

ADEM



ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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ONIS "TREY" GLENN, III, P.E.

DIRECTOR

BOB RILEY

GOVERNOR

March 28, 2005

Certified Mail 7004 2510 0002 3291 0116

Return Receipt Requested

Timothy K. Garrett
PMCSO-ANCDF FO
ANCDF Field Office
3580 Morrisville Road
Anniston, AL 36201

Facsimiles: (334)

Administration: 271-7950
General Counsel: 394-4332
Communication: 394-4383
Air: 279-3044
Land: 279-3050
Water: 279-3051
Groundwater: 270-5631
Field Operations: 272-8131
Laboratory: 277-6718
Mining: 394-4326

Certified Mail 7004 2510 0002 3291 0123

Return Receipt Requested

Robert C. Love
Westinghouse Anniston
ANCDF Field Office
3580 Morrisville Road
Anniston, AL 36201

Dear Mr. Garrett and Mr. Love:

Enclosed please find Consent Order No. 05-061-CHW which requires you to take certain actions in regard to alleged violations of the Alabama Hazardous Waste Management and Minimization Act. This Order has been issued with your consent and is final and not appealable.

Should you have any questions concerning this matter please call Mr. Ronald T. Shell at (334) 271-7748.

Sincerely,

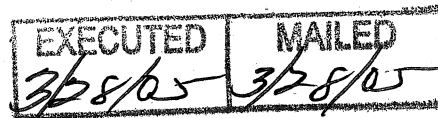
Wm. Gerald Hardy, Chief
Land Division

WGH:RTS:mal

Enclosure

cc: Col. Alexander B. Raulerson

File: Anniston Army Depot (Calhoun County)/ AL3 210 020 027/ Hazardous Waste/ Correspondence



Birmingham Branch
110 Vulcan Road
Birmingham, Alabama 35209-4702
(205) 942-6168
(205) 941-1603 [Fax]

Decatur Branch
2715 Sandlin Road, S.W.
Decatur, Alabama 35603-1333
(256) 353-1713
(256) 340-9359 [Fax]

Mobile Branch
2204 Perimeter Road
Mobile, Alabama 36615-1131
(251) 450-3400
(251) 479-2593 [Fax]

Mobile - Coastal
4171 Commanders Drive
Mobile, Alabama 36615-1421
(251) 432-6533
(251) 432-6598 [Fax]



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**ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

IN THE MATTER OF

**UNITED STATES DEPARTMENT OF THE ARMY
U S ARMY CHEMICAL MATERIALS AGENCY
ANNISTON CHEMICAL AGENT DISPOSAL FACILITY FIELD
OFFICE (ANCDF SITE)
3580 MORRISVILLE ROAD
ANNISTON, ALABAMA 36201**

**WESTINGHOUSE GOVERNMENTAL ENVIRONMENTAL
SERVICES COMPANY LLC
WESTINGHOUSE ANNISTON
ANCDF FIELD OFFICE
3580 MORRISVILLE ROAD
ANNISTON, ALABAMA 36201**

USEPA ID NUMBER AL3 210 020 027

CONSENT ORDER NO 05-061-CHW

FINDINGS

Pursuant to the provisions of the Alabama Environmental Management Act, Code of Alabama 1975, §§ 22-22A-1 through 22-22A-16, as amended, and the Alabama Hazardous Wastes Management and Minimization Act of 1978, (AHWMMA) Code of Alabama 1975, §§ 22-30-1 through 22-30-24, as amended, and the ADEM Administrative Code, promulgated thereunder, the Alabama Department of Environmental Management (hereinafter "ADEM" or "the Department") makes the following FINDINGS:

1. The U.S. Army Chemical Materials Agency, Anniston Chemical Agent Disposal Facility Field Office (Army) and Westinghouse Governmental Environmental Services Company LLC (Westinghouse) (hereinafter jointly referred to as "ANCDF") own and operate a facility at 3580 Morrisville Road, Anniston, Alabama 36201 (assigned EPA ID Number AL3 210 020 027). ANCDF's primary activities involve the treatment of chemical agent and chemical agent munitions and the storage and management of related hazardous wastes. ANCDF has an Alabama Hazardous Wastes Management and Minimization Act (AHWMMA) permit for the treatment and storage of hazardous waste.

2. The Alabama Department of Environmental Management is a duly constituted department of the state of Alabama pursuant to §§22-22A-1 through 22-22A-16, Code of Alabama 1975, as amended.

3. Pursuant to Code of Alabama (1975), § 22-22A-4(n), as amended, the Department is the state agency responsible for the promulgation and enforcement of solid and hazardous waste regulations in accordance with the federal Solid Waste Disposal Act, 42 U.S.C. 3251, et. seq. as amended, including §§ 6901 through 6992k, as amended. In addition, the Department is authorized to administer and enforce the provisions of the Alabama Hazardous Wastes Management and Minimization Act, Code of Alabama (1975), §§ 22-30-1 through 22-30-24, as amended.

4. Permit Condition I.E.8. of ANCDF's AHWMMMA Permit states that the Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit...to include following standard operation procedures.

5. Permit Condition VI.A.5/ Deactivation Furnace System GB Agent Trial Burn (DFS GB ATB) Plan (Rev. 2, August 2003) Section 1.3.8.2 states that, "A separate and additional [Depot Area Air Monitoring System] DAAMS station co-located with the sampling trains will be used during the DFS GB ATB. It [the additional DAAMS station] will operate simultaneously with the duct sampling times and will be analyzed as required to determine the [Destruction and Removal Efficiency] DRE for GB agent. The DAAMS station is located in the exhaust duct of the DFS in the same proximity as the sampling ports. The DAAMS tubes will be changed out hourly.

6. ADEM Admin. Code R. 335-14-2-.01(7)(b)(i) states that a container is empty if all wastes have been removed that can be removed using practices commonly employed to remove materials from that type container (e.g., pouring).

7. ADEM Admin. Code R. 335-14-3-.03(5)(a)3. requires containers of hazardous waste at large quantity generators such as ANCDF to be labeled "hazardous waste" and with the EPA hazardous waste number .

8. ADEM Admin. Code R. 335-14-3-.03(5)(a)2. requires containers of hazardous waste at large quantity generators such as ANCDF to be marked with the date upon which each period of accumulation begins.

9. ADEM Admin. Code R. 335-14-3-.03(5)(a)1.(i) and 335-14-6-.09(8)(c) requires a generator of hazardous waste to separate wastes from any other incompatible materials stored nearby by means of a dike, berm, wall, or other device.

10. ADEM Admin. Code R. 335-14-5-.03(2) requires a facility to be maintained and operated to minimize the possibility of a fire, explosion, or any unpermitted sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater which could threaten human health or the environment.

11. ADEM Admin. Code R. 335-14-5-.10(4)(e)1.(iii) states that the external liner systems must be free of cracks and gaps.

12. ADEM Admin. Code R. 335-14-3-.03(5)(a)1(ii) allows generators of hazardous waste to store hazardous waste in storage tanks for 90 days or less if they comply with the requirements of 335-14-6-.10, 335-14-6-.27 through 335-14-6-.29, except 335-14-6-.10(8)(e) and 335-14-6-.10(11).

13. Permit Conditions VI.B.4 and VI.D.4 require the Permittee to maintain, calibrate, and operate process monitoring, control, and recording equipment as specified in Tables 6-3, 6-11, 7-1, and 7-5 while incinerating hazardous waste in the LIC or DFS. The conditions also prohibit the Permittee from feeding hazardous waste to the LIC or DFS if any of the listed monitoring equipment fails to operate properly.

14. Proviso #15 of Air Permits 301-0050-X001 & X002 states "This source is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, found in Subpart EEE of 40 CFR Part 63."

15. 40 CFR Part 63.1209(b) states "You must use CMS (e.g., Thermocouples, pressure transducers, flow meters) to document compliance with the applicable operating parameter limits under this section."

16. 40 CFR Part 63.1206(c)(7) states "You must prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants."

17. Permit Condition VI.D.3.x and xi requires the Automatic Continuous Air Monitoring System (ACAMS) alarm for the Heated Discharge Conveyor (HDC) bin enclosure to be managed as an Automatic Waste Feed Cutoff (AWFCO).

18. ADEM conducted 24 hour/ 7 days a week monitoring of ANCDF from April 4, 2004 to June 22, 2004 to determine the facility's compliance with applicable portions of ANCDF's permit and the generator standards outlined in Division 14 of the ADEM Administrative Code. A Notice of Violation (NOV) dated August 26, 2004 was issued to ANCDF citing the following violations detected as a result of this monitoring and self-reported by ANCDF.

- A. Appendix D of ANCDF's Laboratory Analysis and Monitoring Plan (LAMP) specifies that DAAMS in the common stack, DFS Pollution Abatement System (PAS), Liquid Incinerator (LIC) PAS, Metal Parts Furnace (MPF) PAS, Pollution Abatement System Filtration System (PFS)-FILT-110, PFS-FILT-111, PFS-FILT-112, PFS-FILT-113, and PFS-FILT-209 will be changed out hourly. ANCDF informed the Department that these DAAMS were only changed every four hours from approximately February 2004 through June 12, 2004 which constitutes a violation of Permit Condition I.E.8. of ANCDF's AHWMMMA Permit. (Note: This information was self-reported by ANCDF.)
- B. During the Deactivation Furnace System GB Agent Trial Burn conducted March 27, 2004 through April 4, 2004, DAAMS tubes were not changed out hourly. They were changed once in a four-hour period which constitutes a violation of Permit Condition VI.A.5/ Deactivation Furnace System GB Agent Trial Burn Plan (Rev. 2, August 2003) Section 1.3.8.2.
- C. On May 7, 2004, HDC bin 118, which was being managed as an empty container, was inspected. The bin contained a cylindrical metal object believed to be a piece of an M-55 rocket. The bin also contained several chunks of white chalky material, and numerous strands of fiber. None of the objects were annealed to the bin. The bin had been "emptied" on April 26, 2004. The bin was taken to the RHA and the contents of the bin were dumped into a roll-off and handled as hazardous waste. HDC bin 118 contained hazardous waste but was not labeled "hazardous waste" and with the EPA hazardous waste number as required by ADEM Admin. Code R. 335-14-3-.03(5)(a)3., or marked with the date upon which each period of accumulation begins as required by ADEM Admin. Code R. 335-14-3-.03(5)(a)2.

- D. On June 5, 2004, a 55-gallon plastic drum of D002 hazardous waste with a basic pH was located on the same pallet as a 3-gallon pail of D002 hazardous waste with an acidic pH. The failure to separate incompatible containers of hazardous waste is a violation of ADEM Admin. Code R. 335-14-3-.03(5)(a)1.(i) and 335-14-6-.09(8)(c).
- E. During the monitoring period of June 3-5, 2004, liquid from the dirty loop of the DFS PAS was leaking onto the concrete floor of the PAS from a broken O-ring in a strainer. The liquid had white residue at its edges. Several cracks were in the concrete floor over which the liquid was flowing. On June 5, 2004, the remaining liquid in the dirty loop of the DFS PAS was removed by allowing it to flow across the same area of the floor, and was managed as a hazardous waste. Even if the floor of the PAS did not contain cracks, it would not be an acceptable conveyance for hazardous waste. The possibility that contaminants may have seeped through the cracks to the underlying soil constitutes a violation of ADEM Admin. Code R. 335-14-5-.03(2).
- F. During the monitoring period June 3-5, 2004, an examination of the secondary containment liner for the brine storage tanks revealed chips/cracks in the sealant. This constitutes a violation of ADEM Admin. Code R. 335-14-5-.10(4)(e)1.(iii).
- G. On June 5, 2004, the ADEM representative at ANCDF observed brine being emptied onto the floor of the PAS during a shutdown. The brine waste was placed in the Recovered Water Tank and some was subsequently pumped out to the brine tanks as a hazardous waste using a temporary piping configuration (TCC-04080). This use of the Recovered Water Tank for hazardous waste storage makes the tank regulated under Permit Condition I.A. and ADEM Admin. Code R. 335-14-3-.03(5)(a)1(ii). ANCDF was not adhering to the requirements of ADEM Admin. Code R. 335-14-3-.03(5)(a)1(ii) for the Recovered Water Tank after the hazardous brine waste was placed in it for storage.
- H. (1.) On June 22, 2004, ANCDF notified the Department that LIC instrument DIT-835; a brine density-indicating transmitter associated with LIC AWFCO #19, had been replaced, but Spent Decontamination Solution (SDS) was fed to the LIC prior to the instrument being fully calibrated. (Note: This information was self-reported by ANCDF.)

(2.) On June 19, 2004, ANCDF notified the Department that FIT 030 associated with DFS AWFCO #17 had been replaced and partially calibrated, but before it was zeroed, strainer socks, a hazardous waste, had been burned in the DFS. (Note: This information was self-reported by ANCDF.)

Permit Conditions VI.B.4 and VI.D.4 require the Permittee to maintain, calibrate, and operate process monitoring, control, and recording equipment as specified in Tables 6-3, 6-11, 7-1, and 7-5 while incinerating hazardous waste in the LIC or DFS. The conditions also prohibit the Permittee from feeding hazardous waste to the LIC or DFS if any of the listed monitoring equipment fails to operate properly. Proviso #15 of Air Permits 301-0050-X001 & X002 states "This source is subject to the applicable requirements of the National Emission Standards for Hazardous Air Pollutants from Hazardous Waste Combustors, found in Subpart EEE of 40 CFR Part 63."

40 CFR Part 63.1209(b) states "You must use CMS (e.g., Thermocouples, pressure transducers, flow meters) to document compliance with the applicable operating parameter limits under this section."

40 CFR Part 63.1206(c)(7) states "You must prepare and at all times operate according to an operation and maintenance plan that describes in detail procedures for operation, inspection, maintenance, and corrective measures for all components of the combustor, including associated pollution control equipment, that could affect emissions of regulated hazardous air pollutants."

The Department reviewed the equipment calibration procedures and determined that ANCDF did not follow the proper procedures for placing the CMS equipment back into service. By failing to follow the "CMS" and "Operation and Maintenance Plans", ANCDF violated the proviso listed above for Air Permits X001 & X002 and the requirements as cited in 40 CFR Part 63, Subpart EEE.

- I. On July 29, 2004, ANCDF notified the Department that from May 24, 2004 until July 22, 2004 the ACAMS alarm for the Heated Discharge Conveyor bin enclosure was not being managed as an AWFCO as required by Permit Condition VI.D.3.x and xi. (Note: This information was self-reported by ANCDF.)

19. The assessment of civil penalties for violations of the Department's rules and regulations, and for violations of any order, permit condition, license, certification or variance issued by the Department is authorized by Code of Alabama 1975, § 22-22A-5(18), as amended. The statute also authorizes that the penalty amount may range from \$100

to \$25,000 per day for each violation, so long as the penalty amount does not exceed \$250,000 in any given order. Each day a violation continues constitutes a separate violation. In addition to the foregoing "findings", the Department has considered the factors detailed in the aforementioned statute in determining the appropriate penalty amount in this particular instance. Those factors are listed as follows:

- A. The seriousness of the violation, including any irreparable harm to the environment and any threat to the health or safety of the public;
- B. The standard of care manifested by the Owner;
- C. The economic benefit which delayed compliance may have conferred upon the Owner;
- D. The nature, extent, and degree of success of the Owner's efforts to minimize or mitigate the effects of such violations upon the environment;
- E. The Owner's history of previous violations; and
- F. The Owner's ability to pay the assessed penalty.

20. ANCDF neither agrees nor disagrees with the Findings presented in this Consent Order, but, in an effort to cooperate with ADEM and to comply with the provisions of the Alabama Hazardous Wastes Management and Minimization Act, has consented to the terms of this Consent Order

21. ADEM has agreed to the terms of this Consent Order in order to resolve the violations cited in this Consent Order, and ADEM has determined that the terms contemplated in this Consent Order are in the best interests of the citizens of Alabama.

ORDER

Based on the foregoing FINDINGS and pursuant to Code of Alabama 1975, §§ 22-22A-5(10), 22-22A-5(18), 22-30-20 and 22-30-19(a) and (b), as amended, it is hereby Ordered:

A. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will comply with all standard operating procedures including ANCDF's Laboratory Analysis and Monitoring Plan as required by Permit Condition I.E.8. of ANCDF's AHWMMMA Permit.

B. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will comply with all provisions of agent trial burn plans as required in applicable sections of ANCDF's AHWMMMA Permit.

C. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will label containers of hazardous waste with the words "hazardous waste" and with the EPA hazardous waste number as required by ADEM Admin. Code R. 335-14-3-.03(5)(a)3., and mark them with the date upon which each period of accumulation begins as required by ADEM Admin. Code R. 335-14-3-.03(5)(a)2.

D. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will separate incompatible containers of hazardous waste as required by Permit Condition IX. I Special Requirements for Incompatible Waste, Permit Condition E3 of Part 1 of Attachment 3, and ADEM Admin. Code R.335-14-5-.09(8)(a)(b)&(c).

E. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will not use floors as conveyances for hazardous waste unless they are under engineering controls and the floor has no cracks, gaps, chips, etc. and has an impermeable coating that is compatible with the waste (e.g., the floors in the Explosive Containment Rooms).

F. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will maintain all secondary containment liners for hazardous waste storage tanks so they are free of cracks and gaps as required by ADEM Admin. Code R. 335-14-5-.10(4)(e)(iii).

G. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will maintain, calibrate, and operate process monitoring, control, and recording equipment as specified in Tables 6-3, 6-11, 7-1, and 7-5 while incinerating hazardous waste in the LIC or DFS as required by Permit Conditions VI.B.4 and VI.D.4. Additionally, ANCDF will follow the "CMS" and "Operation and Maintenance Plans" and the proper procedures for placing the CMS equipment back into service as required by Proviso #15 of Air Permits 301-0050-X001 & X002 and the requirements as cited in 40 CFR Part 63, Subpart EEE.

H. That, immediately upon receipt of this Order and continuing each and every day thereafter, ANCDF will manage the ACAMS alarm for the Heated Discharge Conveyor bin enclosure as required by Permit Condition VI.D.3.x and xi.

I. That unless ANCDF chooses and fulfills the requirements of the alternative payment method below which requires implementation of the Supplemental Environmental Project (SEP), ANCDF shall pay to the Department a civil penalty in the amount of seven thousand five hundred dollars (\$7,500.00) not later than forty-five (45) days after the effective date of this Consent Order. The Army and Westinghouse have agreed that any fine or SEP relating to this Consent Order will be paid by Westinghouse. Notwithstanding this agreement, ADEM reserves the right to hold the Army and Westinghouse jointly and severally liable to pay the aforementioned civil penalty or implement an approved SEP.

J. Alternatively, within forty-five days after the effective date of this Consent Order, ANCDF shall submit a SEP for approval by the Department. The SEP proposal shall contain a detailed chronological list of the steps to be taken to complete each task outlined in the SEP, and the estimated cost of each step. Within the time frames set forth in the approved SEP, ANCDF shall complete all actions described in the SEP. If the SEP is implemented, ANCDF shall submit monthly status reports to ADEM documenting monthly accomplishments and actual implementation costs. The SEP may, at the sole discretion of ADEM, offset a portion of the penalty at a ratio of \$1 of penalty for every \$3 spent on the SEP. Adequate documentation of all such expenses shall be submitted to ADEM for review and concurrence in determining the amount of the penalty to be offset no later than 30 days after the approved completion date of the SEP or the completion of the SEP, whichever is earlier. Routine operating costs (i.e., those costs which would normally be incurred by ANCDF absent the requirements of this SEP) and costs related to routine compliance requirements, including the cost of complying with the requirements of paragraphs A through H above, shall not be considered for penalty offset. Should ANCDF not offset the total amount of the penalty, the remaining amount of the penalty required in paragraph I above which is not offset shall be due and payable within 30 days of ADEM's notifying ANCDF of the remaining amount of penalty due to be paid. Nothing in this Consent Order shall be interpreted to require obligations or payments by the United States Army in violation of the Anti-Deficiency Act, 31 U.S.C. Section 1341. K. That all penalties due pursuant to this Order shall be made payable to the Alabama Department of Environmental Management by certified or cashier's check or electronic funds transfer and shall be remitted to:

Office of General Counsel
Alabama Department of Environmental Management
P.O. Box 301463

All checks and related correspondence shall reference the Owner's name and address, and the ADEM Consent Order number of this action.

L. That this Consent Order shall apply to and be binding upon both parties, their directors, officers, and all persons or entities acting under or for them. Each signatory to this Consent Order certifies that he or she is fully authorized by the party he or she represents to enter into the terms and conditions of this Consent Order, to execute the Consent Order on behalf of the party represented, and to legally bind such party.

M. That, subject to the terms of these presents and subject to provisions otherwise provided by statute, this Consent Order is intended to operate as a full resolution of the violations which are cited in this Consent Order.

N. That ANCDF is not relieved from any liability if it fails to comply with any provision of this Consent Order.

O. That, for purposes of this Consent Order only, ANCDF agrees that ADEM may properly bring an action to compel compliance with the terms and conditions contained herein in a court of competent jurisdiction, including, but not limited to, Montgomery County Circuit Court. ADEM recognizes that the Army has statutory rights of removal to another forum. ANCDF also agrees that in any action brought by ADEM to compel compliance with the terms of this Agreement, ANCDF shall be limited to the defenses of *Force Majeure*, compliance with this Agreement, and physical impossibility. A *Force Majeure* is defined as any event arising from causes that are not foreseeable and are beyond the reasonable control of ANCDF, including its contractors and consultants, which could not be overcome by due diligence (i.e., causes which could have been overcome or avoided by the exercise of due diligence will not be considered to be beyond the reasonable control of ANCDF and which delays or prevents performances by a date required by the Consent Order. Events such as unanticipated or increased costs of performance, changed economic circumstances, normal precipitation events, or failure to obtain federal, state or local permits shall not constitute *Force Majeure*. Any request for a modification of a deadline must be accompanied by the reasons (including documentation) for each extension and the proposed extension time. This information shall be submitted to ADEM a minimum of 15 days prior to the original anticipated completion date. If ADEM, after review of the extension request, finds the work was delayed because of

conditions beyond the control and without the fault of ANCDF, ADEM may extend the time as justified by the specific circumstances.

P. That the sole purpose of this Consent Order is to resolve and dispose of all allegations and contentions stated herein concerning the factual circumstances referenced herein. Should additional facts and circumstances be discovered in the future concerning the facility which would constitute possible violations not addressed in this Consent Order, then such future violations shall be addressed in Orders as may be issued by the Director, litigation initiated by ADEM, or such other enforcement action as may be appropriate, and ANCDF shall not object to such future orders, litigation, or enforcement action based on the issuance of this Consent Order if future Orders, litigation or other enforcement action address new matters not raised in this Consent Order.

Q. That, by agreement of the parties, this Consent Order shall be considered final and effective immediately upon signature of all parties. This Consent Order shall not be appealable, and ANCDF does hereby waive any hearing on the terms and conditions of same.

Executed in duplicate with each part being an original.


UNITED STATES DEPARTMENT OF THE ARMY
US ARMY CHEMICAL MATERIALS AGENCY
(formerly PMCD)


TIMOTHY K. GARRETT

ANCDF Site Project Manager
(Title of Authorized Representative)

Date Signed: 14 January 2005

WESTINGHOUSE GOVERNMENTAL
ENVIRONMENTAL SERVICES COMPANY LLC

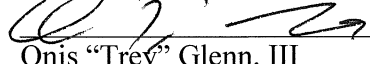

(Name of Authorized Representative) R.C. Love

Project Manager, Westinghouse Amniston
(Title of Authorized Representative)

Date Signed: 1/18/05

ALABAMA DEPARTMENT OF

ENVIRONMENTAL MANAGEMENT


Onis "Trey" Glenn, III
Director

Date Signed: 3-28-05