



California Environmental Protection Agency Department of Toxic Substances Control

DRAFT HAZARDOUS WASTE FACILITY PERMIT

Facility Name: Naval Base Coronado
Mixed Waste Storage Facility (MWSF)

Owner Name: United States Department of the Navy
1400 Farragut Avenue
Bremerton, Washington 98314

Operator Name: United States Department of the Navy
Puget Sound Naval Shipyard
and Intermediate Maintenance Facility
1400 Farragut Avenue
Bremerton, Washington 98314

EPA ID Number: CAR 000019430

Effective Date:

DRAFT

Expiration Date:

Pursuant to California Health and Safety Code section 25200, this Resource, Conservation, and Recovery Act (RCRA) - equivalent Hazardous Waste Facility Permit is hereby issued to: the United States Department of the Navy, Puget Sound Naval Shipyard and Intermediate Maintenance Facility for the Mixed Waste Storage Facility at Naval Base Coronado, San Diego County, California.

The Issuance of this Permit is subject to the terms and conditions set forth in Attachment A and the Part "B" Application (Operation Plan) dated March 3, 2014. The Permit consists of 18 pages, including this cover page and Attachment A.

Lori Koch, P.E.
Supervising Hazardous Substances Engineer I
Office of Permitting
Department of Toxic Substances Control

Date: _____

**NAVAL BASE CORONADO
MIXED WASTE STORAGE FACILITY (MWSF)
CORONADO, CALIFORNIA 92135-7029
EPA ID No.: CAR 000019430**

DRAFT HAZARDOUS WASTE FACILITY PERMIT

ATTACHMENT A

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PART I. DEFINITIONS

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **“DTSC”** as used in this Permit means the California Department of Toxic Substances Control.
2. **“Facility”** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

3. **“Permittee”** as used in this Permit means the Owner and Operator.
4. **“RCRA”** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).
5. **“RCRA hazardous waste”** as used in this Permit has the same definition as in Health and Safety Code section 25120.2.
6. **“Mixed waste”** as used herein shall refer to waste that contains both a RCRA hazardous waste, as defined in Health and Safety Code section 25120.2, and a source, special nuclear, or by product material, regulated under the Atomic Energy Act (42 U.S.C. 2011 et. seq.).
7. **“Combined waste”** as used herein shall refer to waste that contains both a non-RCRA hazardous waste, as defined in Health and Safety Code section 25117.9, and a source, special nuclear, or by product material, regulated under the Atomic Energy Act (42 U.S.C. 2011 et. seq.).

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility

United States Department of the Navy
1400 Farragut Avenue
Bremerton, Washington 98314

2. Owner of Real Property

United States Department of the Navy
1400 Farragut Avenue
Bremerton, Washington 98314

3. Operator of Facility

United States Department of the Navy
Puget Sound Naval Shipyard and Intermediate Maintenance Facility
1400 Farragut Avenue
Bremerton, Washington 98314

4. Location

The Mixed Waste Storage Facility (MWSF) is located within the Depot Maintenance Facility in the northeastern part of Naval Base Coronado (formerly known as Naval Air Station – North Island (NASNI)) near the corner of Roe Street and Quentin Roosevelt Boulevard. Naval Base Coronado is bordered on the east by City of Coronado, on the north and west by San Diego Bay and on the south by the Pacific Ocean. The San Diego Assessor's parcel number for Naval Base Coronado is 536-510. Naval Base Coronado is located within unsectioned land designated as "Pueblo Lands of San Diego". Township, Range and Sections are not defined within Pueblo Lands.

5. Description of Facility Operations

The MWSF is a single concrete masonry and steel truss building (designated as Building 74) within the Depot Maintenance Facility (DMF) and stores mixed and/or combined waste.

Solid mixed and/or combined waste is contained at the jobsite by placing the solid waste into heavy-duty plastic bags, chip collectors, or vacuum canisters. The plastic bags are sealed with tape, and the chip collectors and vacuum cleaners have mechanical sealing methods. Liquid mixed and/or combined waste is contained at the jobsite by placing the waste into rigid containers with mechanical seals. The plastic bags and rigid containers may be double-bagged by placing them into another heavy-duty plastic bag and sealing the bag with

tape. These sealed bags are then packed into excepted package, general design package, or United Nations (UN) certified Department of Transportation (DOT) shipping containers (e.g. metal drums, metal/fire-resistant wood waste boxes, etc.). The sealed shipping containers are brought to the MWSF for storage until arrangements can be made to ship the waste to an authorized offsite treatment or disposal facility.

All shipping containers in the MWSF are kept closed except when consolidating compatible wastes into partially filled containers or performing surveillances.

6. Facility History

DTSC issued a hazardous waste facility permit to the United States Department of the Navy, Puget Sound Naval Shipyard and Intermediate Maintenance Facility (PSNS & IMF) to construct and operate the MWSF at the NASNI (now known as Naval Base Coronado) on September 29, 1998, which was appealed. The permit decision was stayed and on December 8, 1998, DTSC rescinded the stay of the permit decision and the permit became effective. The permit had an expiration date of November 2, 2008. Construction of the MWSF was completed in April 2000. Mixed waste operations started on June 7, 2001.

On December 20, 2007, PSNS & IMF submitted an application to renew its hazardous waste facility permit. DTSC found the application to be timely and complete. State law allows PSNS to continue to operate under the terms of the 1998 permit until DTSC makes a final decision on PSNS's application.

There is also a Hazardous Waste Facility Permit issued to the United States Department of Navy for the Hazardous Waste Facility Complex (EPA ID No. CA7170090016) at Naval Base Coronado which is operated by Shaw Infrastructure, Inc. and separate from MWSF.

7. Facility Size and Type for Fee Purposes

The Facility is categorized as a small storage facility pursuant to Health and Safety Code section 25205.1, and for purposes of Health and Safety Code sections 25205.2 and 25205.19.

8. Closure Cost Estimate

The MWSF is owned by the United States Department of the Navy and is exempt from the requirements to provide a closure cost estimate and financial assurance mechanisms for closure in accordance with California Code of Regulations, title 22, section 66264.140(c).

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The Part “A” Application and the Part “B” Application (Operation Plan), “Naval Base Coronado Mixed Waste Storage Facility Part B Application” dated August 2014 (hereinafter referred to as the “Permit Application”) is hereby made a part of this Permit by reference.

2. EFFECT OF PERMIT

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations (Cal. Code Regs.), title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to store mixed and/or combined wastes in accordance with the terms and conditions of this Permit. Any management of mixed, combined, or hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in this Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including, but not limited to, penalties pursuant to Health and Safety Code sections 25187.
- (f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).

- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

DTSC prepared a "Mitigated Negative Declaration (April 1998) for Permit Determination for the Mixed Waste Storage Facility at Naval Air Station - North Island" (1998 Mitigated Negative Declaration). In accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, California Code of Regulations, title 14, DTSC determined that the 1998 Mitigated Negative Declaration provided an accurate description of proposed project activities, current baseline environmental conditions, and an analysis of potential impacts; and therefore, no additional CEQA documentation is necessary for this permit determination.

4. ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

5. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing, sampling, or monitoring as DTSC deems necessary; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all

records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit or undertake any other activity necessary to determine compliance with applicable requirements.

- (b) Nothing in this Permit shall limit or otherwise affect DTSC's right to access and entry pursuant to any applicable State or federal laws and regulations.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous, mixed, or combined waste at this Facility other than those specified in this Table 1 of this Permit. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

Unit #1

UNIT NAME:

Mixed Waste Storage Facility

LOCATION:

The MWSF is located within the DMF in the northeastern part of Naval Base Coronado near the corner of Roe Street and Quentin Roosevelt Boulevard (See Figure 1).

ACTIVITY TYPE:

Storage in Containers

ACTIVITY DESCRIPTION:

The MWSF stores containers of solid and/or liquid mixed and/or combined wastes. Sealed containers of mixed waste are brought to the MWSF for storage until arrangements can be made to ship the mixed waste to an authorized offsite treatment or disposal facility.

Mixed and/or combined wastes are generated either from ships docked at Naval Base Coronado, onsite at the DMF, or offsite from Naval Base Point Loma. Solid mixed and/or combined waste is contained at the jobsite by placing the solid waste into heavy-duty plastic bags, chip collectors, or vacuum canisters. The plastic bags are sealed with tape, and the chip collectors and vacuum cleaners have mechanical sealing methods. Liquid mixed and/or combined waste is contained at the jobsite by placing the waste into rigid containers with mechanical seals. The plastic bags and rigid containers may be double-bagged by placing them into another heavy-duty plastic bag and sealing the bag with tape. These sealed bags are then packed into excepted package, general design package, or United Nations (UN) certified Department of Transportation (DOT) shipping containers (e.g. metal drums, metal/fire-resistant wood waste boxes, etc.). All shipping containers in the MWSF are kept closed except when consolidating compatible wastes into partially filled containers or performing surveillances.

PHYSICAL DESCRIPTION:

The MWSF consists of one building within the Depot Maintenance Facility. The building is an enclosed concrete masonry and steel truss building (measuring 42 feet by 54 feet) and a

loading/unloading area covered in concrete/asphalt (measuring 54 feet by 20 feet) (See Figure 3). The roof of the facility is constructed of metal standing seam roofing, rigid roof insulation, steel roof deck, and steel joists. The building has exterior personnel doors, which are painted, insulated, steel doors with steel frames; and a rolltop door, which is chain and motor operated. Within the MWSF building is a small room, referred to as a mechanical room, measuring approximately 5 feet by 8 feet. The mechanical room is separated from the storage area by an interior wall constructed of water-resistant gypsum board and metal studs.

The inside perimeter of the building is fitted with a 10-inch concrete berm to prevent any spills from leaving the MWSF. This berm provides approximately 12,754 gallons of secondary containment. The floor of the storage area slopes inward from the berms toward a blind floor sump at a 1% grade. Any spills or leaks flow by gravity to the floor sump. The sump has no drain. If liquids drain to the sump, the collected liquid is removed using a portable pump or absorbent and placed into approved containers, then characterized and handled as mixed waste if necessary. The entrances are protected by concrete ramps and/or platforms with adjoining steps.

The floor of the MWSF consists of a 8.5-inch thick concrete slab on grade which is covered with impervious epoxy coating. The slab is reinforced with 0.75 inch diameter rebar on 6 inch center in two directions to prevent crack opening or movement, and underlain by a 2-inch layer of sand and a 4-mil polyethylene vapor barrier sheet.

MAXIMUM CAPACITY:

The total maximum permitted storage capacity is 5,500 gallons (20 cubic meters).

WASTE TYPES:

See Table #1

CALIFORNIA HAZARDOUS WASTE CODES:

See Table #1

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. All containers shall be placed on pallets except storage boxes. Storage boxes may be placed directly on the ground.
2. Containers without liquids shall not be stacked more than two high. Containers with liquids shall not be stacked.
3. All containers in the MWSF shall be kept closed except when consolidating compatible pre-packaged wastes into partially filled containers or when performing surveillances.
4. The Permittee shall maintain a minimum aisle space of 36 inches in this Unit to allow for movement of emergency equipment and personnel.

PART V. SPECIAL CONDITIONS

1. The Permittee is prohibited from conducting any hazardous, mixed, or combined waste transfer, storage, treatment or other management activity unless it is specifically described in this Permit or otherwise authorized by DTSC.
2. The Permittee shall not accept any mixed or combined wastes generated outside the boundaries of the Depot Maintenance Facility (DMF) for storage at the MWSF with the exception of mixed wastes from the maintenance facility at Naval Base Point Loma or from any ships docked at Naval Base Coronado.

3. TRAFFIC

The Permittee shall require, as a condition of any agreement with any waste hauler for on-site receipt or off-site shipment of mixed and/or combined wastes, the use of truck routes prescribed in the City Council Resolution No. 8264 of the City of Coronado (Resolution), for the transportation of mixed and/or combined wastes, and shall prohibit the use of certain streets, as specified in the Resolution, during the hours of 7:00 to 8:00 am and 4:00 to 5:00 pm.

As of the effective date of this Permit, the Permittee shall ensure that this condition is observed by all mixed and/or combined waste haulers transporting wastes to or from the MWSF pursuant to this Permit.

If the Resolution is superseded by a new resolution by the City Council of the City of Coronado, which specifies truck routes applicable to shipments of mixed wastes, the Permittee shall notify DTSC of the change and shall require waste haulers to comply with the new resolution in accordance with this special condition.

4. The Permittee may store mixed and/or combined waste that is restricted from land disposal beyond one year; however, the Permittee bears the burden of proving that such storage is solely for the purpose of accumulating such quantities of mixed and/or combined waste necessary to facilitate proper recovery, treatment or disposal pursuant to California Code of Regulations, title 22, section 66268.50.
5. The Permittee shall maintain an Operating Record at the Facility which documents all mixed or combined waste activities at the Facility, including the quantities and types of mixed or combined waste transferred to or from the Facility, the dates of arrival and departure of shipment, and the manifest document numbers.
6. In the event any cracks, gaps or tears are detected in any hazardous waste management units, repairs shall be initiated as soon as possible and completed within one week of discovery of the problem. Within seven days of discovery of the problem, the Permittee shall notify DTSC in writing of corrective measures that have been taken.
7. Containers holding mixed or combined wastes shall be stored only in the authorized areas designated in Part IV of this Permit. Any non-hazardous waste that is stored in a designated hazardous waste storage area as provided by this Permit shall be subject

to the conditions of this Permit, including volume calculations, compatibility and inspections.

8. For the purpose of calculating the permitted maximum capacity limitations for storage and for secondary containment, all containers in the authorized units are assumed to be full, and all mixed and/or combined waste that is stored or located in an authorized unit shall be included in the calculation for that unit, including any hazardous waste that is covered by the transfer facility exemption under California Code of Regulations, title 22, section 66263.18.
9. Only employees of the Permittee who are fully trained in the Facility's operations and procedures are allowed to handle the transfer and storage operations at the Facility.
10. The Permittee shall not store more than five (5) gallons of ignitable waste at the Facility.
11. The Permittee shall not store reactive waste at the Facility.
12. In addition to submitting a report to DTSC in accordance with California Code of Regulations, Title 22, section 66264.56(j) of any incident that requires implementing the contingency plan, the Permittee shall also within fifteen (15) calendar days after the incident, send a copy of the that same report to:

City Manager
City of Coronado
1825 Strand Way
Coronado, California 92118
13. Pursuant to Health and Safety Code sections 25201(a) and 25203, hazardous, mixed, or combined wastes shall not be disposed of at the MWSF.
14. The Permittee shall not accept hazardous, mixed, or combined waste containing PCBs with a concentration of 500 parts per million (ppm) or greater.
15. Upon receipt of waste at the Facility, the Permittee shall mark the date of acceptance on each shipping container and maintain original generator labels on all shipping containers until such time as the waste is shipped from the MWSF to an off-site treatment or disposal facility. The date of acceptance shall be the date of the earliest sealed plastic bag, chip collector, vacuum canister, or rigid container placed into the shipping container.
16. The Permittee shall take and provide to DTSC photographs, and sound or video recordings upon DTSC's request. If the Permittee cannot comply with such request due to the US Navy's security protocols, the Permittee shall provide written notification denying DTSC's request within 7 calendars of DTSC's request.

PART VI. CORRECTIVE ACTION

1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. In order to avoid duplication of efforts by having two organizations within the United States Department of the Navy cleaning up the same site, corrective action for this permit is incorporated into the corrective action program being carried out under the Hazardous Waste Facility Permit issued to the United States Navy Hazardous Waste Facility Complex (EPA ID No. CA7170090016) on July 25, 2010 and pursuant to the Federal Facility Site Remediation Agreement (“FFSRA”), signed by DTSC on January 3, 1999.
2. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. “Best efforts” as used in this paragraph shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within fourteen days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.
3. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee’s liability and obligation to perform corrective action including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.
4. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threat to human health and/or the environment.
5. DTSC may require the Permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents.

Table 1 – Allowable Waste Streams

Waste Stream Number	Waste Stream Name	Common Name	RCRA, (CA) Waste Codes	Hazardous Properties	Physical State
MW1	Mixed Waste Requiring Organic/ Characteristic Treatment	Solid Waste with Heavy Metals, Vacuum Contents with Heavy Metals, or Ignitable Liquids	D001, D004, D005, D006, D007, D008, D009, D010, D011, (132), (135), (151), (181), (212), (214), (223), (343), (352), (723)	Toxic Ignitable	Solid or Liquid
MW2	Mixed Waste for Macroencapsulation (includes hazardous debris and PCBs)	Lead Solids or Debris, or Lead Solids or Debris with PCBs	D004, D005, D006, D007, D008, D009, D010, D011, (151), (181), (261), (352)	Toxic	Solid
MW3	Mixed Waste Containing PCBs	Solid Waste with Heavy Metals and PCBs or Vacuum Contents with Heavy Metals and PCBs	D004, D005, D006, D007, D008, D009, D010, D011, (151), (181), (261), (352)	Toxic	Solid
MW4	Combined Waste (includes Combined Waste with PCBs)	Vacuum Contents with Combined Waste or Combined Waste - Batteries	(132), (133), (134), (135), (151), (181), (223), (261), (352), (512), (513)	Toxic	Solid or Liquid
MW5	Mercury Containing Waste ≥ 260 ppm	Same as Waste Stream Name	D004, D005, D006, D007, D008, D009, D010, D011, (151), (181), (352), (725)	Toxic	Solid or Liquid

Table 1 – Allowable Waste Streams

Waste Stream Number	Waste Stream Name	Common Name	RCRA, (CA) Waste Codes	Hazardous Properties	Physical State
MW7	Potassium Chromate Solution	Same as Waste Stream Name	D007, (723)	Toxic	Liquid
MW8	Chloride Titration Solution	Mercuric Nitrate Solution	D009, (725)	Toxic	Liquid
MW9	Chloride Turbidity Test Solution	Silver Nitrate Solution	D002, D011, (792)	Toxic Corrosive	Liquid
MW10	Liquid Waste with Heavy Metals/ Corrosivity Characteristic	Same as Waste Stream Name	D002, D004, D005, D006, D007, D008, D009, D010, D011, (121), (122), (132), (223), (791), (792)	Toxic Corrosive	Liquid
MW11	Potassium Chromate Test Solution	Same as Waste Stream Name	D002, D007, (792)	Toxic Corrosive	Liquid

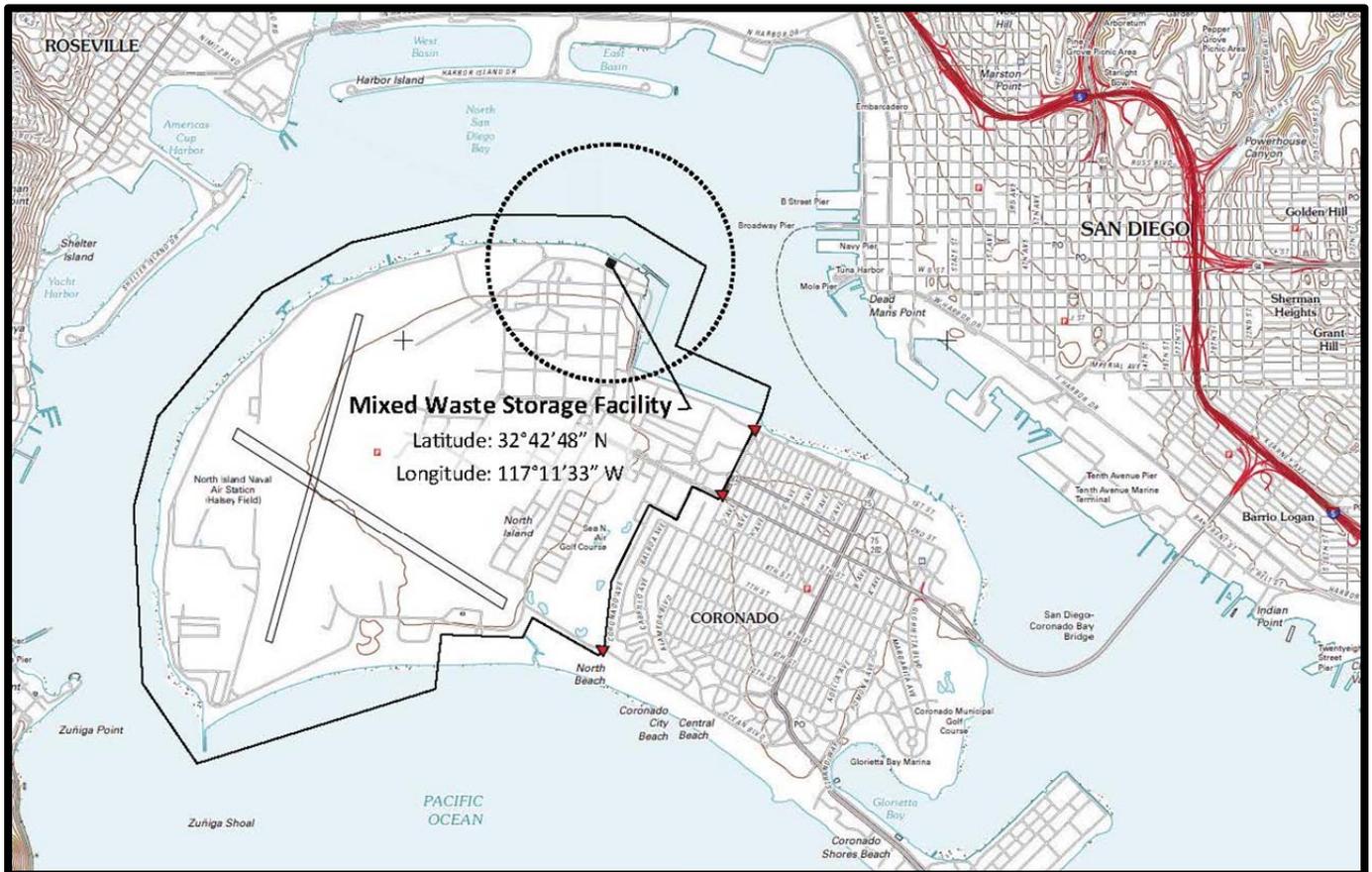


Figure 1. Location of the Mixed Waste Storage Facility

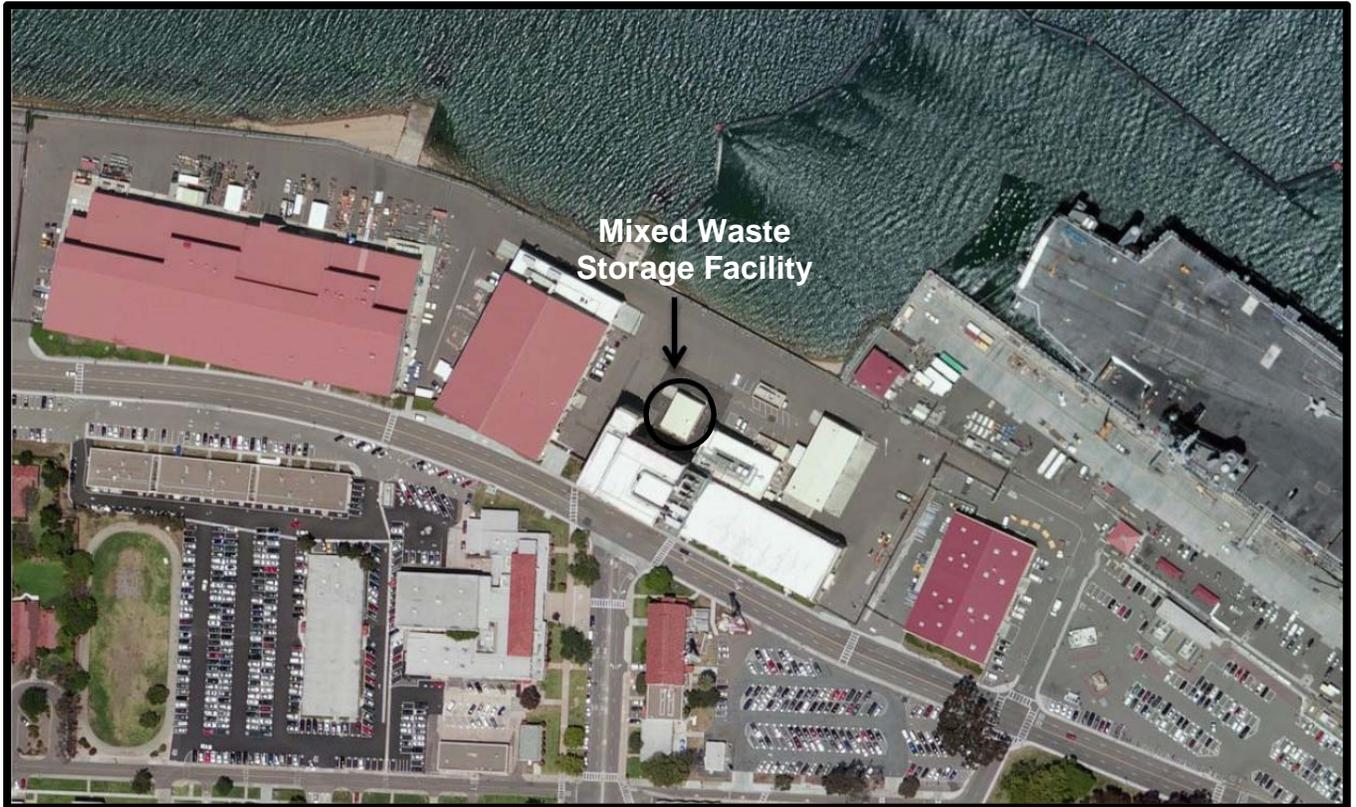


Figure 2. Aerial Photograph of the Mixed Waste Storage Facility

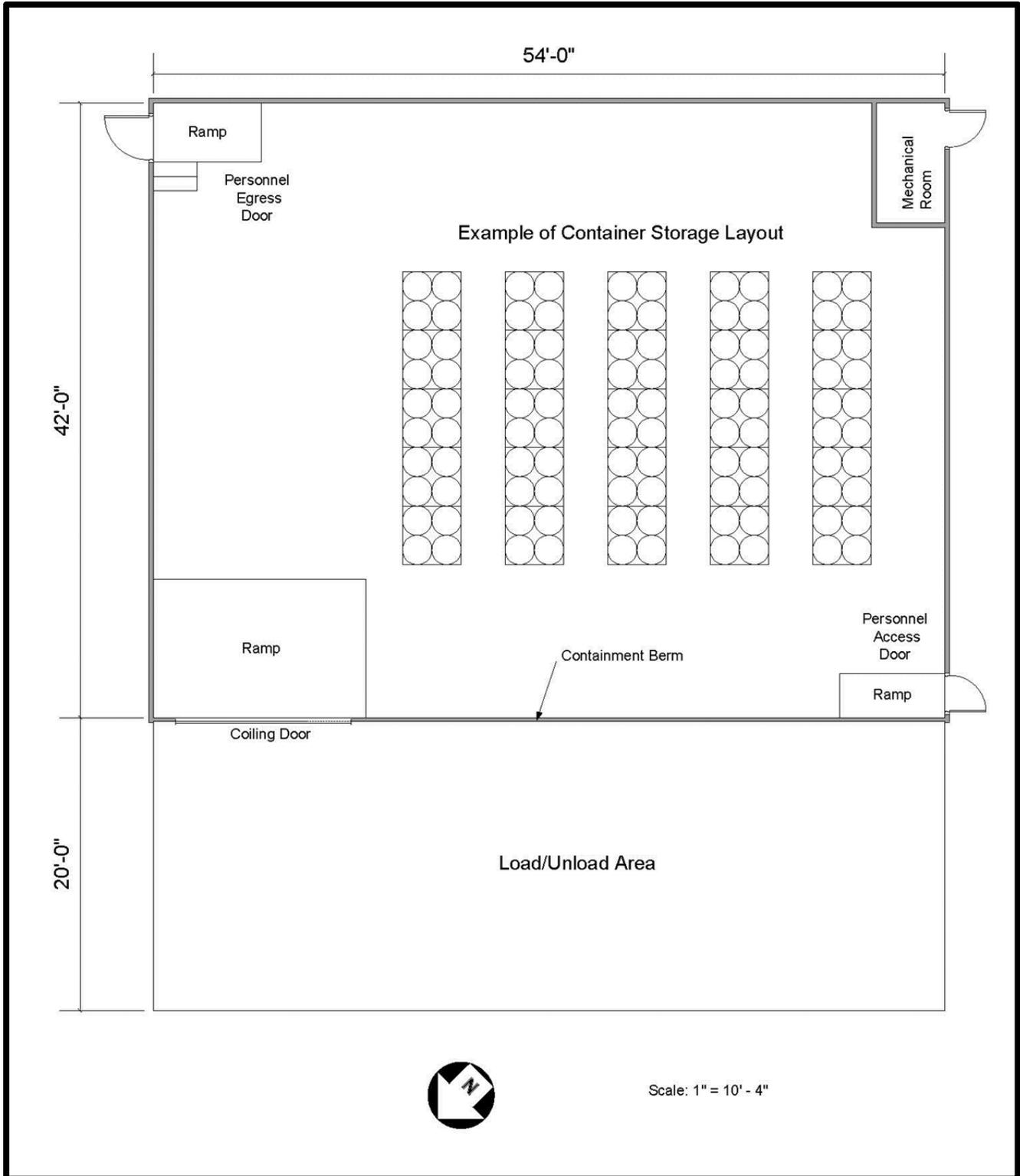


Figure 3. Facility Layout