Memorandum



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To: Mr. John M. Hunt, *de maximis, inc.*

CC:

From: TerraTherm, Inc.

Date: 6/21/2011

Re: SRSNE Constructability and HAZOP Review

On March 7, 2011 a Constructability Review (CR) of the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site In-Situ Thermal Remediation (ISTR) project was held at the TerraTherm, Inc. (TTI) office located in Fitchburg, MA and via telephone conference all. Participating at the meeting were:

TTI: Jim Galligan, Dave Brogan, Prakash Acharya, Renée Lagassé, Larry Conant, Robin Swift, John LaChance, Gregg Crisp, Phil Theriault (phone), and Nick LaChance (phone)

The Constructability Review, focused on reviewing and cross-checking between the site layout and the availability of utilities to coordinate system functionality. In addition, we performed an extensive review of the on-going progress in finalizing the wellfield layout, specifics of the drilling sequence/well installation, and cover. Detailed tables of the discussions, action items, and resolutions have been included in Appendix A. Appendix B includes reference drawings that were used during the CR.

A summary of the items reviewed during the meeting is as follows:

- I. Discussion of Site Logistics
- II. Discussion of Site Layout
 - a. Make reference to available figures, attached to memo in Appendix A
- III. Discussion of Site Utilities
 - a. Electric
 - b. Gas
 - c. Sewer
 - d. Water
- IV. Discussion of Wellfield
 - a. Number and type of wells
 - b. Stockpiling materials
 - c. Drilling sequence
 - d. Handling cuttings
 - e. Installation
- V. Cover
- VI. Manifold Runs

10 Stevens Road

Fitchburg, MA 01420

978-343-0300...978-343-2727

VII. Process equipment

On March 14 and 15, 2011 a Hazard and Operability (HAZOP) Review of the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site ISTR project was held at the TerraTherm, Inc. (TTI) office located in Fitchburg, MA and via telephone conference all. Participating at the meeting were:

March 14: Jim Galligan, Dave Brogan, Prakash Acharya, Renée Lagassé, Larry Conant, Robin Swift, John LaChance, Gregg Crisp, Phil Theriault (phone).

March 15: Jim Galligan, Dave Brogan, Prakash Acharya, Renée Lagassé, Larry Conant, Robin Swift, John LaChance, Gregg Crisp.

The Hazard and Operability (HAZOP) review was a structured and systematic examination of the current wellfield and electrical design, and the vapor/liquid treatment system piping & instrumental diagram (P&IDs) for the SRSNE Superfund Site. The system was broken down piece-by-piece to identify, evaluate and rank potential problems that may represent risks to personnel, public, equipment, or the environment. The following summarizes how the potential risks were categorized and ranked:

Severities (S) of risk

Level 1	Personnel	Potential for injury requiring first aid
	Public	Minor transient odor or nuisance
	Environmental	Contained release
	Equipment	Damage/loss of equipment up to \$10,000
Level 2	Personnel	Potential for severe injury requiring physician's care (i.e. lost-time accident)
	Public	Persistent odor or nuisance, causing multiple complaints
	Environmental	Small uncontained release with potential for minor environmental impact
	Equipment	Damage/loss of equipment worth \$10,000 up to \$100,000
Level 3	Personnel	Potential for life threatening injuries or fatality
	Public	Exposure to potential injurious hazards
	Environmental	Uncontained release with potential for environmental impact
	Equipment	Damage/loss of equipment greater than \$100.000

Likelihood (L) of risk

Level 1	Unlikely	1 event per year
Level 2	Potential	1 event per month
Level 3	Probable	1 event per day

A Risk Ranking (RR) was then calculated for each identified risk by the following equation:

RR= S x L

Where a high RR would represent a highly likely event of a high severity, and where a low RR would represent a low likely event of low severity.

The following presents a summary of items reviewed during the HAZOP:

- I. Wellfield
 - a. Heater wells
 - b. VEW wells
 - c. Temperature monitoring wells
 - d. Pressure monitoring wells
 - e. Surface cover
 - f. Wellfield vapor piping
- II. Electrical

VI.

- a. Utility power
- b. Standby generator
- c. Switchgear
- d. Phone line
- III. P&ID 102 Sheet 6 Treatment System Utilities
 - a. Cooling tower W-101
 - b. Air compressor Z-104
- IV. P&ID 102 Sheet 1 Gas Conditioning
 - a. Moisture separator S-102
 - b. Vacuum blower B-101A/B
 - c. Caustic Tank T-102
- V. P&ID 102 Sheet 2 Gas Conditioning
 - a. Vapor chiller E-102A/B
 - b. Moisture separator S-102
 - c. Duct heater H-101
 - P&ID 102 Sheet 3 &4 Thermal Oxidizer
 - a. Burner Z-101A/B
 - b. Thermal Oxidizer F-101A/B
 - c. Thermal Relief Valve
- VII. P&ID 102 Sheet 5 Quench/Scrubber System
 - a. Cooling blower B-105
 - b. Emergency water T-108
 - c. Quench/Scrubber A-101
 - d. Caustic Tank T-101
- VIII. P&ID 102 Sheet 7 Liquid Treatment System
 - a. Oil/water Separator S-103
 - b. Bag filter FX-101A/B
 - c. Air stripper Z-103
 - d. Air Stripper vacuum blower B-104A/B
 - e. Carbon cells C-101A/B

Detailed tables presenting the identified hazards, their rankings, and the measures/changes that will be taken to mitigate the hazards, if necessary, are included in Appendix C. The P&ID's, Wellfield, and Electrical designs have been attached to Appendix D.

Appendix A

Constructability Table

SRSNE CONSTRUCTABILITY REVEIW WORKSHEET Date: 3/7/11

System ID		Discussion	C
Site Logistics	Access to Targeted Treatment Zone Structures, fencing, adjacent properties	 Arcadis to provide final grade plan. Arcadis needs to complete sheet pile insta Process equipment aread to be completed Arcadis will do the compacting of the area. 	
	Overhead and underground obstructions and/or Site topography and grading requirements: Site drainage and storm water management:		
	Electric	Capacity: approx 4.5 MW Location: Southeast of wellfield, south of process equipment area	
Litilitor	Gas	Capacity: up to 20 MMBtu/hr Location: Northeast of wellfield toward NTCRA 1 Treatment System.	
Utilites	Sewer	Capacity: 30 to 60 GPM Location: Northeast of wellfield toward NTCRA 1 Treatment System.	
	Water	Capacity: To be verified Location: Northeast of wellfield toward NTCRA 1 Treatment System.	

omments

allation. d while wells are being installed.

SRSNE CONSTRUCTABILITY REVEIW WORKSHEET Date: 3/7/11

System ID		Co	
		593 HO	-SOP's will be drafted by Robin and Renee. -Stake ends of HEW.
	Number and types of wells	550 VEW	
		200 linear feet of HEW	
	Stockpiling materials:	in wellfield	
Wellfield	well drilling sequence:	to be determined. Generally from south to north	
	Handling cuttings:	to be determined by <i>de maximis</i>	
	Installing heater cans:	manual insertion	
	Installing vapor extraction wells	TT to place screens and fill	
	Installing monitoring wells:	to be determined	
	Stockpiling materials:	to be finalized with contractor. May deliver dry material in bulk	
Cover	Concrete pour:	aerated concrete.	Being finalized by Kevin Crowder
	Vertical Sections:	to be finalized.	May be aerated concrete behind insulating s
	Stockpiling materials:	on-site in wellfield	
Manifold Runs	Pipe Runs:	four main 8" headers going to 6" and 4" branches. HEW 6" connector	
	Pipe Support:	Standard pipe supports	
	Line Termination:	transition to process equipment to be finalized.	

omi	nents
she	et. Pour lower sections first.

SRSNE CONSTRUCTABILITY REVEIW WORKSHEET Date: 3/7/11

System ID		Discussion	Co
	Power drop pole to Process Equipment area pole:	can this be included with original lower drop?	-Can some portion of power be brought to th NW corner? No -Secondary containment for transformers. C
	Trenches to transformer pads:	to be finalized with transformer selection	_
	Transformer locations:	to be finalized with transformer selection	_
	Transformer fencing:	to be finalized with transformer selection	_
Electrical	Ground grid:	TT to install. Grounding rods at each skid with cross connection	_
	AHJ testing requirements:	to be confirmed with client.	_
	SCR shed:	On eastern edge of wellfield	_
	Distribution panels:	On eastern edge of wellfield	
Process	Placement:	to be finalized after bids accepted	
Equipment	Secondary Containment:	to be determined after equipment is purchased	Secondary containment pad for all equipment? Just caustic tank?
Gas Connection	Gas Fitter:	Conatct authorized	Larry to follow up.
Sewer Connection	No issues	to be completed by <i>de maximis.</i>	
Water Connection	No issues	to be completed by <i>de maximis.</i>	

omments

he site on the northern end to power heaters in the

Can we use biodegradable oil?

Individual skids, to be finalized after vendors finalized.

Appendix B

Figures Referenced

-"Operations Area NTCRA 1 Containment Area and Former Cianci Property Map" -"Pre-ISTR Site Plan T-1" -SRSNE Vapor Trunk Lines Vapor Manifold ELEV Detail" -"Well Installations with Possible NAPL at the SRSNE Superfund Site"











- 1. SITE PLAN TAKEN FROM DIVERSHTED GTECHNOLOGIES CORP. 556 WASHINGTON AVE., NORTH HAVEN, CT. DATED 6/93. TOPOGRAPHY REPORTED TO HAVE BEEN DIGITZED FROM TOWN OF SOUTHINGTON POPOGRAPH WAPSIANCE G-7, G-8, G-9; PHOTOGRAPHIZ OWTER NOV. 1978, SCALE: 1"=100'. PROPERTY LINES REPORTED TO HAVE BEEN DIGITIZED AND LOT NUMBERS TAKEN FROM "PROPERTY MAP, TOWN OF SOUTHINGTON" MAPS 134 & 147, SCALE: 1"=100' BY DIVERSIFIED TECHNOLOGIES CORPORATION.
- 2. BENCHMARK #1 IS AT ELEVATION 164.03. PK NAIL; S'LY SIDE; POLE #9049.
- 3. THE 100-YEAR FLOOD LIMIT AND WETLAND AREAS WERE TAKEN FROM THE FINAL REMEDIAL INVESTIGATION REPORT (HNUS, MAY 1994). THE 100-YEAR FLOOD LIMIT WAS REVISED TO FOLLOW THE LELEVATION 156 CONTOUR BASED ON INFORMATION PROVIDED BY THE SOUTHINGTON TOWN ENCINEER ENGINEER.
- 4. THE LOCATIONS OF EXISTING DRIVE POINTS, WELLS AND PIEZOMETERS ARE APPROXIMATE ONLY.

0	50'	100'
	GRAPHIC SCALE	

CIANCI PROPERTY MAP

Appendix C

HAZOP Table

System ID	What If	Hazard & Consequences	s	L	RR	Existing Safeguards	Recommendations	Offsite Release?	Comments
1) Sheets S	SRS-5102 E102 C10	7 C109 - Wellfield Heater	Wells	Probes	and V	apor Manifold			
			110 110,	110000					
	1) Heater overheats	Potential heater failure	1	2	2	Monitoring thermocouples are installed two per circuit leg minimum, schedule 80 pipe.	Monitor TCs daily, limit temp to 1200°F, profile heater temps weekly, set at the hottest depth. Heater temperature monitoring system to be automated.		Bring back up TCs into Temperature Monitoring Point (TMP) system; consider separate monitor system for heater TCs to avoid electrical issues on wellfield TMP system
		Multiple bester failure in some area	1	2	2	Peoirouit ofter profiling bestere	Consider having an alarm for all the back-up		
		Multiple heater failure in same area	1	Z	2	Recircuit after profiling neaters.	TUS for the circuits.		
1-1 Heater Wells	2) Heater Thermocouple Fails	Loss of heater monitoring	1	1	1	high temp application, flex cord connector typical to minimize damage at connector. Back up TCs installed on each circuit leg, keep spares on site			
	3) Heater shorts electrically						Visual check of cables, connections, ohmmeter/megohmmeter check for shorts at the commissioning phase. Isolate circuit		
	o,	Potential current to ground	2	2	4	Circuit breaker, fused SCR, ceramic insulators. Keep spare heaters on site. Monitor circuit amperage regularly	leg/heater remove, repair , replace as necessary. Use IR cameras to look for trouble spots.		
	4) Heater well leaks	COCs released to the atmosphere, H&S issue	1	2	2	Robust well design, additional well liner is included to prevent the leak	Whenever well leaks, use the available SOP to prevent liquid and vapor leak to the atmosphere. Drager tubes at site and ambient air monitoring.		
	1) VEW well clogs	Potential COCs / steam leakage at surface cover penetrations with decreased vapor control	1	1	1	Well screen / sandpack sized properly, SS screens, concrete surface cover, redundant vapor extraction capacity in wellfield	Check vacuum well riser temps regularly for flow indication, address blockage when detected.		
1-2 VEW	2) VEW connection material degradation	Potential vacuum leakage, maintenance issues	1	2	2	Threaded connections minimized (thin wall of the thread and hose barb are the first to corrode through), condensing collection points minimized. Slope connections to manifold pipe from riser.	Riser may need to be insulated to minimize condensing corrosion		
	3) Vaporization of NAPL	LEL generation	2	1	2	Sufficient water vapor is present to maintain safe LELs.			
1-3 Temperature Monitoring Wells	1) Temperature sensor malfunctions, reading high or low	- No hazard concern - operational	1	1	1	Run instrument wiring away from power cable, cross at 90 degree angle, check temp monitoring well for liquid. Shielded cable for protection.			
1-4 Pressure Monitoring Wells	1) Positive pressure readings	May indicate potential for surface vapor release	1	1	1	Redundant vacuum coverage, concrete surface cover	Check vacuum wells in the area, adjust as necessary. Conduct daily wellfield observation.		
1-5 Surface Cover	1) Surface cracking occurs or surface damage	May allow surface water penetration, ambient air vacuum leakage, vapor release or moisture intrusion may affect insulating value	1	2	2	Surface cover may be installed in lifts with control joints, surface seal, etc.	Monitor and repair, seal, etc.		

HAZOP WORKSHEET SRSNE Superfund Site HAZOP Review Date: 3/14/11 - 3/15/11 Revision date: 3/30/11

					il in the second			Offsite	
System ID	What If	Hazard & Consequences	S	L	RR	Existing Safeguards	Recommendations	Release?	Comments
	1) Condensate build up in						Inspect hose connections regularly, eliminate		
	branch lines or vapor well		1			Piping is sloped 1% typical to collection	any low spots, piping supports must be	1	
1.6 Wollfield	connections	May lead to loss of vacuum influence	1	2	2	point / treatment equipment	spaced to prevent sagging		
Vapor Pining	2) Material degradation						Monitor VEW temperatures entering the FRP		
vapor riping			1			FRP pipe temperature rating is in the 250	pipe, properly seal any penetrations made	1	
			1			to 300F range, corrosion resistance rating	through the wall of the pipe. Properly seal any	1	
		Potential vacuum leakage	1	1	1	is typically for the inner tube	cuts through the pipe.	1	
VEW - Vapor Ex	VEW - Vapor Extraction Wells; SCR - Silicon Controlled Rectifier								

System ID	What If	Hazard & Consequences	e		DD	Evisting Safoguards	Perommondations	Offsite	Comments
2) Clobal I		Hazard & Consequences	3	L .	КК		Recommendations	Release :	Comments
Z) Global I	SSUES - Electrical								
							Deriadia fan in an action, an action ar action		
	1) Transformer Fans						Periodic fan inspection once every month.		
	Malfunctions	Detential Demonstrate Transformer	0	4	2	Temperature Course / Deadout	Specify a temperature limit on the operator		
		Potential Damage to Transformer	Z	_	2	Temperature Gauge / Readout			
		Overnealing of Transformer due to				Liquid Lovel Cougo, Temperature Cougo			
	2) Transformer leaks oil	Pologog Detential danger to				Dereannel te weer enprenriete DRE	Containment and Deriodia Inspection anap		Evaluate the use of his degradable
			2	1	2		containment and Penodic Inspection once		
2-1 Utility Power		personnei.	2	I	2	Standby Generator and Automatic		1	
FOWER	2) Transformer Internal					Transfer Switch to provide power to critical			
		Power Interruption to site Damage to				equipment Euses and circuit breaker to	Transformer to be tested prior to connecting		
	Faults	equipment	2	1	2	limit damage for equipment	to the grid		
		equipment	2	I	2		Consider installing spare conduit for		
	4) Low Voltage Cable Failure						emergency cable run. Have spare cable on		
		Electrical Equipment damage	2	1	2	Fuses and breakers to protect equipment	site for emergency repair		
		Environmental Release Insufficient	-		-	Secondary containment subsequent start-			
	1) Diesel Fuel Leak	fuel to run generator	2	1	2	ups and monthly inspection		YES	
	2) Failed Battery / Failed	Generator fail to start. Unable to	-		_				
	block heater	provide power to critical equipment	1	1	1	Once a week generator test		YES	
2-2 Standby	3) Automatic Transfer Switch	Unable to provide power to critical		-		<u> </u>			
Generator	fail to transfer load	equipment during outage	1	1	1	Manual transfer.		YES	
		Generator Damage. Unable to							
	4) Generator internal faults	provide power to critical equipment							
	,	during outage.	2	1	2	None		YES	
	(1) Dreeker feil te trin	Additional equipment damage may				Upstream breaker will operate. More			
	T) Breaker fail to trip	result	2	1	2	loads may be taken offline as a result			
						Upstream breaker will operate. More			
						loads may be taken offline as a result.			
2.2 Switchgoor						Proper PPE for personnel. Good			
2-3 Switchyear	2) Switchgear internal bus					Housekeeping around equipment. Ensure			
	fault					that a second person checks inside the			
		Switchgear damage and equipment				cabinet before re-energizing to minimize			
		damage. Possible danger to				the likelihood of having loose wires or	Switchgear to be tested at shop and site prior		
		personnel. Potential ignition source	3	1	3	tools left in cabinet.	to startup	YES	
2-1 Phone Line	1) Phone line cut	No outside communication to site					Have an automatic dial out to check		
		svstem	1	1	1	Operator schedule to limit downtime.	connection once a day.		

System ID	What If	Hazard & Consequences	s	L	RR	Existing Safeguards	Recommendations
3) P&ID 10	2 Sheet 6 - Treatmer	nt System Utilities	-				II
	1) High W-101 Cooling						
	Tower level	Overflow of cooling water onto ground	1	1	1	High level switch LS-601	Install an overflow line to the grou
	2) Low W-101 Cooling Tower	Starve cooling water pump P-101A/B,				TIT-101 on inlet to moisture separator S-	
	level	loss of cooling for E-101	1	1	1	101 will indicate high temperature	Add high temperature alarm on T
	3) Fan motor burns up	Smoke, possible electrical short	1	1	1	Circuit breakers	Identify back-up motor.
	4) Cooling tower freezes up	Starve cooling water pump P-101A/B, loss of cooling for E-101	1	2	2	Immersion heater	
3-1 Cooling Tower W-101	5) Biological or mineral fouling of tower	Starve cooling water pump P-101A/B. Clog cooling water packing. Diseases, loss time for illness.	2	1	2	Bioagent, chlorine duck, periodic maintenance, check water quality periodically.	
	6) Low water hardness	Starve cooling water pump P-101A/B. Clog cooling water packing. Diseases, loss time for illness.	2	1	2	Water is already soft enough.	
3-2 Air Compressor Z- 104, Air Receiver Z-	1) High air pressure in Receiver Z-105	Potential property damage and injury	1	1	1	Pressure relief valve PRV-601 is designed to relieve at 125 psig. Receiver tank is a code-rated tank. Piping should be pressure tested beyond pressure relief valve setting.	
	2) Low air pressure in Receiver Z-105					PSL-601 on air receiver and PSL-602 on instrument air provide early warning. Critical valves are all spring loaded to their	
105, Air Dryer		Loss of control valves	1	1	1	safe position.	Install alarms on PSL-601 and PS
Z-106	3) Air Compressor Z-104	Loss of compressor oil causes	4	1	1	Low oil pressure would shut down	
	4) Air Dryer Z-106 failure	Loss of pressure due to clogging with oil	1	1	1	None.	Keep spare dessicant modules in warehouse.
	5) PCV 601 failure	High pressure downstream	1	1	1	PSH-602	
	6) PRV 601 failure	High pressure downstream	1	1	1	PSH-602	

	Offsite Release?	Comments
ınd.	Yes, water.	
IT-101		
SL-602		
TerraTherm		

System ID	What If Hazard & Consequences		s	L	RR	Existing Safeguards	Recommendations
4) P&ID 10	2 Sheet 1 - Gas Con	ditioning	u	11			
	1) High incoming vapor temperature	Potential damage to expansion joints and gaskets	1	1	1	Interlock 101. Shutdown wellfield block valve to prevent additional damage.	Expansion joints should be rated 250 deg F. Add high temperature TIT-101.
	2) High incoming vapor pressure	No Hazard	N/A	N/A	N/A	None required.	
	3) High vacuum	No Hazard	N/A	N/A	N/A	S-101 is equipped with vacuum relief valve.	
4-1 Vapor Cooler E- 101A/B	4) P-102A/B shutdown on motor overload or other problem	Back liquid up into vapor path	2	1	2	LAH-101 will alarm. Manually start the spare pump. Interlock 101 shuts down wellfield block valve to prevent additional damage.	
	5) High cooling water temperature	Lose adequate cooling for vapor	1	1	1	TI-103, TI-104 and TI-105 provide indication of inlet and outlet cooling water temperature. TI-102, TI-106, and TI-107 provide local indication of inlet and outlet vapor temperature	Add high temperature alarm on T
	6) Cooling water leak in heat exchanger tubes due to corrosion/cracking	Lose adequate cooling for vapor, additional liquid in condensate system	1	1	1	Pre-installation pressure test.	Monitor operational data in water
	7) Gasket leak in ducts due to material of construction	Exposure to fugitive vapors	1	1	1	Expanded teflon material of construction	Conduct preventive visual inspect
	8) High pressure drop	Plugged tubes, fugitive vapors	1	1	1	Monitor pressure gauges PI-110, PI-105	
	1) High high liquid level	Back liquid up into vapor path	1	2	2	LSH-101 turns on P-102A/B. Add interlock to shutdown vacuum blowers to avoid pulling water into blowers on high-high level (LSHH-101) of S-101. Additionally wellfield block valve would shut. Equipment specification sheet specifies as a standard item to keep sensors on stilling well.	Add an additional port for a pipe of for overflow on S-101.
4-2 Moisture	2) Low liquid level	Potential vacuum leak, damage to P- 102A/B	1	2	2	Check valves CK-101 and CK-102 will prevent vacuum leak.	Add LSLL to S-101 shut down pu 102A/B.
4-2 Moisture Separator S- 101	3) P-102A/B high discharge pressure / dead-head	Damage pump, piping	1	1	1	Centrifugal pumps are used.	Plan to test piping at 1.5 x max. o pressure or max. available, which
	4) P-102A/B shutdown on motor overload or other problem	Back liquid up into vapor path	1	1	1	LAH-101 will alarm on high-high level. Shutdown wellfield block valve to stop additional liquid build-up.	Add manual valve with a tee under motorized valve for dilution air up 101A/B
	5) High vapor temperature	Potential damage to expansion joints Failure of tank liner	1	1	1	Automatic dilution air Automatic dilution air	Expansion joints should be teflon- rated for high vapor temperature. Add high temperature alarm on T
	6) High vacuum	Implode vessel	2	1	2	PI-110 after extraction well; VRV-101 on S-101	Vessel should be designed for 1.5 vacuum than the blower.

	Offsite	
	Release?	Comments
() () () () () () () () () ()		
for at least alarm to		
	Yes	
IT-101		
usage.		
tion daily.		
	Yes	
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connection		
mps P-		
perating ever is less		
er the		
stream of E-		
lined and		
III 00 0		
IT-101		
5x higher		
	1	

HAZOP WORKSHEET SRSNE Superfund Site HAZOP Review Date: 3/14/11 - 3/15/11 Revision date: 3/30/11

8							
System ID	What If	Hazard & Consequences	s	L	RR	Existing Safeguards	Recommendations
							Keep spare filters on site. Put a lo
		Loss of vacuum in wellfield, fugitive					red line marking max DP that nee
		emissions	1	1	1	Monitor PI-105, PI-106 at blower inlet.	serviced.
	1) Filter FX-102A/B plugs						Maintain filter per manufacturer's
							instruction/recommendation. Put
		Block or decreased vapor flow,					with red line marking max DP that
		damage to blower.	1	1	1	Monitor PI-105, PI-106 at blower inlet.	be serviced.
	2) Water accumulation in FX-	Loss of blower and loss of vacuum in				Conduct preventive drain of filters as	
	102A/B	wellfield	1	2	2	required.	
						LSH-101 turns on P-102A/B. Add interlock	
1.0.1	3) High high liquid level in S-					to shutdown vacuum blowers to avoid	
4-3 Vacuum	101					pulling water into blowers on high-high	
Blowers B-						level (LSHH-101) of S-101. Additionally	Add an additional port for a pipe c
101A/B		Back liquid up into vapor path	1	1	1	DIOCK VAIVE WOULD Shut.	for overflow on S-101.
	4) Low liquid level in S-101	Potential vacuum leak, damage to P-	1	2		Check valves CK-101 and CK-102 will	Add LSLL to S-101 shut down pur
	,	102A/B	1	2	2	prevent vacuum leak.	102A/B.
	5) High vacuum in S-101	Implede C 101		1		PI-110 after extraction well; VRV-101 on S	Vessel should be designed for 1.5
	() D 101 A / D chutdown on				2	101	vacuum than the blower.
	6) B-101A/B shutdown on	Linchia ta maintain yaayuum at wall				PI 110 on the inlet to $F 1010/P$	
			2	1	2	Interlocked with thermal eviditor	Start up back up blower
	7) Sparks are caused by			1	2	Because of high moisture content in the	
	metal-on-metal contact	Potential deflagration	3	1	3	las I EL will be low	
	8) High Temperature	Flectrical short	1	1	1	Thermal protection on motor and VED	
	9) Oil leak	Slip and environmental hazard	1	1	1	Structure built within containment	
		Unable to supply caustic to separator			•		Switch to higher strength caustic
	1) Liquid freezing	S-101	1	1	1	Use cold weather blend.	weather.
				_			
							Decrease flow from wellfield operation
	2) Chemical metering pump						that pump is sized correctly. Inter
	P-111 unable to maintain pH						and GC-103 should be removed.
	level						BA-123 and install 3-way solenoid
		Ineffective flow of caustic to separator				pH gauge GE-101. Monitor/adjust/clean	intersection so that it is either re-c
4-4 Caustic		S-101	1	1	1	pH loop on a regular basis.	discharging through FQIT-101.
Tank T-102,	3) Chemical addition line					Conduct preventive visual inspection of	
Pump P-111	failure	Spray caustic	2	1	2	the piping daily. Use proper PPE.	
-							
	4) Low caustic level in drum	Unable to supply caustic to separator				Secondary containment. Daily inspection	
		S-101. Potential leak at caustic drum.	2	1	2	of drum is required.	
			1				
	5) Air in sensor	Incorrect reading from pH sensor, and	1			Proper installation to minimize air	
		no caustic added.	2	1	2	accumulation	
	6) Dirty pH probe	Incorrect reading from pH sensor, and	1				
		no caustic added.	2	1	2	Periodic maintenance	

S	Offsite Release?	Comments
a local DP with eeds to be		
s ut a local DP lat needs to		
connection		
oumps P-		
1.5x higher		
c during cold		This drum will be too big to use drum heaters.
erationally so erlock I-103 d. Remove bid valve at e-circulating or		

System ID	What If	What If Hazard & Consequences			DD	Evisting Safaguards	Recommendations			
	$\frac{1}{2} = \frac{1}{2} + \frac{1}$									
J FOID IC	Jz Sheet z - Gas Con	anioning								
						LSH 201 turns on D 1024/D. Add interlook				
						LSH-201 lums on P-103A/B. Add Interlock				
	() Llink bink linuid laural					to shutdown vacuum blowers to avoid				
	1) High high liquid level					pulling water into blowers on high-high				
						level (LSHH-201) of S-102. Additionally	Add an additional port for a pipe of			
		Back liquid up into vapor path	1	2	2	block valve would shut.	for overflow on S-102.			
	2) Low liquid level	Potential vacuum leak, damage to P-			_	Check valves CK-201 and CK-202 will	Add LSLL to S-102 shut down put			
	_/	102A/B	1	2	2	prevent vacuum leak.	103A/B.			
	3) P-103A/B high discharge									
5-1 Moisture	pressure / dead-bead						Plan to test piping at 1.5 x max. o			
Separator S-		Damage pump, piping	1	1	1	Centrifugal pumps are used.	pressure or max. available, which			
102	4) P-103A/B shutdown on					LAH-201 will alarm on high-high level.				
102	motor overload or other					Shutdown wellfield block valve to stop				
	problem	Back liquid up into vapor path	1	1	1	additional liquid build-up.				
							Expansion joints should be teflon-			
		Potential damage to expansion joints	1	1	1	Automatic dilution air	rated for high vapor temperature.			
	5) High vapor temperature						Add TIT and high temperature ala			
							inlet to S-102. Add TAH-202 on			
		Failure of tank liner	1	1	1	Automatic dilution air	outlet of S-102.			
	6) PRV-201 releasing vapors									
	to atmosphere	Offsite release possible	2	1	2	Self-closing valve				
	1) High vapor temperature on	· · · · ·				TIC-203 is the control and TSH-201, I-203				
5-2 Duct	outlet of duct heater	Damage to heater coil.	1	1	1	will reduce the heater power input.				
Heater H-101		Damage to oxidizer due to								
	2) Low outlet temperature	condensation	2	1	2	Monitor the temperature				
5-3 Dilution Air			_	-	_	Perform periodic maintenance. Also	Remove PSL-201 and I-202 and			
Blower B-102	1) Dilution air blower failure	Loss of LEL control	1	1	1	dilution valves throughout the system.	operations with butterfly valve BF			

	Offsite Release?	Comments
connection		
mps P-		
perating lever is less		
-lined and		
arm on the FIT-202 on		
	Yes	
do all the -203.		

System ID	What If	Hazard & Consequences	s	L	RR	Existing Safeguards	Recommendations
6) P&ID 10	2 Sheet 3 & 4 - Theri	nal Oxidizer					
	1) Loss of combustion air	Loss of burner, process upset, generation of carbon monoxide	1	1	1	NFPA Logic. If B-103A/B and B-106A/B fail, I-310 will shut down the burner. Both burners have an installed spare blower. If TCV-302 fails, TCV-301 will close.	Add check valves on outlet of eac Relocate PSL-302/402 and I-310 main line.
	2) Natural gas high pressure	Possible burner blowout, loss of temp control, possible equipment damage	2	1	2	NFPA Logic, TCV-301, PSH-301, TCV- 401, PSH-401. Will shut down the burner.	Add pressure regulator after BA-3 oxidizer.
6-1 Burner Z- 101A/B	3) Loss of natural gas pressure	Loss of burner, process upset	1	1	1	PSL-301, PSL-401 will shut down the burner.	
	4) Burner refractory damage	Hot gas exposure to metal	2	1	2	Inspection of refractory prior to start-up.	Monitor surface temperature on the reactor.
	5) Pressure regulator leak	Release to the atmosphere	2	1	2	Periodic inspection; natural gas odor.	
	1) High LEL on inlet duct	High temperature vapor damages upstream piping and equipment. Release of COCs to the atmosphere.	2	1	2	No hazard because of high moisture content.	
	2) High process vapor		_	_	_		
	heating value	Overheating of vapor	2	1	2	TE-301, TE-302, TE-401, TE-402	Investigate any NFPA requirement
6 2 Thormal	3) Reverse flow due to high back pressure	High temperature vapor damages upstream piping and equipment. Release of COCs to the atmosphere.	2	2	4	CK-301, CK-401 will prevent reverse flow.	Add check valves at blowers B-10 106A/B discharge.
	4) High exit vapor temperature	Damage of downstream equipment	2	1	2	TE-301, TE-302, TE-401, TE-402. Will provide indication and TAH alarms go off. B-105 will automatically open up when TE- 501 indicates high T.	Work with vendor on oxidizer out
Oxidizer F- 101A/B	5) Low exit vapor temperature	Insufficient heating of vapor and low DRE. Release of COCs	2	1	2	TE-301, TE-302, TE-401, TE-402 will provide indication.	
	 High pressure due to downstream equipment blockage. 	Damage of downstream equipment	2	1	2	TRV-301 and TRV-401 opens up automatically. Wellfield block valve will be shut.	
	7) Scrubber packing melts	Increase in pressure in F-101A/B	2	1	2	Close wellfield block valve.	Interlock I-313 blocks the wellfield TRV-301. Shuts down the process
	8) Flame failure	Unnecessary shutdown reducing system reliability. Release of COCs	2	1	2	Three redundant flame scanners installed for each oxidizer.	
	9) TE-301/TE-401 failure due to high temperature	Damage of downstream equipment.	2	1	2	Redundant thermocouples used. High temperature alarm on TI-302/402.	
	Thermal Oxidizer	Loss of refractory in the thermal oxidizer	2	1	2	carry over	

	Offsite Release?	Comments
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	Yes	
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)3A/B and B-	Yes	
et valve	Yes	
l and opens ss blower.		
	Yes	

HAZOP WORKSHEET SRSNE Superfund Site HAZOP Review Date: 3/14/11 - 3/15/11 Revision date: 3/30/11

								Offsite	
System ID	What If	Hazard & Consequences	S	L	RR	Existing Safeguards	Recommendations	Release?	Comments
	11) TE-302/TE-402 failure					Redundant thermocouples used. High			
	due to high temperature	Damage of downstream equipment.	2	1	2	temperature alarm on TI-302/402.			
6.2 Thormal						Proper conditioning of the refractory done			
0-2 Memai	12) Thermal oxidizer internal					during start-up. Inspection prior to start-			
	installation falls off					up. Follow the correct refractory curing			
IUTAD		Carbon steel shell overheats.	3	1	3	procedure from the vendor.			
	12) Folge flome signal					TE-301, TE-302, TE-401, TE-402 on			
13) Faise fiame signal		High natural gas flow into oxidizer	2	1	2	oxidizer outlet.			
6.2 Thormol						Wheel and chain assembly included. PIT-			
	1) Relief valve does not open	Damage to downstream equipment,				301 and PIT-401 will shut down the			
Relief valve		high pressure	2	1	2	process system.			

System ID	What If	Hazard & Consequences	e		DD	Existing Safeguards	Recommendations
	2 Sheet 5 - Quench/	Sheet 5 - Quench/Scrubber System					Recommendations
7-1 Cooling Air	1) Loss of flow from B-105	Hot vapor enters scrubber	2	1	2	TIC-501 indicates higher temperature.	Add an interlock to shut down but check valve between CV-501 and line to quench.
Blower B-105	2) B-105 shutdown on motor overload or other problem	May burn the FRP A-101 and melt packing.	1	1	1	TIC-501 indicates high temperature. Interlock TRV on oxidizer. Kynar packing and FRP shell.	
	1) High liquid level	Overflow tank within containment	1	1	1	Tank level normally maintained by P-110 on/off control.	
	2) Low liquid level	Damage P-110	1	1	1	Equipment specification sheet includes mechanical float in the tank.	Add level switch so that tank low permissively disables P-110. Re- daily visual inspection/periodic te
7-2 Reserve Water Tank T-	3) Loss of power	No emergency water to quench.	1	1	1	All pumps feeding 1-103 (quench) as well as P-110 are backed up by standby generator.	
108	4) P-110 discharge high pressure / dead head	Damage pump, piping	1	1	1	Piping design/testing pressure should be higher than pump dead head pressure.	
	6) SV-502 doesn't open6) Frozen reserve water line	No emergency water to quench	2	2	4	Primary plant water line enters reserve tank and flows to pump.	Make P-110 a primary booster pubypass line with solenoid valve and case pump fails.
	1) High liquid level	Water carry over to atmosphere. Excess back pressure to upstream	1	1	1	LIH-501 will alarm. LIHH will shutdown the entire system. Increase blowdown to POTW. Existing safeguards in thermal ovidizer	Add overflow line to scrubber
7.2 Quanab/	2) No liquid flow to demister	Possible build up of solids on top of tower	1	1	1	Not applicable.	
Scrubber A-101	3) Scrubber loop stops	Loss of scrubbing, loss of cooling, loss of pH	1	1	1	Back up pump P-105B will start manually. FE-501 on pump discharge recirculation will indicate no flow.	
	4) Recirculation pump line break	Personnel injury, chemical injury, damage to equipment, scrubber failure	3	1	3	Personnel training, administration controls. Spill is contained in secondary containment. Periodic inspection. CPVC material of construction.	
	1) Liquid freezing	Unable to supply caustic to scrubber A-101	1	1	1	Use drum heaters and cold weather blend.	Switch to higher strength caustic weather.
7-4 Caustic Tank T-101	2) Chemical metering pump P-106 unable to maintain pH level	Ineffective use of caustic to scrubber A-101	1	1	1	pH gauge GE-501. Monitor/adjust pH PID loop on a regular basis.	Decrease flow from wellfield oper that pump is sized correctly. Inte and GC-501 should be removed. BA-526 and install 3-way solenoid intersection so that it is either re-o discharging through FE-501.
	3) Low caustic level in drum	Unable to supply caustic to scrubber A-101. Potential leak at caustic tank.	2	1	2	Secondary containment. Daily inspection of tank is required.	
4) Chemical addition line failure		Spray caustic	2	1	2	Conduct preventive visual inspection of the piping daily. Use proper PPE.	

	Offsite Release?	Comments
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System ID	What If	Hazard & Consequences	s	L	RR	Recommendations	
8) P&ID 10	2 Sheet 7 - Liquid Tr	eatment System		•		<u> </u>	
,							
8-1 Oil Water Separator S- 103, Pumps P-108A/B	1) High liquid level	Overflow tank within containment	1	1	1	LAH-701 will alarm. Tank level normally maintained by P-108A/B on/off control based on LSH-701 and LSL-701.	Include on overflow pipe to S-103 containment. Show high level on DNAPL tanks. Remove level swi 107, except HS-701.
	2) Low liquid level	Damage P-108A/B	1	1	1	None.	Add interlock on LSL-703 to shut 108A/B.
	3) P-108A/B discharge high pressure / dead head	Damage pump, piping	1	1	1	Centrifugal pump. Piping design/testing pressure should be higher than pump dead head pressure.	
	4) P-108A/B discharge pipe breaks	Spills liquid within containment	1	1	1	Piping design/testing pressure should be higher than pump dead head pressure. Use proper construction procedure when installing pipe.	
	5) High temperature water on inlet to S-103	Evaporation of COC vapors	1	1	1	TE-701, TIT-701, I-703. Release is into contained vent line.	
8-2 DNAPL Tank T-104,	1) High liquid level in DNAPL Tank T-104	Spill of DNAPL within containment	1	1	1	None.	Add high LAH and high level swit
Discharge Tank T-105,	2) High liquid level in Discharge Tank T-105	Overflow tank within containment	1	1	1	LAH-703 will start P-108.	
106	Tank T-106	Spill of LNAPL within containment	1	1	1	None.	Add high LAH and high level swit
8-3 Bag Filter FX-101A/B	1) High differential pressure	Reduced flow rate in liquid treatment system	1	1	1	705 will show on-set of condition. FIT-701 will indicate reduced flow.	Install differential pressure gauge each filter.
	2) High inlet pressure	Damage to filter	1	1	1	PI-702 and PI-703 on inlet to the filters. Filter bags are designed for higher than pump discharge pressure.	
	3) Bags require changing during operation	Potential personnel exposure	1	3	3	Parallel filters and isolation valving allow for on-line bag change-out. Wear proper PPE and discard filters in hazardous waste drums.	
	4) Clogged Filter	Damage to filter	2	1	2	FQIT-701 will indicate flow. Monitor on regular basis.	
8-4 Air Stripper Z-103, Pumps P-109A/B	1) High liquid level	High liquid level of Z-103 may block vapor path	1	1	1	LAH-702 will alarm and shut down P-108.	
	2) Low liquid level	Damage P-109A/B	1	1	1	None.	Add LSLL-702 to shut down P-10 low liquid level.
	3) Loss of power to pumps P- 109A/B	P-108 and P-109A/B stop.	1	1	1	High point of liquid nozzle in tower will not allow gravity flow of liquid.	
	4) P-109A/B discharge high pressure / dead head	Water will enter B-104A/B. Damage blower, piping	1	1	1	LSHH-702. Piping design and testing pressure should be higher than pump dead head pressure.	

	Offsite Release?	Comments
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System ID	What If	Hazard & Consequences	s	L	RR	Existing Safeguards	Recommendations
8-4 Air Stripper Z-103, Pumps	5) Air Stripper high differential pressure	Reduced air flow, poor air stripper performance. Possible damage to blower B-104A/B	1	1	1	None.	Add DP gauge on air stripper. Add separator between air stripper and with water gravity draining to separ Add pressure indicator on inlet and a pressure differential gauge.
P-109A/B	6) High air stripper vacuum	Increased evaporation and water vapor loading	1	1	1	None.	
	7) P-109A/B discharge pipe breaks	Spills liquid within containment	1	1	1	Use proper construction procedure when installing pipe.	
8-5 Air Stripper	1) Low pressure	Untreated water	1	1	1	PSL-701 indicates low pressure.	Add interlock to PSL-701 to shut dupstream process.
Induced Draft Blowers B- 104A/B	2) B-104A/B shutdown on motor overload or other problem	No vapor flow to S-102	2	1	2	FIT-702 indicates flow. PSL-701 indicates low pressure.	
	1) High water pressure	Damage vessel	1	2	2	PI-708, 709, 710 and PI-711 will indicate high pressure. Design vessel for higher pressure than pump dead head.	
8-6 Carbon Cells C-101A/B	2) High differential pressure	Impede flow, limit system throughput	1	2	2	Each cell is equipped with inlet and outlet pressure indicators, PI-708, 709, 710, 711	. None
	3) TCE or PCE breakthrough occurs between carbon adsorbers	Exceed allowable discharge limit of each COC	2	2	4	Check for breakthrough using PID meter.	Add manual valves on both sides of connection to the carbon cells and ports with the PI gauges.
	4) Change-out of carbon is required	Personnel exposure	1	2	2	Operating and maintenance procedure should be in place. PPE must be used.	
	5) Problems occur during backwash	Improper / incomplete backwashing may hinder performance and removal efficiency	1	1	1	Initial backwash of cells should be addressed in operations and maintenance plan.	

าร	Offsite Release?	Comments
Add moisture and blowers, eparator S-101. and outlet and		
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es of the hose and sample	Yes	

Appendix D

The P&ID's, Wellfield, and Electrical Designs







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