



Momentive Performance Materials Inc.
260 Hudson River Road
Waterford, NY 12188
momentive.com

SUBMITTAL

Date: February 27, 2019

To: Kevin Wood
Regional Materials Management Engineer
New York State Department of Environmental Conservation
Region 5 Office
232 Golf Course Road
Warrensburg, NY 12885

Daniel Evans
Director, Bureau of Hazardous Waste and Radiation Management
Division of Materials Management
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-7260

Re: Major Permit Modification Request

From: Thomas Shaw, CHMM
Hazardous Waste Program Leader
MPM Silicones LLC

Subject: 6NYCRR Part 373
Hazardous Waste Management Permit
NYSDEC Permit No. 5-4154-00002/00357
EPA ID No. NYD002080034

Per 6 NYCRR 373-1.4(a)(5) -

"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 fine and imprisonment for knowing violations."

Regards,

**Brian C.
Hupe**

Digitally signed by
Brian C. Hupe
Date: 2019.02.28
13:15:18 -05'00'

Brian Hupe
Environmental Manager

Dear Sirs:

Momentive is requesting a major permit modification to address two items as outlined below.

- 1) To address the department's concerns regarding the secondary containment capacity for permitted hazardous waste storage tanks T-39 (T-39) and T-40 (T-40), Momentive is proposing a modification of the secondary containment system which will provide additional capacity to address T-39 and T-40's ability to be interconnected and will be inclusive of the 25-year, 24-hour rainfall event equal to 4.8 inches of rain. The proposed modification will allow the secondary containment system for T-39 and T-40 to overflow into the adjacent secondary containment system currently utilized for permitted hazardous waste storage tanks 26A (T-26A) and 26B (T-26B). Because T-39 and T-40 contain methyl slurry waste and T-26A and T-26B contain halogenated silane waste, no chemical incompatibility concerns exist. The new configuration will require a 4 inch deep by 3 foot long weir cut into the common wall between the two secondary containment areas. The weir will be coated with Carboline Semstone 245 which is the same coating used in all of the permitted transfer areas in the site. The coating is compatible with the waste stored in tanks 39 and 40 as well as tanks 26A and 26B. The new coating will be "tied into" the existing coating according to manufacturer's instructions. This change will provide 619 gallons per minute (gpm) flow rate from the secondary containment area for T-39 and T-40 into the secondary containment area for tanks 26A and 26B. Based on the most likely worst case scenario for a release from T-39 or T-40, i.e. a valve directly downstream of the P-25 transfer pump for the tank systems being left open, the maximum expected flow rate is approximately 150 gpm. Said flow rate is based on the P-25 pump curve. Because the proposed weir's flow rate is calculated at 619gpm and the expected discharge rate is 150gpm, the weir is adequately sized to prevent overflow of the T-39 and T-40 containment at a different location. The new combined secondary containment capacity for this configuration is 21,383 gallons. Attached are the following supporting documents: P-25 pump curve and PE stamped new secondary containment calculations. Momentive is claiming these attachments are business confidential information. The Semstone 245 coating requires a minimum surface temperature of at least 50 degrees Fahrenheit, therefore this project will be completed during the next construction season (2019) as weather permits. A final "as-built" drawing will be supplied once this project is completed.
 - 2) Upon issuance of the facility's 2016 Permit, it was realized that the secondary containment capacity for the T-538 Transfer Area was below the listed total of 64,411 gallons in the permit application. The containment calculation inadvertently included Cadigan's Tomb, a shared secondary containment system located southeast of the T-538 transfer area. The correct containment capacity, provide by a licensed surveyor, is 5,375 gallons. Currently, all permitted hazardous waste tankers (4004, 4386 and 3137) have available capacity (i.e. 6,500 gallons) exceeding the available 5,375 gallons of secondary containment. To address this matter, Momentive is entering into an agreement with Matlack to purchase a new, smaller tanker with a maximum capacity of 5,121 gallons. Due to the acidic nature of the material this tanker will contain it must be Halar lined. Upon completion of the liner installation the tanker will then be delivered to Momentive to be put into service for transporting hazardous
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waste. Attached are spec sheets for the new tank wagon and the stamped drawing for the secondary containment capacity of the T-538 transfer area. These items are considered confidential business information. When this new tanker, T-50-230 is placed in service it will be able to be used at the following transfer areas: T-538 Transfer Area, APS Transfer Area, B71 Transfer Area, B76 Transfer Area and the B23 Transfer Area. Table C-2 Authorized Hazardous Waste Transfer Areas (TA's) will be updated to show this change. The table in footnote 1 of Table C-3 Authorized Containers Subject to 373 will also be updated to include the new tanker.

If you have any questions regarding this request please do not hesitate to contact me directly.

Sincerely,

Thomas Shaw, CHMM
Hazardous Waste Program Leader

cc. William Collins, Momentive
Todd Hyde, Jr, Momentive
Brian Hupe, Momentive
Whitney Crowe, Momentive
Lynn Winterberger, NYSDEC
Brad Shaw, NYSDEC
Eric Hart, NYSDEC
