Streamlining TSD Permitting in Washington State

Mark Furnish
TSD Permit Writer
8/13/19
Mark Furnish
Brief History

2002: Washington had 11 facilities with TSD permits and 4 permit writers and 1 permit engineer

2004: Permit lapses and budget cuts called for a change. So Ecology decided to go to an expedited permit plan eliminating NODs and structuring the permit process.

2012: Because of success, permit renewal and modification times reduced even further

2016 and present: Use current goals with 5 permitted facilities, 1 permit writer and 1 permit engineer*

* Does not include Hanford facility
Overview

The Department of Ecology’s goals are:

To complete Class 1 modifications within 30 days

To complete Class 2 modifications sent for Public Comment within 6 weeks

Renew TSD permits within 18 months
Overview

Current Average Time per Modification
= 36 days

Percentage of modifications meeting
goal = 59%

Longest modification held at Ecology
= 14 days
Permit Modifications
Permit Modifications

Facility sends an informal notice of its intention to create a permit modification

Ecology confirms modification class type

Facility provides draft copy of modification

Dangerous Waste Permit Modification

Facility: Burlington Environmental, LLC (Stericycle) Tacoma facility (VIAD 020 257 945)

Modification Title: Part A Update / Remove "Interim" Construction Versions/References

Modification Number: TAC21-1 Submitted: March 4, 2019 (draft)

Description of Modification:

This modification:

- Revises Section A (Part A of the RCRA Permit Application) to provide updated information including Facility Contact and Photographs; and
- Removes the outdated "interim" construction version/references of all sections of the DW permit application. These versions/references are no longer applicable following completion of the construction project to relocate containerized operations from the Stericycle – Kent facility to the Stericycle – Tacoma facility.

Modification Class:

Stericycle is proposing that this modification is a Class 1 requiring prior agency approval, as described in WAC 173-303-830(4)(d)(i).

Backup Technical Documents:

Not applicable.

List of Affected Sections:

The following list outlines portions of the dangerous waste permit and its attachments that are affected by this modification. Revised pages are attached.

Permit:

None

Permit Attachments:

Section A, Part A of the RCRA Permit Application (revised text)
Section A, Part A of the RCRA Permit Application (Updated Photographs)

- Main Check-In Area (New)
Draft permit modification is reviewed by Permit Engineer, Associated Inspector, Permit Writer, Other personnel as applicable.
Permit Modifications

Ecology uses Microsoft SharePoint to distribute and store facility modification requests.
4. PROCESS EQUIPMENT

4.1. This section describes process equipment utilized for DW management at the Tacoma Facility. Process equipment units are tools that assist in the processing of the waste. These units do not contain waste in the same way as a tank contains waste, and therefore, they are not considered to be tanks.

4.2. The locations of process equipment are shown in Figures 03-2 and D3-2p. Containers to be processed are moved to process equipment by forklift or manually to the location of the units. Incompatible wastes are not to be processed simultaneously in process areas. Changing the location of any of the process equipment identified in this section or adding additional dangerous processing equipment would necessitate a modification per WAC 173-303-880. Design and operational information for process equipment can be located in Appendix D-B, Process Equipment. Note that the literature provided describes typical processing units, and actual process equipment may be different in type or size, or may be an equivalent unit from a different manufacturer.

4.3. Shredder

The Shredding Systems Inc. (SSI), Model 1200 shredder is located in Process Area #1 (Cell C). The shredder is used for size reduction and separation of solid materials e.g., manufacturing debris, PPE, rags, cardboard, empty containers, or similar materials, or small containers with non-liquids to be solidified or stabilized (e.g., biohazardous) shredding containers and their contents using low-speed, high torque, cutting teeth. The shredder is equipped with a fire suppression system meeting IFC requirements. Covers are removed from containers to be processed, and the containers are lifted via forklift and rotated to empty the contents into the shredder hopper. Material passing through the shredder falls into a 2-cubic yard steel tub that is within a secondary containment tray. Shredded material will be containerized for shipment off-site or will be transported to the Stabilization Building for additional processing.

Flammables, reactives, incompatibles, and materials containing > 500 ppm VOCs will not be processed in the shredder.

Furnish, Mark (BCY)
As this shredder was not designed to safely handle liquids (except in negligible amounts), BCY would want the wording in this modification to reflect that all containers sent through the shredder have been confirmed to be RCRA empty.
Permit Modifications

When all sides agree, the facility sends an electronic and hard copy formal request.

A formal approval is typically sent within 5 business days.

November 14, 2018

[Signature]
Field Compliance Manager
Burlington Environmental, LLC (Stericycle-Tacoma)
1701 East Alexander Avenue
Tacoma, WA 98421

Dear [Name],

Burlington Environmental, LLC, Tacoma Facility, (WAD020257945), made a submittal of permit modification request (TAC19-1) for the Burlington Environmental, LLC (Stericycle) Tacoma facility on November 1, 2018. This Class 1 modification addresses the replacement of the facility’s carbon units with functionally equivalent units.

Ecology approves this modification and agrees that it meets the criteria for a Class 1 modification under WAC 173-303-830.

As required by WAC 173-303-830(4)(a)(ii)(B), notice of the modification needs to be sent to all persons on the facility mailing list within 90 calendar days after the change is put in effect.

If you have any questions or concerns, please contact Mark Furnish at 360-407-7160 or by e-mail at mfrush41@ecy.wa.gov.

Sincerely,

[Signature]
Ava Edmooson
Section Manager
Hazardous Waste and Toxics Reduction

c/c: Luan Castelli, Environmental Protection Agency, Region 10

[Signature]
Puyallup Tribe
Leslie Morris, Ecology, SWRO Hazardous Waste Compliance Unit Supervisor
Andy Reppert, Ecology, SWRO Hazardous Waste Compliance Inspector
Jason Lindblom, Ecology, EQ, Permit Engineer
Mark Furnish, Ecology, HQ, T&D Permit Writer
Permit Renewals
Any facility with a permit who wishes to continue to operate after the permit expires must submit a new application 180 days prior to the expiration date of the effective permit (WAC 173-303-806(6)).

Permit Writer contacts facility a year (or more) before the renewal application due date.

Permit Writer schedules an in-person meeting with facility to discuss permit renewal.
During initial renewal meeting:

The facility identifies significant changes they propose for the renewed permit.

Ecology identifies changes to the permit they want to see.
Permit Renewals

A schedule is created that identifies when each draft section should be submitted and reviewed.
Permit Renewals

Each section has draft submittals and is stored and commented on using SharePoint.
Each section goes through this back and forth, using SharePoint, until Ecology accepts that section and determines it is complete.
New Permits
New Permits

Washington state has strict siting criteria for any new TSD permit. Since that state rule adoption, no new TSD permits have been issued.
Questions?

Special thanks to Ecology team members:
Jason Landskron P.E., Leslie Morris, Michelle Underwood (Boss 😊)