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## Department of Toxic Substances Control

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FROM: Allan Plaza, P.E., Unit Chief / Steve Rounds, P.E., Project Manager

TO: File

DATE: December 18, 2006

SUBJECT: Changes from Draft Permit to Final Permit

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The following change was made from the Draft Permit to the Final Permit:

### **Minor Changes**

1. Inserted Issuance Date of Permit as December 18, 2006.
2. Inserted Effective Date of Permit as January 20, 2007.
3. Inserted Expiration Date of Permit as January 19, 2017.
4. Inserted Permit Number 06-GLN-17 on cover page of permit.
5. Deleted the word "Draft" from Header.
6. Changed the cover page of permit to read "58" pages versus "55" pages shown on draft permit.
7. Corrected USEPA facility ID number to CAD 099452708.
8. The Part B application submittal date was corrected to September 2000.
9. The title of Section II, Item 6 has been changed to "Facility Size and Type for Fee Purposes."
10. The title of Section V has been corrected to read "Special Conditions Which Applies to The Entire Facility's Storage and/or Treatment Unit(s)."

11. The Table of Contents has been updated.

## **Major Changes**

### **Part II. Description of the Facility and Ownership:**

1. Item 5, Wastewater Treatment System has been changed to read:

“The wastewater treatment system shall treat on-site generated wastewater from the Oil Treatment System, Glycol Recovery System, and the Waste Solids Treatment Unit, and any off-site generated wastes listed on page 24 of this permit. The treatment includes heavy metal removal and neutralization of water before discharge to POTW under a permit issued by the City of Los Angeles Bureau of Sanitation. The system capacity is 84,600 gallons/day.”

2. Item 5, Used Oil Treatment has been changed to read:

“The current used oil treatment system may be modified to include a series of storage tanks, filtration units, and separation tanks which shall employ heat and chemicals to produce recycled oil as described in section IV (Oil Treatment System) of the Part B permit application. The system is authorized to treat up to 228,600 gallons/day of waste.”

### **Part IV. Permitted Units and Activities**

1. Process Descriptions, Container Management Area No. 7, Activity Description has the following text added:

“Empty containers and containers storing reagent chemicals / off-specification materials may be stored in CMA-7.”

2. Process Descriptions, Container Management Area No. 7, Waste Type has the following text removed:

“Ignitable and reactive wastes may be stored in that portion of the containment area which is greater than 50 feet from the property lines.”

In its place the following text has been added:

“Ignitable wastes may be stored in that portion of the containment area which is greater than 50 feet from the property lines.”

3. Process Descriptions, Wastewater Treatment System, Activity Description has the following text removed:

“Recovered oil shall be collected in a 55-gallon drum and stored next to the OWS for a maximum of 90 days before being sent to the Oil Treatment System for further treatment.”

In its place the following text has been added:

“Recovered oil shall be collected in a 55-gallon drum and stored next to the OWS for a maximum of 90 days prior to: 1) being sent to the Oil Treatment System for further treatment; or 2) being sent to container management unit CMA-1 or to container management unit CMA-7 for storage as hazardous waste. ”

4. Process Descriptions, Wastewater Treatment System, Physical Description has the following text removed:

“The interior of all steel tanks in this unit are coated with epoxy to prevent corrosion.”

In its place the following text has been added:

“The interior of the tanks in this system will be epoxy-coated to resist corrosion if, based on the tank assessments described in Part V.(1) a of this permit, the engineer certifying the tank assessment reports recommends epoxy coating of the interior of the tanks to resist corrosion.”

5. Process Descriptions, Wastewater Treatment System, Unit Specific Conditions has the following text removed:

“The interior of all steel tanks in this unit are coated with epoxy to prevent corrosion.”

In its place the following text has been added:

“The interior of the tanks in this system will be epoxy-coated to resist corrosion if, based on the tank assessments described in Part V.(1) a of this permit, the engineer certifying the tank assessment reports recommends epoxy coating of the interior of the tanks to resist corrosion.”

6. Process Descriptions, Oil Treatment System, Unit Specific Conditions, has the following text added:

”None”

7. Process Descriptions, Glycol Recovery System, Activity Description has the following text added:

“Waste antifreeze and used antifreeze are currently received from off-site sources for storage in Tanks 47 and 50. From Tanks 47 and 50, the waste antifreeze and used antifreeze are shipped off-site for treatment.”

8. Process Descriptions, Glycol Recovery System, Unit Specific Conditions has the following text removed:

“The interior of all steel tanks in the GRS shall be coated with epoxy to resist corrosion.”

In its place the following text has been added:

“The interior of the tanks in this system will be epoxy-coated to resist corrosion if, based on the tank assessments described in Part V.(1) a of this permit, the engineer certifying the tank assessment reports recommends epoxy coating of the interior of the tanks to resist corrosion.”

9. Process Descriptions, Railcar Loading and Unloading, Unit Specific Conditions has the following text removed:

“RCRA waste shall not be directly transferred from truck to rail car. Only blended RCRA waste from RCRA waste tanks onsite may be transferred to rail car.”

10. Process Descriptions, Railcar Loading and Unloading, Unit Specific Conditions has the following text removed:

“No ignitable or reactive wastes shall be placed into rail cars within 50 feet of the property boundary (in any direction). “

In its place the following text has been added:

“No ignitable wastes shall be placed into rail cars within 50 feet of the property boundary (in any direction). “

11. Process Descriptions, Container Management Area No. 1, Waste Water Treatment System, Oil Treatment System, Glycol Recovery System, and Rail Car Loading And Unloading, Air Emissions Standards has the following text removed:

“Containers and tanks in this unit must comply with 40 Code of Federal

Regulations Part 264 Subpart C-C, and California Code of Regulations, title 22, division 4.5, chapter 14, articles 27, 28, and 28.5.”

In its place the following text has been added:

“Containers must comply with 40 Code of Federal Regulations Part 264 Subpart CC, and California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.”

12. Process Descriptions, Fuel Blending and Waste Solids Treatment, Air Emissions Standards has the following text removed:

“Containers and tanks in this unit must comply with 40 Code of Federal

Regulations Part 264 Subpart C-C, and California Code of Regulations, title 22, division 4.5, chapter 14, articles 27, 28, and 28.5.”

In its place the following text has been added:

“Containers and tanks in this unit must comply with 40 Code of Federal Regulations Part 264 Subparts BB and CC, and California Code of Regulations, title 22, division 4.5, chapter 14, articles 28 and 28.5.”

**Part V. Special Conditions:**

1. Special Condition 1a has the following text removed:

“Tank Assessments. The Permittee shall conduct an integrity tank assessment of all tanks in accordance with California Code of Regulations, title 22, section 66264.191 and the American Petroleum Institute (API) 653 standards. The thickness of all tank walls shall not be below the minimum requirement specified in API 653. All hazardous waste storage tanks shall be internally inspected by emptying the contents of the tanks in accordance with API 653 or an equally accepted industry standard every five (5) years from the date of such previous inspections.”

In its place the following text has been added:

“Tank Assessments. The Permittee shall conduct an integrity tank assessment of all tanks in accordance with California Code of Regulations, title 22, division 4.5, chapter 14, article 10 and the American Petroleum Institute (API) 653 standards. The thickness of all tank walls shall not be below the minimum requirement specified in API 653. All hazardous waste storage tanks shall be internally inspected by emptying the contents of the tanks in accordance with API 653 or an equally accepted industry standard every five (5) years from the date of such previous inspections.”

2. Special Condition 1c has the following text removed:

“The CCE and the financial assurance documents shall be amended to reflect the cost of any remediation of contamination that may be required for the closure of the hazardous waste management units and former locations of the oil storage tanks.”

In its place the following text has been added:

“Within 60 days after the completion of Special Condition 2o, the CCE and the financial assurance documents shall be amended to reflect the cost of any remediation of contamination that may be required for the closure of the hazardous waste management units and former locations of the oil storage tanks.”

3. Special Condition 1d has the following text removed:

“ISOCI will be required to update financial assurance documents to reflect the CCE for new operations, and the financial assurance will need to be increased at least 60 days before the new authorized operations are added at the facility. The CCE for proposed operations at the facility is \$1,595,272.00.”

In its place the following text has been added:

“ISOCI shall be required to update any and all financial assurance documents to reflect the CCE for any new operations at the facility, and the financial assurance shall be increased at least 60 days before the new authorized operations are constructed at the facility. The CCE for proposed operations at the facility is \$1,595,272.00.”

4. Special Condition 2b(iii) is now Special Condition 2b(I).
5. Special Conditions 2b(i) and 2b(ii) are now Special Conditions 2c(I) and 2c(II), respectively.
6. Special Conditions 2c through 2o have been renamed Special Conditions 2d through 2p, respectively.
7. Special Condition 2q was added. It reads as follows:

“The facility shall not accept any waste that exhibits the characteristic of reactivity (D003) based on the test result using US EPA SW-846 as listed in Table III-3 of the Part B permit application or any waste that has been identified by the generator in the Waste Profile or hazardous waste manifest that the waste contains reactive waste..”

8. Special Condition 2r was added. It reads as follows:

“Wastes that contain polychlorinated biphenyls (PCBs) with concentration between 5 to 49 parts per million (ppm) shall only be managed at the Fuel Blending Unit. The facility shall not accept any waste containing PCBs with concentration of 50 ppm or greater.”

9. Special Condition 2s was added. It reads as follows:

“For purposes of waste characterization, the methods for analyzing volatile organic compounds (VOCs) and semi-volatile organic compounds (SVOCs) shall be changed to from EPA SW 846 Methods 624 and 625 to EPA SW 846 Methods 8260b and 8270c, respectively. In addition, Method 8010a will be replaced by 8021b, Method 8080 will be replaced by 8082, Method 9040/9040b will be replaced by 9040c, and Method 9045c will be replaced by 9045d. Waste analysis Method 25D shall not be used.”

10. Special Condition 2t was added. It reads as follows:

“The facility shall not receive more than 100 trucks per day and shall not receive more than 10 rail cars per day.”

11. Special Condition 2u was added. It reads as follows:

“The facility shall not begin construction of any proposed hazardous waste units until it obtains all permits required by all state and local regulatory agencies. Pursuant to California Health and Safety Code section 25199.3(a) the permit for the proposed units shall not become effective until the applicant is granted a local land use permit.”

12. Special Condition 2v was added. It reads as follows:

“The Permittee shall not place hazardous waste anywhere on the property other than in a permitted unit authorized to accept that particular hazardous waste.”

13. Special Condition 2w was added. It reads as follows:

“Within 60 days of the effective date of this permit, ISOCI shall demonstrate that the facility is not located within a 100-year floodplain. If ISOCI cannot demonstrate that the facility is not located within a 100-year floodplain, it shall submit within 90 days a plan to comply with California Code of Regulations, title 22, section 66264.18(b).”

14. Special Condition 2x was added. It reads as follows:

“Within 90 days of the effective date of this permit, ISOCI shall submit a complete revised Section V of the Part B Hazardous Waste Facility Permit application that complies with all applicable sections of California Code of Regulations, title 22, Articles 28 and 28.5, Air Emission Standards for Tanks, Surface Impoundments, and Containers.”

15. DTSC used CostPro 5.0 software to calculate the Closure Cost Estimate (CCE). The spreadsheet used to calculate the CCE is included as Attachment 1. The unit cost for labor supplied by the software falls into an acceptable range for labor costs in the Los Angeles area. These labor costs are not considered atypical by DTSC.