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## Department of Toxic Substances Control

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TO: Permit File for AERC.com  
FROM: Alejandro Galdamez  
DATE: February 11, 2010  
SUBJECT: Changes from Draft Permit to Final Permit

The following changes were made from the Draft Permit to the Final Permit

1. Administrative Changes Applicable to Entire Permit:
  - a. Added the effective date of the Permit in the header of Permit and removed "Draft" in the headers.
  - b. Corrected typographical errors throughout the Permit.
2. Specific Changes from the Draft to Final Permit:
  - a. Inserted effective date as February 12, 2010 and expiration date as February 11, 2020.
  - b. Corrected the number of pages in the permit from 29 to 27.
  - c. Changed signatory on cover page from "Peter Bailey, P.G." to "Alfred Wong, P.E." due to DTSC internal reorganization.
  - d. Removed "Draft" from cover page and page 2 of Permit.
  - e. Corrected page numbering in the Table of Contents and corrected the titles of the Attachments and Tables for consistency purpose.
  - f. Inserted in page 5 under Description of Facility Operations: "This Permit authorizes the Permittee to store only non-RCRA hazardous waste in the lamp storage areas" to clarify that this permit authorizes the storage of only non-RCRA hazardous waste.
  - g. On page 6, changed the phrase "in 2009 dollars" to "in 2008 dollars" to show the correct date of the Closure Cost Estimate approved by DTSC.

- h. Removed “U.S. EPA Hazardous Waste Code: D009” from the Hazardous Waste Codes section of the Permit in Storage Areas # 1 and #2 on pages 13 and 15, respectively, in order to clarify that the facility is permitted to store only non-RCRA hazardous waste.
- i. Added Special Condition 6 on page 16: “The Permittee shall not conduct any hazardous waste management activities that would require a permit issued under RCRA or a RCRA-equivalent Hazardous Waste Facility Permit issued by DTSC. Specifically, the Permittee is prohibited from storing HID light tubes, Fluorescent light tubes, and any other light tubes that fail the Toxic Characteristic Leaching Procedure (TCLP) criteria except for those wastes that have been designated as a household hazardous waste, or have been accepted from a household hazardous waste collection facility” to clarify that the facility is permitted to store only non-RCRA hazardous waste.
- j. Revised the wording “U.S. EPA Waste Code D009” in Table 1 to “U.S. EPA Waste Code D009 – Treatment Only” to clarify that the Permittee is authorized to treat, but not to store D009 at the facility.
- k. Revised Maximum Storage Time in Table 1 to “No storage of RCRA hazardous waste; otherwise, 90 days” to clarify that only non-RCRA hazardous waste can be stored at the facility. RCRA hazardous waste (D009) may only be treated at the facility.