DEPARTMENT OF
ECOLOGY
State of Washington

Response to Comments

Aerosol Can Puncturing Device at Perma-Fix NW, Inc.

March 11 – May 9, 2013

Summary of a public comment period and responses to comments

July 2013
Publication no. 13-05-014

Publication and Contact Information

This publication is available on the Department of Ecology's website at http://www.ecy.wa.gov/biblio/nwp.html

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- *Northwest Regional Office, Bellevue* *425-649-7000*
- *Southwest Regional Office, Lacey* *360-407-6300*
- *Central Regional Office, Yakima* *509-575-2490*
- *Eastern Regional Office, Spokane* *509-329-3400*

Ecology publishes this document to meet the requirements of Washington Administrative Code 173-303-840 (9).

If you need this document in a format for the visually impaired, call the Nuclear Waste Program at 509-372-7950. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Response to Public Comments

Aerosol Can Puncturing Device at Perma-Fix NW, Inc. March 11 – May 9, 2013

Department of Ecology
Nuclear Waste Program
3100 Port of Benton Boulevard
Richland, Washington 99354

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Table of Contents

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Introduction

The Washington State Department of Ecology's Nuclear Waste Program (NWP) manages dangerous waste within the state by writing permits to regulate its treatment, storage, and disposal. When a new permit or a significant modification to an existing permit is proposed, Dangerous Waste regulations require public comment periods to allow the public to review the change(s) and provide formal feedback. (See Washington Administrative Code [WAC] 173-303-830 for types of permit changes.)

The Response to Comments is the last step before issuing the final permit, and its purpose is to:

- *Specify which provisions, if any, of a permit will become effective upon issuance of the final permit, providing reasons for those changes.*
- *Describe and document public involvement actions.*
- *List and respond to all significant comments received during the public comment period and any related public hearings.*

This Response to Comments is prepared for:

Comment period:	Aerosol Can Puncturing Device at Perma-Fix NW, Inc., March 11 – May 9, 2013
Permit:	*Perma-Fix Northwest Richland, Inc., Mixed Waste Facility*
Original issuance date:	May 28, 2009
Draft effective date:	July 11, 2013

To see more information related to the Hanford Site or nuclear waste in Washington, please visit our website: www.ecy.wa.gov/programs/nwp.

Reasons for Issuing the Permit

The type of permit modification in this request is "Class 2." These modifications are more significant than "Class 1" modifications, and less significant than "Class 3" modifications. A table in WAC 173-303-830 describes changes and their class.

The Permittee, Perma-Fix Northwest Richland, Inc., seeks to add the capability to process mixed waste in aerosol cans. In particular, the Permittee wants to use a commercially available aerosol can puncturing device designed to safely treat any volatile organic compounds in the cans.

The maximum rate of processing would be two aerosol cans per minute. The contents of the punctured cans would drain and be collected in a compatible container. The propellants — compressed gases and volatile organic compounds — would go through a carbon filter mounted on a drum, then be discharged as treated emission. The emptied aerosol cans would be sent to the Permittee's low-level waste building for further treatment.

The Permittee will train all workers on how to properly use the puncturing device and ensure that incompatible materials are stored separately.

Currently, when the Permittee gets aerosol cans, they send them back to the generator. The Permittee seeks this change to allow it to handle an expected waste stream, which will mostly be aerosol cans comingled with other mixed waste debris. (Mixed waste is material that is both radioactive and chemically hazardous.) The permit change will allow the Permittee to handle any other aerosol cans that are in future mixed wastes they receive.

Public Involvement Actions

NWP encouraged public comment on the Class 2 permit modification to Perma-Fix Northwest Richland, Inc. Mixed Waste Facility during a during a 60-day public comment period held March 11 through May 9, 2013.

The Permittee is responsible [WAC 173-303-830 (4) (b) ii and iv] for holding a comment period and public meeting for Class 2 permit changes. The Permittee mailed a notice announcing the comment period to 177 interested members of the public and emailed it to the 206 members of the mailing list who choose to get notifications via email.

The Permittee ran a legal classified advertisement in the *Tri-City Herald* on March 10, 2013. The Permittees held a public meeting on April 11, 2013. No members of the public attended or gave testimony.

NWP also encouraged public comment by featuring the comment period on our website. Ecology posted the comment period as an event on our Hanford Education & Outreach Facebook page.

The following public notices for this comment period are in Appendix A of this document:

1. Public notice (focus sheet) on NWP website.
2. Classified legal advertisement in the *Tri-City Herald*.
3. Letter sent to postal and email lists.
4. Event posted on Ecology Hanford Education & Outreach Facebook page.

Response to Comments

Ecology accepted comments from March 11 until May 9, 2013. This section provides verbatim comments that NWP received during the public comment period and our responses. It also lists the Permittee's responses to the commenter. (RCW 34.05.325(6)(a)(iii)).

Linda Meyer, U.S. Environmental Protection Agency

Questions regarding the Class 2 permit modification request from Perma-Fix for addition of an Aerosol Can Puncture Device.

1) The cover letter states that cans PFNW [Perma-Fix Northwest] generates will be dealt with separate from off-site waste. Please clarify how PFNW's cans are managed, treated and disposed of – how is the liquid from PFNW's waste going to be managed?

RESPONSE: Once an aerosol can has been used up and has been deemed "empty," PFNW's personnel puncture and drain the residue into a 55-gallon drum using a commercially available puncturing unit similar to the one in Attachment 12. The empty aerosol cans are collected in a container (designated trash can) until full. Once the container is full, the contents are removed for either recycling or disposal as solid waste. The residual propellants are filtered through a drum-mounted carbon filter. The liquids that drain from the aerosol cans are collected in a 55-gallon drum and managed under the Satellite Accumulation Area rules in WAC 173-303-200(2). Once the drum of liquid is full, the drum will be shipped to a TSDF [treatment, storage, and disposal facility] that is permitted to treat organic liquids (PFNW currently is not permitted to treat organic liquids).

2) The WAP [Waste Analysis Plan] should include the maximum size can that can be placed on the aerosol can puncture device. (process limits section)

RESPONSE: Per the manufacturer's instruction (Att. 12), the puncturing device can accommodate aerosol cans up to 3 inches in diameter.

3) Unclear what was changed in attachment GG

RESPONSE: Page 65, Table 10: Added TP-15 (Aerosol Can Puncturing Device)

4) Attachment NN – how will operator know a can has 25 psi? how much liquid is expected from a can? I see that 5% is used later in doc – what volume does that equate to? What is the max amount that would be in a full can? Will liquids always be compatible? Shouldn't the liquid be stabilized before waste is maco? Section states that cans are placed into a container – unclear?[1]

RESPONSE: Many factors determine the internal pressure of an aerosol can. These factors include the amount of product remaining inside the can, the product(s) or ingredients, and the viscosity of the liquid contents. Typical internal pressure of a full aerosol can is conservatively estimated at 75 psi. Except for the fact that the aerosol can is empty or nearly empty, thus exempt from the Resource Conservation & Recovery Act, *an operator has no indication or measurement tool that will indicate the pressure is below 25 psi. However, due to the strong prevalence of use throughout industry, PFNW believes aerosol cans should not be grouped under the category of "Containers holding a containerized gas" as a restricted wastes listed in Table 1 of the WAP. In fact, as a generator, PFNW has four aerosol can puncturing devices purchased for internal use that have no processing limits or ventilation requirements. This is the same situation for all industries. Moreover, according to Ecology's* Focus on Aerosol Can

[1] Comment by Barry Nichols: Can't find this in the section proposed (pg. 11 of NN). This practice is only for PFNW generated aerosol cans. Not to be confused with a generator's waste.

Management *guidance (November 2007, Publication 07-04-005), only two options are available to generators for proper treatment and disposal. The first is to puncture and drain on site. The second is to send to a TSDF. PFNW believes it has the proper equipment and treatment processes to effectively treat this waste stream.*

PFNW would like to make the distinction that Table 1 of the WAP is not meant to include aerosol cans. Hence, 25 psi is not an issue. The reason the restriction is there is PFNW does not have the necessary processing equipment to treat containers with containerized gases. In the case of aerosol cans, PFNW does have a treatment option available.

PFNW conservatively estimated the typical amount of liquid remaining in an aerosol can as five percent. Aerosol cans typically contain between 12 and 28 ounces of liquid when full. The estimated amount of liquid remaining ranges from 0.8 to 1.4 ounces. Again, this is very conservative because a generator would not normally discard these cans until no product comes out of the can. That is when they would send it to a TSDF.

In the Washington State Department of Ecology's Focus on Aerosol Can Management *guidance (November 2007, Publication 07-04-005), Ecology says they do not regulate empty aerosol cans as dangerous waste. PFNW believes a majority of these aerosol cans would fall under this category. However, on rare occasions, PFNW may receive an aerosol can from a generator that is not completely empty. PFNW believes they should be able to puncture and drain these aerosol cans just like a generator would.*

PFNW estimates there will not be a large need for this type of work but wants to be permitted in the event that an aerosol can is found in a generator's waste stream. Compatibility will be reviewed by the waste acceptance coordinator during the profiling process, visual inspection, and ultimate treatment of the cans. If multiple aerosol cans are sent to PFNW, the compatibility would be evaluated to ensure no additional hazards are created.

1. *The treatment path of the liquid(s) that has been drained from the can(s) will be determined based on several factors:*
    a. *The waste codes that were assigned to the waste by the generator (Characteristic codes (D codes), listed codes (P,U,K, of F), and WA State DW codes (WT, WP).*
    b. *Characteristic code subcategory (if applicable).*
    c. *Treatment standard for RCRA codes (concentration based or technology based).*
    d. *PFNW's treatment capability based on the waste code and treatment standard.*
2. *Based on current treatment capabilities, PFNW will treat, prior to packaging and disposal, liquids that are designated as:*
    a. *Washington State Dangerous Waste Criteria codes (WT01, WT02, WP01, WP02, WP03).*
    b. *RCRA Characteristic codes:*
        i. *D001 with the subcategory of "Ignitable Characteristic Waste except for High TOC."*
        ii. *D004-D011 Toxicity Characteristic metal codes.*
        iii. *Any designated Inorganic UHC's (primarily metals) identified in 40 CFR 268.48 Universal Treatment Standards.*

3. *Liquids designated with characteristic waste codes or listed waste codes for which PFNW does not currently have the treatment capability will be sent to other Perma-Fix facilities (such as Kingston, TN) for treatment until PFNW has permitted treatment capabilities for these types of waste.*

See footnote on page 9 above.

5) Section NN page 11- doc states that drained liquids will be removed from the container. Does this mean after all cans are punctured the liquid in the collection container (plus the liquid from the carbon unit) will be poured somewhere else or will the collection container + liquid be compacted and macroed? – The doc states a different container is used for each waste shipment so why remov liquids from the container. Please clarify this. How is the liquid emptied from the drum? Is the lid removed?

RESPONSE: Liquids will not be macroencapsulated; they will be treated to meet the applicable treatment standard (concentration or technology standard or Washington State Dangerous Waste Land Disposal Restrictions). See the response to Comment #4 about Attachment NN.

The volume of liquid drained from a single can is anticipated to be extremely small compared to the volume of the collection container (an ounce of drained liquid vs. a 30 or 55 gallon collection container).

The removal of the liquids from the puncturing process is a result of the process. The main intent is to relieve the aerosol can of its internal pressure.

PFNW will use a container or a plastic liner inside of a container to collect the drained liquid. The plastic liner will then be removed and placed back into the generator's waste stream for further treatment. If no liner is used, the container (which will be considered a RCRA-empty container) will be placed back in to the generator's waste stream for further processing. Due to the minute amount of liquid that is expected to be collected, the residue will not be considered a "free liquid" because there will not be enough to drain from either the drum or plastic liner.

To facilitate volume reduction, the liner holding the captured liquids will be removed and placed into a suitable sized container, and if the liquids are to be shipped offsite for treatment, a DOT approved shipping container (i.e. 5 gallon) will be used. No liquids will be poured directly out of the collection container and into another container.

Once the aerosol can has been punctured and drained, the lid will be removed to either remove the liner or to place the container back in to the generator's waste stream.

6) Section NN unclear if the liquids from the carbon unit will also be drained to the collection container.

RESPONSE: The coalescing/activated carbon unit is designed to absorb the propellants or gases aspirated from the aerosol cans. It does not treat liquids.

7) Section NN, page 33 – states the carbon filter has a plastic housing – is this special plastic so solvents and organics don't degrade housing and gasket?

RESPONSE: Per the distributor, the plastic housing is made of high-density polyethylene (HDPE), which is compatible with the typical solvents and gases that would come in contact with the unit. The gaskets are made of Aeroprene, which is also solvent-resistant.

8) There are no inspection step proposed – how do you ensure the puncture system and the carbon filter are completely secure? How do you know how many cans have been processed and that it is time to change the filter. The spec suggests after 4000 cans. How will you track this?

RESPONSE: The puncture system is designed to thread into a standard two (2) inch bung hole of a 30 or 55 gallon drum. The unit will be installed in accordance with the manufacturer's instructions. In addition, the processing areas where this unit will be operated have a process ventilation system that continually provides a negative pressure in the area(s). Should vapors escape from the container, they would be captured by the building ventilation and treated accordingly.

The life expectancy of the carbon filter depends on many factors, including the amount of propellants, types of propellants/gases, and other environmental factors. The carbon filter changes color when the activated carbon has reached its maximum treatment life expectancy. The manufacturer states that the life expectancy can be increased by removing the carbon filter and bagging it when not in use. The manufacturer's instructions indicate the residuals collected from 4,000 cans are equal to the drum being 75 percent full. This is not related to the number of cans that the carbon filter can treat.

The carbon filter will be replaced when the activated carbon changes color in accordance with the colormetric indicator that is attached to the filter.

9) Attachment PP, page 72, Third sentence in section 5 makes no sense. Revise to discuss this unit instead of the mixer. Vent ports?

RESPONSE: The remaining text in this paragraph, including the third sentence, was mistakenly left behind while revising this document. These sentences need to be removed and replaced with:

> "Any compressed gases and/or propellants aspirated from the punctured aerosol cans into the container are treated with the carbon filter cartridge. Once these gases are treated and discharged from the carbon filter cartridge, they will be considered treated emissions. The stabilization building non-process ventilation system uses a baghouse and carbon filtration to treat any particulates and organics vapors that may be generated during normal operations. Any emissions coming from the carbon filter will be captured by the non-process ventilation system."

The language related to the vent ports does not apply and will be removed.

10) Attachment PP, page 72, safety performance requirements – how much liquid of this nature (organic) can be added to the material needing stabilization? Is this liquid going to be stabilized separately? The third paragraph of this section states" the performance spec and operating procedures take into account the specific characteristics of the given waste stream and appropriate treatability test". Will a treatability test be conducted for this waste stream?

RESPONSE: The residual liquid is estimated to be a very minute amount. The plastic bag containing the residue is estimated to be less than 1 percent of a generator's total waste stream.

Due to the inconsequential amount of liquid residue collected, it will not be stabilized separately.

The third paragraph will be deleted, and the following text will be added:

> "The aerosol can puncturing device uses a carbide-tipped puncture pin that is spark resistant. When the pin punctures the dome of the aerosol can, a smooth, jagged-free hole is the only damage done to the can. The unit will be grounded using an anti-static wire. In addition, there will be no open flames in the area where this unit could be operated."

A treatability study will not be conducted.

11) Attachment PP, Section 7 P&P procedures – inspection, maintenance and carbon filter change out is done according to manufacture recommendations. The vendor information provided in attachment 12 had no recommendations for inspection and maintenance. Please provide or propose inspection and maintenance required.

RESPONSE: Additional information from the manufacturer will be provided with this document.

<u>Inspection</u>

The manufacturer recommends operators "…inspect the gasket and seals for deterioration or contamination and replace or remedy as necessary." See the Maintenance section below for frequency proposed.

<u>Maintenance</u>

"In addition, the valve assembly should be inspected after puncturing 1,000 cans by detaching the unit from the drum and inspect for seal quality. Finally, the unit should be cleaned thoroughly inside and out." Due to the expected use of this unit, PFNW recommends doing this every 1,000 cans or five (5) years.

List of Commenters

The table below lists the names of organizations or individuals who submitted comments and the page numbers of Ecology's responses.

Commenter	Page(s) for response
Linda Meyer, U.S. Environmental Protection Agency	9–13

Appendix A: Copies of All Public Notices

Public notices for this comment period:

1. Public notice.
2. Classified advertisement in the *Tri-City Herald*.
3. Letter sent to postal and email lists.
4. Event posted on Ecology Hanford Education & Outreach Facebook page.

PUBLIC NOTICE & MEETING

PERMA-FIX NW, INC.
CLASS 2 PERMIT MODIFICATION

PUBLIC NOTICE

In accordance with Washington regulation WAC 173-303-830(4)(b)(ii), Perma-Fix Northwest Richland, Inc. (PFNW-R) is providing this public notice regarding the Class 2 permit modification for the addition of an aerosol can puncturing device to allow for the occasional need to safely and environmental- compliantly treat empty or partially-full (due to nozzle damage) pressurized aerosol cans that may be found in permit-approved mixed wastes that are accepted at the mixed waste facility (Permit WAR 0000 10355).

The name and telephone number of the permittee (i.e., PFNW-R) is Mr. Richard Grondin at 509-375-7026. The name and telephone number for the Department of Ecology contact person is Mr. Sterling Derrick at 509-372-7896. The name and telephone number for the U.S. Environmental Protection Agency contact person is Ms. Linda Meyer at 1-206-553-6636.

A copy of the Class 2 Permit Modification Request and supporting documentation is available for review and copying by contacting the Department of Ecology Nuclear Waste Program Office, 3100 Port of Benton Blvd, Richland, Washington, 99354 (509-372-7950). Additionally, a copy of the proposed modification can be viewed at the Richland Public Library at 955 Northgate Drive in Richland, Washington.

The public comment period for 60 days begins on March 11, 2013. Any comments on the Class 2 permit modification should be submitted in writing to Mr. Sterling Derrick or Ms. Linda Meyer by May 9, 2013.

Ecology's address is:
Washington Department of Ecology
3100 Port of Benton Blvd.
Richland, Washington 99354

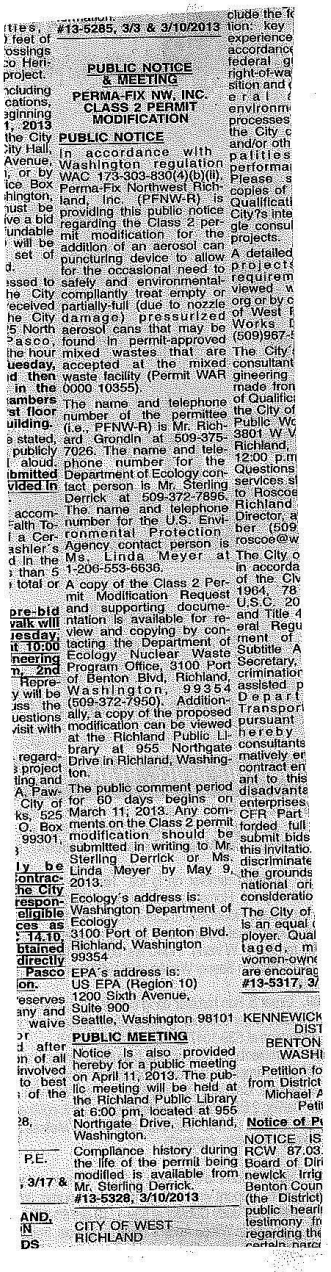
EPA's address is:
US EPA (Region 10)
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101

PUBLIC MEETING

Notice is also provided hereby for a public meeting on April 11, 2013. The public meeting will be held at the Richland Public Library at 6:00 pm, located at 955 Northgate Drive, Richland, Washington.

Compliance history during the life of the permit being modified is available from Mr. Sterling Derrick.

Figure 1. Public notice.



#13-5285, 3/3 & 3/10/2013

PUBLIC NOTICE & MEETING

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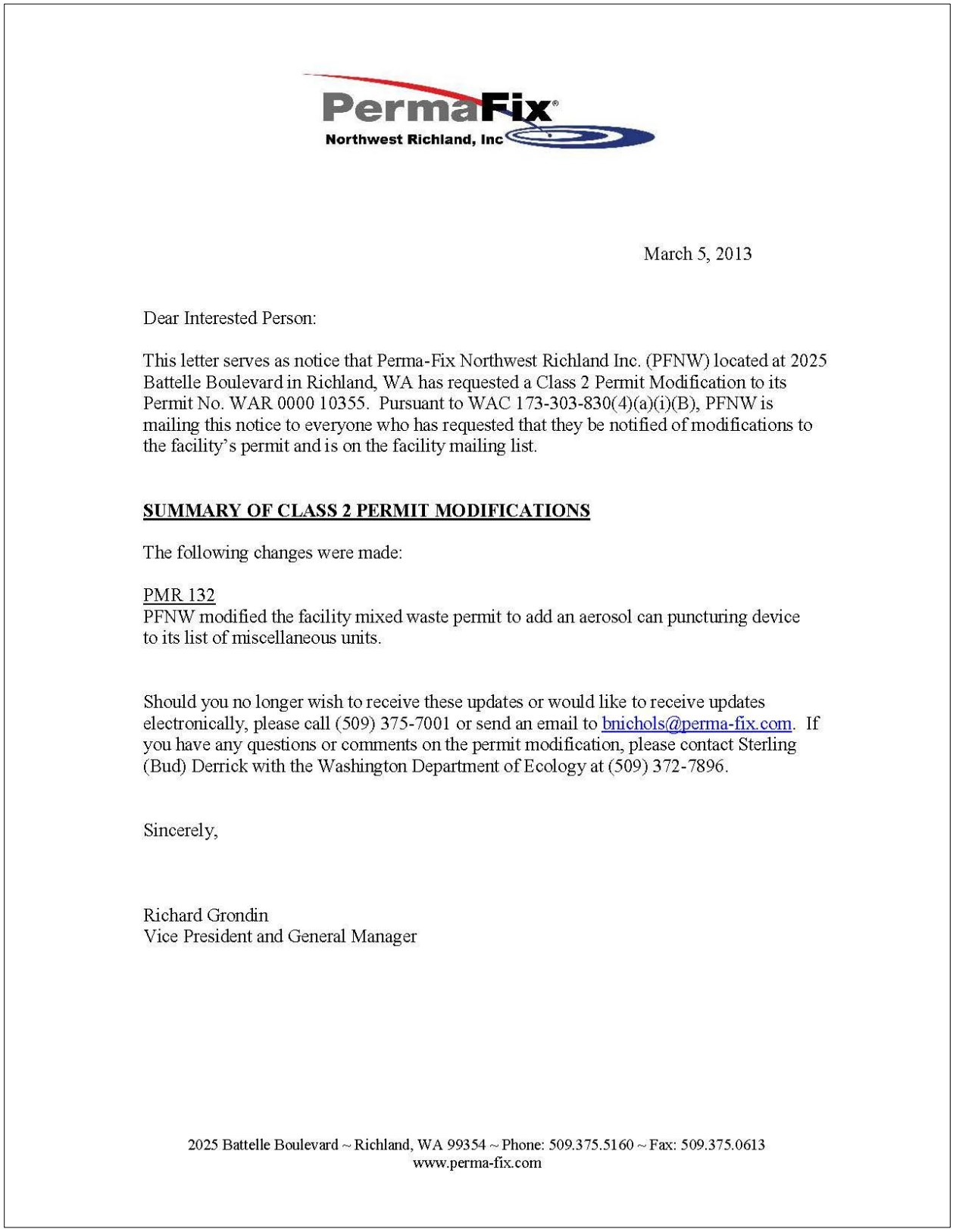
Compliance history during the life of the permit being modified is available from Mr. Sterling Derrick.

#13-5328, 3/10/2013

CITY OF WEST RICHLAND

TCH 3/10/2013

Figure 2. Legal classified advertisement in the Tri-City Herald.



Perma-Fix Northwest Richland, Inc

March 5, 2013

Dear Interested Person:

This letter serves as notice that Perma-Fix Northwest Richland Inc. (PFNW) located at 2025 Battelle Boulevard in Richland, WA has requested a Class 2 Permit Modification to its Permit No. WAR 0000 10355. Pursuant to WAC 173-303-830(4)(a)(i)(B), PFNW is mailing this notice to everyone who has requested that they be notified of modifications to the facility's permit and is on the facility mailing list.

SUMMARY OF CLASS 2 PERMIT MODIFICATIONS

The following changes were made:

PMR 132
PFNW modified the facility mixed waste permit to add an aerosol can puncturing device to its list of miscellaneous units.

Should you no longer wish to receive these updates or would like to receive updates electronically, please call (509) 375-7001 or send an email to bnichols@perma-fix.com. If you have any questions or comments on the permit modification, please contact Sterling (Bud) Derrick with the Washington Department of Ecology at (509) 372-7896.

Sincerely,

Richard Grondin
Vice President and General Manager

2025 Battelle Boulevard ~ Richland, WA 99354 ~ Phone: 509.375.5160 ~ Fax: 509.375.0613
www.perma-fix.com

Figure 3. Letter sent to postal and email lists.

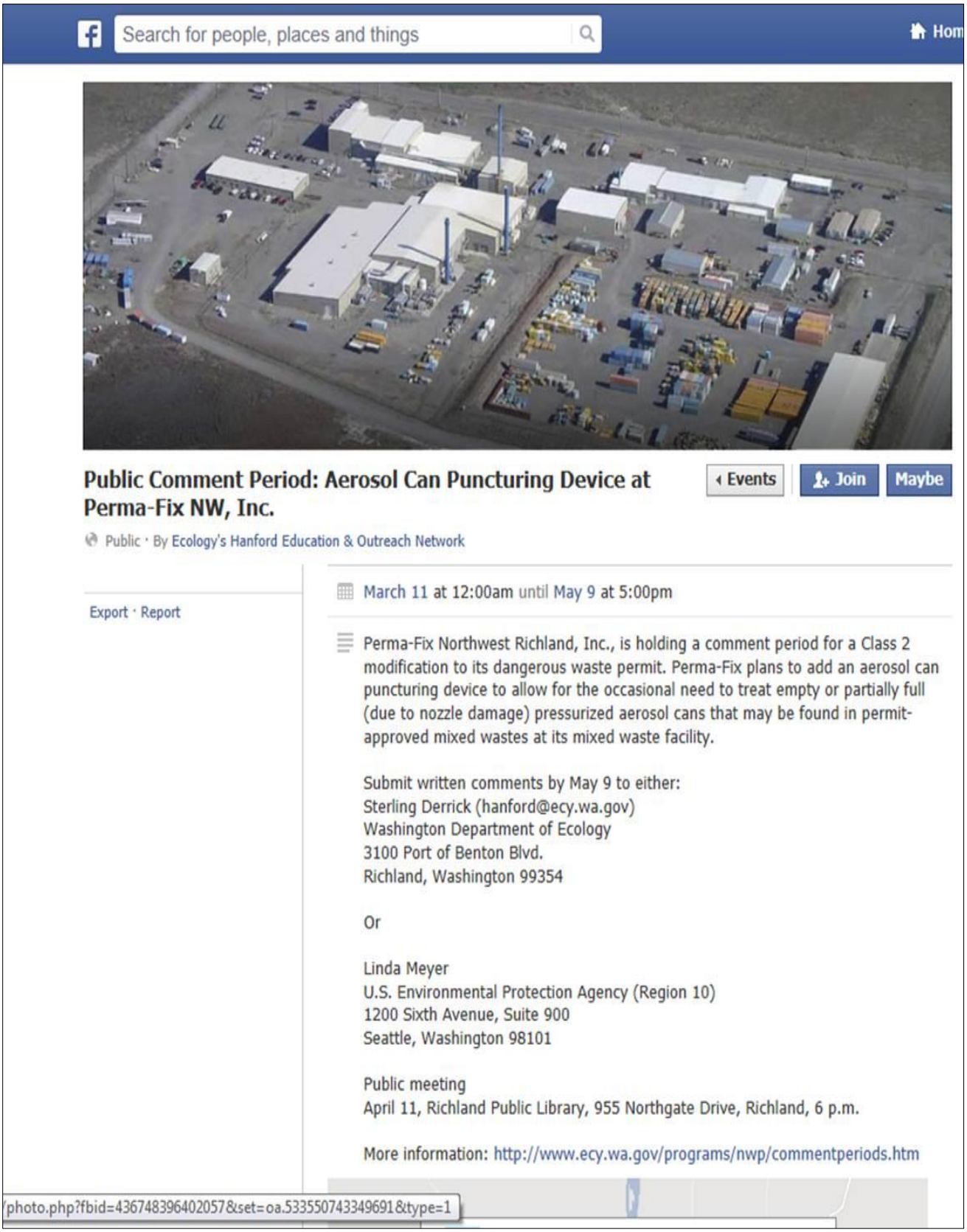


Figure 4. Event posted on Ecology's Hanford Education & Outreach Facebook page.

Appendix B: Copies of All Written Comments

From: Meyer, Linda [mailto:Meyer.Linda@epa.gov]
Sent: Friday, May 17, 2013 3:53 PM
To: Graber, Kerry (ECY); Conaway, Kathy (ECY); Prignano, Andrea (ECY); Derrick, Bud (ECY); Bond, Rick (ECY)
Cc: Boller, Jack; Bartus, Dave; Schanilec, Kevin
Subject: Linda's comments on the PermaFix Class 2 permit mod for the aerosol can puncturing unit.

Bud/Rick – I took a look at this class 2 mod request. These are the comments I have on the PermaFix permit mod to for this unit. In a nutshell the unit has a little carbon filter as well as the puncture device which they plan to attach to a new drum (for liquid containment) to treat cans for each waste shipment. The liquid will then be solidified or macroencapsulated with all of the rest of the waste from that shipment. What is not clear is if they plan to compact the liquid collection container with the liquid in it or just how they manage the liquids. Is there a certain volume that we should say they can't macro? Is this liquid a listed haz waste now? This unit seems like a better approach then just shipping the cans back to Hanford but a few details are not clear. Let me know if you have any questions or other thoughts –or if you have time to look at it the mod and have any other comments. Also, once I (or Bud) has an idea of some permit conditions, maybe we can convene a discussion. Thanks!

Questions regarding the Class 2 permit modification request from PermaFix for addition of an Aerosol Can Puncture Device.

1) The cover letter states that cans PFNW generates will be dealt with separate from off-site waste. Please clarify how PFNW's cans are managed, treated and disposed of – how is the liquid from PFNW's waste going to be managed?
2) The WAP should include the maximum size can that can be placed on the aerosol can puncture device. (process limits section)
3) Unclear what was changed in attachment GG
4) Attachment NN – how will operator know a can has 25 psi? how much liquid is expected from a can? I see that 5% is used later in doc – what volume does that equate to? What is the max amount that would be in a full can? Will liquids always be compatible? Shouldn't the liquid be stabilized before waste is maco? Section states that cans are placed into a container – unclear?

5) Section NN page 11- doc states that drained liquids will be removed from the container. Does this mean after all cans are punctured the liquid in the collection container (plus the liquid from the carbon unit) will be poured somewhere else or will the collection container + liquid be compacted and marcoed? – The doc states a different container is used for each waste shipment so why remov liquids from the container. Please clarify this. How is the liquid emptied from the drum? Is the lid removed?

6) Section NN unclear if the liquids from the carbon unit will also be drained to the collection container.

7) Section NN, page 33 – states the carbon filter has a plastic housing – is this special plastic so solvents and organics don't degrade housing and gasket?
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Appendix C: Permit Revisions Based on Comments

APPENDIX C: Permit revisions based on comments

Attachment NN Revision 3 (Pg. 11)

Aerosol Can Puncturing Device (TP-15). Treatment line 400 includes the treatment capability to safely depressurize non-punctured aerosol cans and treat the propellants and gases with a commercially available puncturing device and carbon filter. Mixed waste containers are opened and the contents are sorted in the Stabilization Building. If a non-punctured aerosol can is found in a generator's (customer's) waste shipment, the aerosol can(s) will be removed and safely punctured using a commercially-available puncturing device. The contents of the aerosol can will be drained into a plastic-lined container for a minimum of 30 seconds.

The puncturing device and carbon filter will be installed, operated, and maintained in accordance with the manufacturer's recommendations (Attachment XX). The unit will be capable of treating aerosol cans up to three (3) inches in diameter.

For shipments of mixed wastes containing more than one aerosol can, PFNW-R will make sure the contents of each can are compatible before draining the cans into the same plastic-lined container. Aerosol cans identified with incompatible constituents will be segregated based on compatibility, then punctured and drained into separately-grouped plastic-lined containers. Drained liquids and punctured aerosol cans will not be comingled with other customers' wastes. Should processing of the aerosol cans extend beyond one shift, the aerosol can puncturing device container, plastic liner, and accumulated liquids will remain in the Stabilization Building and managed according to the container management requirements of Attachment LL.

There are two options for management of drained free liquid wastes. Free liquid wastes associated with punctured aerosol cans will either be 1) treated to meet LDR standards (e.g. absorbed, stabilized) and the waste acceptance criteria of the disposal facility (e.g. no free liquids), and placed back in with the generator's waste, or 2) repackaged to be sent to an off-site TSDF. In addition, the liquid wastes may be stored on site according to all permit requirements before processing for disposal.

Within 21 calendar days after the final can is punctured for each receipt of waste managed according to option 1 or 2 above, the puncturing device, carbon filter, and lid will be removed from the container (and

liner) and a lid will be placed on the container to ensure the container is closed. The lid with the puncturing device and carbon filter will then be placed on a container with a clean plastic liner. When not in use, the puncturing device and carbon unit will be stored on a container with a clean plastic liner in the Stabilization Building.

Waste packaged for shipment, liquid wastes in storage, or waste pending analytical results will be stored in the permittee's permitted Waste Storage Building in accordance with Attachment LL. These containers will be treated and disposed or shipped to an off-site TSD within 365 days of formal receipt as allowed in Sect. 4.2 of Attachment CC.

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Aerosol Can Puncturing Device (designated as TP-15)

As required by the WAP, all incoming waste shipments are required to undergo visual inspection. Table 1 of the WAP lists all wastes that PFNW-R is restricted to accept. One of these restricted wastes is, "Containers containing pressurized gases…" The reason why these containers are restricted is because PFNW-R did not have an adequate method of treating this waste. Aerosol cans are not expected to fall in to this category; therefore PFNW-R can accept and treat these types of waste. The aerosol can puncturing unit will be capable of treating aerosol cans up to three (3) inches in diameter.