PPC 9441.1991(01)

MODIFICATIONS TO WASTEWATER TREATMENT SYSTEMS UNDER EXCLUSION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JAN 3 1991

Mr. Lynn Cooper
Michelin Tire Corporation
P.O. Box 2846
Greenville, South Carolina 29602-2846

Dear Mr. Cooper:

This letter is in response to your November 7, 1990 letter regarding modifications to Michelin's Sandy Springs wastewater treatment system. According to your letter and our December 11, 1990 telephone conversation, you have already changed to a new belt filter press which produces a higher percent solids and processes higher rate of sludge production. In addition, according to your letter and our telephone conversation, you will soon institute other modifications to the current wastewater treatment system to address greater capacity needs resulting from ongoing production expansion at Sandy Springs. Specifically, the planned modifications are:

The existing turbocirculators are to be replaced by a lamella clarifier and sand filter.

The existing Diapac sanitary package plant will be replaced by a pair of sequencing batch reactors (SBR) for sanitary treatment and organics removal.

The wastewater will be routed to the new SBR for biological treatment prior to discharge.

When the original exclusion for the waste generated at Michelin's Sandy Springs facility was granted by the Agency, it was conditioned by stating that "the exclusion remains in effect unless the waste varies from that originally described in the petition (e.g., the waste is altered as a result of changes in the manufacturing or treatment process)." Although you submitted

results of TCLP testing on the sludge conducted by RMT Laboratory to show that the original exclusion should still apply to the waste that is currently being generated, these data are not sufficient for our evaluation. As discussed further below, we cannot fully assess the impact of the modifications on the exclusion of your wastewater treatment sludge without knowing more details about these modifications and their impact on the composition of the filter press sludge.

We are concerned about the modification you have already implemented (the new belt filter press) and the others you are planning to implement. The increase in the amount of wastewater treated, improved metals removal, higher degree of biological treatment, and higher percent of solids in sludge may change the chemical form/composition of the waste. In order to make certain that the original exclusion still applies to the waste that is currently being generated at Michelin's Sandy Springs facility, we request that you submit the information specified below. If you decide to not submit the information requested below, you must notify the Agency within two weeks of the receipt of this letter.

A. Process Information

We need more detailed information on the modifications planned. Therefore, you must submit the following:

A description of the Lamella clarifier, the sand filter, the biological treatment (sequencing batch reactors), the belt filter press (including the percent solids), and any other process information that you believe might be pertinent. The drawings referenced on page two of your letter (62005POl and 62006PO5) might provide some of this information but they were not attached to the letter we received. A description and revised drawing similar to those submitted in the letter to Myles Morse on January 20, 1986 would be appropriate (see Enclosure I).

An estimate of the new average and maximum sludge generation rates on a monthly and annual basis.

If there are any other reasons, besides those already stated in your November 7, 1990 letter, which make your planned modifications necessary (e.g., NPDES permit requirements).

B. Sampling and Analysis Information

An explicit statement explaining why the three samples collected in June and July 1990 (and future samples undertaken in response to today's letter) are representative of any process or waste variability.

Total constituent analysis results for at least four representative samples collected over a one-month period for the eight metals listed in 40 CFR §261.24 and nickel. We request that you quantify total levels to support your claim that the system modifications are minor and "will not change the characteristics of the sludge".

Total sulfide and total cyanide analyses for four representative samples. You must also submit results from reactive sulfide and reactive cyanide testing if total sulfide and total cyanide levels exceed 500 and 250 parts per million (ppm), respectively. Leachability analysis for cyanide, using the TCLP, is also required if total cyanide levels are greater than 100 ppm. When testing for leachable cyanide, deionized water should be used in place of the acid leaching medium.

Total oil and grease analysis for four representative samples. We are concerned that your waste may have an oil and grease content above one percent because in your original petition the filter press sludge had a maximum oil and grease content of five percent. If the total oil and grease content is greater than one percent, you must use the Oily Waste Extraction Procedure (OWEP, SW-846 Method 1330) to analyze at least four representative samples for leachable concentrations in lieu of the TCLP. When using the OWEP, please substitute the TCLP for the extraction procedure in Step 7.9 of the OWEP. Leachable nickel and cyanide concentrations must also be quantified.

If total levels of oil and grease are less than one percent, you must submit results of TCLP analyses for at least four representative samples for the eight metals listed in 40 CFR §261.24, nickel, and cyanide.

Total constituent and TCLP analysis data for all hazardous

organic constituents listed on 40 CFR Part 261, Appendix VIII (including acetone, ethyl benzene, isophorone, 4 methyl-2-pentanone, styrene, and xylene) which are likely to be present in your waste. (Michelin initially identified 182 Appendix VIII hazardous constituents which could be expected to be present or released during the facility's operation, and provided total constituent analyses for these Appendix VIII hazardous constituents.) We are especially concerned about toluene, ethyl benzene, styrene, malaeic anhydride, and thiuram (these were detected in samples submitted in support of your original petition).

We recognize that the Appendix VIII list presents a number of analytical problems for some constituents. For analytical testing purposes, you must analyze the samples for those compounds which can be accurately quantified using appropriate SW-846 methods. It should be noted that SW-846 analytical test methods exist for all constituents listed in 40 CFR Part 264, Appendix IX. For any hazardous constituents for which analytical results are not provided, a rationale must be provided explaining why the constituent is not expected to be present.

In lieu of analytical testing, you may present mass balance arguments that demonstrate that constituents cannot be present in the waste at levels of concern.

You should submit the above requested process information and any other information you believe to be pertinent to our office as soon as possible. Please submit the sampling and analysis information, along with the appropriate QA/QC information, to our office within 90 days after the planned modifications have been implemented. Following implementation of the planned modifications, we suggest that you treat the waste as hazardous until we have made a decision regarding the status of your exclusion. This should be viewed as a precautionary measure in case our evaluation of your new waste data results in a decision that your original exclusion is no longer applicable to the waste being generated.

If Michelin decides not to implement any of the proposed changes to the process (or if these process changes are delayed), you must still provide further sampling/analysis data to demonstrate that the change in filter press has not adversely

affected the waste. Therefore, we may accept the TCLP data you have already submitted (provided they are from representative samples with total oil and grease levels of less than one percent). However, even in this case, you need to supplement the existing data to include total constituent and TCLP analyses such that all of the above requested analyses are provided for at least four representative samples.

If you have any questions about this correspondence, please feel free to contact Narendra Chaudhari of my staff at (202) 382-4770.

Sincerely,

Robert Kayser, Chief
Delisting Section

Enclosure

cc: Narendra Chaudhari, EPA HQ
Jim Kent, EPA HQ
Doug McCurry, EPA Region IV
James Scarbrough, EPA Region IV
Sarah Bennett, SAIC