

## SUMMARY OF CHANGES ON FINAL PERMIT

The following changes have been made on the final permit based on the public comments received and internal review.

### Changes to the Final Permit

- Permit Number, Effective Date and Expiration Date have been included on the cover page.
- The statement on the cover page that begins with “Pursuant to Section 25200 of the California Health and Safety Code”, has been modified to show the facility name as Beckman Coulter, Inc., instead of Beckman Coulter, Incorporated.
- The page numbers have been changed to include the cover page as page 1. All other page numbers were changed as well.
- A definition has been added to Part I, Definitions, that reads “**Storage or Storing**” as applicable to this permit means holding waste coolant in containers in Building 10 for more than 90 days, holding waste liquid scintillation cocktail and controls in containers in the mixed waste storage room for more than 90 days, holding waste coolant in the waste coolant tanks for more than 90 days or holding pseudocumene wastewater in the pseudocumene wastewater storage tank for more than 90 days.”
- Part II, section 1, Owner – has been changed from “Incorporated” to “Inc”
- Part III, section 3, the word “the” after the word “in” and before the word “accordance” has been deleted.
- Part IV, second paragraph of the introduction, the word “Machining” has been added after the word “Waste” and before the word “Coolant”.
- On page 9, in subsection LOCATION, the word “southern” was changed to the word “northern”.
- On page 9, in subsection WASTE TYPES, the entire statement has been deleted and “Container Storage Area, Building 10, Bay 1 shall be used to store waste machining coolant, as specified in Part V.B of this permit.” was substituted.
- On page 9, in subsection RCRA Hazardous Waste Codes, the entire statement has been deleted and “Waste machining coolant is not a RCRA waste” was substituted.
- On page 9, the subsection CALIFORNIA WASTE CODES has been added and this statement has been added beneath “The California waste code for waste machining coolant is 133.”
- On page 10, in subsection LOCATION, the words “in the southern” have been deleted and the words “toward the northern” were substituted.
- On page 10, in subsection WASTE TYPES, the entire statement has been deleted and “Container Storage Area, Building 10, Bay 2 shall be used to store waste machining coolant , as specified in Part V.B of this permit.” was substituted.

- On page 10, in subsection RCRA HAZARDOUS WASTE CODES, the entire statement has been deleted and the words “Waste Machining Coolant is not a RCRA waste” were substituted.
  - On page 10, the subsection CALIFORNIA WASTE CODES has been added and this statement was added beneath “The California waste code for waste machining coolant is 133.”
- On page 11, in subsection ACTIVITY DESCRIPTION, the words “Liquid Scintillation Cocktail” have been added ahead of the abbreviation LSC., and the phrase “(20 drums)” was added after the words “200 gallons”.
- On page 11, in subsection WASTE TYPES, the content has been changed to read “Mixed waste is waste LSC and control standards. LSC is a mixture of organic chemicals used on Liquid Scintillation Counters to measure the concentrations of tagged materials in samples.”
- On page 12, in subsection PHYSICAL DESCRIPTION, the content has been changed to read “The Waste Machining Coolant Storage Tanks are located due east of Building 6. The tanks are set on steel platforms that are on a 6 foot by 19.5 foot poured concrete containment pad which is surrounded by a 16.5-inch tall poured concrete wall.”
- On page 12, in subsection CALIFORNIA WASTE CODE, the content has been changed to read “The California waste code for Waste Machining Coolant is 133.”
- On page 13, in subsection UNIT NAME, the name waste trimethylbenzene has been changed to Pseudocumene Wastewater.
- On page 13, in subsection LOCATION;, the name waste trimethylbenzene has been changed to Pseudocumene Wastewater.
- On page 13, in subsection ACTIVITY DESCRIPTION, the content has been changed to read “Pseudocumene wastewater consists of wash water from the mix tanks used to formulate liquid scintillation cocktail. Liquid scintillation cocktail is a mixture of organic chemicals used on liquid scintillation counters to measure the concentrations of chemicals tagged with a radioisotope in a sample. The wastewater is greater than 90% water with the balance of the wastewater being the organic chemicals that are used to manufacture the liquid scintillation cocktail. The pseudocumene wastewater is contained in a 2,000 gallon tank.”
- On page 13, in subsection PHYSICAL DESCRIPTION, the name “waste trimethylbenzene” has been changed to Pseudocumene Wastewater.
- On page 13, in subsection MAXIMUM CAPACITY, the name waste trimethylbenzene has been changed to Pseudocumene Wastewater.
- On page 13, in subsection WASTE TYPES, the word “waste” has been changed to “wastewater”.
- On page 13, in subsection RCRA HAZARDOUS WASTE CODES, the name “waste trimethylbenzene solution” has been changed to “Pseudocumene Wastewater”
- On page 13, in subsection CALIFORNIA WASTE CODE, the content has been changed to read “The California waste code for pseudocumene wastewater is 134”.

- On page 14, in subsection ACTIVITY DESCRIPTION, the content has been changed to read “The Plating Shop Neutralization System treats rinse waters from the rinse tanks of various in-plant plating operations. The system consists of three separate chambers. Treatment is accomplished by the addition of sodium hydroxide solution in order to increase the pH to a value that is within the Orange County Sanitation Industrial Water permit limits. Operation of the unit is required by the Orange County Sanitation District.”
- On page 14, in subsection MAXIMUM CAPACITY , the content has been changed to read “The maximum permitted throughput capacity is 50,000 gallons per day.”
- In Part V, SPECIAL CONDITIONS, the first paragraph has been labeled “A” and a second paragraph “B” has been added. The paragraph reads “The Permittee is authorized to store waste codes other than those specified in Part IV of this Permit in Building 10, Bay 1 and in Building 10, Bay 2 for 90 days or less. The storage requirements of Title 22 Division 4.5, Chapter 14, Article 9 shall only apply to the waste coolants that are stored in Building 10, Bay 1 and 2. For those wastes stored for 90 days or less in Building 10, Bay 1 and 2, the generator requirements of Title 22, Division 4.5 Chapter 12, Article 3 shall apply as long as the facility does not exceed the maximum permitted capacity of Bay 1(156-55 gallon or 8580 gallons in aggregate) and Bay 2 (84-55 gallon or 4,620 gallons in aggregate) at any given time. The facility is also required to segregate the wastes stored more than 90 days from the wastes stored for 90 days or less in each Bay 1 and 2.
- In Part VI, CORRECTIVE ACTION, subsection A, first paragraph, the word “remediation” has been changed to “investigation”.