

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD**COLORADO RIVER BASIN • REGION 7**

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MAY 11 1995

Mel Wong
Pacific Gas & Electric
123 Mission Street, Room 932
San Francisco, CA 94106

RE: Closure Certification Report Addendum for the Wastewater Evaporation Ponds at PG&E's
Topock Compressor Station Dated March 15, 1995

Regional Board staff has reviewed the subject report. We consider the conductivity issue at the site
to be fully corrected and we approve the report.

If you have any further questions concerning this matter, please call me at (619) 776-8942.

NEAL KRULL

Sanitary Engineering Associate

NK/pkg

cc: Michael E. Heckathorn, Trident Environmental and Engineering, Inc., Antioch
Mohinder Sandhu, Chief, Dept. of Toxic Substances Control, Long Beach

File: PG&E Topock Compressor Station, Board Order No. 85-099

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Region 4
245 West Broadway, Suite 425
Long Beach, CA 90802-4444

DTSC
1995



June 26 , 1995

Mr. Melvin Wong
Project Manager
Pacific Gas and Electric Company
123 Mission Street (P.O. Box 770000)
San Francisco, California 94177

Dear Mr. Wong:

CLOSURE CERTIFICATION ACCEPTANCE: HAZARDOUS WASTE MANAGEMENT UNITS AT PACIFIC GAS AND ELECTRIC CO. (PG&E) TOPOCK COMPRESSOR STATION, NEEDLES, CALIFORNIA (EPA ID NO. CAT080011729)

The California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), has reviewed the Phase III Closure Certification Report dated December 27, 1993 and a Closure Certification Report Addendum dated March 15, 1995 for the PG&E Topock Compressor Station's four evaporation ponds. As noted in the DTSC letter dated May 10, 1991, PG&E had completed Phases I and II closure of sludge drying beds, chromate reduction tank, precipitation tank, process pump tank, transfer sump and associated ancillary pipes and pumps under the Closure Certification Report dated June 1990. These Closure Certification Reports certify that PG&E had closed its hazardous waste management units in accordance with an approved Closure Plan dated August 1986. The DTSC hereby accepts the Closure Certifications and considers the subject hazardous waste management units at PG&E Topock Compressor Station closed.

The Colorado River Basin Regional Water Quality Control Board (CRBRWQCB), based on its letters to PG&E dated February 14, 1994 and May 11, 1995, and copied to the DTSC, has overseen the clean up for electrical conductivity (E.C.) in soils in the evaporation ponds area. Therefore, the DTSC's acceptance of the Closure Certification Reports is consistent with the approval by the CRBRWQCB concerning E.C.

The DTSC's acceptance does not certify that the subject facility will not pose an environmental or public health threat. Neither does this acceptance release PG&E from any liabilities associated with past hazardous waste management practices which occurred at the facility. Pursuant to the Health and Safety Code, Section 25187, the DTSC may issue an order specifying corrective action if the DTSC determines that there has been a release of hazardous waste or constituents into the environment from any solid waste management units at your facility. Solid

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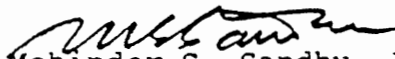
waste management units are any units or areas at a hazardous waste facility from which hazardous constituents might migrate, irrespective of whether the units or areas were intended for the management of wastes.

The DTSC requests that PG&E decommission the ground water monitoring wells for the evaporation ponds, in accordance with a DTSC approved Workplan in order to prevent the wells from serving as conduits for subsurface contamination.

Pursuant to the California Code of Regulations, Title 22, [Section 66264.143 (j) (1) or 66265.143 (j) (1)], PG&E is no longer required to maintain financial assurance and liability coverage for the PG&E Topock Compressor Station's hazardous waste management units. PG&E may submit request for releasing its financial documents to Ms. Joyce Haire, Financial Responsibility Coordinator, State Compliance Branch, at the letterhead address. Ms. Haire may be contacted at (310) 590-5930, if you need her assistance.

If you have any questions, please contact Mr. Eduardo Vallesteros of my staff at (310) 590-4876.

Sincerely,


Mohinder S. Sandhu, P.E., Chief
Facility Permitting Branch

cc: Ms. Paula Bisson
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cc: Ms. Karen Baker, Unit Chief
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Mr. Joe Medina
Southern Area Superintendent
Pacific Gas & Electric Company
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San Francisco, California 94177

Certified Mail
Z 091 901 208
Return Receipt Requested

HAZARDOUS WASTE MANAGEMENT PROGRAM
MANAGEMENT MEMO

RECEIVED

MANAGEMENT MEMO #EO-93-008-MM

TITLE: GENERATOR ACCUMULATION AND FACILITY STORAGE ACTIVITIES

PROGRAM MANAGEMENT MANUAL VOLUME: Permits
Surveillance and Enforcement

SUBJECT CATEGORY(IES): Storage; Generators; Containers; Tanks;
Treatment

AFFECTED PROGRAMS: Facility Permitting; Surveillance & Enforcement

ISSUE:

The purpose of this management memo is to clarify a number of questions that have been raised relating to hazardous waste accumulation and storage activities at generator sites and at authorized storage facilities.

When a grant of authorization from the Department is required to hold hazardous waste, those holding activities are referred to as "storage". Those hazardous waste holding activities that do not require a grant of authorization are referred to as "accumulation", and are limited to the holding of waste onsite by the generator of the waste. There are two levels of regulation governing hazardous waste accumulation activities: "satellite" accumulation and "90-day" accumulation.

The BACKGROUND section of this management memo begins with a summary of the statutory and regulatory provisions that govern which hazardous waste holding activities require a grant of authorization and those which do not. This is followed by a step-by-step discussion of how to determine which storage or accumulation requirements apply to a given hazardous waste holding activity. The ACTION section of the management memo addresses a number of questions and issues that have been raised regarding hazardous waste accumulation and storage requirements.

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5,000 gallon per-tank/container or 50,000 gallon per-site limits. "Free liquids" is defined in 22 CCR section 66260.10.

3. APPLICATION OF THE 5,000/50,000 GALLON LIMITS TO "TANKS" AND "CONTAINERS"

A generator may accumulate an aggregate of no more than 50,000 gallons in all tanks (stationary and portable) at the generator site; and no more than 50,000 gallons in all containers at the generator site. The definitions for "stationary tank", "portable tank" and "container", specified in section A. above, should be used for purposes of applying these two separate 50,000 gallon limits. These two per-site accumulation limits apply to all hazardous waste containing free liquids accumulated in all 90-day accumulation containers or tanks at the generator site (i.e., all generator accumulation activities that are: (a) located on contiguous property, meeting the definition of "onsite", and (b) not covered under a grant of authorization or the "satellite" accumulation exemption).

The 5,000 gallon limit applies to all receptacles meeting the definition of tank or container, that are used to accumulate hazardous waste containing free liquids at the generator site without a grant of authorization for storage.

Hazardous waste held in "portable tanks" meeting the definition in 22 CCR, section 66262.34 (d) (2) and satisfying one of the following conditions is not included in determining whether a generator has exceeded the 5,000 gallon or 50,000 gallon limits:

- Portable tanks used to accumulate hazardous waste generated from onsite maintenance activities that occur less frequently than annually;
- Portable tanks used for no more than 60 consecutive calendar days to accumulate hazardous waste onsite.

NOTE: The applicable statutes and regulations do not specify how often the portable tank can be used for this 60-day accumulation activity. However, the legislative intent appears to have been to exclude these tanks from the 5,000 and 50,000 gallon limits because they are used for temporary, infrequent and short-lived hazardous waste accumulation activities. This legislative intent should be applied in determining if a particular tank qualifies for this exclusion from the 5,000 and 50,000 gallon limits.

4. USE OF TANKS/CONTAINERS LARGER THAN 5,000 GALLONS

Generator accumulation tanks and containers with a capacity of more than 5,000 gallons may be used to accumulate up to 5,000 gallons under the "90-day accumulation rules" if control devices are installed and waste input and output records are maintained to ensure to the Department's satisfaction that the 5,000 gallon limit is not exceeded. Examples of control devices that might be used for this purpose are level measuring instruments and alarms, cutoff valves and overflow mechanisms. If the volume of waste in the tank/container exceeds 5,000 gallons at any time, a grant of authorization is required for the tank/container. ✓

NOTE: Similarly, authorized storage facilities may replace tanks described in the original grant of authorization with larger tanks without a modification, if control devices and recordkeeping practices are used to ensure to the Department's satisfaction that the tank volume limit specified in the grant of authorization is not exceeded.

5. STORAGE IN EXCESS OF THE ACCUMULATION QUANTITY LIMITS

- (a) Onsite storage of RCRA and non-RCRA wastes in excess of the 5,000 or 50,000 gallon limits for no more than 90 days is proposed for inclusion in the permit-by-rule (PBR) program. Therefore, pending adoption of new PBR regulations, the regulation of these storage activities will be addressed in the same manner as for other potential PBR activities. ✓
- (b) When a generator's accumulation volume exceeds one or both of the 50,000 gallon per-site limits for hazardous waste containing free liquids, the generator must obtain an applicable grant of authorization. However, the generator is not required to include all accumulation activities in the grant of authorization. The generator may continue to accumulate hazardous waste under the "90-day rules" as long as the total volume of hazardous waste containing free liquids held at the generator site under the "90-day rules" does not exceed the 50,000 gallon per-site limits.

Likewise, when an authorized storage facility (which is also a generator) exceeds one or both of the 50,000 gallon per-site limits in its generator accumulation activities, the facility must obtain a modification, as needed, to accommodate the excess within the scope of its storage authorization. However, the facility is not required to add all of its generator accumulation activities to the grant of authorization.

Once an activity is designated as authorized storage, it must continue to be operated as such, unless/until it qualifies for generator accumulation and the facility has complied with applicable requirements for conversion to generator status for that activity. (Conversion requirements will be addressed in a separate management memo.)

E. "Satellite" Accumulation Exemption

1. QUALIFYING CRITERIA FOR "SATELLITE" ACCUMULATION EXEMPTION

In order for a generator accumulation activity to qualify for management under the "satellite accumulation rules", all of the following criteria must be satisfied:

- (a) The hazardous waste must be accumulated in containers.
- (b) The hazardous waste must be accumulated "at the initial accumulation point", which must be "at or near the area where the waste is generated".

The term "at or near" means that the process generating the waste and the "satellite" accumulation point must be in the same or adjacent room or work area. ✓

The term "initial accumulation point" means that there cannot be any interim accumulation of the waste prior to its being accumulated at the "satellite" accumulation point. However, certain generating activities (for example, equipment maintenance) may necessitate the temporary interim accumulation of the waste during the process of performing such activities. Such temporary interim storage will not disallow "satellite" accumulation of the waste, if the interim accumulation is necessary to the generating activity and if the waste is placed in the "satellite" accumulation area prior to the end of the work shift of the person generating the waste. ✓

Residuals from the treatment of onsite waste may not be accumulated under the "satellite" accumulation exemption. (The waste treatment process is not the process generating the waste, and the accumulation of the waste subsequent to treatment does not qualify as "initial accumulation".) ✓

- (c) "The initial accumulation point" must be "under the control of the operator of the process generating the waste".