TANK SYSTEM DESIGN ASSESSMENT REPORT FOR FAC POND 5 TANK T-9001

[NOTE: To be added to the Permit in its entirety]

Tank System Design and Assessment Report for Fac Pond 5 Tank T-9001



CWM Chemical Services, LLC Model City, New York

> April 2013 (Revised August 2013) (Revised November 2013)

> > Prepared by

EnSol. Inc. Environmental Solutions

EnSol, Inc. Environmental Solutions

Professional Engineering • Business Consulting

Ph (716) 285-3920 • Fx (716) 285-3928 E-Mail bshiah@ensolinc.com

Transmitted Via Electronic Mail and Hand Delivery

November 7, 2013

Mr. Stephen Rydzyk Maintenance Manager / Engineer CWM Chemical Services, LLC 1550 Balmer Road, P.O. Box 200 Model City, New York 14107

 Re: Tank System Design and Assessment Report for Fac Pond 5 Tank T-9001 Model City, New York EnSol Project #: 13-7006

Dear Mr. Rydzyk:

Enclosed please find two copies of the Final Report titled, *Tank System Design and Assessment Report for Fac Pond 5 Tank T-9001* dated April 2013 (revised August 2013 and November 2013), as prepared by EnSol, Inc. (EnSol). This report is provided to present applicable design and construction information for the proposed Tank T-9001 system, as described herein, to allow for storage of collected water from the secondary containment system of proposed Fac Pond 5.

The report includes an assessment and review of the structural integrity of the proposed tank system and compatibility of the materials of construction with the material expected to be handled. This assessment is intended to satisfy the State and Federal Regulations listed under 6 NYCRR Part 373-2.10(c), and 40 CFR 264.192, respectively, with regards to design and installation of new tank systems or components.

The intent of this report is to provide sufficient information to the New York State Department of Environmental Conservation (NYSDEC) for review of the proposed system design and usage, and for subsequent approval to construct and operate the tank system.

If you have any questions or require additional information, please contact me at (716) 285-3920, ext. 212.

Sincerely,

ENSOL, INC.

Bron Shing

Brian D. Shiah, P.E. President

Enclosures

Tank System Design and Assessment Report for Fac Pond 5 Tank T-9001



CWM Chemical Services, LLC Model City, New York

April 2013 (Revised August 2013) (Revised November 2013)

> Prepared by EnSol, Inc. 661 Main Street Niagara Falls, New York 14301

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1. Introduction

1.1 General Site Information

CWM Chemical Services, LLC (CWM) owns and operates a commercial hazardous waste treatment, storage, and disposal facility (TSDF) in Model City, Niagara County, New York. This TSDF began operating in 1972 as ChemTrol Pollution Services, Inc. Due to corporate acquisitions and name changes, CWM, a subsidiary of Waste Management, Inc., is the present owner and operator of the facility. Waste Management, Inc. is based in Houston, Texas.

The facility is located on Balmer Road in Model City, New York, approximately 1.9 miles east of New York State Route 18 (Creek Road), and occupies land in the towns of Lewiston and Porter. A Regional Location Map and Facility Location Detail are presented in Figures 1 and 2, respectively. All existing waste management units on the site are located within the Town of Porter. The contiguous property along Balmer Road is also the location of offices for the Administrative, Sales and Marketing, Data Processing, Accounting, Environmental, and Engineering Departments.

The CWM Model City facility is permitted as a TSDF under the Resource Conservation and Recovery Act (RCRA). Numerous units at the site are used to store, treat, and dispose of a variety of liquid and solid organic and inorganic hazardous wastes. Storage, treatment, and disposal capabilities include an Aqueous Wastewater Treatment System (AWTS) utilizing chemical, physical, and biological treatment processes from which treated wastewater is discharged to the Niagara River in accordance with the facility's State Pollutant Discharge Elimination System (SPDES) Permit; secure landfilling of approved waste solids and semisolids, including polychlorinated biphenyls (PCBs); waste stabilization; container and tank storage; transformer decommissioning; and PCB treatment and storage. Figure 3 presents a Facility Layout Plan.

1.2 **Project Purpose and Objective**

The purpose of this report is to present applicable design and construction information for the proposed Fac Pond 5 secondary containment storage tank (SCS Tank), and to document the results of an assessment conducted by EnSol, Inc. (EnSol) for this tank system. The proposed SCS Tank is a double walled premanufactured High Density Linear Polyethylene (HDLPE) storage tank, to be located in the Fac Pond Riser House at Fac Pond 5. Fac Pond 5 will be a newly constructed surface impoundment constructed with a double liner system. This will include leachate collection and removal system between such liners. Any liquids that reach the secondary containment will drain to a low point or sump and be pumped into the proposed SCS Tank. The SCS Tank will be housed within a Riser House at the top of the perimeter embankment of the fac pond. The proposed tank will be known as T-9001. It is intended that this report be used by CWM to aid in obtaining an approval from the New York State Department of Environmental Conservation (NYSDEC) as per 6 NYCRR 373-2.10(c) to install the tank, piping, and appurtenances, and to operate the SCS Tank system for the purpose stated above.

The objective of the assessment is to satisfy the applicable State and Federal Regulations for the installation of new tank systems as required by CWM's Sitewide Part 373 Permit #9-2934-020022/00097. As required by 6 NYCRR 373-2.10(c)(1), the owner or operator of a new tank system must obtain and submit to the NYSDEC a written assessment attesting that the tank system has sufficient structural integrity and is acceptable for storing hazardous waste.

The following information is included in this report for the proposed SCS Tank system: location, configuration, design parameters, operating procedures, materials of construction, provisions for secondary containment and leak detection, and the results of EnSol's assessment.

1.3 Tank Inspection/Assessment Requirements and Guidelines

An assessment of the subject tank system is required by State and Federal Regulations listed under 6 NYCRR 373-2.10(c) and 40 CFR 264.192, respectively, pertaining to Hazardous Waste Management Facilities. These regulations identify the assessment requirements to be met and associated activities to be performed related to the design and installation of new tank systems or components. The assessment procedure also requires an evaluation of the system design, as it pertains to the containment and detection of releases, in accordance with State and Federal Regulations listed under 6 NYCRR 373-2.10(d) and 40 CFR 264.193, respectively. Additional site-specific permit requirements may also be developed between the owner and the regulatory agencies, such as the CWM Tank and Sump Assessment Schedule included in CWM's Sitewide Permit.

In addition to general regulations and/or site-specific permit requirements, there are several recommended or applicable guidance documents pertaining to tank inspections, assessments, and design. EnSol personnel have used the primary guidance documents referenced below to conduct previous site inspections, assessments, and designs for tank systems, and to aid in the design and assessment contained herein.

- i. *Guide for Inspection of Refinery Equipment, Chapter XIII, Atmospheric and Low Pressure Storage Tanks*, American Petroleum Institute (API) publication, 4th edition, 1991.
- ii. *Tank Inspection, Repair, Alteration, and Reconstruction*, API Standard 653, 3rd Edition, December 2001.
- iii. *Requirements for Tank and Container Storage*, NYSDEC, Technical and Administrative Guidance Memorandum No. 3019, April 23, 1991.
- iv. *Concrete Secondary Containment for Tank and Container Storage*, NYSDEC, Technical and Administrative Guidance Memorandum No. 3021, March 11, 1991.
- v. Chemical Plant and Petroleum Refinery Piping, American Society of Mechanical Engineers (ASME) Standard B31.3-1990

2. Tank Location and Description

2.1 Location

The SCS Tank will be located in the proposed Fac Pond Riser House located along the perimeter berm of Fac Pond 5. Fac Pond 5 will be constructed new as part of the RMU-2 development project. Fac Pond 5 will be located between closed landfills SLF 12 and SLF 7 to the north of the existing Leachate Tank Farm. The location of the fac pond is shown on the set of design drawings by Arcadis included in Appendix A.

2.2 Dimensions and Capacity

The SCS Tank will be a single chamber, dual walled, cylindrical vessel with a flat bottom and a flat roof, with exterior dimensions of 6 feet - 4 inches diameter x 8 feet - 10 inches high. The design capacity of the tank is 1,100 gallons.

2.3 Structural Support and Foundation

The tank will be a free standing flat bottomed tank which will be supported by a 6-inch thick reinforced concrete slab system within the Riser House. The concrete slab will be underlain with a minimum 6-inch thick layer of compacted stone. The tank will not require additional supports or tie-downs as it will not be subject to any wind, snow, significant seismic, or other external loads, however, as an added measure, tie-downs will be included to anchor the tank to the Riser House floor slab using the manufacturer provided cable restraint system or an or-equal approved system.

2.4 Materials of Construction

The SCS Tank is a 1,100 gallon High Density Linear Polyethylene (HDLPE) tank manufactured by Snyder Industries, Inc. The design shell thickness will be a minimum 0.187 inches (3/16 inch). Refer to Appendix B for additional design and construction specifications and manufacturers information.

2.5 Miscellaneous Attachments

As shown on the reference drawings in Appendix A, the SCS Tank will have one inlet and one outlet on the top of the tank and one top vent opening with breather valve. Nozzle diameters will all be 2-inches. The tank will also include an 18-inch top manway.

2.6 Process Description, Piping, and Pumping System

The proposed use of the SCS Tank will be for the storage of liquid generated from the secondary collection sump in Fac Pond 5. The liquid will be pumped up the 18-inch diameter HDPE sideslope riser pipe from the secondary collection sump via a submersible pump. The pump will be connected to the tank piping using a 2-inch diameter chemical flex hose. The tank will be equipped with a 2-inch diameter HDPE inlet pipe and flow meter to measure any liquid that is pumped into the tank. The tank will store the liquid until it can be pumped out of the tank via vacuum truck utilizing the 2-inch dip tube on the top of the tank. This liquid will then be transferred to the on-site AWTS for processing.

2.7 Overpressure/Vacuum and Overfill Protection

Primary overpressure/vacuum protection, under normal operating conditions (i.e., tank filling, content withdrawal, and diurnal breathing), will be provided by a 2-inch diameter pipe vent open to the atmosphere.

Overfill protection for the tank is provided by a high level float switch inside the tank. This switch will inhibit the inlet pump and signal an alarm light on the exterior of the building.

2.8 Protective Coatings

The tank is constructed of HDLPE resin and is inherently resistant to corrosion or chemical degradation by the anticipated liquids (Fac pond water) without the addition of any protective coatings. Chemical analysis of Fac Pond water was provided by CWM and is included in Appendix B. The tank will be housed within the Riser House, which is a heated structure; therefore, the tank will not require any additional external coatings to protect it from UV degradation or other environmental factors. Manufacturer's Specifications, including chemical resistance data and chart are included in Appendix B.

2.9 Secondary Containment and Leak Detection

Secondary containment for the SCS Tank is provided by a double walled tank construction. In the event of a leak from the primary tank, the liquid would be contained within the secondary tank. The tank's double walled design meets all volume requirements for secondary containment and will provide a minimum of 100% of the normal fill capacity of the primary tank.

Leak detection for the SCS Tank will be provided by an electronic moisture sensor placed within the interstitial space of the double walled tank. This sensor will activate a visible alarm (light) on the exterior of the Riser House which will be seen by visual means through daily inspection by CWM personnel. The tank sides, top, nozzles, and system piping are all visible for easy inspection. A drain valve located near the bottom of the secondary containment tank wall will also be available to check for liquids in the secondary containment area as an additional measure.

3. Assessment and Certification

EnSol conducted an assessment and review of the proposed SCS Tank system components at CWM's Model City facility in order to assess the integrity and to confirm the compatibility of the components with materials that are to be handled.

3.1 Design and Record Information

EnSol reviewed available design and record information that were provided by CWM and/or the various equipment and tank manufacturers. Information regarding design standards, materials of construction, structural supports, hazardous characteristics of the waste stream to be handled, and corrosion protection systems (internal and external) was obtained from these sources. EnSol did not perform compatibility studies or materials testing for the proposed system components, however; a close review and comparison of the system's specific materials of construction compared to available manufacturers published chemical compatibility and resistance data, tables, charts, and test results clearly indicates adequate compatibility with the materials expected to be handled and no chemical compatibility issues are expected. It is also noted that EnSol's extensive familiarity and experience with these materials (see Appendix C) in similar applications at CWM and elsewhere, combined with our knowledge of the materials/liquids expected to be handled within the Fac pond allows EnSol to judge the tank materials of construction to be compatible with the waste to be stored.

3.2 Summary and Conclusions

The SCS Tank system is to be used by CWM for the storage of liquids generated from the secondary containment sump in proposed Fac Pond 5. Chemical analysis of the Fac pond water typically handled, provided by CWM, does not contain constituents or concentrations harmful to the tank or piping systems. The proposed tank was specified and designed as a chemical-resistant tank that will provide maximum performance, within the specified limits, to contain aggressive chemicals at atmospheric pressures. The tank is expected to meet or exceed the conditions it will be exposed to.

In accordance with the requirements listed under 6 NYCRR 373-2.10(c)(2), the new tank system will be inspected by an independent, qualified, installation inspector or registered New York Professional Engineer prior to placing the system in use. During start up CWM will visually inspect the system components to insure they are free of leaks and any deficiencies immediately addressed.

The assessment for the proposed SCS Tank system, as prepared by EnSol and presented in this report, includes consideration of the proposed tank's foundation, structural supports, secondary containment, leak detection, tank design standards, proposed equipment, and existing conditions. EnSol considers each of these items to be adequately designed and/or constructed for the intended use and, where applicable, to have sufficient structural strength. Proposed materials of construction for the systems appear to be sufficiently compatible with the materials expected to be handled. Considering the proposed use and service, the proposed tank system identified herein were judged by EnSol to be adequate for its intended service, providing the tank system operating temperature and chemical exposure limitations are not exceeded.

TANK SYSTEM DESIGN AND ASSESSMENT REPORT FOR FAC POND 5 TANK T-9001

CWM Chemical Services, LLC Model City, New York Facility

CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision according to 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 the person imprisonment for knowing violations.

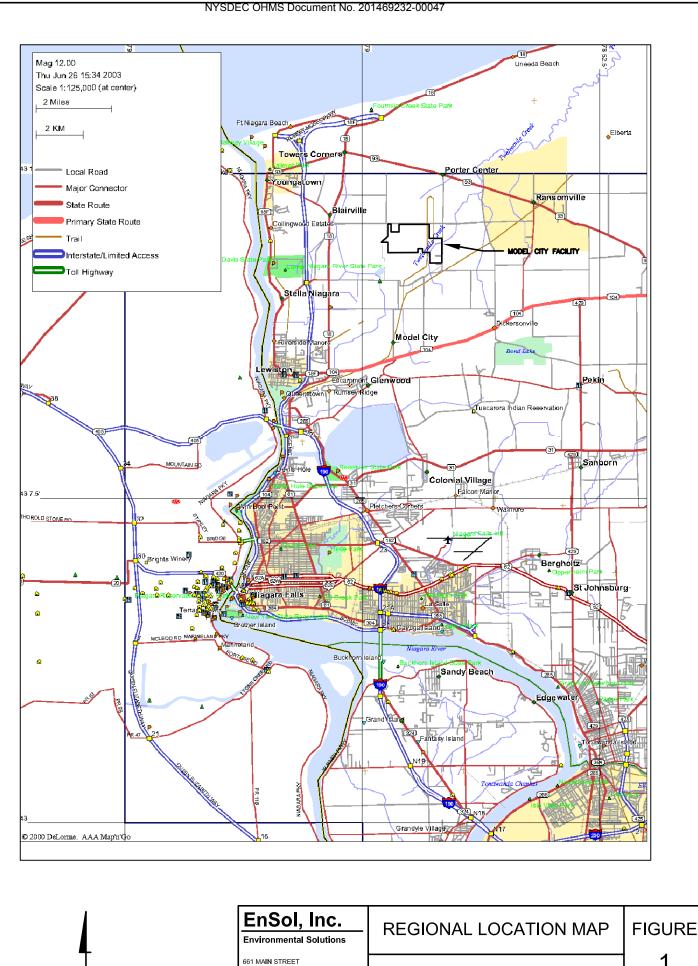


 $\frac{11/7/13}{Date}$

Brian D. Shiah, P.E. ENSOL, INC. NYSDEC OHMS Document No. 201469232-00047

Figures

EnSol, Inc.

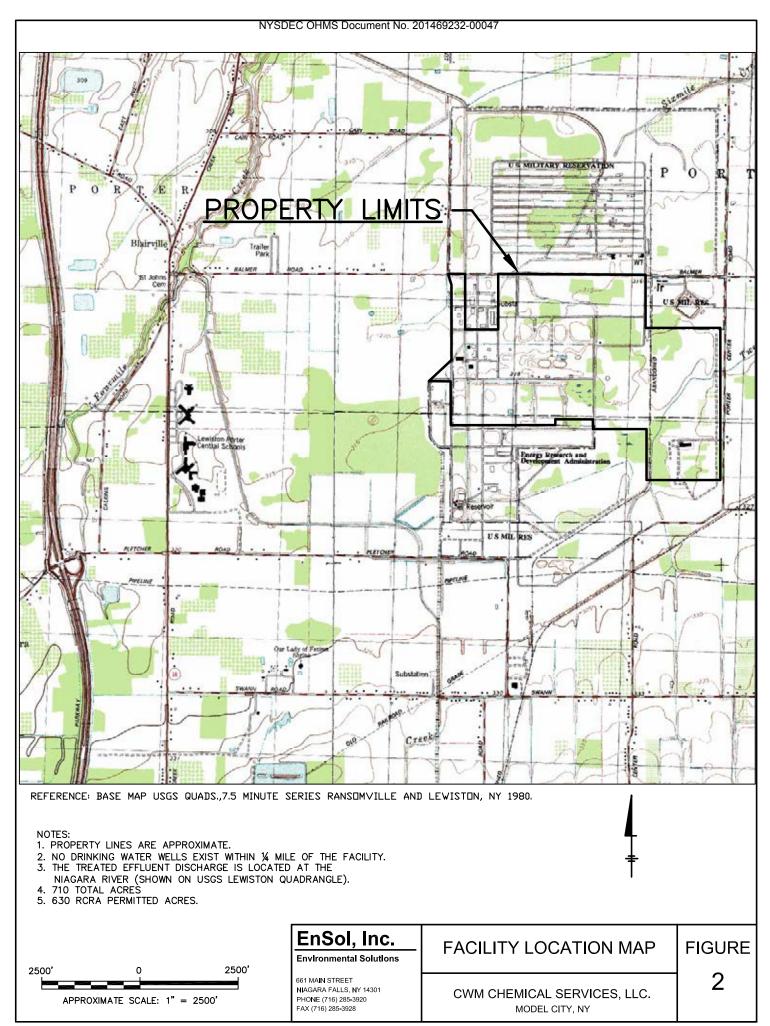


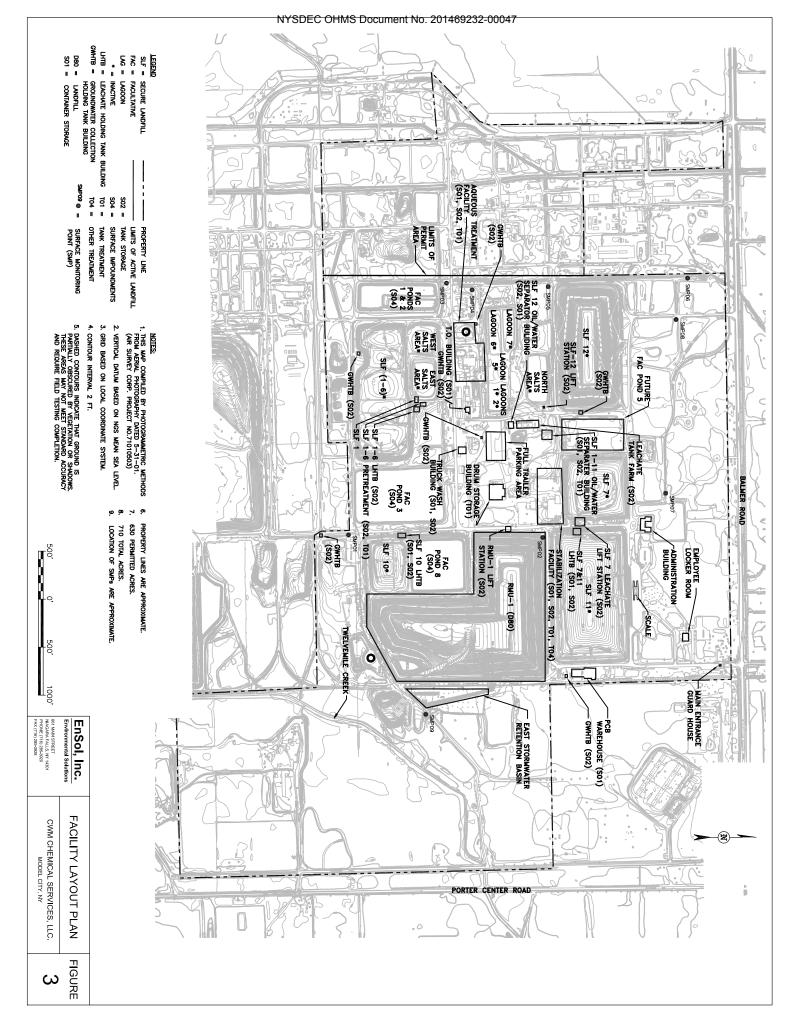
NIAGARA FALLS, NY 14301

PHONE (716) 285-3920 FAX (716) 285-3928

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CWM CHEMICAL SERVICES, LLC. MODEL CITY, NY

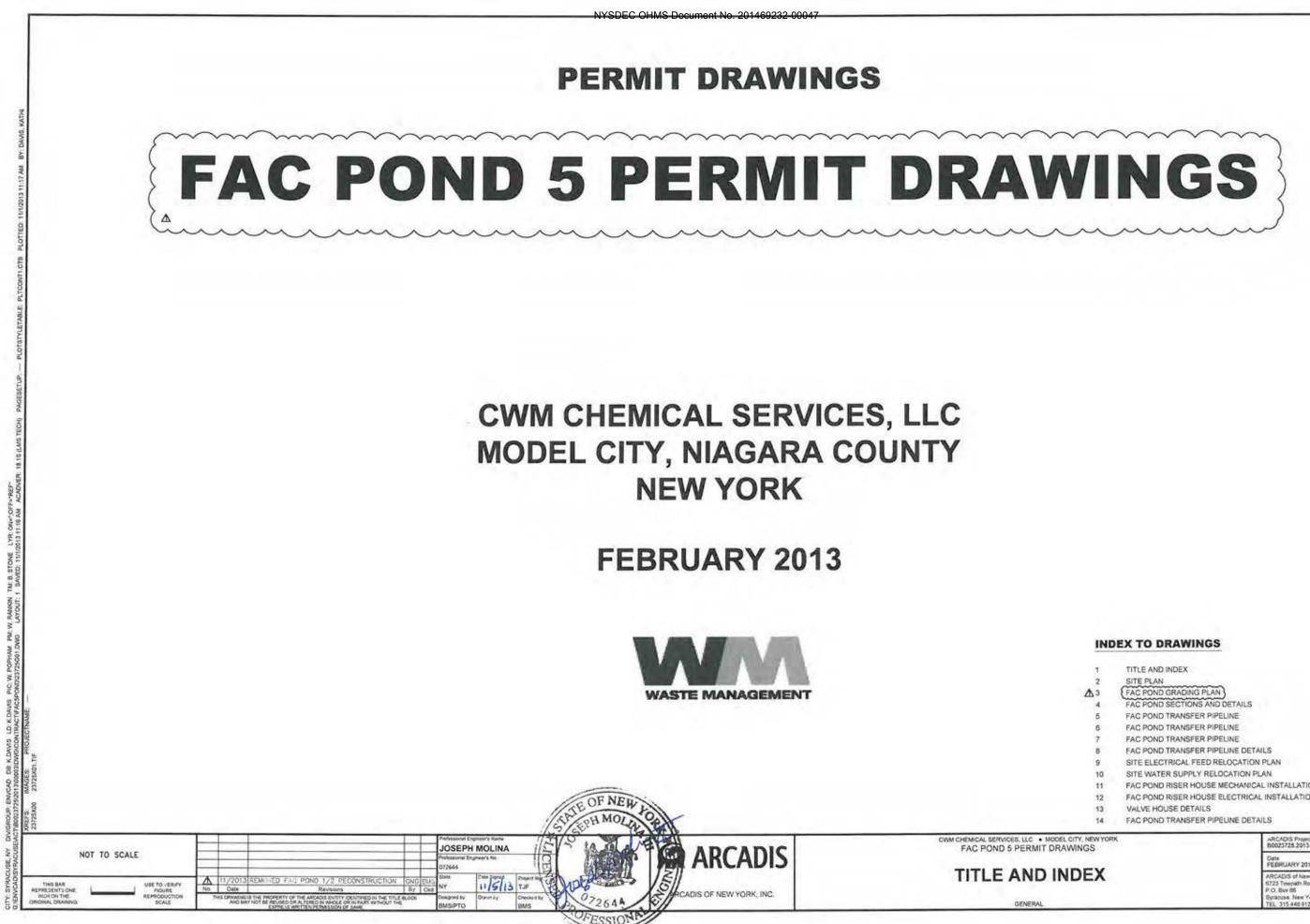




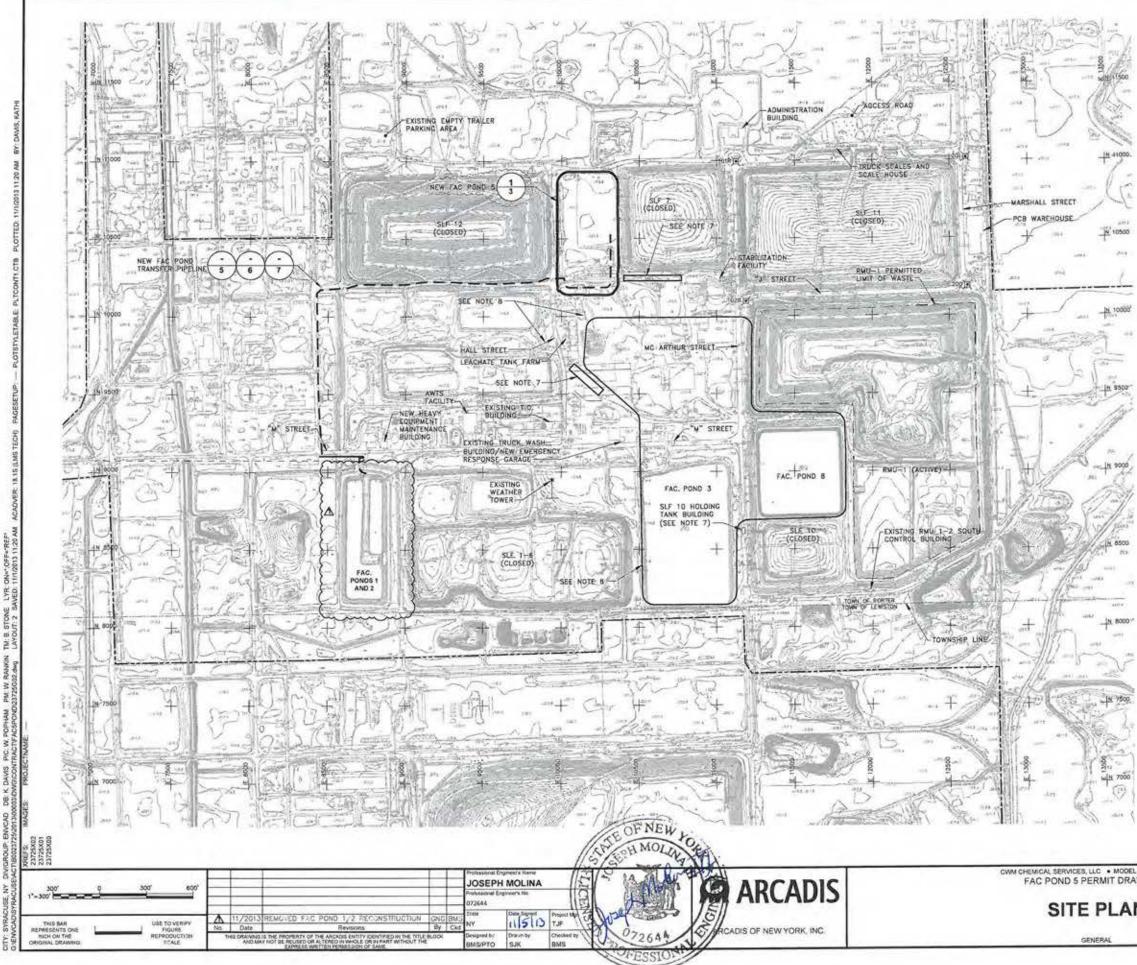
Appendix A

Proposed Fac Pond 5 Permit Drawings (Arcadis)

EnSol, Inc.



| - 2 | 1 | TITLE AND INDEX | | |
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| 3 | 2 | SITE PLAN | | |
| Δ: | 3 | FAC POND GRADING PLAN | | |
| 120 | 4 | FAC POND SECTIONS AND DETAILS | | |
| | б | FAC POND TRANSFER PIPELINE | | |
| | 6 | FAC POND TRANSFER PIPELINE | | |
| 6 | 7 | FAC POND TRANSFER PIPELINE | | |
| ģ | 8 | FAC POND TRANSFER PIPELINE DE | TAILS | |
| | 9 | SITE ELECTRICAL FEED RELOCATION | ON PLAN | |
| - i | 10 | SITE WATER SUPPLY RELOCATION | PLAN | |
| - 8 | 11 | FAC POND RISER HOUSE MECHANI | CAL INSTALLATION DETAILS | |
| 3 | 12 | FAC POND RISER HOUSE ELECTRIC | CAL INSTALLATION DETAILS | |
| | 13 | VALVE HOUSE DETAILS | | |
| 3 | 14 | FAC POND TRANSFER PIPELINE DE | TAILS | |
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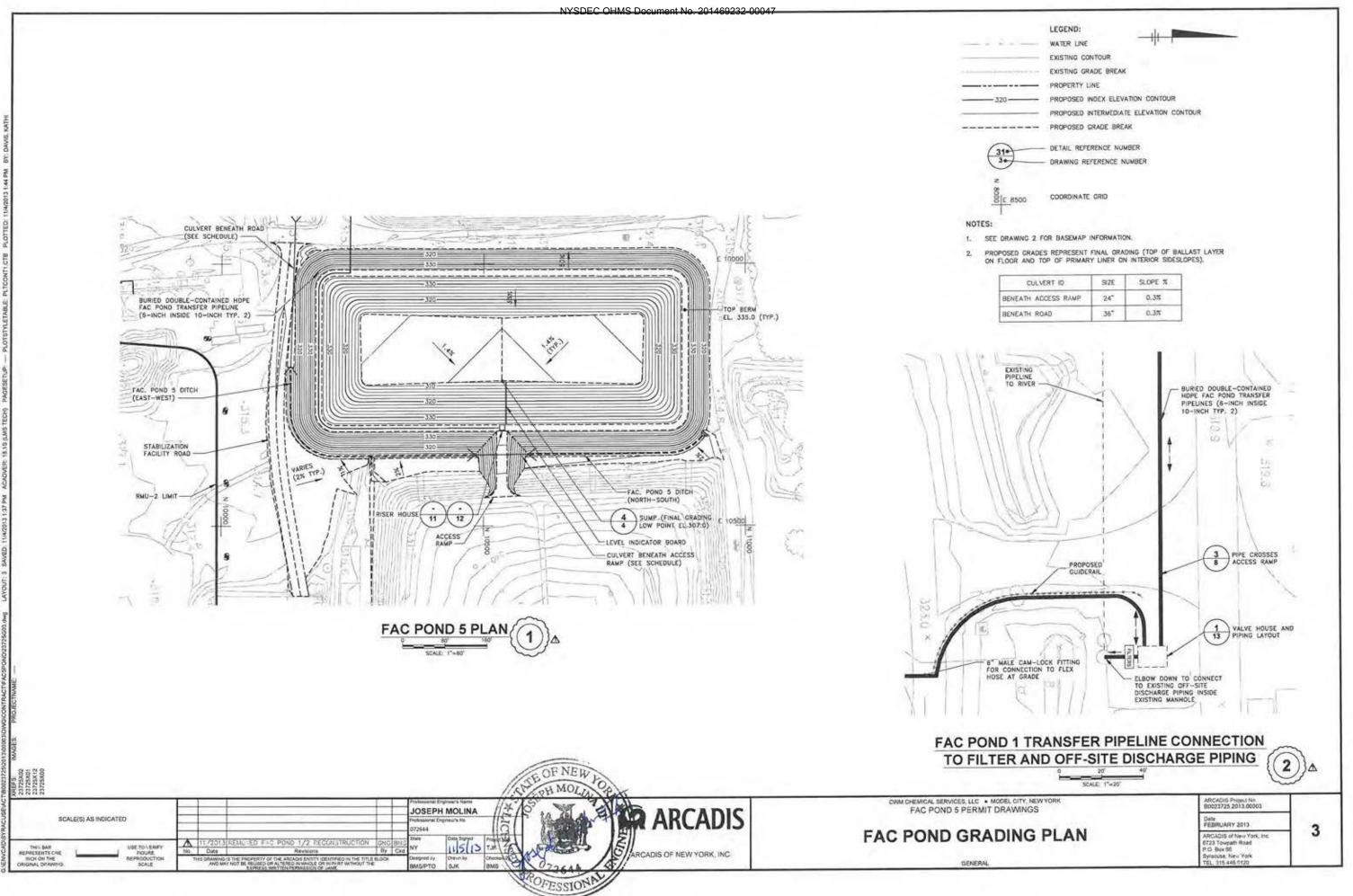
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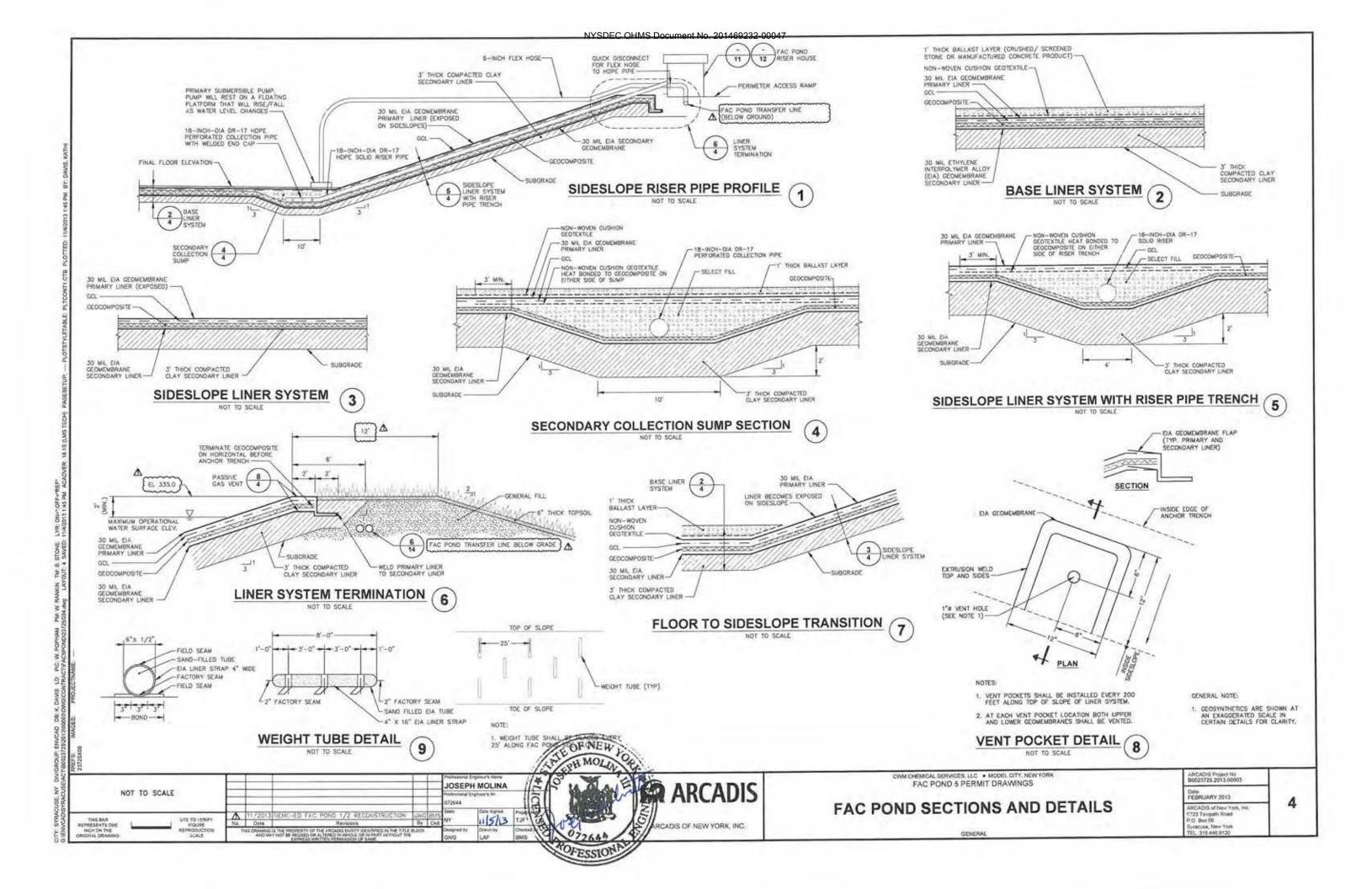
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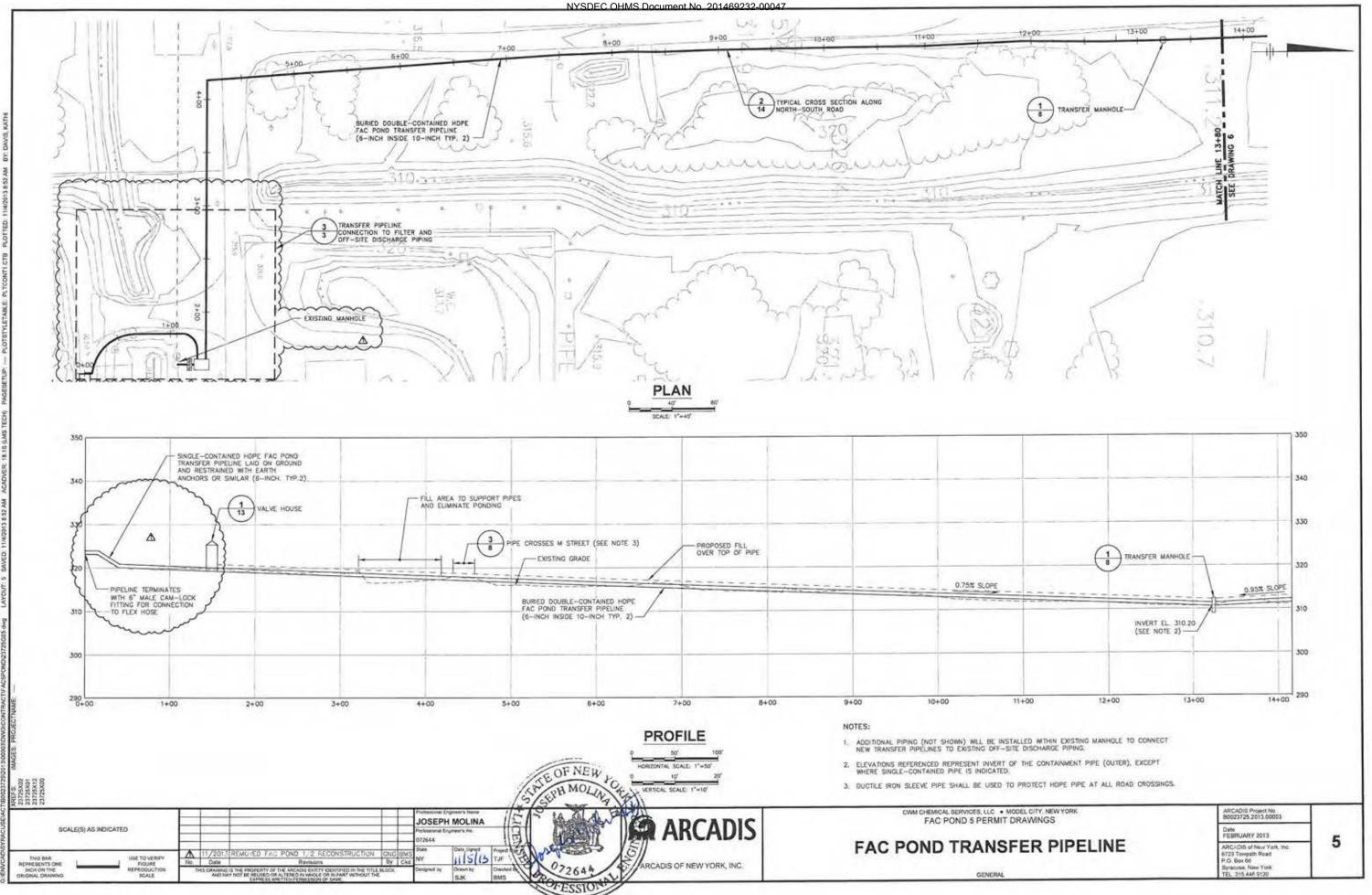
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- 8. REFER TO DRAWINGS IN ATTACHMENT J FOR FURTHER DETAIL.

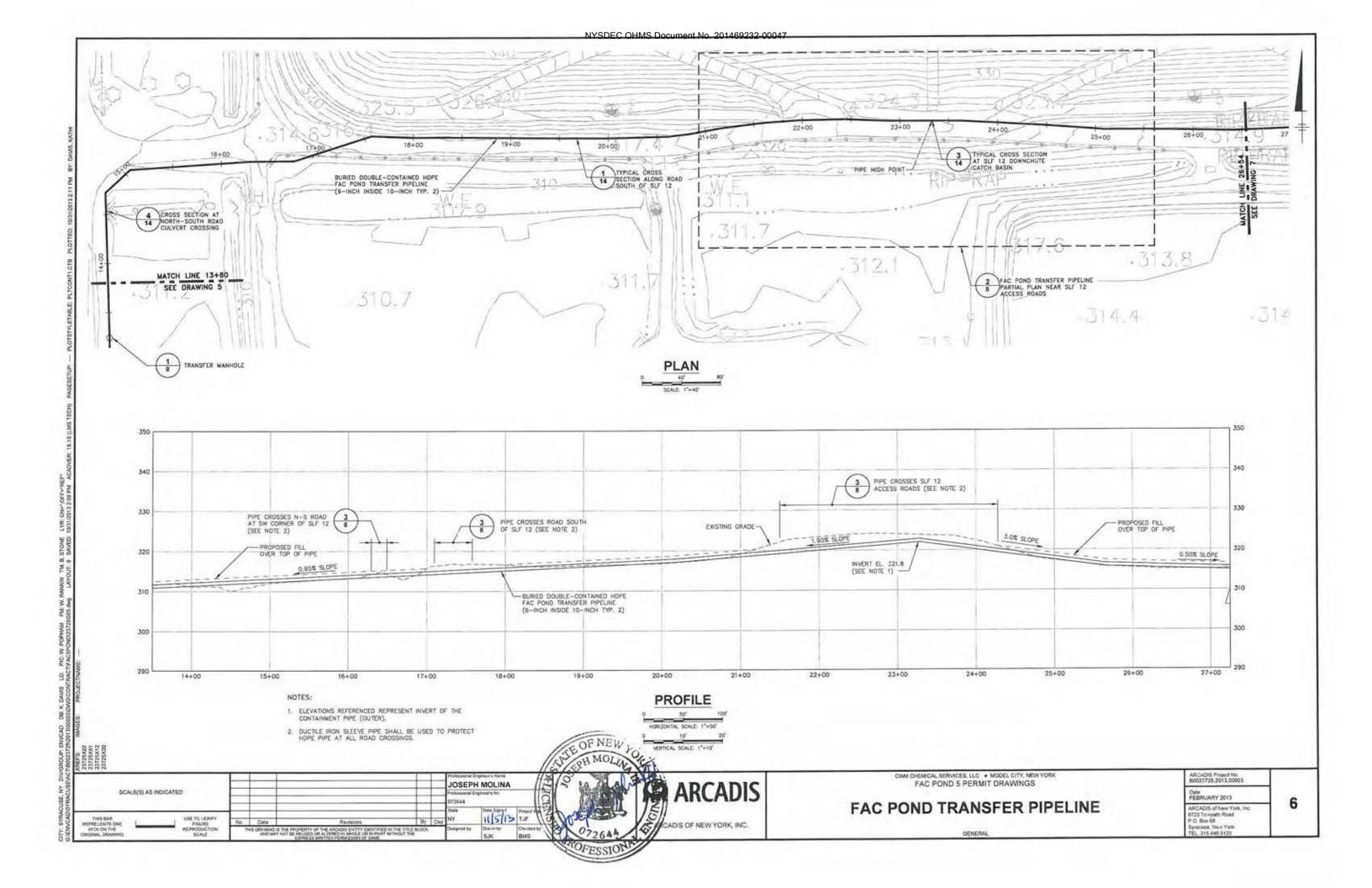
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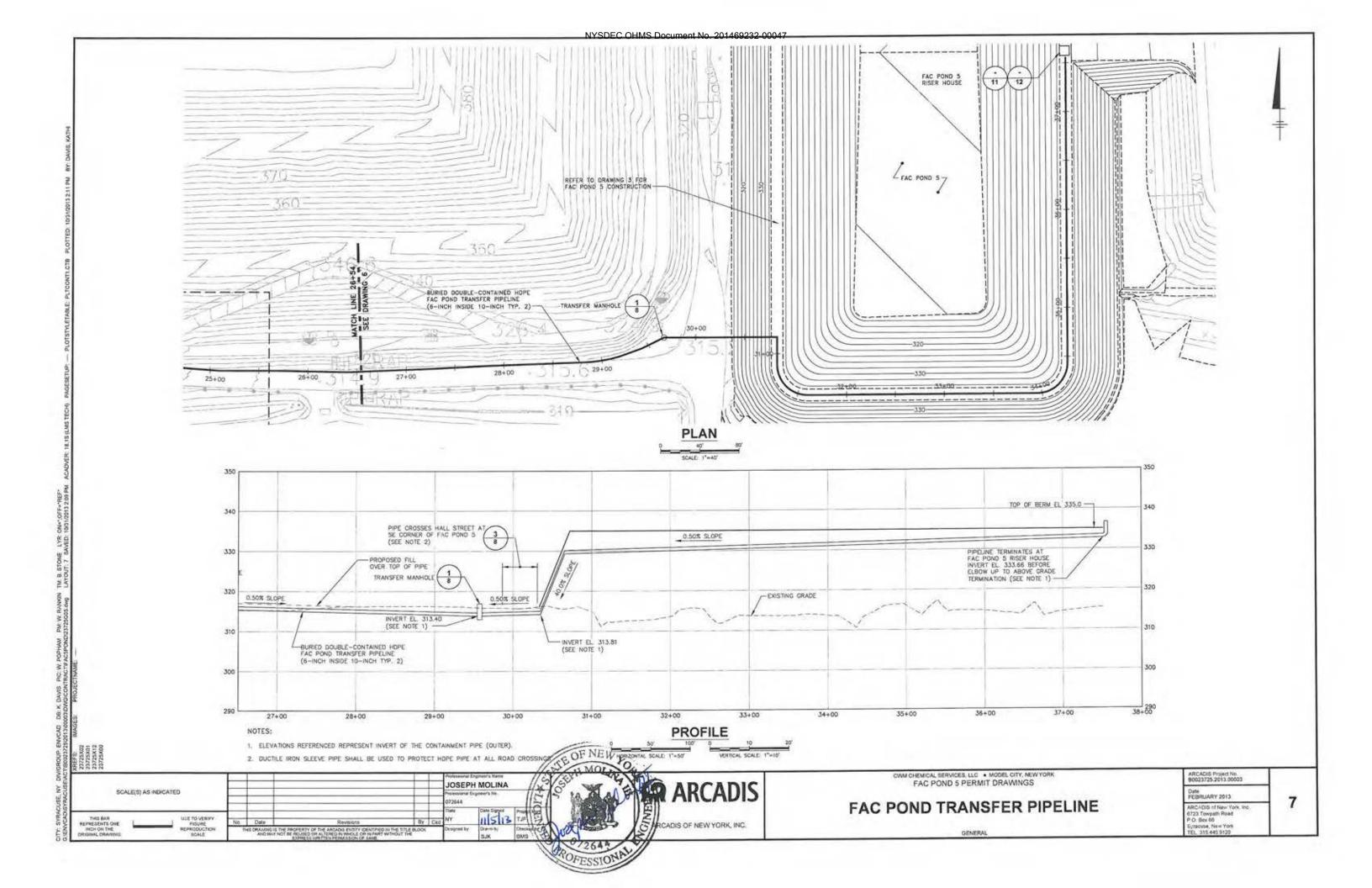


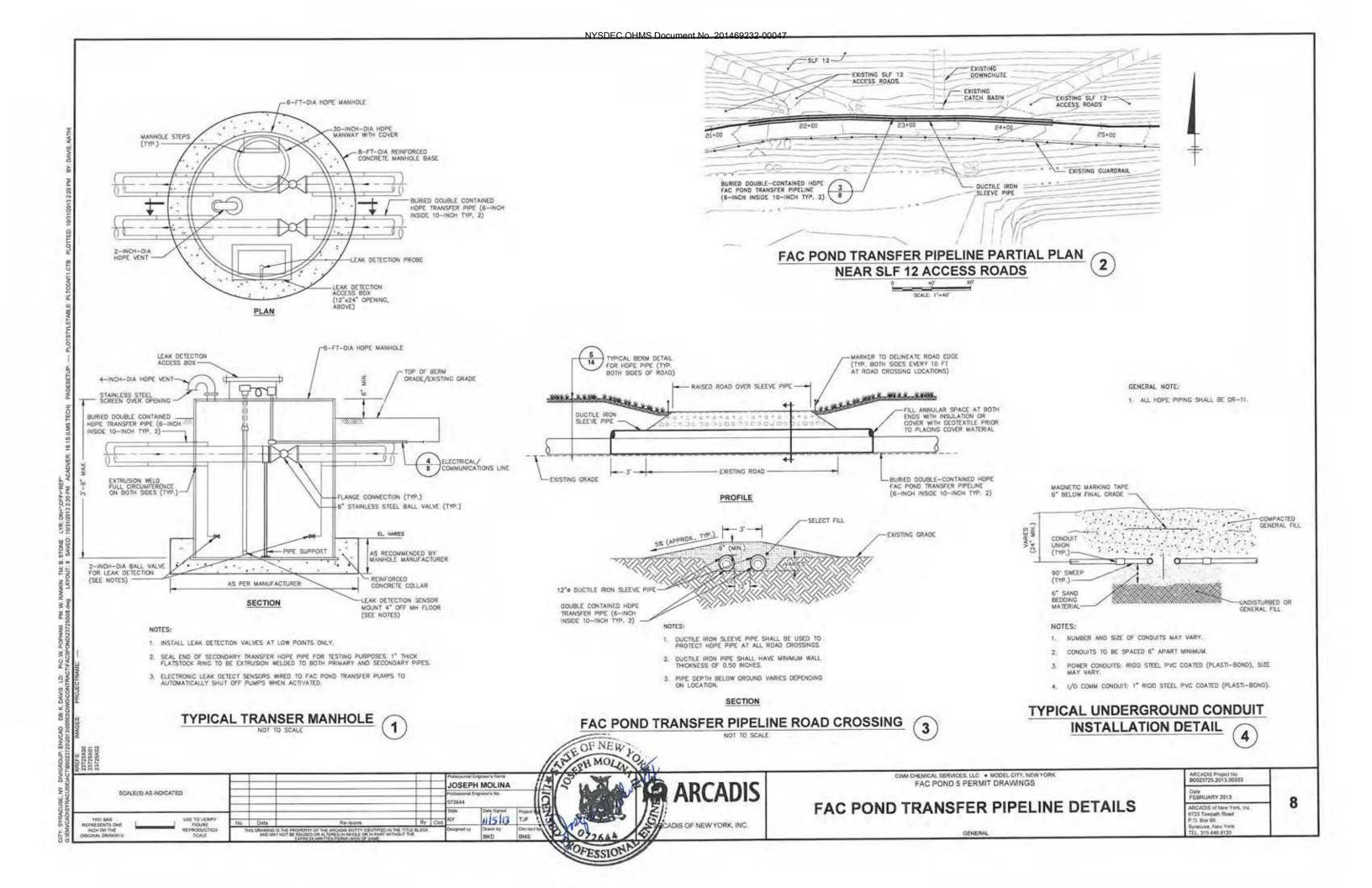


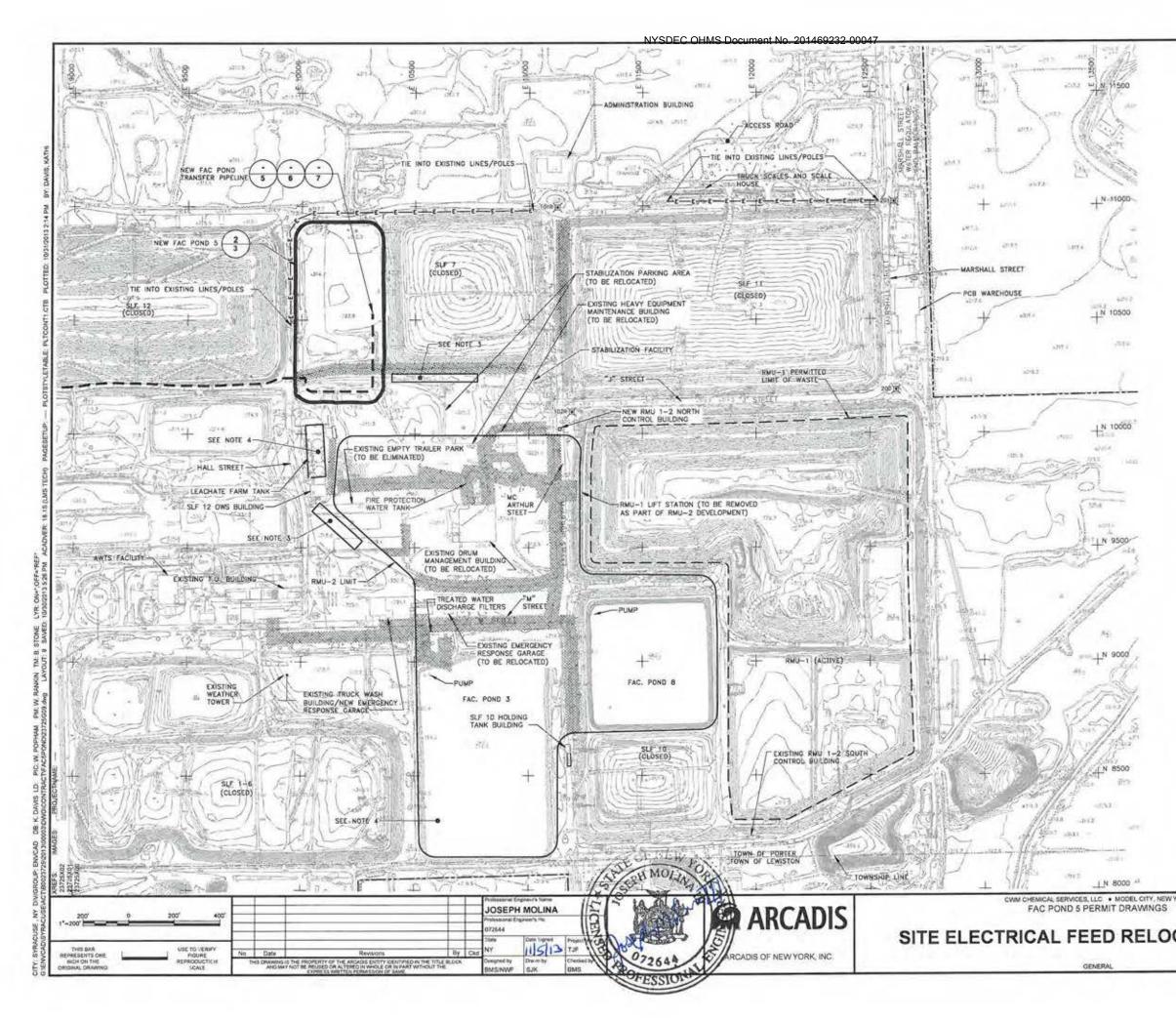


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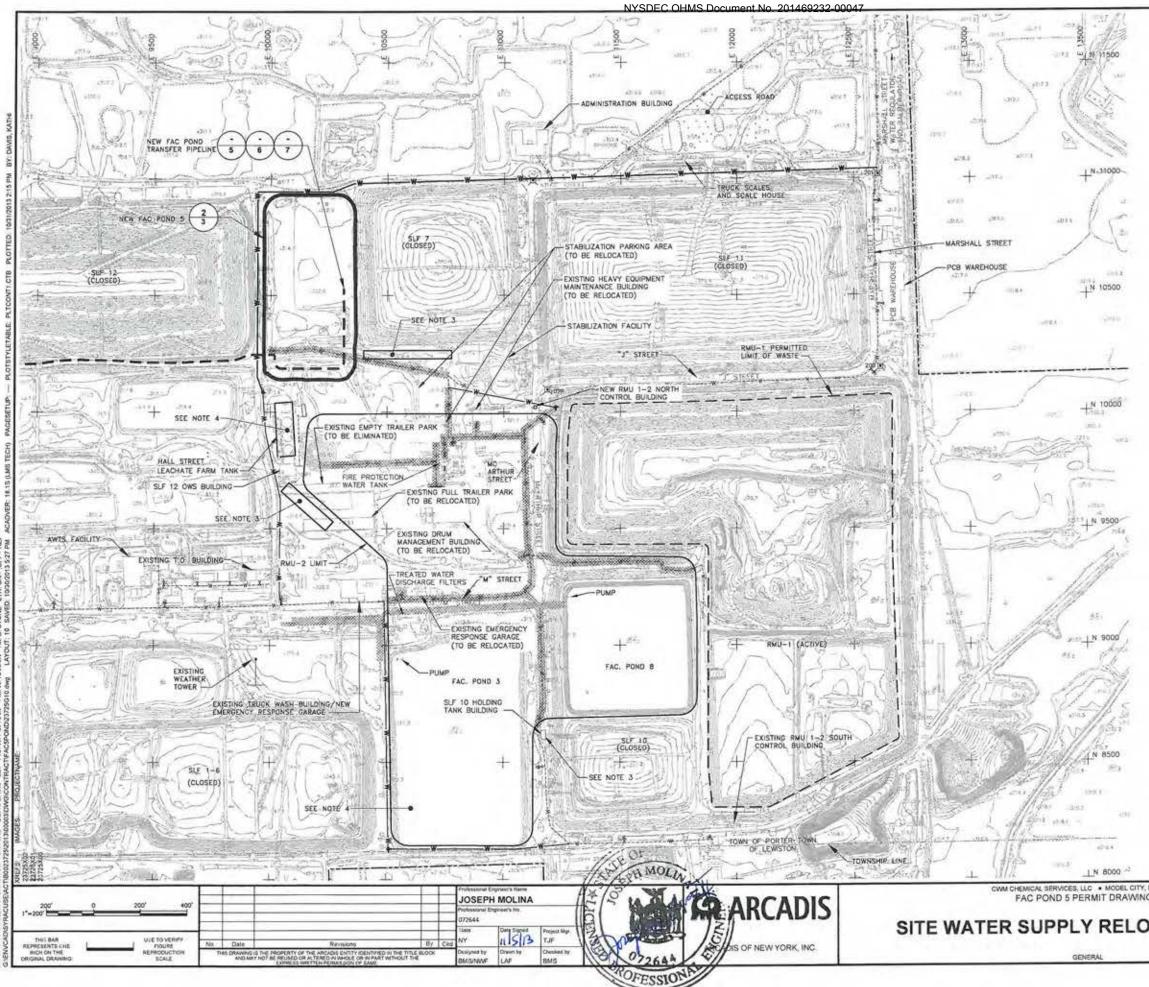








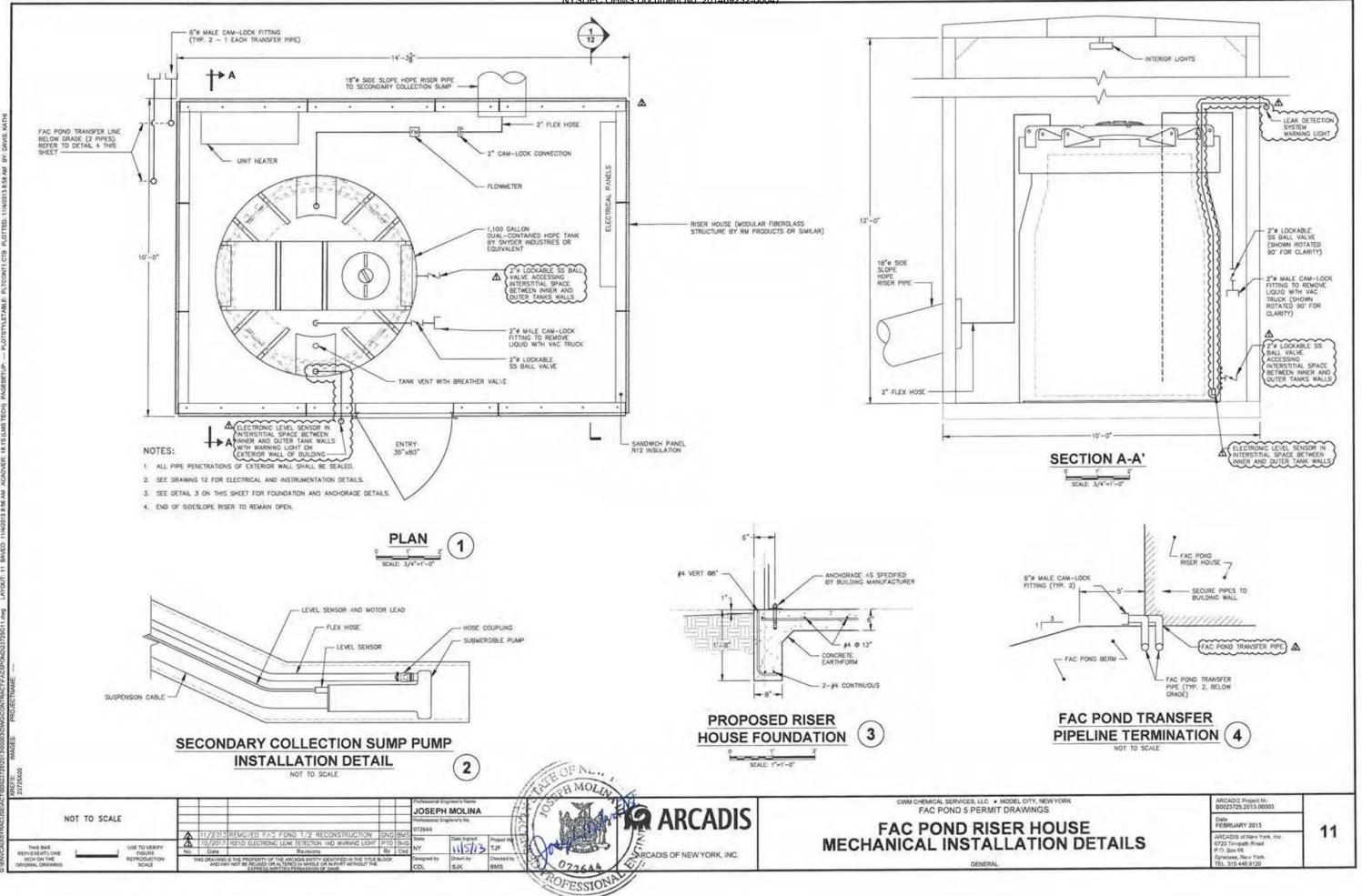
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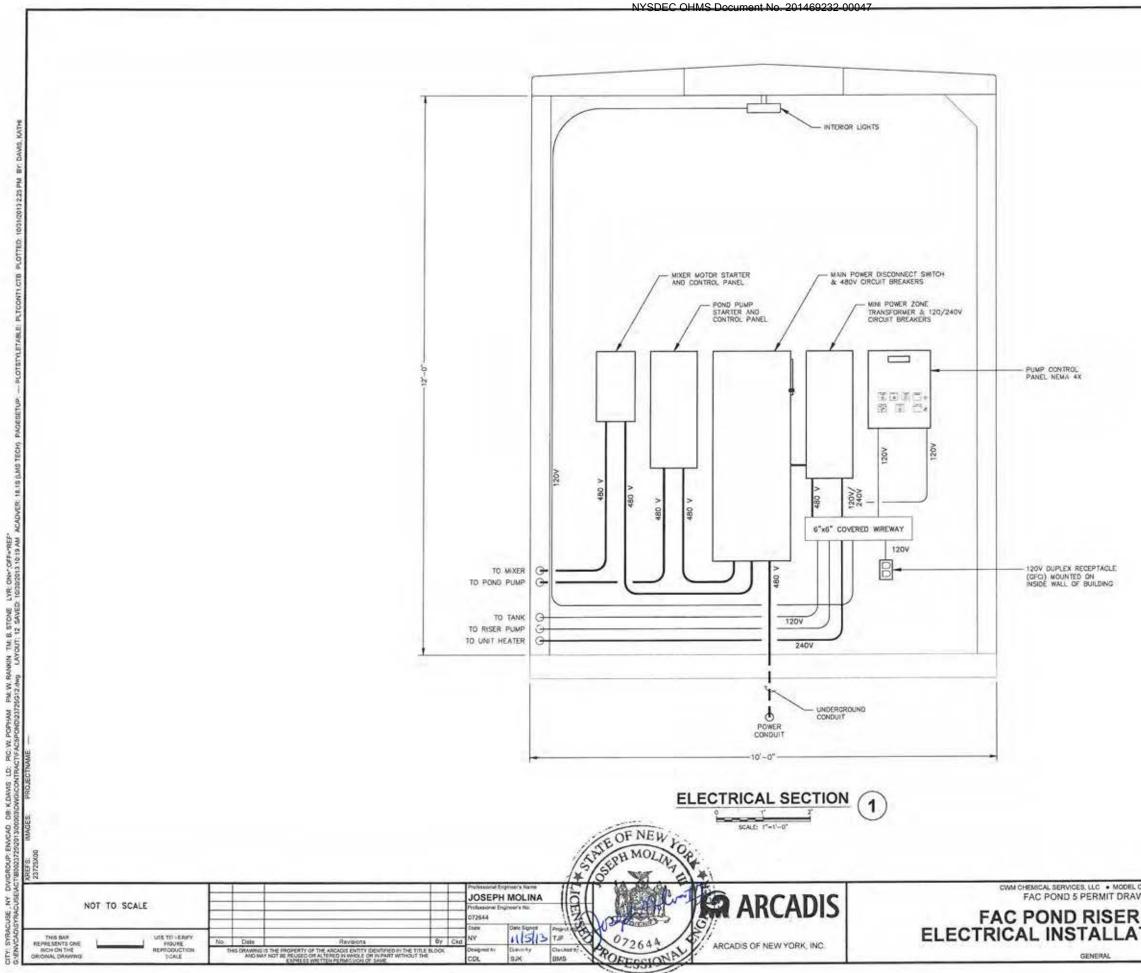


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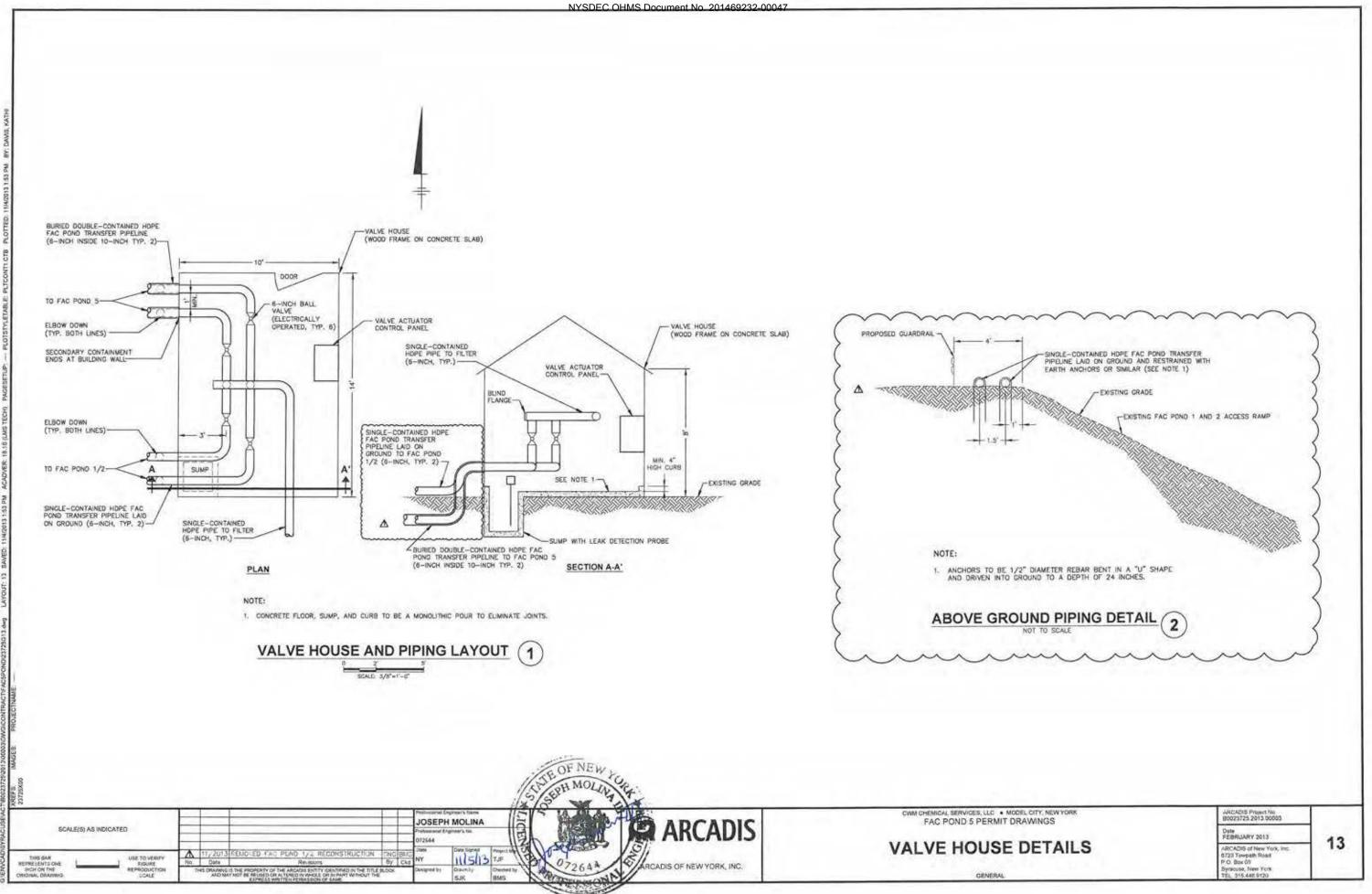
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| | | POTABLE WATER | |
| | | VALVE | |
| | | UTILITY POLE | |
| | - - | UNIDENTIFIED OBJECT | |
| | | TREELINE | |
| | | TREE | |
| | | IRAFFIC LIGHT | |
| | | SIGN SWAMP | |
| | | RAILROAD TRACKS | |
| | | NONUMENT POST | |
| | ۵ F | POLE | |
| | | HISCELLANEOUS | |
| | | JGHT POLE | |
| | | SUARD RAIL | |
| | | ENCE TIRE HYDRANT | |
| | | DROP INLET | |
| | | CATCH BASIN | T |
| | • | CABLE MARKER | 1 |
| | - 6 | BRUSHLINE | |
| | L | LEGEND: | |
| | | | |







| CITY, NEW YORK WINGS | ARCADIS Project No. B0023725 2013.00003 Date FEIBRUARY 2013 | - |
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| TION DETAILS | ARCADIS of New York, Inc. 6723 Torystem Road P.O. Box 65 Symeura, New York TEL, 315 446 3120 | 12 |



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