Attachment 9
Process Descriptions

PROCESS DESCRIPTIONS

1.0 Container Management Building (CMB)

The CMB is the main container offloading, processing and storage area at the Facility. This newly reconstructed building contains nine loading/unloading bays, 2 X 6,000 gallon storage tanks, and a pump room for the commingling of wastes and a labpack loose pack consolidation/commingling area. The process for offloading waste from drums and small containers can be separated into four categories as follows:

(1) Offloading of waste from drums and small containers by pumping,
(2) Offloading of waste from drums and small containers by vacuuming,
(3) Offloading of "lab-pack waste by repackaging and pouring.
(4) Offloading of "loose packs" by repackaging and pouring

1 . Drum Pumping – Pump Room

Waste received in drums or other small containers will be removed from the shipping truck or storage location and placed on a roller conveyor. Shortly before the waste is to be pumped from the drum, the drum lid will be removed and a compatibility test performed. Once it is determined that the material is compatible, a pump lance will be inserted into the liquid waste. The waste will be pumped from the drum until only a residual heal remains. The drum will then proceed to a pouring station where the drum will be inverted and the residual waste poured into a collection trough. After pouring the residual waste from the drum, the lid will be re-attached and the empty drum transferred back into a shipping truck.

The drum pumping process will manage a maximum of approximately 10 drums per hour and 30,000 drums per year. The waste that will be handled by the drum pumping process will be substantially similar to that currently handled by the waste storage and blending tanks. This waste will be temporarily stored in two 6,000 gallon waste storage tanks located outside the new drum offloading building before being transferred (i.e., pumped) to the waste storage and blending tank farm. Waste types will include RCRA/Non-RCRA waste types and limited to hazard classes 3, 6, and 9.

1.2 Drum Vacuuming

Drum vacuuming will be conducted using the same process (as well as the same process line stations) as drum pumping except that the waste will be vacuumed from drums rather than pumped. The drum vacuum lance will go to either a stationary vacuum system or to a vacuum system from a vacuum truck. Waste collected by the stationary vacuum pump system will go to the two 6,000 gallon waste storage tanks located outside the new drum offloading building. Waste collected by the vacuum truck will be temporarily stored in the vacuum truck tank before being driven to the waste storage and blending tank farm. Waste types will include RCRA/Non-RCRA waste types and limited to hazard classes 3, 6, and 9.

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1.3 Container Consolidation/Commingling

Lab-Pack Consolidation Area

Lab-pack waste is packaged in small (e.g., one to five-gallon) containers that are placed inside drums filled with absorbing material. Process operators will identify the waste type and then pour the waste as follows in:

(1) RCRA/Non-RCRA waste types and limited to hazard classes 3, 6, and 9 will be poured into a compatible container for transfer to the two 6,000 gallon waste storage tanks or the PCPG West Tank Farm (Tank System 1), SBS Tank Farm (Tank System 2) or SDG Waste Storage Tank Farm (Tank System 3)

(2) Acidic waste will be poured into an acid waste storage drum through a bung funnel.

(3) Basic waste will be poured into a basic waste storage drum through a bung funnel.

The acidic and basic waste drums will be sealed when full and stored until they can be transferred off-site for further management.

The inner packages of lab packs may be repackaged into other containers for shipment off-site for further management.

Loose Pack

The inner packages containing similar material will be repackaged into larger outer containers (pails, drums, totes, bulk containers). Compatible materials of similar type will be commingled into other containers. Reactive materials will not be commingled.

Solids

Containerized solids of compatible wastes may be comingled into roll-off boxes for transfer off-site for further management. The types of solids to be commingled will include non-dusty, non-hazardous solids and hazard classes: 4.1, 6, 8 (caustic) and 9. This activity will occur at the loading/unloading bays where fire suppression systems are installed.

2.0 Dock One

Dock one is primarily a container storage area and staging area for Dock Four truck well. The dock is constructed of concrete and is approx 60' X 60' in size

PROCESS DESCRIPTIONS

3.0 Dock Two

Dock two is utilized for the storage of non-hazardous and universal wastes. Containers of compatible materials may be commingled into roll-offs. The area is approximately 55' x 60'.

4.0 Dock Three

The Dock Three truck well is concrete lined and measures approx 17' x 45'. This dock primarily serves as a container storage area for outbound loads. The dock is partially canopied and sloped to prevent run-off.

5.0 Dock Four

Dock Four has approximate dimensions of 27 feet by 50 feet. The truck well, is concreted, canopied and sloped to prevent run-off. This dock is primarily utilized as a container storage area for outbound shipments and commingling/consolidation of hazardous and nonhazardous solids.

6.0 1st Floor Operations Building

The 1st floor Operations Building is utilized for the storage of containerized RCRA and non-RCRA wastes and staging of containers for outbound shipment. A self-contained storage closet is utilized to store reactive type wastes (DOT hazard classes 4.2, 4.3, 5)

7.0 SBS Container Storage Area

This enclosed area is utilized for the storage of containerized hazardous and non-hazardous wastes. A chain linked cage approx 20 feet by 20 feet will be utilized for the secure storage of hazardous and non-hazardous pharmaceutical (Rx and DEA/state controlled) wastes.

8.0 SBS Dock Storage Area

The SBS Dock Storage Area is primarily utilized for the storage of hazardous and non-hazardous wastes as well as the commingling/consolidation of hazardous and non-hazardous waste solids limited to hazard classes 4.1, 6, 8 (caustic) and 9.

9.0 SBS Solids Area

The SBS Solids Area is primarily utilized for the storage of hazardous and non-hazardous wastes as well as the commingling/consolidation of hazardous and non-hazardous waste solids limited to hazard classes 4.1, 6, 8 (caustic) and 9.

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10.0 PCPG West Tank Farm (Tank System One) Transfer Pad

The PCPG West Tank Farm (Tanks 16 through 30) receives bulk and containerized fuel type wastes for storage, commingling and blending into fuel products or incinerator feed material. These containers will be staged on the loadlunload pad for up to 72 hours prior to processing through the pumping stations or a vacuum truck into the tank system

11.0 SBS Tank Farm (Tank System Two) Transfer Pad

The SBS Tank Farm (Tanks 35 through 40) receives bulk and containerized fuel type wastes for storage, commingling and blending into fuel products or incinerator feed material. These containers will be staged on the loadlunload pad for up to 72 hours prior to processing through the pumping stations or a vacuum truck into the tank system

12.0 SDG Waste Storage Tank Farm (Tank System Three) Transfer Pad

The SDG Waste Storage Tank Farm (Tanks 61 through 72) receives bulk and containerized RCRA (69 – 72) and non-RCRA (61 – 68) wastes for commingling. These containers will be staged on the transfer pad for up to 72 hours prior to processing through the pumping stations or a vacuum truck into the tank system. Each tank has 2 dedicated lines to prevent cross contamination of RCRA and non-RCRA waste types. RCRA waste types to be commingled are limited to DOT hazard classes 3, 6, 8 (caustic) and 9.

13.0 SDG Product Storage Tank Farm (Tank System Four) Distill Load/Unload Pad

The SDG Product Storage Tank Farm, specifically tanks 56 and 57, have the capability to receive recoverable type product for transfer off-site to an end user.

Waste types that can be filtered into a saleable product will the stored in this tank system. These materials will be transferred to a dedicated portable filtration system that consists of a centrifugal pump and filtration basket. The processed material will be transferred offsite to the end user.

Containers of fuel type wastes may be staged on the transfer pad for up to 72 hours prior to processing through the PCPG pumping stations or a vacuum truck into the PCPG Tank system.

Containerized recoverable type products may also be staged on the pad for filtration then transfer to the Product Storage Tank Farm or truck/trailer for shipment offsite to an end user.

Sequence of Operations

1. Load Arrival

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All wastes destined for receipt at PCPG will arrive for inspection. Loads (truck, trailers) may be staged at the 72 hour pad in a hold pattern prior to relocation to the container offload areas or tank system offload areas

1.1. Containerized Wastes

All containerized wastes will be directed to one of nine off-loading bays at the CMB for inspection; Wastes destined for storage in SBS Storage Areas may be directed to the SBS Loading Dock

1.2. Tanker Truck Wastes

Wastes arriving in tanker trucks for receipt at the tank systems will be directed to the appropriate transfer pad for sampling.

2. Receiving Inspection

2.1. Containerized Loads

2.1.1. Each package will be unloaded from the transport unit and inspected as per the Waste Analysis Plan

2.1.2. Packages will be staged in the CMB awaiting lab verification

2.1.3. Once verification from the lab is received, each container will be transferred to the appropriate container storage area for:

2.1.3.1. eventual transportation off-site to an authorized facility for further management or

2.1.3.2. commingling or consolidation

2.2. Bulk Tanker Truck Loads

2.2.1. Each truck will be staged at the appropriate tank system loadlunload pad and sampled as per the Waste Analysis Plan

2.2.2. Once lab verification is complete, the load will be transferred in the tank system

2.3. Bulk Solids Loads

Each bulk container will be staged at the CMB loading dock, Dock 1, Dock 2, Dock 3, Dock 4, SBS Dock Storage Area or SBS Solids Storage Area for sampling and verification. Staging may also occur at the tank system loadlunload pads.

3. Processing

3.1. Commingling

3.1.1. Labpack Depack Area (Combination Packaging Processing Stations – CPPS)

Loose packs and/or labpacks may be commingled in Labpack Depack work stations. The commingled waste container will be properly marked, labeled then transferred to the appropriate storage area for eventual transportation off-site to an authorized facility for further management.

3.1.2. Pump Room

3.1.2.1. Compatible wastes may be commingled through the Pump Room equipment then transferred to either CMB Tank 1 or CMB Tank 2 for blending at PCPG West Tank Farm (Tank System 1), SBS Tank Farm (Tank System 2) or SDG Waste Storage Tank Farm (Tank System 3). Wastes commingled through the use of a vacuum truck may be transferred directly to Tank System 1, 2 or 3

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3.1.2.2. Flammable wastes may also be commingled in the pump room fumehood area (PR-CPPS)

3.1.3. CMB Dock
Compatible non-dusty solid wastes may be consolidated into roll-offs at the loading dock

3.1.4. Dock 2
Compatible non-dusty non-RCRA solid wastes may be consolidated into roll-offs

3.1.5. Dock 3
Compatible non-dusty solid wastes may be consolidated into roll-offs

3.1.6. Dock 4
Compatible non-dusty solid wastes may be consolidated into roll-offs

3.1.7. SBS Solids Area
Compatible non-dusty solid wastes may be consolidated into roll-offs

3.1.8. SBS Dock Area
Compatible non-dusty solid wastes may be consolidated into roll-offs

3.2. Blending
Blending of fuel type wastes will occur at PCPG West Tank Farm, SBS Tank Farm, CMB Tanks 1 & 2 and SDG Waste Storage Tank Farm. Both containerized and bulk fuel type wastes will be blended via staging at these tank system transfer pads in addition to Tank System 4 Transfer Pad

3.3. Filtration
Solvent wastes that can be reclaimed through filtration will be unloaded in the SDG Waste Storage Tank Farm (69 – 72). The pre-reclamation material will be transferred through a portable centrifugal pump system. The filtrate will be transferred directly to a truck or the SDG Product Storage Tank Farm (Tank 56., 57) for transportation off-site as a saleable product to the end user.

3.4. Consolidation
Labpacks and loose packs may be repackaged to maximize the contents of the outer container. This activity may occur in the Labpack Depack Area (CPPS), Pump Room fume hood (PR-CPPS), SBS Dock Storage Area or SBS Container Storage Area.

3.5. Adulteration
Pharmaceutical type wastes may be adulterated to prevent reintroduction into a supply chain or human consumption. This will be accomplished by commingling specific pharmaceutical wastes in a container of compatible solvent. This activity will occur in the caged area of the SBS Container Storage Area.

3.6. Waste Storage

3.6.1. Containerized Wastes
Containerized Waste will be stored in CMB Storage Areas (container storage areas, CPPS, PR-CPPS), CMB Docks, Dock 1, Dock 2 (non-RCRA), Dock 3, Dock 4, SBS Container Storage Area, SBS Dock Storage, and SBS Solids Area for up to one year.

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3.6.2. Bulk Wastes

3.6.2.1. Non-corrosive liquid wastes will be stored in the PCPG West Tank Farm, SBS Tank Farm, CMB Tanks 1 & 2 and SDG Waste Storage Tanks (69 – 72). Corrosive wastes may be stored in the SDG Waste Storage Tank Farm (69 – 72).

3.6.3. Staging

3.6.3.1. Truck Pad

Trucks may be staged on the 72 hour pad prior to receipt or shipment.

3.6.3.2. Transfer Pads

Containerized wastes may be staged up to 72 hours on TS1, TS2, TS3 or the TS4 transfer pad prior to transfer into the corresponding Tank System.

3.6.3.3. CMB

Wastes may be staged up to 72 hours in QA Staging (Area 4), Labpack Depack Area or Pump Room. Drums remaining on the conveyor, they will be closed and locked in place for processing during the next operating day.

3.7. Product Storage

Reclaimed product may be stored in the SDG Product Tank Farm (Tank 56, 57) for transportation off-site to the end user.

3.8. Packaging

Compatible wastes may be repackaged to maximize inner contents of the outer package. This may occur in the Labpack Depack Areas, (CPPS, PR-CPPS), SBS Dock Area or SBS Container Storage Area

4. Shipment

All waste received from off-site sources or generated from processing activities will be shipped off-site to authorized facilities for further management.

Table 1 - Site Capacity

Waste Management Units	Permitted Capacity (gallons)	
	1999 Application	2009 Re-Application
Tank Management Units:		
PCPG West Tank Farm/TS1 (16 - 30)	420,000	420,000 [1]
SDG Waste Storage Tank Farm (61 - 72)	86,162	46,956 [2]
SBS Tank Farm/TS2 (35 - 40)	168,000	168,000 [3]
East Tank Farm	31.260 [4]	
CPS Tank 32	5.300 [4]	
CPS Tank 33	9,660 [4]	
CPS Tank 34	10,720 [4]	
CPS Tank 44	2,394 [4]	
CMB Tank 1/TK001		6,000
CMB Tank 2/TK002		6,000
Subtotal:	733,496 [10]	646,956
Permitted Storage:	847,095	733,496
Additional Available Tank Storage:		86,540
Container Management Units:		
East Pad	48,480 [4]	
Front Pad	57,420 [4]	
First Floor Operations Building - North Storage	38,500	38,500
First Floor Operations Building - South Storage (CPS Phase IIA Drum Storage)	47,300 [4]	
Second Floor	24,200 [4]	
Dock #2 (Truck Well)	16,160 [5]	
Dock #3 (Truck Well)	16,500	16,500
Dock #4 (Truck Well)	8,080	8,080

Table 1 - Site Capacity

North Load Pad	16,160 [6]	
SBS Container Storage Room	36,000	14,960 [7]
SBS Dock Storage Area	33,000	20,240 [8]
SBS Solids Storage Area	8,080	8,080
CMB Roll-Off Storage		8,080
CMB Temporary Storage:(674 X 55 gal drums - Area 4,QA Staging, pump room)		37,119
CMB Container Storage Areas (3,888 X 55 gal drums)		213,840
Truck Staging (72 hours)	40,000	20,000 [9]
Subtotal:	349,880	385,399
Permitted Storage:	309,200	395.740 [10]
Excess Available Capacity		10,341 [11]
Total Site Available Capacity:	1,083,376	1,042,696
Total Site Permitted Capacity:	1,156,295	1,042,696 [12]

[1] *Permitted capacity at 28,000 gal per fank*

[2] *Tanks 69-72 for RCRA use; changed from permitted to tank capacities (69-70 @ 13,277; 71-72 @ 10,201)*

[3] *Permitted capacity @ 28,000 gal per fank*

[4] *Area decomissioned as a result of 2006 event loss*

[5] *Utilized for non-RCRA storage*

[6] *Use discontinued with approval of CMB storage*

[7] *Max container storage of 272 drums*

[8] *Max container storage of 368 drums or bulk storage of 2 roll-offs*)

[9] *Proposed change from 24 to 72 hours and reduction to 20,000 gallons*

[10] *Proposed permitted capacity (transfer 86,540 gallons permitted capacify from tank to container storage)*

[11] *Available excess capacity for future use - Dock 'E' and/or TS3 fank*

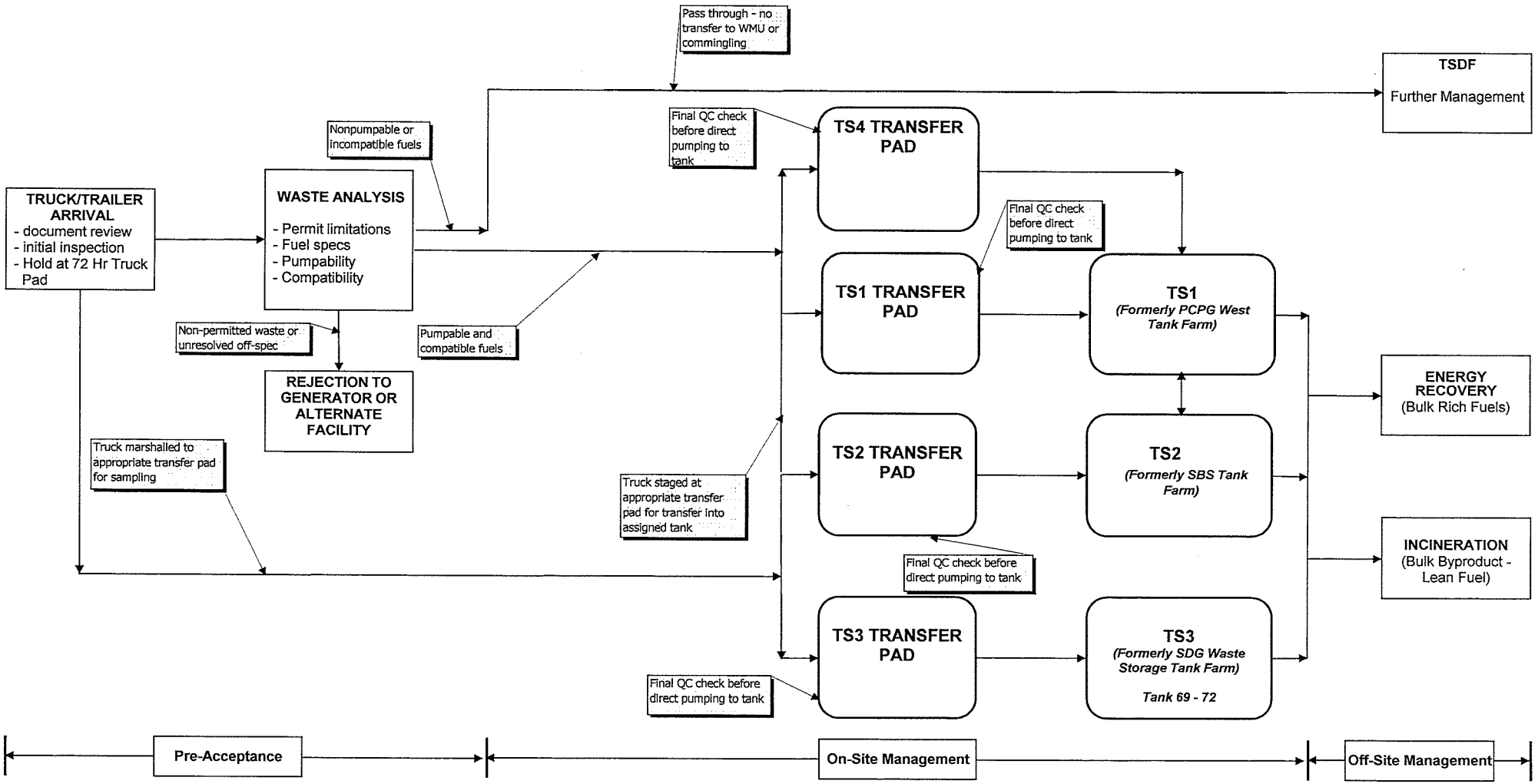
[12] *Overall site permitted capacify*

Table 2 - Hazardous Waste Management Units

Hazardous Waste Management Units
Tank Management Units:
PCPG West Tank Farm/TS1 (16 - 30)
SDG Waste Storage Tank Farm (69 - 72)
SBS Tank Farm/TS2 (35 - 40)
CMB Tank 1/TK001
CMB Tank 2/TK002
CMB Processing Units:
Pump Room Drum Pumping Station

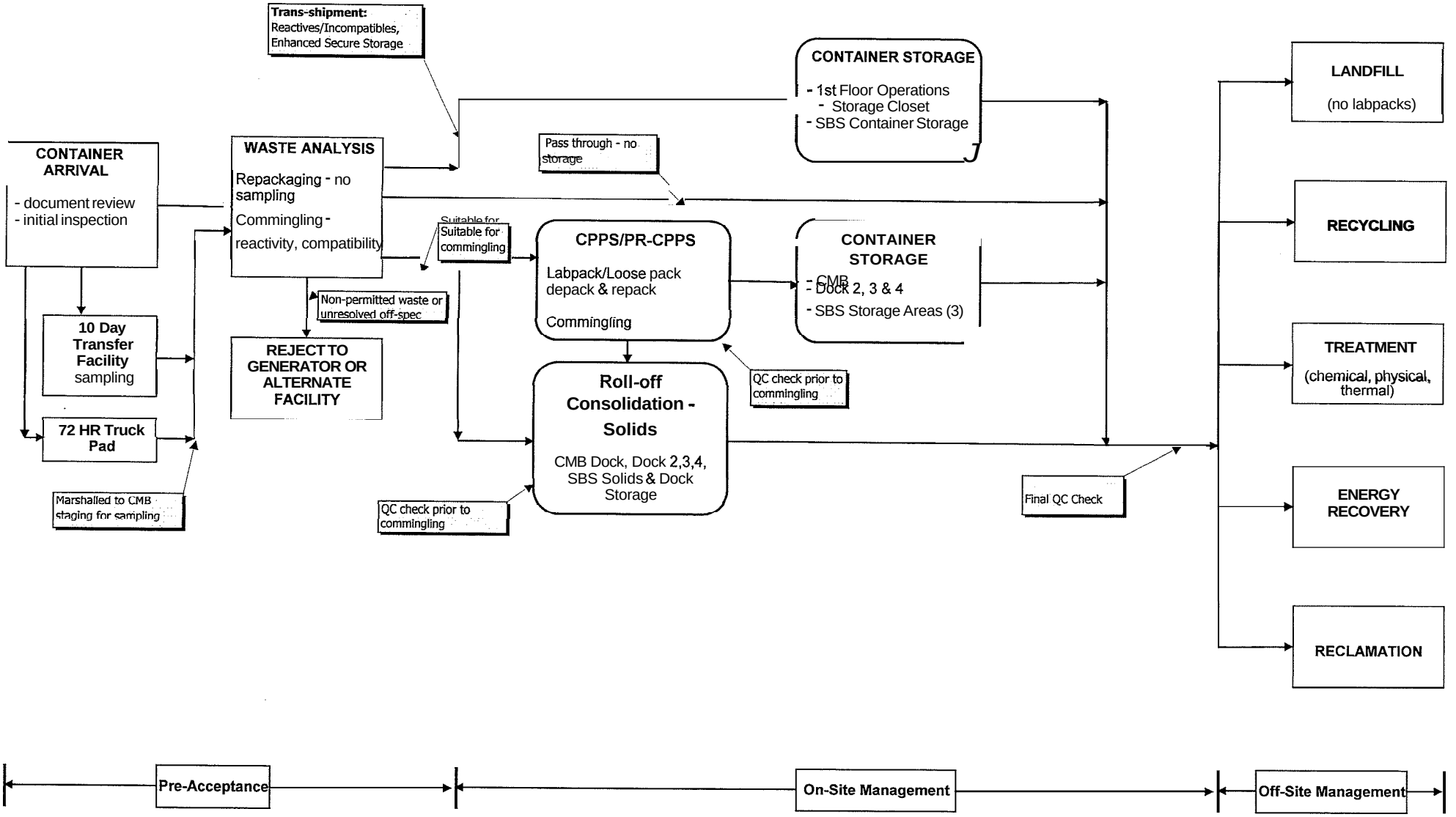
BULK FUEL PROCESS FLOW

REV:0
JAN-11



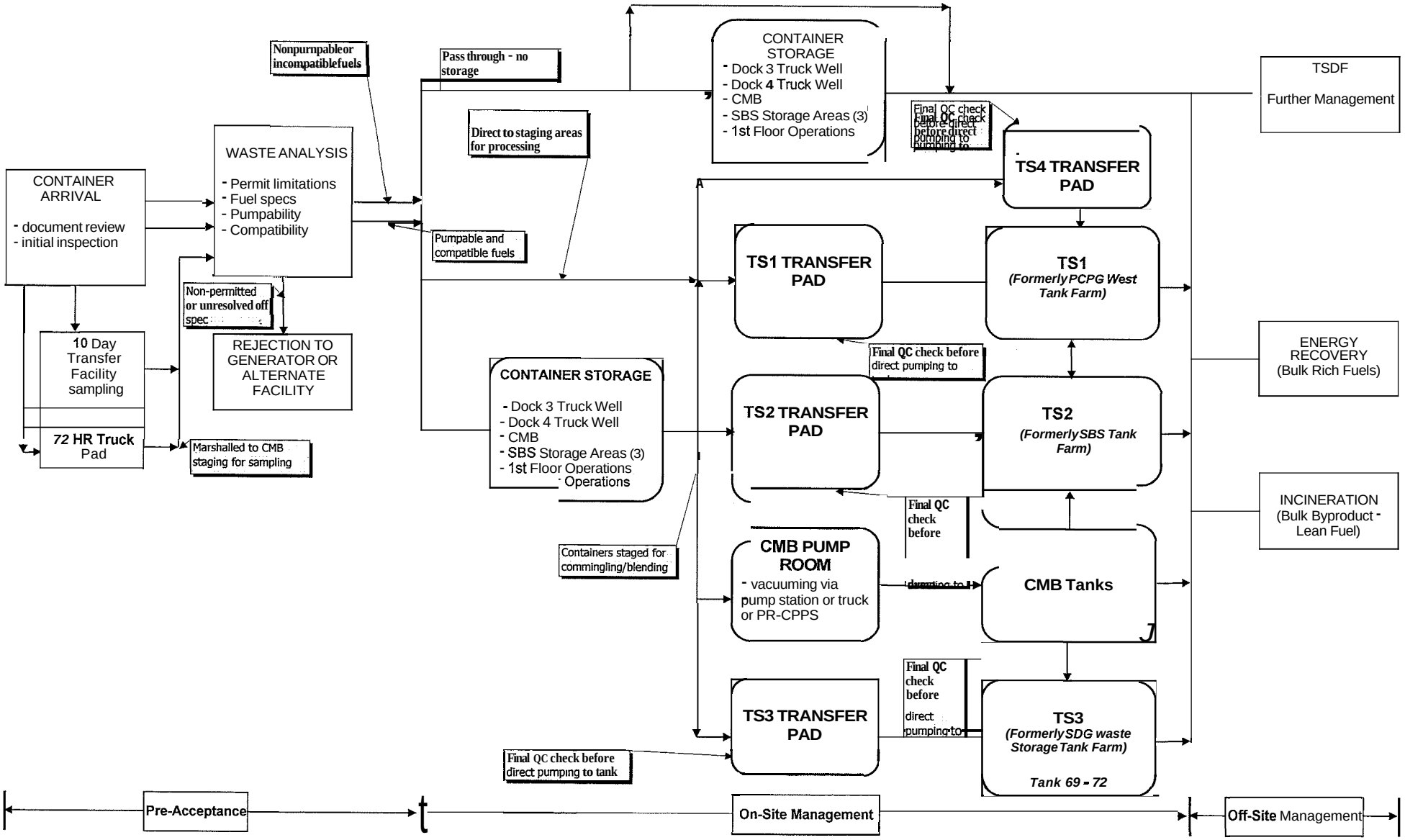
CONTAINER CONSOLIDATION/COMMINGLING FLOW DIAGRAM

REV: 0
JAN-11



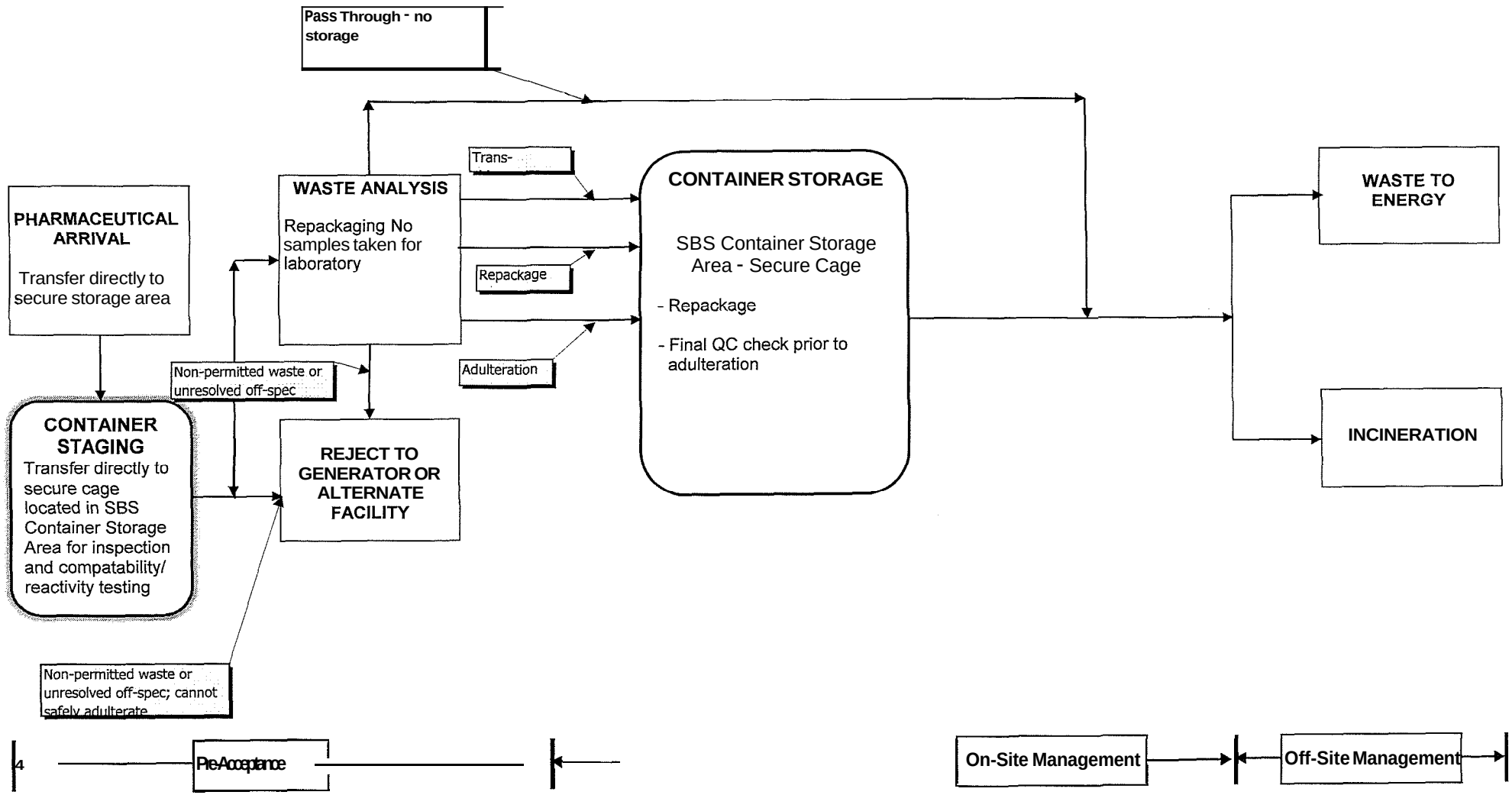
CONTAINERIZED FUEL PRO FLOW

REV: 1
JAN-11



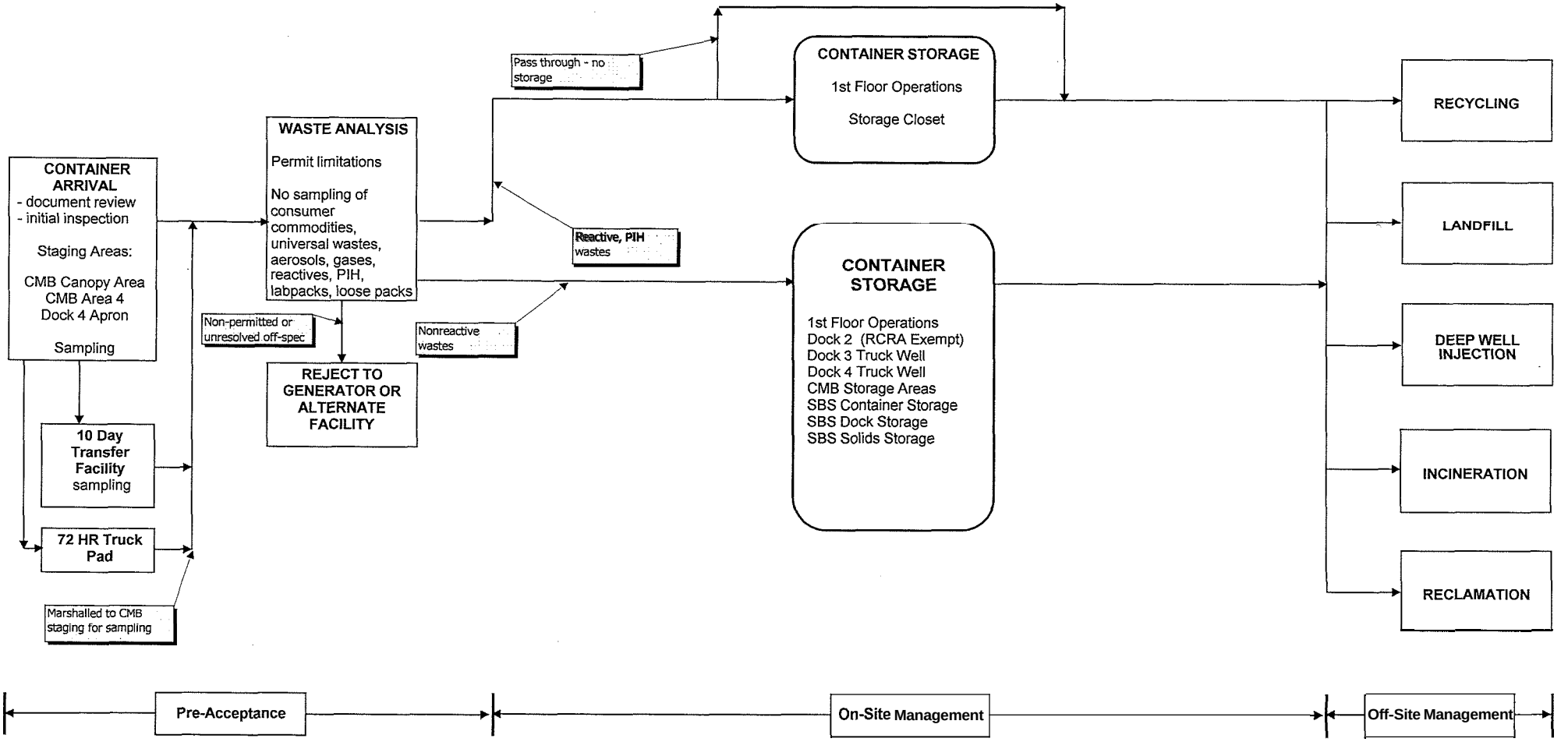
PHARMACEUTICAL MANAGEMENT PROCESS FLOW

REV: 0
JAN-11



TRANS-SHIPMENT PROGRAM PROCESS FLOW

REV: 0
JAN-11



SOLVENT RECLAMATION PROCESS FLOW

REV:0
JAN-11