage and disposal facilities include one-time and ongoing reporting and recordkeeping requirements necessary to implement the program and establish a data base to monitor program compliance. Major components of these paperwork requirements include the following:

All handlers of hazardous waste must notify EPA and receive identification numbers (see Section 3010). Each generator must initiate a manifest with each shipment of waste, containing waste information and an EPA identification number. This manifest is to be carried by the transporter, to the facility owner or operator and returned to the generator. Copies of the manifest are to be retained as records by all handlers (see Section 3002).

All treatment, storage, and disposal facilities and generators must submit annual reports on their hazardous waste activities during the previous calendar year and retain copies of these reports as records (see Section 3002, 3004). In addition, treatment, storage, and disposal facilities must prepare and submit applications for permits to operate a hazardous waste management facilities under the full facility standards (see Section 3005). All facilities must maintain personnel files, records of training procedures, and a daily operating record which includes a description of shipments received, procedures followed and incidents which occur (see Section 3004).

Facilities must also prepare and maintain contingency plans and closure plans, with estimates for the cost of closure care. Where post-closure care is required, plans and costs estimates for this care must be prepared and maintained (see Section 3004).

Finally, the standards require facilities to notify EPA concerning the establishment of financial instruments to assure closure and post-closure care (see Section 3004).

Rather than expend its limited resources analyzing the more than 30 individual paperwork requirements, EPA has concentrated on the seven largest information collection activities in order to achieve the greatest possible burden reduction. Together, these seven requirements account for approximately 80 percent of the information burden on the regulated community. They are the following:

Annual Report (for generators and facilities)
Manifest System Information Requirements
Permitting Requirements (Part B) for Storage Facilities
Operating Record
Groundwater Monitoring Recordkeeping and Reporting
Closure/Post-Closure and Financial Assurance—Recordkeeping and Reporting Requirements
Contingency Plan

EPA has developed specific preliminary proposals regarding the annual report, the manifest system and the permitting requirements. In the four remaining areas, EPA has identified further possibilities for information burden reduction.

EPA's examination of the paperwork burden will continue in these remaining areas. At the same time, EPA is also reviewing its RCRA regulations to identify areas where a "degree/class of hazard" approach may be incorporated into the regulation to a greater extent. Once the paperwork reduction examination in the remaining four areas has been completed and integrated with the class of hazard analysis, EPA expects to prepare final proposals for paperwork reduction by September.

During the pendency of this review and the regulatory process to change the regulation, of course, the present requirements remain in full force and effect.

II. Results of Preliminary Analysis

A. *Annual Report* (40 CFR 262.41, 264.75, and 265.75)

The Agency plans to eliminate the current requirement that all generators and all owners or operators of hazardous waste facilities file an annual report summarizing their activities related to hazardous waste management. In its place, EPA plans to substitute an annual survey of generators and facilities. The survey would be sent each year to a statistical sample of both the generator and facility populations.

The authority for the use of an annual survey comes from Sections 3002, 3004, and 3007 of the statute.

The benefits associated with replacing annual reporting requirements with a sample survey approach are significant. First and foremost, this approach will greatly reduce reporting requirements on the regulated community. In fact, we estimate the burden reduction for annual reporting requirements to be in the range of 90 to 95 percent—from roughly 290,000 hours down to approximately 26,000 hours. Two factors account for this reduction. First, only 10 percent or less of the total number of generators and facilities will be affected at all in any given year. Second, the survey forms are substantially simplified and therefore less

burdensome to complete than the current annual report forms.

In addition, the survey approach will significantly reduce EPA's processing costs. This reduction will allow a more complete and systematic compilation and analysis of the hazardous waste data received through the survey. Finally, this approach will result in more representative statistics because the survey will go out to a statistically representative sample of facilities and generators in all states. The Subtitle C program provides for the authorization of state hazardous waste programs, in lieu of the Federal program, where the state program is substantially equivalent to the Federal program. Using the current annual reporting mechanism, however, EPA would receive reports only from hazardous waste handlers in states where EPA is operating the program, i.e., in non-authorized states. Thus, over the years EPA would only be collecting information directly from the handlers in the handful of states which do not receive authorization to run their own hazardous waste programs. Such a report may not yield nationally representative information.

B. *Manifest System* (40 CFR 262.20–262.23, 263.20, 264.71, and 265.71)

The Agency expects to replace the general information requirements for what data must appear on manifests with a prescribed uniform manifest form. Current regulations do not set forth a required form for the manifest system. The Agency's original intent was to set up a manifest requirement with enough flexibility to allow States and industry to design specific documents to fulfill specific needs.

The current system is causing two problems. First, the lack of uniformity in the manifests required by the States has created situations in which generators and transporters must fill out and carry multiple manifest forms when wastes are shipped interstate. Currently, a transporter carrying a hazardous waste shipment across state lines must comply with the manifest system operating in each state. This means that a transporter traveling through a state must have in his possession the manifest required in that state. Under these conditions, several manifests could be necessary to transport one load of hazardous waste interstate.

Second, generators with plants in more than one state cannot consolidate and standardize their manifesting procedures company-wide because of a lack of uniform requirements. This situation results in a failure to achieve efficiency in information collection activities in all multistate corporations in the country which are currently regulated by RCRA.

To solve these problems—all of which give rise to unnecessary paperwork burdens—EPA has been working with the Association of State and Territorial Solid Waste Management Officials and the Hazardous Materials Advisory Council, which represent the States and industry, respectively, in developing a uniform manifest system. Although the exact burden reduction which will accrue from this project is difficult to calculate due to uncertainties in the number of interstate waste shipments and the actual economies of scale achievable by multi-state corporations not having multiple requirements with which to comply, EPA believes, nonetheless, that burden reduction can be significant by adopting uniform manifest requirements.

In addition to a uniform manifest form, EPA is developing a proposal for a permanent manifest which could be used in certain cases as an alternative to the existing manifest system. This alternative is designed to reduce the administrative burden on generators in cases where the same wastes are shipped by generators to off-site facilities which they own.

In lieu of the existing system which requires a separate manifest for each waste shipment, a permanent manifest would be carried by the transporting vehicle every time a shipment of this same waste occurred. The permanent manifest would include all manifest information and identify the route the vehicle would travel. The generator and hazardous waste management facility would also be required to establish a waste tracking system that would identify the quantity for each shipment (e.g., shipment log).

Notice of intent to use this alternative system would be sent to EPA prior to initiation, and would include a copy of each permanent manifest and an explanation of the waste tracking system.

This alternative system provides for a simpler and more practical approach to the manifest requirement when a generator and hazardous waste facility are owned or operated by the same person. A large measure of the paperwork in such situations would be eliminated through the discontinuation of manifest preparation for each and every shipment of the same waste. In addition, there would be reduced recordkeeping due to the need to keep only a copy of the shipping log rather than each individual manifest.

Establishment and implementation of this alternative manifest system requires Department of Transportation concurrence and joint rulemaking. A final joint proposal for a permanent manifest is expected to be developed in conjunction with the uniform manifest form proposal.

C. *Permitting Requirements* (40 CFR 122.4)

Using a class of hazard approach, the Agency plans to reduce the information requirements for permit applications and permit procedures for lower risk hazardous waste storage facilities. Storage facilities have been targeted for permit process burden reduction for two reasons. First, such facilities represent a highly significant portion of hazardous waste facilities. Preliminary analysis of the approximately 14,000 Part A permit applications received by EPA indicates that roughly 40 percent of all applications only involve storage of hazardous wastes in tanks or containers. Second, storage facilities, if properly run, represent in general a lower public health and environmental risk than disposal facilities.

Under this proposal, Part B permit applications and permitting procedures would be tailored to the degree of risk posed by the various categories of storage facility. In the case of very low risk storage facilities, no permit application would be required. If facility owners or operators use appropriate Department of Transportation containers and notify EPA that they fall in this category, then such facilities would be granted a permit by rule.

For moderate risk storage facilities, EPA would develop a standardized and simplified Part B permit application. Certain technical information required in an application would be obtained through statements to be filled in or checked by the applicant (e.g., the distance to firefighting equipment is —— feet). Certain other technical and administrative information required in an application (e.g., the contingency plan) would be provided by self-certification that such information is available at the facility and does comply with the requirements of the regulations.

For high risk facilities, the Part B permit application requirements currently in effect and the normal permit procedures would remain in effect owing to the greater risks involved.

The benefits of this approach are obvious. Low risk facilities will not have to submit any Part B permit applications. As a result, the paperwork burden associated with permit application for this class of facility will be completely eliminated. Although the exact number of low risk storage facilities is unknown, the burden

reduction should be significant. Burden reduction will also accrue from the simplified permit applications for moderate risk facilities. And although not strictly a paperwork burden, permitting process burdens for moderate risk facilities also will be significantly reduced by the expedited procedures which will be adopted.

III. Other Areas of Analysis

A. *Operating Record* (40 CFR 264.73, 265.73)

EPA will review the current operating record requirements with the objective of reducing the information burden in two major areas. First, the number of handling codes to be used in the operating record should be reduced to agree with the number used in the permitting process. Facilities must currently utilize a table of 85 handling codes to identify the management techniques applied to each waste. Facility permits, however, utilize only 13 handling codes. Furthermore, the proposed annual survey will collect information based upon those 13 codes. Continuing to require facilities to keep records based on the 85 codes when the Agency intends to analyze their operations using only 13 codes seems questionable.

Second, the operating record requirements mandate that facilities keep copies of a number of reports that result in duplication of records kept in other locations. Examples include summary reports of emergency incidents and notices of certification of compliance with permit requirements. Copies of these reports may be kept more appropriately in another location instead of placing this burden on the facility.

Additional possibilities for burden reduction may be discovered as a result of the class of hazard analysis scheduled for completion in late summer. In large measure, however, the facility operating records form a keystone to the entire hazardous waste regulatory system. Not only does the waste-specific information included in the operating record provide the basis upon which facilities can comply with the various reporting requirements of the regulations, it also constitutes a key element in the framework of documenting the actual management of hazardous wastes from generation through transportation to final disposition.

B. *Groundwater Monitoring* (40 CFR 265.94)

EPA will review the groundwater monitoring requirements as part of the class of hazard analysis. EPA, however, does not expect possibilities for major burden reduction in the groundwater monitoring requirements. Protection of groundwater against contamination from releases of hazardous wastes or hazardous waste constituents is a major objective of RCRA. Years of negligence in guarding against groundwater contamination have led to the closing of countless wells used by individuals and public utilities as sources of drinking water. These impacts are long-term in nature, and may ultimately produce irreversible damage to our groundwater resources.

In this context, the groundwater monitoring requirements affect only a small subset of the population of hazardous waste management facilities, i.e., an estimated 4,500 landfill, injection well, surface impoundment (for storage, treatment and disposal) and land treatment facilities. Furthermore, there is provision for facilities to obtain a waiver from compliance with any of the groundwater regulations, upon demonstration of low potential for migration of contaminants to water supply wells.

Moreover, EPA has tried to minimize the burden of groundwater monitoring with a minimum indicator program leading to assessment monitoring only if problems are detected. However, EPA has a continuing concern that the funds which industry expends on groundwater monitoring pursuant to this regulation lead to information useful to the facilities and to environmental officials. To get maximum use of the data EPA plans to issue further guidance to facilities on how they can be sure of getting sound advice from their hydrogeologists and drillers. EPA will also undertake a timely evaluation of the groundwater monitoring requirements to ensure that industry and agencies are getting the most from the expenditure of funds in this area.

C. *Closure/Post-Closure and Financial Assurance Requirements* (40 CFR 264.112–264.120, 264.142–264.151, 265.112–265.120, 265.142–265.151)

EPA will review two elements of the closure/post-closure and financial assurance requirements which may be unnecessarily burdensome to the regulated community. First, the requirement that post-closure cost estimates be adjusted to reflect changes in the post-closure plan during the post-closure period should be reconsidered. Since during the post-closure period, the amount of the financial instrument adjustment is no longer required and does not appear in the final regulation, this requirement could possibly be eliminated.

Second, the requirement that both a copy of the insurance policy and endorsement be forwarded to the Regional Administrator by all owners or operators may not be necessary. The receipt of the endorsement alone would be sufficient evidence of insurance. A sampling of policies, however, may be necessary to determine whether there is a need to make coverage requirements more specific.

D. *Contingency Plan* (40 CFR 264.52–264.56, 265.51–265.56)

The Agency will review the contingency plan requirements to assess whether they fully address the variety of hazards posed by different facilities applying different processes to different waste streams.

The purpose of the contingency plan requirement is to ensure that treatment, storage and disposal facilities are prepared to address emergency situations rapidly and in such a manner so as to limit or prevent injuries or possible hazards to human health or the environment. Because the contingency plan requirement is a performance standard which takes into account varying circumstances related to waste management, the owner/operator already has the authority to tailor his approach to a variety of hazards. It may, however, make sense to clearly and explicity identify situations where less regulation is required.

Through the degree of hazard analysis, EPA will attempt to tailor contingency plan requirements to classes of wastes. Wastes which pose lower risks of unplanned emergencies, such as non-ignitable or compatible wastes in storage situations, may be the subject of less stringent contingency plan requirements.

IV. Conclusion

Based on the results of this preliminary examination of the reporting and recordkeeping requirements, EPA is certain that information burden reductions can be made. The Agency is continuing its efforts to identify burden reduction targets and has developed the following scheduled for completing the analysis and forwarding necessary regulatory modifications to OMB.

Paperwork requirement	Completion date
Annual Report	July 1981.
Manifest System	Sept. 1981.
Permitting Requirements	Sept. 1981.
Operating Record	Sept. 1981.
Groundwater Monitoring	Sept. 1981
Closure/Post-Closure and Financial Assurance Requirements.	Sept. 1981.
Contingency Plan	Sept. 1981.

A single copy of the preliminary report is available from Ed Cox, Solid Waste Information, USEPA, 26 West St. Clair Street, Cincinnati, Ohio 45258; (513) 684–5362.

Dated: July 24, 1981.

Anne M. Gorsuch,

Administrator.

[FR Doc. 81–22373 Filed 7–30–81; 8:45 am]

BILLING CODE 6560–26–M

20. Page 68642—§ 141.30(f)(4) should be revised such that the words, "as a disinfectant," beginning on the tenth line, are deleted in their entirety.

Dated: March 5, 1980.

Victor J. Kimm,

Deputy Assistant Administrator for Drinking Water.

[FR Doc. 80-7508 Filed 3-10-80; 8:45 am]

BILLING CODE 6560-01-M

40 CFR Part 775

[80T-7]

Tetrachlorodibenzo-P-Dioxin; Prohibition of Disposal

AGENCY: Environmental Protection Agency (EPA).

ACTION: Notice of Immediately Effective Rule.

SUMMARY: This notice refers all interested persons to the proposed rule section of this issue of the Federal Register, where the Environmental Protection Agency is issuing an immediately effective proposed rule which prohibits Vertac, Inc., from disposing of specific chemical wastes contaminated with 2,3,7,8-TCDD (Tetrachlorodibenzo-p-dioxin) located at its Jacksonville, Arkansas facility. This rule also requires any person to notify EPA at least sixty days before he intends to dispose of any wastes resulting from the production of 2,4,5-Trichlorophenol and/or its pesticide derivatives or from production of other substances on equipment which was previously used for production of 2,4,5-Trichlorophenol or its pesticide derivatives.

EFFECTIVE DATE: This rule takes effect at 9:00 a.m. on March 11, 1980. Technically, it is a proposed rule which the EPA is declaring immediately effective under section 6(d) of TSCA. Since it is a proposed rule the Agency is accepting public comments on it. For the dates of the comment period and the public hearing, interested persons should consult the DATES and PUBLIC HEARINGS section of the preamble that accompanies the full text of the rule published in the proposed rule section of this issue of the Federal Register.

FOR FURTHER INFORMATION CONTACT: Gordon Olson, Office of Pesticides and Toxic Substances (TS-794), Environmental Protection Agency, 401 M Street S.W., Washington, D.C. 20460.

SUPPLEMENTARY INFORMATION: In the proposed rule section of this issue of the Federal Register is published a proposed rule which the EPA is declaring immediately effective under section 6(d) of the Toxic Substances Control Act (TSCA). The Agency is also accepting comments on the rule and intends to conduct a public hearing after the close of the comment period. If requested to do so, the Agency may conduct an expedited review of the rule under section 6(d) of TSCA. Persons who may wish to submit comments or to participate in the public hearing should also consult the full text of the rule and preamble for further details.

Dated: March 7, 1980.

Steven Jellinek,

Assistant Administrator for Pesticides and Toxic Substances.

[FR Doc. 80-7656 Filed 3-10-80; 8:45 am]

BILLING CODE 6560-01-M

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Office of the Secretary

41 CFR Part 3-3

Procurement by Negotiation

AGENCY: Department of Health, Education, and Welfare.

ACTION: Final rule.

SUMMARY: The Department of Health, Education, and Welfare is amending its procurement regulations to clarify the management review process regarding fee levels under cost-plus-a-fixed-fee contracts.

Section 304(b) of the Federal Property and Administrative Services Act of 1949 (41 U.S.C. 254(b)) establishes maximum fee limits for cost-plus-a-fixed-fee contracts. The Department, under existing procurement regulations, imposes a management review of proposed fees under cost-plus-a-fixed-fee contracts below the maximum statutory limits and requires that a determination and findings be executed by a procurement management official whenever the proposed fee will exceed a designated level. The purpose of the review is to provide a "check and balance" in the procurement process.

However, some departmental contracting officers have erroneously interpreted the fee levels that reflect a management review as fee ceilings. Therefore, to clarify this misinterpretation and to express the original intent of the management review, the Department is eliminating the requirement for the execution of a determination and findings and is revising its regulations covering the review process. The following amendments reflect these actions.

EFFECTIVE DATE: March 11, 1980.

FOR FURTHER INFORMATION CONTACT: J. Coleman, Office of Procurement Policy, Office of Grants and Procurement, OASMB-OS, HEW, Washington, D.C. 20201 (202-245-8791).

SUPPLEMENTARY INFORMATION: It is the general policy of the Department to allow time for interested parties to participate in the rulemaking process. However, since the amendments are administrative in nature and concern the clarification of regulations, the public rulemaking process was deemed unnecessary in this instance. The provisions of these amendments are issued under 5 U.S.C. 301; 40 U.S.C. 486(c).

Therefore, 41 CFR Chapter 3 is amended as set forth below.

Dated: March 4, 1980.

E. T. Rhodes,

Deputy Assistant Secretary for Grants and Procurement.

PART 3-3—PROCUREMENT BY NEGOTIATION

§ 3-3.303-52 [Amended]

1. Under Subpart 3-3.3, Determinations, Findings, and Authorities, of Part 3-3, Procurement by Negotiation, subparagraph 3-3.303-52(a)(7) is deleted, and subparagraph 3-3.303-52(a)(8) is redesignated as subparagraph 3-3.303-52(a)(7).

2. Under Subpart 3-3.4, Types of Contracts, of Part 3-3, Procurement by Negotiation, section 3-3.405-5, Cost-plus-a-fixed-fee contract, is amended by deleting subparagraph (c)(2) and adding the following:

§ 3-3.405-5 Cost-plus-a-fixed-fee contract.

* * * * *

(c) *Limitations.* (1) [Reserved.]

(2) Proposed coat-plus-a-fixed-fee contracts, or subsequent modifications to this type of contract, which provide for fixed fees in excess of the following amounts shall be submitted by the contracting officer to the principal official responsible for procurement for preaward review and approval to insure that the factors for determining fee set forth in § 1-3.808-2 have been considered:

(i) Ten (10) percent of the estimated cost, exclusive of fee, for any cost-plus-a-fixed-fee contract for experimental, developmental, or research work.

(ii) Seven (7) percent of the estimated cost, exclusive of fee, for any other cost-plus-a-fixed-fee contract.

This review and approval requirement is not to be construed as an administrative limitation or establishment of a maximum fee ceiling.

78-086 TRW, Inc., Redondo Beach, CA (April 1978)

22 USEPA, OPP: *Environmental Fate of TCDD (2,3,7,8-Tetrachlorodibenzo-P-Dioxin) a Contaminant of 2,4,5-TCP* (March 1, 1979)

23 USEPA, Region 6: *Affidavit of Robert B. Elliott before the State of Texas, County of Dallas.* (February 14, 1980)

24. US NIEHS/IARC Work Group: *Long Term Hazards of Polychlorinated Dibenzofurans* Lyon. (June 1978) (2)

25. Van Miller, J.P., Lalich, J.J., Allan, J.R. *Increased Incidence of Neoplasms in Rats Exposed to Low Levels of 2,3,7,8-Tetrachlorodibenzo-P-Dioxin Unpublished*

In an effort to develop more orderly organization of this part the numbering for Subpart J has been changed. For the convenience of the reader the following redesignation table is being provided.

Proposed section	Final rule section
775.1	775.1180
775.2	775.1183
775.3	775.1186
775.4	775.1190
775.5	775.1195
775.6	775.1197

Under Executive Order 12044, EPA is required to judge whether a regulation is "significant" and therefore subject to the procedural requirements of the Order or whether it may follow other specialized development procedures. EPA labels these other regulations "specialized." This regulation has been reviewed, and it has been determined that it is a specialized regulation not subject to the procedural requirements of Executive Order 12044

Dated May 12, 1980

Douglas M. Costle,

Administrator

Therefore, Chapter I of Title 40 of the Code of Federal Regulations is amended by adding a new Part 775 consisting at this time of Subpart J

PART 775—STORAGE AND DISPOSAL OF WASTE MATERIAL

Subparts A-I—[Reserved]

Subpart J—Disposal of Waste Material Containing Tetrachlorodibenzo-p-dioxin (TCDD)

Sec
775.180 Scope
775.183 Definitions
775.186 Prohibited Acts
775.190 Required Acts
775.195 Compliance
775.197 Exclusions

Authority: Sec. 6 Toxic Substances Control Act (TSCA), Pub. L. 94-469, 90 Stat. 2020 (15 U.S.C. 2605)

Subpart J—Disposal to Waste Material Containing Tetrachlorodibenzo-p-dioxin (TCDD)

§ 775.180 Scope.

This subpart prohibits the removal for disposal of wastes containing TCDD presently located at the Vertac Chemical Co. facility at Jacksonville, Arkansas. In addition, this subpart requires persons who dispose of wastes containing TCDD to notify the Administrator sixty days before disposal

§ 775.183 Definitions.

In addition the definitions in section 3 of the Toxic Substances Control Act (TSCA), 15 U.S.C. 2602, the following definitions shall apply to this subpart

(a) "Assistant Administrator" means the EPA Assistant Administrator for Pesticides and Toxic Substances.

(b) "EPA" means the U.S Environmental Protection Agency

(c) "Dispose of chemical substances or mixtures for commercial purposes" means disposal by any person who disposes of chemical substances or mixtures for the purpose of obtaining commercial advantage, as well as disposal by any person incidental to his commercial activities.

(d) "Person" includes any individual, firm, company, corporation, joint venture, partnership, proprietorship, association, or any other business entity; any state or political subdivision thereof, any municipality, any interstate body, and any department, agency, or instrumentality of the federal government.

(e) "TCDD" means 2,3,7,8-Tetrachlorodibenzo-p-dioxin

(f) "Waste material" or "waste" means any garbage, refuse, sludge from a waste treatment plant or water supply facility and other discarded material including solid, liquid, semi-solid, or contained gaseous material resulting from industrial, commercial, mining and agricultural operations.

(g) "Waste material containing TCDD" or "waste(s) containing TCDD" means any waste material or waste(s) resulting from manufacture or processing of 2,4,5-Trichlorophenol or its pesticide derivatives, or any waste(s) resulting from manufacturing processes using equipment that was at some time used in the manufacture of 2,4,5-Trichlorophenol or its pesticide derivatives.

§ 775.186 Prohibited acts.

(a) Vertac Chemical Co., of Memphis, Tennessee, shall not remove for disposal any of the wastes containing TCDD produced before May 12, 1980 currently located at its facility in Jacksonville Arkansas.

(b) No person who disposes of chemical substances or mixtures for commercial purposes shall remove for purposes of disposal the wastes containing TCDD produced before May 12, 1980 currently located at the Vertac Chemical Co. facility in Jacksonville, Arkansas.

§ 775.190 Required acts.

(a) Vertac Chemical Co.: (1) Shall post a notice (or notices, as appropriate) at the principal access point to the storage area(s) at its Jacksonville facility stating that Tetrachlorodibenzo-p-dioxin contaminated waste materials are stored on site and that removal for disposal of such waste is prohibited without express permission from the Assistant Administrator.

(2) Shall dispose of all waste material containing TCDD produced at the Jacksonville facility after May 12, 1980 at facilities which comply with the requirements of § 761.41(b), until the required actions of § 775.190(a)(3) are completed Vertac shall notify the Assistant Administrator at least one week prior to shipment in accordance with the requirements of § 775.190(b) (1) through (5). Such notification shall also include sufficient additional information to allow the Assistant Administrator to evaluate compliance with the requirements of § 761.41(b). (This additional information will only be required once for each facility receiving waste material containing TCDD).

(3) Shall test the wastes produced after May 12, 1980 at the Jacksonville facility, employing the TCDD detection methodology described in § 775.197(c) of this subpart and provide the Assistant Administrator with the results within two weeks of the date the analyses are completed. If the wastes contain no detectable TCDD then the requirement in § 775.190(b) will be withdrawn, and the exclusion in § 775.197(b) will be controlling. In the event that future production shifts to 2,4,5-Trichlorophenol or its pesticide derivatives separate notification under § 775.190(b) will be required before any wastes generated in such production can be disposed of.

(b) *Disposal Notification* Any person who disposes of chemical substances or mixtures for commercial purposes who wishes to dispose of wastes containing TCDD shall notify the Assistant Administrator sixty (60) days prior to their intended disposal of such wastes Notification shall be by certified letter to the Assistant Administrator with a copy to the EPA Regional Administrator for

ITEM X - FORM 1

EXISTING ENVIRONMENTAL PERMITS

A. NPDES - Permit application was filed on 9/14/79 for two point sources:

1. Non-contract cooling water totally contained within piping and equipment in the process areas.

2. Wastewater discharge to the City of Jacksonville POTW.

(It is not certain that an NPDES permit is needed for this facility. Compliance with Pesticide PSES will be through City of Jacksonville.

E. OTHER - Permits with the Arkansas Department of Pollution Control and Ecology.

Permit Number	Description	Date Issued
184-A	Installation of Pollution Control Equipment (1. Caustic scrubber - Chlorination) (2. Water scrubber - Chlorination) (3. Herbicide acid reactor)	9/28/73
225-A	Storage Tank Emissions Control (T-337 A & B) (T-331 B) (NaDCP Storage)	5/17/74
269-A	TCB Storage Tanks	12/6/74
270-A	Dalapon Plant	12/6/74
270-A (modified)	Dalapon Plant (Scrubber addition)	4/30/76
326-A	DCP Project	3/26/76
366-A	TCP (Containment System)	9/24/76
381-A	TCB Plant	11/19/76

001529

03108239