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**Mallinckrodt**

1993 FEB -5 PM 1:23

Mallinckrodt Specialty Chemicals Company  
16305 Swingley Ridge Drive  
Chesterfield, MO 63017  
(314) 530-2000

February 2, 1993

VIA HAND DELIVERY

David Friese, P.E.  
Chief, Corrective Action Unit  
Hazardous Waste Program  
Missouri Department of Natural Resources  
Division of Environmental Quality  
205 Jefferson Street  
Jefferson City, Missouri 65101

Re: Mallinckrodt, Inc./St. Louis Plant, St. Louis, MO  
EPA ID No. MOD096726484

Dear Mr. Friese:

Mallinckrodt Specialty Chemicals Company (Mallinckrodt) is providing the Missouri Department of Natural Resources (MDNR) with the enclosed information identifying potential solid waste management units (SWMU) at Mallinckrodt, Inc.'s St. Louis Plant to supplement the information submitted to the MDNR by letter dated November 11, 1992. These potential SWMU's are in addition to Mallinckrodt's permitted hazardous waste storage pad, for which MDNR already has complete information.

There are a few other matters we would like to address. We have also enclosed a revised list of St. Louis Plant Potential SWMU's and a revised site map identifying these potential SWMU's in the Non-FUSRAP areas.

David Friese, P.E.  
February 2, 1993  
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If you have any questions regarding the potential SWMU information, please contact the undersigned at (314) 530-2170 or Mark Puett at (314) 539-1344.

Sincerely,

*Robert F. Boland (cdb)*

Robert F. Boland, P.E.  
Environmental Program Manager  
Mallinckrodt Specialty  
Chemicals Company

RFB/cdb

Enclosures

1. Revised List of Potential SWMU's in Non-FUSRAP areas.
2. Information sheets for each additional potential SWMU.
3. St. Louis Plant Site Delineation with Potential SWMU's, Drawing #5000-245-002.

cc: David Adler, U.S. DOE  
David Bedan, MDNR  
Khan Nguyan, MDNR  
Katherine Bello, EPA Region 7  
Lyndell Harrington, EPA Region 7  
Susan Rogers, Metcalf & Eddy

ST. LOUIS PLANT POTENTIAL SWMU'S  
REVISED 2/2/93

<u>SWMU NO.</u>	<u>DESCRIPTION</u>
1-1	Drum pads northwest of B97
1-2	Wastewater storage tank and tank truck loading area northeast of B97
1-3	Truck unloading area north of T Building
1-4	Drum pad north and east of B10
1-5	B5 construction area
1-6	Plant 1 sulfuric acid truck unloading area
1-7	Drum pad to the north and east of B6 and west of B26
1-8	Coal ash truck loading area
1-9	Waste staging area east of Building W
1-11	Building W Acetic Acid Unloading Area
1-12	Building X Rail Car Unloading Area
2-1	T-513 wastewater treatment tank for B507
2-2	Drum pads and storage north of B501
2-3	Wastewater tanks (T801 and T802) east of B503
2-4	Drum staging area east of B503
2-5	T-201, <90-day storage area at B503
2-6	B503 wastewater sump
2-7	T-464, <90-day storage tank at B504
2-8	T-288, <90-day storage tank at B505

SWMU  
NO.DESCRIPTION

2-9	Plant 2 sulfuric acid truck unloading area north of B50
2-10	Waste compactors near B213, B501, B502 and B76
2-11	Building 502 Drum Staging Area
2-12	T-667 Wastewater Treatment Tank for Building 505
2-13	Building 504 Drum and Wastewater Tank Truck Staging Area
3-1	Special waste drums south of B76
3-2	Historic drum storage and handling area west of B63
3-3	Historic sodium metal storage area in B66
5-1	Drum pad south of B235, B219 and lots east and west of B219
5-2	Drum pad north side of B204, B200 and west of B200
5-3	Tank farm and truck unloading area south of B235
5-4	Building 201 Drum Storage Area
5-5	Potassium sulfate unloading area west of B201
5-6	Drum storage area east of B250
5-7	Tannin process sludge dumpster northeast of B235
5-8	Quonset hut waste storage area (B221)
5-9	PCB Storage Area
6-1	Drum pad northeast corner of B130
6-2	Hazardous waste drum pumping area north of B130
8-1	Waste oil storage area in B90
9-1	Drum pad east and north of B98

100209

SWMU  
NO.

DESCRIPTION

9-2

Building 99 Drum Filling Area

February 2, 1993

SWMU # 1-9 INFO. SHEET

Waste Staging Area East of Building W

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 50' x 50' area east of Building W. Used for staging non-hazardous wastes in drums and caddies. Not regulated.

B. Design; Integrity; Containment

Asphalt pavement. Pavement in good condition.

C. Waste Type; Volume; Concentration

Non-hazardous filter cakes containing zinc sulfate, iron hydroxide, zinc phenolsulfonate, and cuprous iodide.

D. Material of Construction (covered in B)

Asphalt pavement.

E. Date of Installation

1991.

F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.

SWMU #1-9  
Waste Staging Area  
East of Building W  
February 2, 1993  
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H. Date of Closure and Closure Procedures

Not applicable.

I. Dates and Quantities of Releases

None recorded or recollected.

J. Release Response and Corrective Measures

Not applicable.

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SWMU # 1-11 INFO. SHEET

Building W Acetic Acid Unloading Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 15' x 50' area north of Building W. Used for unloading of raw material acetic acid (90%) tank trucks. Not regulated.

B. Design; Integrity; Containment

Asphalt pavement. Pavement in good condition.

C. Waste Type; Volume; Concentration

Incidental drippage of raw material acetic acid have occurred in this area during unloading operation.

D. Material of Construction (covered in B)

Asphalt pavement.

E. Date of Installation

6/20/91

F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.



SWMU #1-11

Building W Acetic Acid Unloading Area

February 2, 1993

Page 2

H. Date of Closure and Closure Procedures

Not applicable.

I. Dates and Quantities of Releases

Incidental losses during hose coupling and uncoupling at completion of tank truck unloading.

J. Release Response and Corrective Measures

Pavement washed with water following completion of transfer.

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SWMU # 1-12 INFO. SHEET

Building X Rail Car Unloading Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 15' x 100' area east of Building X. Used for unloading of raw material hydrochloric acid and stearate rail cars. Not regulated.

B. Design; Integrity; Containment

Limestone chat roadbed.

C. Waste Type; Volume; Concentration

Incidental drippage of raw material hydrochloric acid and stearate have occurred in this area during unloading operations.

D. Material of Construction (covered in B)

Limestone chat roadbed.

E. Date of Installation

Approximately 1980

F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.

SWMU #1-12

Building X Rail Car Acid Unloading Area

February 2, 1993

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H. Date of Closure and Closure Procedures

System taken out of service in 1988.

I. Dates and Quantities of Releases

Incidental losses during hose coupling and uncoupling at completion of unloading.

J. Release Response and Corrective Measures

Releases were to limestone rock which was washed with water and replaced periodically.

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SWMU # 2-11 INFO. SHEET

Building 502 Drum Staging Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 40' x 50' area between Buildings 502 and 507 used for waste drum staging. Not regulated.

B. Design; Integrity; Containment

Asphalt and concrete paving. Pavement in good condition.

C. Waste Type; Volume; Concentration

Non-hazardous stearate wastes from Building 502 operations. Hazardous waste methyl alcohol, resins, and metallic catalyst from Building 507 operations.

D. Material of Construction (covered in B)

Asphalt and concrete paving.

E. Date of Installation

August, 1991.

F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.

SWMU #2-11  
Building 502 Drum Staging Area  
February 2, 1993  
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H. Date of Closure and Closure Procedures

Not applicable.

I. Dates and Quantities of Releases

None recorded or recollected.

J. Release Response and Corrective Measures

Not applicable.

February 2, 1993

SWMU # 2-12 INFO. SHEET

T-667 Wastewater Treatment Tank for Building 505

A. I.D.; Description; Location; Drawings; Regulatory Status

200 gallon agitated tank. Used to neutralize wastewater from Buildings 504 and 505. Not regulated.

B. Design; Integrity; Containment

Fiberglass reinforced plastic tank located on concrete foundation. Hard piped discharged to sewer. Pavement in good condition.

C. Waste Type; Volume; Concentration

Approximately 25,000 gallons per day aqueous process wastewater is neutralized with caustic and discharged to plant sewer system. Wastewater sources are deionization columns, methanol still bottoms, resin conditioning column, purification columns, decolorization columns, desilica columns, and hydrolysis vessels overheads.

D. Material of Construction (covered in B)

Tank is Atlac 382 fiberglass reinforced plastic (FRP). Piping is stainless steel. Surrounding pavement is concrete.

E. Date of Installation

Tank was placed in service in March, 1989.

F. Historical Contents (if different from C)

Not applicable.

SWMU #2-12  
T-667 Wastewater Treatment Tank  
for Building 505  
February 2, 1993  
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G. Use (historical and current)

Not applicable.

H. Date of Closure and Closure Procedures

Not applicable. Unit still in service.

I. Dates and Quantities of Releases

None.

J. Release Response and Corrective Measures

Not applicable.

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SWMU # 2-13 INFO. SHEET

Building 504 Drum and Wastewater Tank Truck Staging Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 60' x 70' area south of Building 504.

1. Used for staging and filling of wastewater tank truck for disposal off-site.
2. Used for satellite accumulation of hazardous wastes in drums and staging of non-hazardous wastes in drums.

Not regulated.

B. Design; Integrity; Containment

Asphalt pavement. Pavement in good condition.

C. Waste Type; Volume; Concentration

1. Wastewater trailer contains non-hazardous wastewater.
2. Hazardous wastes are laboratory samples containing amyl acetate and 1,1,2-trichloroethane in lab packs, and used absorbent pads in drums. Non-hazardous waste in drums are also staged in this area.

D. Material of Construction (covered in B)

Asphalt paving.

E. Date of Installation

1989.



SWMU #2-13  
Building 504 Drum and  
Wastewater Tank Truck Staging Area  
February 2, 1993  
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F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.

H. Date of Closure and Closure Procedures

Not applicable.

I. Dates and Quantities of Releases

None recorded or recollected.

J. Release Response and Corrective Measures

Not applicable.

November 11, 1992  
Revised February 2, 1993

SWMU # 5-4 INFO. SHEET

Building 201 Drum Storage Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 50' x 70' area west of Building 201 including two covered sheds and approximate 15' x 18' covered canopy at northwest corner of Building 201. Not regulated.

B. Design; Integrity; Containment

Asphalt and concrete floors and pavement. Pavement is in good condition.

C. Waste Type; Volume; Concentration

Non-hazardous waste storage including small and large leverpaks of cosmetic products, bismuth oxychloride and magnesium sulfate are present.

D. Material of Construction (covered in B)

Area is paved with concrete and asphalt.

E. Date of Installation

Prior to 1960.

F. Historical Contents (if different from C)

Not applicable.

SWMU #5-4  
Building 201 Drum Storage Area  
November 11, 1992  
Revised February 2, 1993  
Page 2

G. Use (historical and current)

Used for this type of storage for over 5 years.

H. Date of Closure and Closure Procedures

Not applicable. Area is currently utilized.

I. Dates and Quantities of Releases

None recorded or recollected.

J. Release Response and Corrective Measures

Not applicable.

February 2, 1993

SWMU # 5-9 INFO. SHEET INFO. SHEET

PCB Storage Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 20' x 30' area within Substation 214 used for storage of drummed PCB liquids and contaminated equipment and debris. Regulated by TSCA and in compliance with TSCA storage requirements.

B. Design; Integrity; Containment

Restricted access area. Concrete floor with no drains.

C. Waste Type; Volume; Concentration

PCB contaminated liquids, rags, other debris, and equipment; typically in drums unless constrained by size.

D. Material of Construction (covered in B)

Substation has concrete floor and brick walls.

E. Date of Installation

Substation constructed in 1948. Used as PCB storage area since 1981.

F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.

SWMU #5-9  
PCB Storage Area  
February 2, 1993  
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H. Date of Closure and Closure Procedures

Not applicable. Area is currently utilized.

I. Dates and Quantities of Releases

None recorded or recollected.

J. Release Response and Corrective Measures

Not applicable.

February 2, 1993

SWMU # 9-2 INFO. SHEET

Building 99 Drum Filling Area

A. I.D.; Description; Location; Drawings; Regulatory Status

Approximate 5' x 15' area in west side of Building 99. Satellite accumulation area for hazardous waste in drums. Not regulated.

B. Design; Integrity; Containment

Concrete dike in good condition.

C. Waste Type; Volume; Concentration

Methylene chloride, methanol, acetonitrile, trifluoroacetic acid, and dimethyl formamide organic wastes from pharmaceutical products manufacture.

D. Material of Construction (covered in B)

Concrete dike floor and walls.

E. Date of Installation

1992.

F. Historical Contents (if different from C)

Not applicable.

G. Use (historical and current)

Not applicable.

SWMU #9-2  
Building 99 Drum Filling Area  
February 2, 1993  
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H. Date of Closure and Closure Procedures

Not applicable.

I. Dates and Quantities of Releases

None.

J. Release Response and Corrective Measures

Not applicable.