

CONN-SELMER, INC. HAZARDOUS WASTE FACILITY PERMIT
EPA I.D. NO. AZT 000 612 135
1310 W. FAIRWAY DRIVE
NOGALES, ARIZONA

This fact sheet was prepared in accordance with the Arizona Administrative Code (A.A.C.) R18-8-271.E(e) and R18-8-271.G. A fact sheet must accompany every Arizona Hazardous Waste Management Act (AHWMA) draft permit that the Arizona Department of Environmental Quality (ADEQ) has prepared that either raises major issues or involves a new facility. All references to the A.A.C. hereafter refer to the A.A.C. R18-8-260 et seq., made effective on December 31, 2017, which incorporates and/or modifies parts of Title 40 Code of Federal Regulations (CFR) Parts 260 et seq. (July 1, 2013, Edition).

FACILITY DESCRIPTION

Conn-Selmer, Inc. (CSI) (formerly United Musical Instruments, Inc.) operates a groundwater remediation system (GRS) at 1310 West Fairway Drive, Nogales, Arizona (see Figures 1 and 2). The GRS is designed to remove volatile organic compounds (VOCs) from the groundwater. The VOC contamination is the result of inappropriate storage of wastes generated from musical instrument manufacturing operations, and occurring from 1966 through 1985. The GRS is a pump and treat system, which pumps groundwater from an extraction well at the source of contamination to a 7,000-gallon equalization tank. Contaminated groundwater is then pumped at 50-75 gallons per minute (gpm) through two air stripper towers that are in series. Each air stripper tower is 28 feet tall, and has an inside diameter of 3.5 feet. The air stripper towers contain packing material to maximize exposure of contaminated groundwater to air, introduced by fans countercurrent to water flow. The clean, treated groundwater is sent to an impoundment located at the former- Palo Duro Creek Golf Course for irrigation. A schematic of the GRS is presented in Figure 3. A photograph of the system is shown in Figure 4.

HISTORY OF THE SITE

From 1966 through 2003, the facility was used to manufacture clarinets and trombones, and to assemble saxophones. In 1966, due to the lack of public wastewater processing plants near the facility's rural location, sanitary waste and industrial process water were treated on-site and directed to a 50 by 200 foot unlined surface impoundment in the northwest portion of the 8-acre property. Approximately 3,000 gallons per month of sanitary waste and industrial wastewater, primarily solvent rinse-water containing small amounts of trichlorethene (TCE) and 1,1,1-trichloroethane (1,1,1-TCA) were discharged to the surface impoundment from 1966 to 1985. A 1,200-gallon concrete tank was used to precipitate metals out of the wastewater from plating operations. Precipitated metals were shipped to smelting and refining companies. The remaining wastewater was treated with

sodium hypochlorite to destroy residual cyanide and discharged to the surface impoundment. Excess wastewater from the surface impoundment was pumped to two smaller, unlined surface impoundments east of the production building.

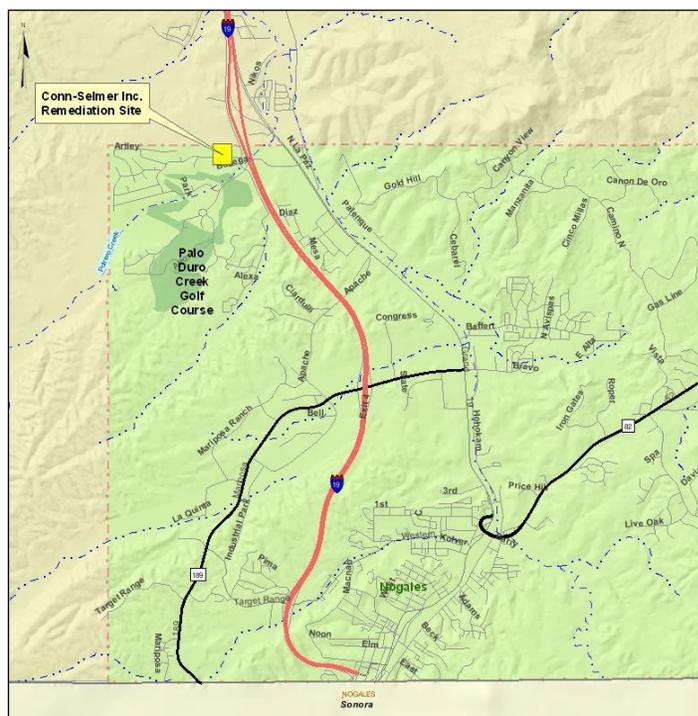


Figure 1 - Location of Applicant's site relative to the City of Nogales, Arizona (see Figure 4 for details).

On August 18, 1980, CSI's predecessor, C.G. Conn/Artley Flute, filed a notice of hazardous waste activity with the EPA as required under the federal Resource Conservation and Recovery Act (RCRA) for their Nogales, Arizona facility. On November 19, 1980, C.G. Conn/Artley Flute submitted a RCRA Part A Permit Application in order to continue to operate under interim status. To comply with interim status requirements under A.A.C. 18-8-265.A (40 CFR 265.90 et seq.), groundwater monitoring was begun. Analysis of ground water samples indicated that contaminants from the surface impoundment had leached through the soil into the groundwater. As a result, in 1985, the large unlined surface impoundment, the two smaller impoundments, and the wastewater treatment system were closed, excavated, and had their contaminated soil removed. Final closure was conducted pursuant to a plan approved by ADEQ in December 1986.

On February 1, 1988, ADEQ certified closure of the three surface impoundments and the wastewater treatment unit under RCRA and the Arizona Hazardous Waste Management Act (AHWMA).

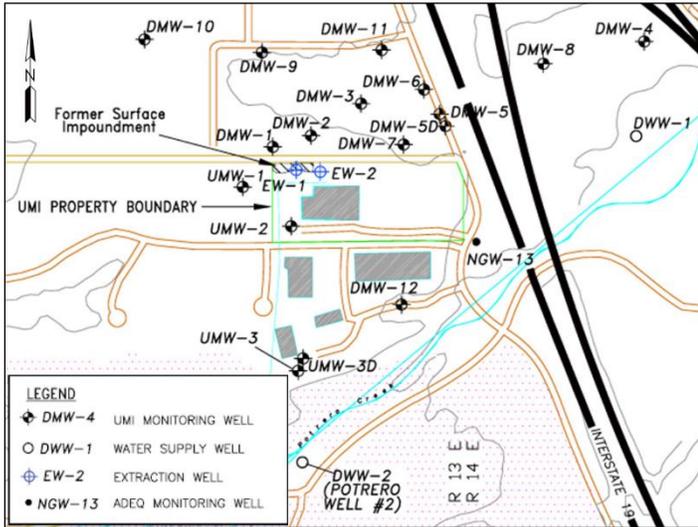


Figure 2 - Conn-Selmer remediation facility, monitoring, extraction, and production wells near the facility



Figure 4 - Groundwater Remediation System (GRS); 1310 West Fairway Drive, Nogales, AZ. The GRS is fed by extraction well EW-2 (Figure 2) pumping at 50 to 75 gallons per minute (gpm) to an equalization tank with a containment capacity of approximately 7,000 gallons (right foreground). Water contaminated with low levels of volatile chlorinated organic solvents and degradation products (Table 1) is remediated via two air strippers, in series (left center). Remediated water is transferred to a 7,500-gallon retention tank for analysis prior to distribution to a lined surface impoundment managed by the City of Nogales. The GRS operates within an 8,150 gallon secondary containment, to capture any equipment spills. (ADEQ, 11/2008)

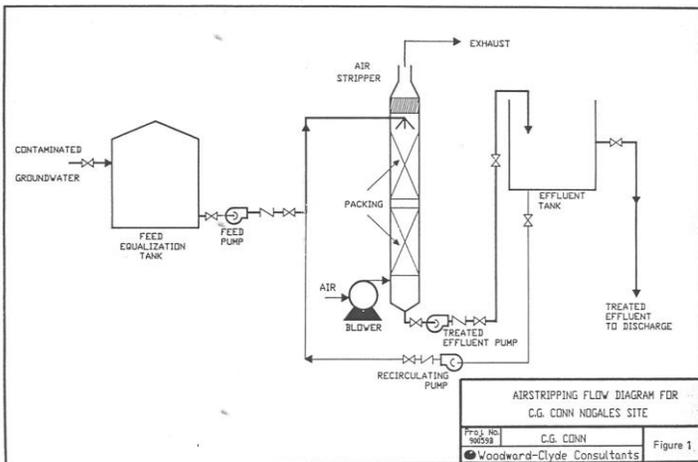


Figure 3 - Schematic of Conn-Selmer's Groundwater Remediation System (GRS)

To mitigate the adverse impacts to the groundwater, an extensive evaluation of groundwater remediation alternatives was conducted in the 1980s. ADEQ approved the use of a pump and treat system to remove the hazardous volatile organic compounds from extracted groundwater. In 1990, CSI's consultant, Woodward-Clyde, installed and evaluated the efficiency of two air strippers operating in series.

In 1993, CSI entered into a consent order (#D-47-93) with ADEQ that required CSI to continue to monitor and remediate groundwater at the site. A second consent order (#Z-10-98) was signed with ADEQ, stemming from violations noted from a 1996 ADEQ site inspection of the facility. The terms of both consent orders have since been met and they have been terminated.

The GRS has now operated continuously since 1998. The concentrations of contaminants at the center of the contamination have been reduced by 93 percent over thirty years (see Table 1). Initially, hazardous contaminant concentrations and degradation products in groundwater at the source were approximately 10,000 parts per billion (TCE and 1,1,1-TCA). By 2018, concentrations of those hazardous VOC contaminants in groundwater have been reduced to less than 250 parts per billion. Treated water leaving the GRS contains no VOCs, and is discharged at an impoundment located at the former- City of Nogales, Palo Duro Creek Golf Course.

The site is currently subject to a RCRA hazardous waste Post-Closure Permit. The renewal of the Post-Closure Permit will allow CSI to continue to operate the GRS for up to ten more years, or until they demonstrate that the health-based aquifer contaminant levels for VOCs and degradation products have been met.

TYPE AND QUANTITY OF HAZARDOUS WASTES MANAGED AT THE FACILITY

Types of Hazardous Wastes (40 CFR § 261, Subpart C & D)

The contaminated groundwater, associated with the former surface impoundment, is currently being withdrawn from an extraction well (EW-2) and pumped through two air strippers in series to

evaporate the VOCs from the water. VOCs detected in groundwater that exceeded established limits for drinking water include trichloroethene, 1,1,1-trichloroethane, and aerobic and anaerobic degradation products.

More specific information on the waste types and codes can be found in the federal hazardous waste rules in title 40 of the Code of Federal Regulations, Part 261 (40 CFR 261) Subpart C, “Characteristics of Hazardous Wastes” and 40 CFR 261 Subpart D, “Lists of Hazardous Waste.”

Quantities of Hazardous Waste Managed

The total quantity of spent halogenated solvents that were placed in the surface impoundments before 1985 is unknown. The quantity of hazardous constituents that may have migrated through the soil to the groundwater is also unknown. However, chemicals used and potentially discharged to the surface impoundment are identified in Attachment A, Exhibit A-3 of the draft permit. That inventory is the basis for the constituents that must be monitored by CSI during post-closure. Metals constituents have not consistently exceeded the established regulatory limits. Therefore, ADEQ proposes in the permit to have CSI analyze the groundwater for total metals on an annual basis, rather than semi-annually, until such a time that CSI begins final site closure.

DESCRIPTION OF POST-CLOSURE PERMIT

The draft Post-Closure Permit consists of seven separate sections of text and their attachments. All conditions are based on the RCRA Part B Post-Closure Permit Application submitted December 31, 1997, with supplements and updates provided by the applicant until March, 2009. The permit establishes a post-closure care period of thirty years, beginning upon permit issuance. The term for the permit will be for ten years, and will be renewed periodically by the applicant until the cleanup is complete.

The following are brief descriptions of the permit parts and their regulatory basis:

Part I contains general permit conditions. These conditions are required by Arizona Administrative Code (A.A.C.) R18-8-270 A and L and 40 CFR 270.30.

Part II contains post-closure facility conditions. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 270.32 and 264, Subpart H.

Part III contains specific conditions related to the groundwater monitoring and remediation system. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 264.100.

Part IV contains specific conditions regarding inspections. These conditions are required by A.A.C. R18-8-264.A. and 40 CFR 264.195 (tank inspections), and 40 CFR 264.602 (miscellaneous unit inspections).

Part V contains specific conditions regarding emergency response. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 264 Subpart D (Contingency Plans and Emergency Procedures).

Part VI contains specific conditions regarding record keeping. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 264 Subpart E (operating record).

Part VII contains conditions regarding corrective action. These conditions are required by A.A.C. R18-8-264.A and 40 CFR 264.101 (corrective action for solid waste management units).

Director-Established Permit Conditions

State and Federal hazardous waste regulations authorize ADEQ to include site-specific permit conditions deemed necessary to protect human health and the environment (see A.A.C. R18-8-270.A, M, N, and O and 40 CFR 270.32). The Director has established the following site-specific permit conditions, also known as Omnibus Conditions at the CSI Groundwater Remediation Facility:

1. CSI must maintain a contact list of K-12 public and private schools within 1.0 mile of the groundwater remediation unit and to provide such a list to the fire department, when requested and at any time when the emergency provisions of the Contingency Plan are implemented by CSI.
2. The aquifer water quality standard (cleanup level for groundwater) for 1,1-Dichloroethane has been updated in the permit, from 12 micrograms per liter to 2.8 micrograms per liter. EPA considers 1,1-Dichloroethane to be a possible human carcinogen, and has published this value for residential tapwater in the list of regional screening levels (RSLs), revised November, 2018.
3. CSI must complete a groundwater model estimating the influence of the City of Nogales’ production well DWW-2 on the groundwater contaminant plume currently being treated at the CSI Groundwater Remediation Facility.

This Permit Condition is found at Part II.A.5 of the draft permit.

APPLICANT REQUESTED VARIANCES

None have been requested by the applicant.

PROCEDURES FOR REACHING A FINAL DECISION ON THE PERMIT

The administrative record for this revision of the permit contains all data submitted by the applicant. A copy of portions of the administrative record, including the draft permit, is available for public review at the Nogales-Rochlin Public Library, 518 N. Grand Ave., Nogales, on Monday and Wednesday 9:30 a.m. – 6 p.m.; Tuesday and Thursday 9:30 a.m. – 7 p.m.; Friday 9 a.m. – 5 p.m.; and Saturday 9 a.m. – 4 p.m. The full administrative record is available at the ADEQ Phoenix office at 1110 West Washington Street and may be viewed from 8:30 am to 4:30 pm, Monday – Friday (excluding state holidays). To arrange an appointment to review this record at ADEQ, contact the ADEQ Records Center at (602) 771-4380.

As required by A.A.C. R18-8-271.L and 40 CFR 124.13, all persons, including applicants, who believe any condition of the draft permit or the tentative decision to prepare and issue this draft

proposed permit is inappropriate, must raise all reasonable ascertainable issues and submit all reasonably available arguments and supporting materials by the close of the public comment period. All comments submitted during the public comment period shall discuss the appropriateness of the draft permit.

The 45-day public comment period will open on issuance of the public notice on April 24, 2019 and will close on June 9, 2019. During the public comment period, any interested person may submit written comments on the draft permit. These comments and supporting materials must be delivered or postmarked by the last day of the public comment period to the agency contact person identified below.

All written comments delivered or postmarked by the last day of the public comment period will be considered in ADEQ’s final determination regarding the draft permit. After all comments have been considered, a final permit decision will be made by the Director. The applicant, each person who has submitted written or oral comments, and each person who has so requested will receive a notice of this final permit decision. This notice shall include reference to procedures for appealing a decision on a draft permit. The final permit decision shall become effective on the date specified in the final permit notice.

At the time that the final decision is made, the Director shall also issue a response to any significant comments. The response to comments shall consider all items as specified in A.A.C. R18-8-271.O and 40 CFR § 124.17. The response to comments shall be made available to the public for review. Any person who desires to be placed on the mailing list for all future permitting activities for this facility or for facilities in a specific geographic area may request so in writing to the above address, pursuant to A.A.C. R18-8-271.I(c)(1)(ix) and 40 CFR § 124.10(c)(1)(ix)(a).

In addition to submitting public comment, any person may request the ADEQ Director to schedule a public hearing. Written requests for a public hearing must be submitted to ADEQ by not later than

close of the comment period, June 9, 2019, and must state the nature of the issues proposed to be raised in the hearing. The Director will hold such a hearing if: 1) he finds, on the basis of requests, a significant degree of public interest in the draft permit, or 2) he finds that the hearing might clarify one or more issues involved in the permit decision, or 3) a formal written notice of opposition to the draft permit is received within the comment period.

If you would like a copy of the facility fact sheet or wish to be put on a mailing list for permit activity, you can make this request to the ADEQ contact person listed above. Please bring this notice to the attention of anybody who might be interested in this matter.

PERSONS TO CONTACT FOR ADDITIONAL INFORMATION

For additional information concerning the draft permit, please contact:

Anthony Leverock – Associate Engineer
ADEQ - Hazardous Waste Permits/Support Unit
1110 West Washington Street
Phoenix, Arizona 85007
E-mail: leverock.anthony@azdeq.gov
(602) 771-4160 or
Toll Free: 1-800-234-5677, extension 7714160

ADEQ Communications Director
(602) 771-2215

Hearing-impaired individuals call our TDD line:
(602) 771-4829

Web site: www.azdeq.gov

Table 1 – Comparison of monitoring well results over 30 years

	REGULATORY LIMIT (µg/l)	1985	2018
		Max Value (µg/l)	Max Value (µg/l)
1,1 – Dichloroethene (1,1-DCE)	7	10,000	590
cis-1,2-Dichloroethene (cis-1,2-DCE)	70	No Results	290
trans-1,2-Dichloroethene (trans-1,2-DCE)	100	880	ND
1,1-Dichloroethane (1,1-DCA)	2.8	44	350
1,1,1-Trichloroethane (1,1,1-TCA)	200	9,800	ND
Trichloroethene (TCE)	5	410	170

ND = not detected