HAZARDOUS WASTE STORAGE INSTALLATION CERTIFICATION STATEMENT

V-402 TANK

I, Thomas W. Roberts Jr., P.E., have reviewed the installation of a tank system located at The Dow Chemical, Michigan Operations, Environmental Operations Facility, in Midland, Michigan. My duties were to review and certify the written assessment for the V-402, as required by the Resource Conservation and Recovery Act (RCRA) regulation(s), specifically 40 CFR 265.192, paragraphs (a)(l); (a)(2), (a)(5), (b), (d), and (e); and 265.193 paragraphs (b), (c), (d), (e)(2-Partial) and (f).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

AECOM Technical Services, Inc.

By:

Thomas W. Roberts Jr., P.E.

Senior Civil Engineer

Title

58637

Registration Number

27777 Franklin Road, Suite 2000

Southfield, MI 48034

Address



ASSESSMENT OF HAZARDOUS WASTE TANK V-402

In accordance with the rules promulgated under the Michigan Public Act 64, Rule 615 which incorporates U.S. Environmental Protection Agency (EPA) Resource Conservation and Recovery Act specifically 40 CFR 265.192, paragraphs (a)(l); (a)(2), (a)(5), (b), (d), and (e); and 265.193 paragraphs (b), (c), (d), (e)(2-Partial) and (f), the following assessment of Tank V-402 is presented attesting that the tank system has sufficient structural integrity and is acceptable for storing of hazardous wastes.

GENERAL INFORMATION

Owner:

Dow Chemical U.S.A

Environmental Operations Business

34 Building

Midland, MI 48667

Location:

703 Tank Farm

Dow Chemical, Michigan Division

Tank Designation:

[V-402]

DESIGN STANDARDS

Tank:

ASME Code for Pressure Vessels, Section VIII, Division 1

2015 Edition

Secondary Containment:

Unknown

Ancillary Equipment:

ANSI B31.3

HAZARDOUS CHARACTERISTICS OF THE WASTE

Tank V-402 is used as a temporary storage vessel for organic or other liquid waste streams. The waste streams enter V-402 via overhead piping systems of a different size and types of pipe. The contents of Tank V-402 are pumped through an overhead 2" stainless steel pipe to the Dow Chemical 32 Incinerator for treatment. Tank V-402 stores wastes for less than one year.

The composition of the hazardous waste is provided in Table 1 below:

.. <u>TABLE 1</u>

CHEMICAL FAMILIES

Hydrocarbons Alcohols

CHEMICAL FAMILIES (CONT'D.)

Ethers

Thiols

Sulfides

Aldehydes

Ketones

Carboxylic Acids & Derivatives

Sulfonic Acids & Derivatives

Amines & Derivatives

Amides & Derivatives

Benzene & Derivatives

Organic Halides

Organic Salts

Water

High Molecular Weight Organics

Aqueous Solutions

- Acids
- Alkalis
- Inorganic Salts
- Organic Salts
- Fluorine and compounds containing fluorides

Chemicals and chemical families specifically excluded from storage in Vessel V-402 are as follows:

Phosphoric and phosphorous acids (>85%)
Phosgene

The average liquid specific gravity is 0.8 - 1.4.

The average pH is 5.61 - 13.5.

The tank system, including the tank, ancillary equipment and secondary containment, is compatible with the contained hazardous waste.

This vessel is constructed of 316 stainless steel. Assuming its integrity is verified periodically by a Dow Chemical internal testing program, the metal should last 20+ years because the corrosion rate is 0.02 mils/year.

The ancillary equipment consists of stainless steel and stainless steel piping and a stainless steel pump. Stainless steel materials show essentially zero corrosion at the operating conditions and should last indefinitely.

This analysis does not take into account any additional chemicals not listed in the table above.

EXTERNAL CORROSION PROTECTION

Because all tank system metal components are above ground and therefore are not in contact with soil or water, a corrosion potential assessment by a corrosion expert is not required to determine the corrosion potential of the soil environment surrounding the system.

DOCUMENTATED AGE OF THE TANK SYSTEM

The tank was built in 2017. Installation of the tank and ancillary equipment was completed in June, 2017.

TANK INFORMATION

Tank V-402 is a cylindrical stainless steel tank supported in the vertical position by four (4) steel support legs. General information regarding the tank is as follows:

PRESSURE VESSEL DESIGN DATA

Internal Design Pressure, psig	25 & Full Vacuum
Design Temperature, deg F	400
Hydrostatic Test Pressure, psig	71
Longitudinal Joint Efficiency	85
Post Weld Tear Treatment	No
Radiographic	RT-3

GENERAL DATA

Head Plate Material, ASME	SA-240-S32205
Shell Plate Material, ASME	SA-240-S32205
Lining Material	N/A
Nozzle Neck Material ASME	SA_700_S32205

Bolting Material, ASTM	SA-193-B7 Flouropolymer Coated
Nut Material, ASTM	SA-194-2H Flouropolymer Coated
Gasket Material	Kammprofile W/ 316L S.S. Grooved

Core & Flexible Graphite Soft Facing Layers On Each Side

Weight Empty, Lbs. (Estimated) 30.559 Weight Full of Liquid, Lbs. 225.129 Diameter, ft-in 13'-0" Length (Str. Side) ft-in 12'-9" Volume Gross, Gal. 15,450 Volume Operating, Gal. 15,450 Shell Nominal Thickness, in. 0.375 0.625 Heads Nominal Thickness, in. 0.0313

Insulation 1.5" Mineral Wool

OPERATING PARAMETERS

Corrosion Allowance, in.

Pressure Atmospheric – 10 psig

Temperature 35°F - 125°F Hq 5.61 -13.5

Nitrogen Blanket Yes Agitated Yes

Recirculation Yes – as needed to prevent

freezing

The tank conforms to ASME Code for Pressure Vessels, Section VIII, Division 1, 2015 Edition, to provide safe containment of the above described hazardous waste.

Tank venting is provided to prevent excessive pressure or vacuum build-up due to maximum emptying, filling, thermal inbreathing and outbreathing rates. 4" by 6" Leser spring operated conventional relief valve set at 10 PSIG. During filling the tank is vented through a 2" stainless steel pipe which goes to the kiln or in the event of an outage, to a carbon absorption unit.

Tank V-402 is equipped with a double level alarm. If the vessel reaches 78% of its full capacity, or if the high level switch trips, a high level alarm is activated in 703 Tank Farm control room and the inlet valves are automatically closed. At 95% of full capacity a high high level alarm is activated.

The tank is stainless steel with 1.5" mineral wool insulation.

The tank foundation will maintain the load of a full tank. The foundation is a reinforced concrete mat. The tank is anchored to the mat to prevent dislodgement.

ANCILLARY EQUIPMENT INFORMATION

The ancillary equipment generally includes a pump, pipe, fittings, and flanges that are used to contain the hazardous waste while in transit.

The pipe and fittings used for the piping system are constructed of 2, 1 and 1-1/2 inch stainless steel. The pump is a stainless steel Goulds Centrifugal pump.

The ancillary equipment conforms to the latest ANSI B31.3 codes to provide safe containment of the above described hazardous wastes.

TANK SECONDARY CONTAINMENT INFORMATION

The secondary containment system, is a part of the 703 Tank Farm, and is constructed to prevent any migration of wastes or accumulated liquid out of the system to soil or groundwater, consists of a reinforced, on-grade concrete slab with containment walls (diking). The old V-402 tank's foundation was cut out and a new concrete foundation was poured and tied into the existing tank farm system. The containment system surrounds the tank completely and covers all surrounding earth likely to come into contact with the waste if released from the tank. All construction joints are caulked and were found to be in good condition at the time of inspection, but should be reinspected at regular intervals. The interior concrete wall and floor joints of the secondary containment are caulked with SEMSTONE 805 High Performance Coating.

The concrete secondary containment is lined with VERSAFLEX FSS 45DC polyurea coating.

The secondary containment's slab is sloped to a sump which collects liquids resulting from potential leaks, or spills. Spilled or leaked waste and accumulated precipitation is removed from the concrete sump within twenty-four (24) hours.

The V-402 Tank is located within the 703 Tank farm which provides total containment in excess of 112,000 gallons, or 725% of the V-402 storage tank volume. The secondary containment also has sufficient volume to contain the largest waste tank volume in the containment. The containment system also has sufficient volume to contain precipitation from a 25-year, 24-hour rainfall event.

The walls and floors also have sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste to which it is exposed, climatic conditions and the stress of daily operation. The foundation is capable of providing support to the secondary containment system, resistance to pressure gradients above and below the system and capable of preventing failure due to settlement, compression or uplift.

ANCILLARY EQUIPMENT SECONDARY CONTAINMENT INFORMATION

There is no secondary containment provided for the majority of the ancillary equipment distributing the flow of hazardous waste from its point of generation to the storage tank. This piping is above ground piping which is visually inspected on a daily basis in accordance with 40 CFR 265.193(f).

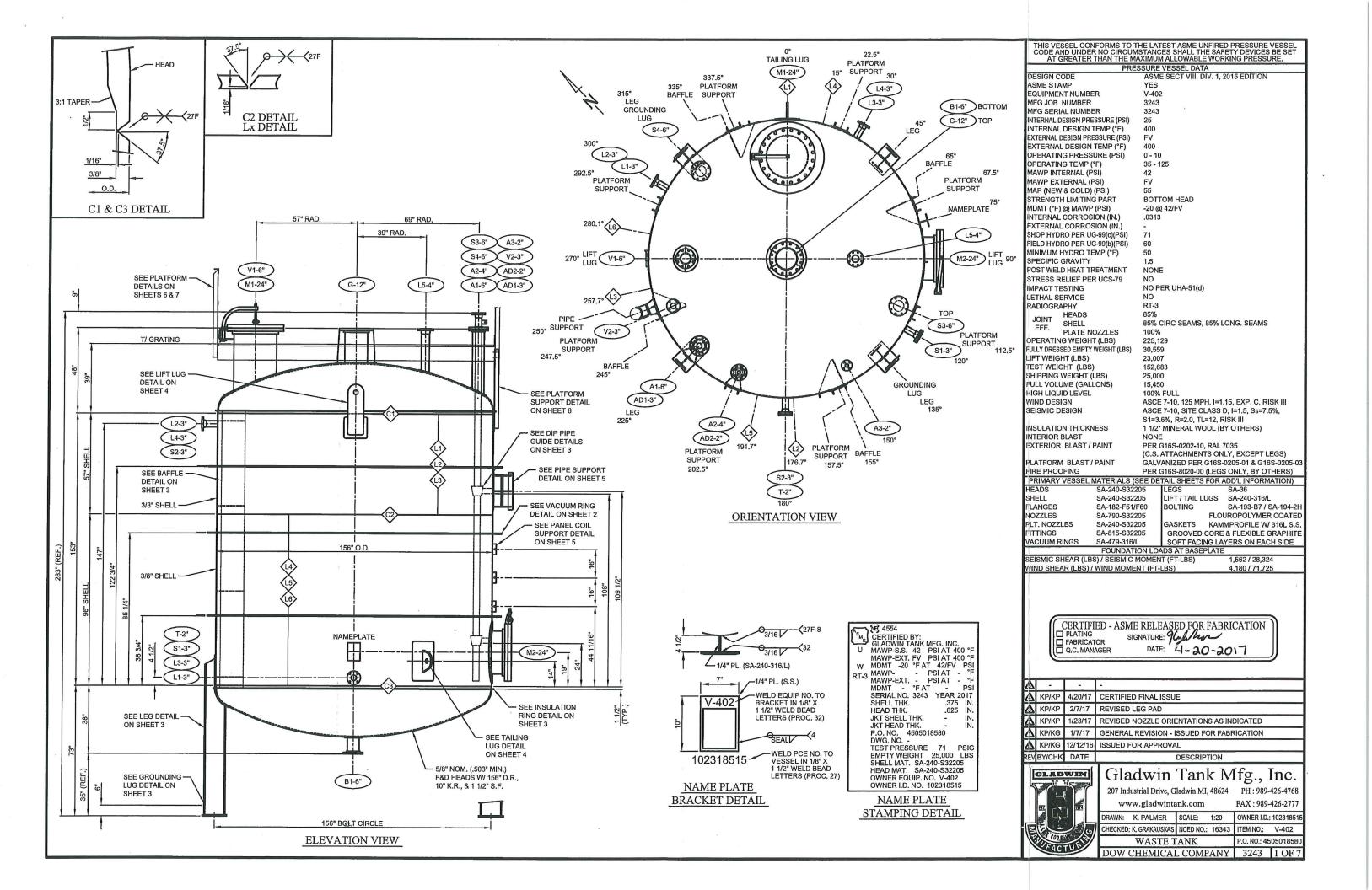
INSTALLATION OF TANK SYSTEM

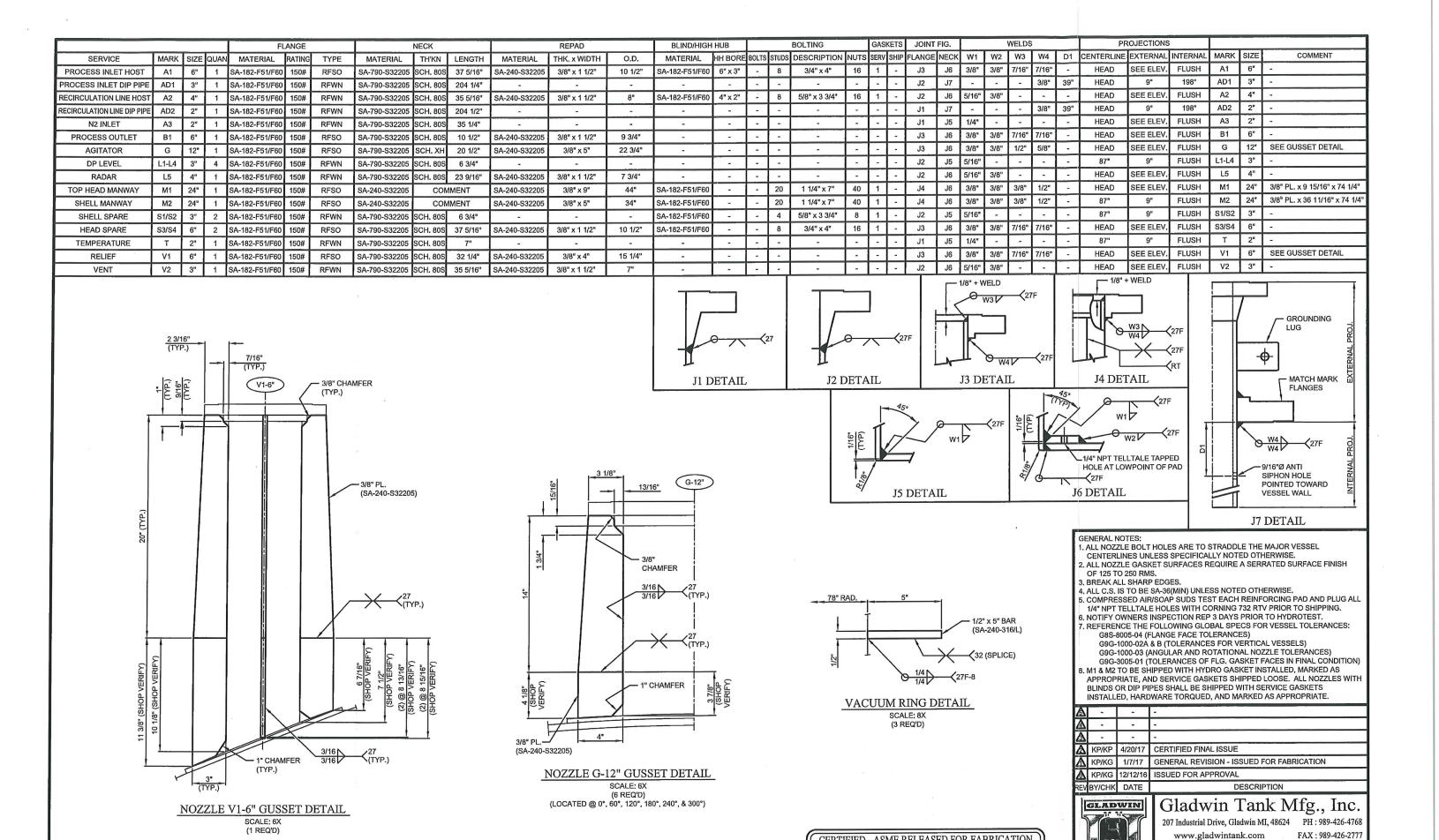
Installation of the tank system by Dow Chemical followed written procedures as outlined in the project specifications and in accordance with manufacturer's instructions. These procedures include inspection of the system for the presence of weld breaks, punctures, scrapes of protection coatings, cracks, corrosion, misalignment, incorrect elevations, improper alignment or any other structural damage or inadequate construction or installation.

TIGHTNESS TEST

The tank was tested for tightness in June of 2017. Testing was performed in accordance with written procedures. Checks were made prior to the initiation of testing and during the actual test. See attached documentation of hydrotest results. The ancillary equipment was pneumatically tested for tightness after installation according to Dow procedures.

END OF ASSESSMENT





CERTIFIED - ASME RELEASED FOR FABRICATION

SIGNATURE: 9/20/hor

DATE: 4-20-2017

☐ PLATING

☐ FABRICATOR

Q.C. MANAGER

DRAWN: K, PALMER SCALE: 1:20 OWNER I.D.: 102318515

CHECKED: K. GRAKAUSKAS NCED NO.: 16343 | ITEM NO.: V-402

DOW CHEMICAL COMPANY 3243 2 OF 7

WASTE TANK

P.O. NO.: 4505018580

