

**RESPONSE TO COMMENTS
FOR
BECKMAN COULTER, INC.
4300 HARBOR BLVD.
FULLERTON, CALIFORNIA
EPA I.D. No. CAD 008254708**

On April 21, 2006, 2005, the Department of Toxic Substances Control (DTSC) issued a public notice on the proposed Hazardous Waste Permit Renewal for Beckman Coulter, Inc., located in the City of Fullerton. The public comment period ended on June 6, 2006.

A public hearing was held on May 23, 2006 in the Sonora High School Little Theater. No oral comment was received during the public hearing.

DTSC received a total of 44 comments from the facility on the draft permit and the draft negative declaration, which have been included in their entirety.

SECTION I. RESPONSE TO COMMENTS RECEIVED BY MAIL TO THE DRAFT PERMIT

Comments 1 through 31 are from Mr. Larry Johnson, Manager Corporate EHS Auditing, Permitting, Site Remediation, of Beckman Coulter, Inc. These were the only comments received by mail.

COMMENT 1 – Cover Page - Page 2 - PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP, 1. OWNER – Page 2 - PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP, 2. OPERATOR

On the cover page we request that **BECKMAN-COULTER, INCORPORATED** be changed to **BECKMAN COULTER, INC.** On page 2 we request that Beckman Coulter, Incorporated be changed to Beckman Coulter, Inc.

Response to Comment 1

DTSC concurs. The cover page and page 3 of the Hazardous Waste Facility Permit (Permit) have been changed as requested.

COMMENT 2 – Page 2 – PART I. DEFINITIONS

Beckman Coulter is requesting that the Part B permit be modified to contain language that clearly states that the permit allows Beckman Coulter to manage, as a hazardous waste generator, including but not limited to the accumulation of hazardous waste under the provisions of CCR Title 22, Division 4.5, Chapter 12, Article 3, Section 66262.34, those hazardous wastes not specifically identified in the permit as waste coolant, pseudocumene waste water, waste liquid scintillation cocktail or plating shop waste water. This flexibility in hazardous waste management is requested to allow the company, without the need for permit modifications, to conduct new hazardous waste activities or to generate new hazardous waste streams in a timely manner as business requirements change.

DTSC granted this flexibility in the existing permit issued July 15, 1994, by adding the following definition.

For purposes of this permit “Storage” means the holding of hazardous waste for longer than 90 days.

To clarify the scope of the permit, Beckman Coulter recommends adding the following to page 2, PART I. DEFINITIONS:

“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.

Beckman Coulter understands the Department’s position that wastes managed in a permitted storage management unit must be managed in accordance with the requirements of Title 22, Division 4.5, Chapter 14, Article 9 – Management of Containers and that the total amount of material stored in the permitted area must be within the permitted maximum capacity. Beckman Coulter can operate within these conditions.

In addition to specifying the scope of storage with the above definition, Beckman Coulter requests modifications to the language in the following Sections of the draft permit on pages 8 and 9:

ACTIVITY DESCRIPTION
WASTE SOURCES
WASTE TYPES
RCRA HAZARDOUS WASTE CODES

The reason for requesting these changes is to add language that will allow Beckman Coulter to conduct additional hazardous waste activities with additional waste streams providing the activities do not constitute treatment or storage for more than 90 days.

The concern with the draft permit as written is that the current language is specific and if Beckman Coulter were to need to add a new activity such as bulking liquid wastes or add a new waste code, a permit modification would be required. Beckman Coulter must be able to add new processes and new waste streams in a timely manner to be competitive. If a permit modification were to be required every time a new waste is generated, this would extend the time required for the company to be able to start a new business and limit Beckman Coulter's ability to be competitive. Additionally, considering the large number of new waste streams Beckman Coulter has added since the original permit was issued, the large number of permit modifications would also create significant administrative burdens on DTSC and Beckman Coulter.

For the ACTIVITY DESCRIPTION: on pages 8 and 9, Beckman Coulter would like language stating that there are hazardous waste activities conducted in the area, not specifically identified in the permit, that involve neither waste treatment nor storage for more than 90 days. The purpose of this language is to allow activities such as bulking liquids, assembling lab packs, etc. for wastes held for 90 days or less and to state in the permit that DTSC recognizes that there are activities beyond storing waste coolant for more than 90 days occurring in the area. This wording is requested because an inspector may observe an activity other than storage for more than 90 days and interpret the activity to be a violation of the permit conditions unless there is specific language in the permit allowing the activities.

For the WASTE SOURCES: on pages 8 and 9, Beckman Coulter would like language stating that there are waste sources not specifically identified in the permit that generate hazardous wastes that are managed and stored in the area for 90 days or less.

For the WASTE TYPES on pages 8 and 9, Beckman Coulter would like language stating that there will be wastes in the area, in addition to waste coolant. All wastes, other than waste coolant, may be stored in the area for 90 days or less.

For the RCRA HAZARDOUS WASTE CODES: on pages 8 and 9, Beckman Coulter would like to suggest that the heading be changed to HAZARDOUS WASTE CODES:

and that language be added to identify that only waste coolant may be held for more than 90 days but that RCRA and California hazardous wastes and Universal wastes may be held in the area provided it is for 90 days or less. Suggested wording is as follows:

Waste Machining Coolant is not a RCRA hazardous waste. It is a California hazardous waste with a waste code of 133.

RCRA and California hazardous wastes and universal wastes may be held in the area for 90 days or less.

RESPONSE TO COMMENT 2

DTSC concurs. A Special Condition has been added to the final permit that defines the situation exactly. See section V. B on page 15 of the Permit. The Special Condition reads as follows: "B. 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."

COMMENT 3 – Page 5 – PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP, 3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

It is suggested that the first sentence be changed from "A negative declaration has been prepared in *the* accordance..." to "A negative declaration has been prepared in accordance..."

RESPONSE TO COMMENT 3

DTSC concurs. Section II.3, Page 6, of the Permit has been changed as requested.

COMMENT 4 – Page 8

Page 8 under the section LOCATION: The Container Storage Area, Building 10, Bay 1 is located in the northern end of building 10.

RESPONSE TO COMMENT 4

DTSC concurs. Page 8, under LOCATION, has been changed as requested.

COMMENT 5 – Page 8 - ACTIVITY DESCRIPTION:

Please see comment 2.

RESPONSE TO COMMENT 5

DTSC concurs. Please see response to Comment 2.

COMMENT 6 – Page 8 - WASTE SOURCES:

Please see comment 2.

RESPONSE TO COMMENT 6

DTSC concurs. The wording of WASTE SOURCES has been changed to read “Various on-site manufacturing processes.”

COMMENT 7 – Page 8 - WASTE TYPES:

Please see comment 2.

RESPONSE TO COMMENT 7

DTSC concurs. The wording of WASTE TYPES has been changed to read "Container Storage Area, Building 10, Bay 1 shall be used to store waste machining coolant, as specified in Part V.B of this permit."

References to other wastes listed in the draft permit were deleted.

COMMENT 8 – Page 8 - RCRA HAZARDOUS WASTE CODES:

Please see comment 2

RESPONSE TO COMMENT 8

DTSC concurs. Please see response to Comment 2. Additionally, the waste codes in this section have been revised to reflect your comment.

COMMENT 9 – Page 8

Since Waste Machining Coolant is not a RCRA waste, it is suggested that the California waste code be identified. The following wording is suggested:

CALIFORNIA WASTE CODE:

The California waste code for Waste Machining Coolant is 133.

RESPONSE TO COMMENT 9

DTSC concurs. The wording of CALIFORNIA WASTE CODE has been added as requested.

COMMENT 10 – Page 9

Page 9 under the section LOCATION: The Container Storage Area, Building 10, Bay 2 is located toward the northern end of building 10.

RESPONSE TO COMMENT 10

DTSC concurs. The wording of LOCATION has been changed as requested.

COMMENT 11 – Page 9 - ACTIVITY DESCRIPTION:

Please see comment 2.

RESPONSE TO COMMENT 11

DTSC concurs. Please see response to Comment 2

COMMENT 12 – Page 9

It is suggested that WASTE RESOURCES be changed to WASTE SOURCES.

RESPONSE TO COMMENT 12

DTSC concurs. The wording of WASTE RESOURCES has been changed as requested.

COMMENT 13 – Page 9 - WASTE SOURCES:

Please see comment 2.

RESPONSE TO COMMENT 13

DTSC concurs. The wording of WASTE SOURCES has been changed to read “Various on-site manufacturing processes”.

COMMENT 14 – Page 9 - WASTE TYPES:

Please see comment 2.

RESPONSE TO COMMENT 14

DTSC concurs. The wording has been changed to read "Container Storage Area, Building 10, Bay 2 shall be used to store waste machining coolant, as specified in Part V.B of this permit."

COMMENT 15 – Page 9 - RCRA HAZARDOUS WASTE CODES:

Please see comment 2.

RESPONSE TO COMMENT 15

DTSC concurs. The wording of RCRA HAZARDOUS WASTE CODES has been changed as requested.

COMMENT 16 – Page 9

Since Waste Machining Coolant is not a RCRA waste, it is suggested that the California waste code be identified. The following wording is suggested:

CALIFORNIA WASTE CODE:

The California waste code for Waste Machining Coolant is 133.

RESPONSE TO COMMENT 16

DTSC concurs. The wording of CALIFORNIA WASTE CODE has been added as requested.

COMMENT 17 – Page 10

The mixed waste is used liquid scintillation cocktail and controls. Pseudocumene wastewater is a different waste stream.

The following wording for WASTE TYPES: is suggested:

Mixed waste is waste liquid scintillation cocktail and control standards. LSC is a mixture of organic chemicals used on Liquid Scintillation Counters to measure the concentrations of tagged materials in samples.

RESPONSE TO COMMENT 17

DTSC concurs. The wording of WASTE TYPES has been changed as requested.

COMMENT 18 – Page 11

The following addition to the wording for ACTIVITY DESCRIPTION: is suggested:

Modify the last sentence from “The maximum amount....is 200 gallons.” to “The maximum amount....is 200 gallons (20 drums).”

RESPONSE TO COMMENT 18

DTSC concurs. The wording of the last sentence of ACTIVITY DESCRIPTION has been changed as requested.

COMMENT 19 – Page 11

The waste coolant tanks are supported by steel platforms that are installed in the concrete pad.

The following wording for PHYSICAL DESCRIPTION: is suggested:

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.

RESPONSE TO COMMENT 19

DTSC concurs. The wording of the PHYSICAL DESCRIPTION has been changed as requested.

COMMENT 20 – Page 11

The waste coolant is an aqueous waste that could contain more than 10% organic material.

The following wording is suggested:

CALIFORNIA WASTE CODE:

The California waste code for Waste Machining Coolant is 133.

RESPONSE TO COMMENT 20

DTSC concurs. The wording of CALIFORNIA WASTE CODE has been changed as requested.

COMMENT 21 – Page 12

Although pseudocumene and 1,2,4-trimethylbenzene are the same chemical compound, it is suggested that the tank used to store the wastewater from the liquid scintillation cocktail manufacturing process be identified in the Part B Permit as the Pseudocumene Wastewater Storage Tank. This is the name of the tank that is used by Beckman Coulter Employees and is the name used in the permit application. It is suggested that this name be used in the permit to maintain consistency between the application and internal company documents.

The following wording for UNIT NAME: is suggested:

Pseudocumene Wastewater Storage Tank

RESPONSE TO COMMENT 21

DTSC concurs. The wording of UNIT NAME has been changed as requested.

COMMENT 22 – Page 12

The following wording for LOCATION: is suggested:

The Pseudocumene Wastewater Storage Tank is located in between Building 11 and Building 10.

RESPONSE TO COMMENT 22

DTSC concurs. The wording of LOCATION has been changed as requested.

COMMENT 23 – Page 12

The following wording for ACTIVITY DESCRIPTION: is suggested:

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.

RESPONSE TO COMMENT 23

DTSC concurs. The wording of ACTIVITY DESCRIPTION has been changed as requested.

COMMENT 24 – Page 12

The following wording for the PHYSICAL DESCRIPTION: is suggested:

The Pseudocumene Wastewater Storage Tank is a horizontal dual-walled tank. The inner tank is 11 feet long with a diameter of 5 feet-7 inches. The outer tank is 11 feet - 6 inches long with a diameter of 6 feet. The tank material is mild steel.

RESPONSE TO COMMENT 24

DTSC concurs. The wording of PHYSICAL DESCRIPTION has been changed as requested.

COMMENT 25 – Page 12

The following wording for the RCRA HAZARDOUS WASTE CODE: is suggested:

The pseudocumene wastewater is not a RCRA hazardous waste.

RESPONSE TO COMMENT 25

DTSC concurs. The wording of RCRA HAZARDOUS WASTE CODE has been added as requested.

COMMENT 26 – Page 12

The pseudocumene waste water is an aqueous waste that contains less than 10% organic material.

The following wording is suggested:

CALIFORNIA WASTE CODE:

The California waste code for pseudocumene waste water is 134.

RESPONSE TO COMMENT 26

DTSC concurs. The wording of CALIFORNIA WASTE CODE has been added as requested.

COMMENT 27 – Page 12

The following wording for the MAXIMUM CAPACITY: is suggested:

The maximum permitted capacity of the Pseudocumene Wastewater Storage Tank is 2,000 gallons.

RESPONSE TO COMMENT 27

DTSC concurs. The wording of MAXIMUM CAPACITY has been changed as requested.

COMMENT 28 – Page 12

The waste stored in the Pseudocumene Wastewater Storage Tank is a wastewater. It is suggested that the waste name used in the permit include the word wastewater.

The following wording for the RCRA HAZARDOUS WASTE CODES: is suggested:

The pseudocumene wastewater is not a RCRA waste.

RESPONSE TO COMMENT 28

DTSC concurs. The wording of RCRA HAZARDOUS WASTE CODES has been changed as requested.

COMMENT 29 – Page 13

The elementary neutralization that is performed on the plating shop wastewater consists only of the adjustment of the pH to meet the Orange County Sanitation Industrial Water permit limits. There is no precipitation in the neutralization process.

The following wording for the ACTIVITY DESCRIPTION: is suggested:

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.

RESPONSE TO COMMENT 29

DTSC concurs. The wording of ACTIVITY DESCRIPTION has been changed to the suggested text.

COMMENT 30 – Page 13

The draft permit identifies a maximum capacity for the neutralization system of 2,192 gallons as well as a maximum daily throughput of 50,000 gallons per day. Since the neutralization tank is a flow through treatment process as opposed to a storage tank, it is more appropriate to state the maximum capacity as 50,000 gallons per day.

The following wording for the MAXIMUM CAPACITY: is suggested:

The maximum permitted throughput capacity is 50,000 gallons per day.

RESPONSE TO COMMENT 30

DTSC concurs. The wording of MAXIMUM CAPACITY has been changed as requested.

COMMENT 31 – Page 14 – PART V – SPECIAL CONDITIONS

The following change in the first sentence is suggested. Change the first sentence from “The Permittee shall submit....and closure of *their* inactive trichloroethane (TCA) tanks.” to “The Permittee shall submit....and closure of the inactive trichloroethane (TCA) tanks.”

RESPONSE TO COMMENT 31

DTSC concurs. The wording of the first sentence of the first paragraph of SPECIAL CONDITIONS has been changed as requested.

COMMENT 32 – Page 14 - PART VI – CORRECTIVE ACTION

A. Existing Contamination

At the current time the work conducted with respect to the Building 10 project has been limited to investigation. No remediation activities have been started. It is suggested that the word remediation in the third line of the first paragraph be changed to investigation.

DTSC has not concurred that the investigation of the contamination is complete. It is suggested that either the sentence "All that is left for Beckman is to begin the removal of the contamination to remedial detection levels" be deleted or that DTSC provide written concurrence that the investigation has been completed and that Beckman Coulter is authorized to proceed with development of a Remedial Action Work Plan.

Based on the data collected to date, Beckman Coulter is convinced that the release is confined to the soil and additional sampling of the groundwater is not required. Beckman Coulter would like receive DTSC concurrence that the investigation phase of the Building 10 project has been completed and the well can be closed.

RESPONSE TO COMMENT 32

DTSC concurs with the first two paragraphs of the above comment. DTSC has deleted the word "remediation" and replaced it with the word "investigation. Additionally, DTSC has deleted the last sentence of paragraph A of Section VI.

DTSC does not concur with the third paragraph of the above comment. DTSC sent a letter dated May 25, 2006 to Beckman transmitting the DTSC's comments pertaining to the status of the groundwater investigation at your facility. To date, DTSC has not received a response to that letter.

SECTION II. RESPONSE TO COMMENTS RECEIVED BY MAIL TO THE DRAFT NEGATIVE DECLARATION

Comments 1 through 12 are from Mr. Larry Johnson, Manager Corporate EHS Auditing, Permitting, Site Remediation, of Beckman Coulter, Inc. They were the only comments received by mail.

COMMENT 1 – Page 1 – Container Storage Area, Building 10, Bay 2

The initial study states that Bay 2 is located in the southern end of Building 10. Bay 2 is located in the northern end of Building 10 immediately south of Bay 1.

RESPONSE TO COMMENT 1

DTSC concurs. The location of Bay 2 on page 1 has been changed as requested.

COMMENT 2 – Page 2 – Plating Shop Neutralization System

The third sentence in the initial study states “Treatment is accomplished....of the Orange County Sanitation District”. Following this sentence the initial study contains the wording “in order to precipitate....ions in the rinsate. The precipitated metal....at a hazardous waste landfill.” The wording “in order to... at a hazardous waste landfill.” Should be deleted from the initial study as the only reason that sodium hydroxide is added to the Plating Shop Rinse Water is to adjust the pH of the rinse water to meet the limits in the Orange County Sanitation District permit.

RESPONSE TO COMMENT 2

DTSC concurs. The requested change to the wording of the paragraph on Plating Shop Neutralization System has been made as requested.

COMMENT 3 – Page 2 – Partial Closure of Inactive Drum Storage Area #8.

The words “with a 6 inch tall containment berm.” should be deleted from the initial study as there is no containment berm for this area.

RESPONSE TO COMMENT 3

DTSC concurs. The words “with a 6 inch tall containment berm.” have been deleted.

COMMENT 4 – Page 4 – Aesthetics – Description of Environmental Setting

The initial study states that the facility operates 5 days a week. The facility operates 7 days per week.

RESPONSE TO COMMENT 4

DTSC concurs. The time that the facility operates has been changed to 7 days per week.

COMMENT 5 – Page 7 – Air Quality – d. Expose Sensitive Receptors to substantial pollutant concentrations

Based on an Internet search for preschools and day care facilities in the vicinity of the facility, the closest preschool appears to be Miss Lucy's Schoolyard located at 2100 E. Lambert, La Habra, CA. Based on the distance calculated from a Google map, Miss Lucy's is 0.5 miles from the Beckman Coulter facility.

If another preschool or child care facility was identified by DTSC through an alternate method, could you please provide its name and address to Beckman Coulter?

RESPONSE TO COMMENT 5

DTSC concurs. The first sentence of the response to 3. Air Quality, subsection d. on page 7 has been revised to read "The nearest sensitive receptors are children at a day care facility **that is 0.5 miles** from the Beckman Coulter facility."

COMMENT 6 – Page 9 – Cultural Resources – b. Cause a substantial.... pursuant to 15064.5

The second sentence states "Therefore, the removal of the contaminated....to cultural resources.

Part IV – CORRECTIVE ACTION of the permit requires Beckman Coulter to submit a work plan for remediation of the release adjacent to Building 10. Without a written and approved work plan should the remediation activities be discussed in the draft Part B

Permit Initial Study? Additionally, it appeared that DTSC form 1176 was completed to provide initial study information for the Building 10 project.

RESPONSE TO COMMENT 6

DTSC concurs. The words “and excavation of contaminated soil and final grading” have been deleted.

COMMENT 7 – Page 9 – Cultural Resources – c. Directly or indirectly.... Paleontological resources.

Part IV – CORRECTIVE ACTION of the permit requires Beckman Coulter to submit a work plan for remediation of the release adjacent to Building 10. Without a written and approved work plan should the remediation activities be discussed in the draft Part B Permit Initial Study? Additionally, it appeared that DTSC form 1176 was completed to provide initial study information for the Building 10 project.

RESPONSE TO COMMENT 7

DTSC concurs. The last sentence in the response to 5. Cultural Resources, subsection c on page 9, has been changed to read “Therefore, the proposed project will not result in any significant impacts to paleontological resources.”

COMMENT 8 – Page 12 – Hazards and Hazardous Materials – b. Create a significant...into the environment.

The second and third sentences in the paragraph beginning “The potential for a release to the environment is minimized...” discuss satellite accumulation areas. There are no permitted activities in the facility related to satellite accumulation areas. The scope of the application limits the permit to the following areas of the facility:

- Building 10 Bays 1 and 2
- Waste Coolant Tanks
- Pseudocumene Wastewater Tank
- Mixed Waste Storage Room
- Plating Shop Neutralization System

There are no satellite accumulation areas in any of these areas of the facility. It is suggested that the sentences "Satellite accumulation areas are either inside structures or provided with secondary containment. Satellite accumulation areas are inspected at least once a week." be removed from the Initial Study.

RESPONSE TO COMMENT 8

DTSC concurs. The second and third sentences in Section 7, Hazards and Hazardous Materials, subsection b on page 12 have been deleted.

COMMENT 9 – Page 12 – Hazards and Hazardous Materials – c. Emit hazardous emissions...or proposed school.

Beckman Coulter is only aware of one preschool or day care facility, Miss Lucy's Schoolyard located at 2100 E. Lambert, La Habra, CA, in the vicinity of the Beckman Coulter Fullerton facility. This is based on a Google search and knowledge of the area. From information contained in directions obtained from Google, Miss Lucy's Schoolyard is 0.5 miles from the Beckman Coulter facility. Unless another preschool or day care facility has been identified that is within 1000 feet of the Beckman Coulter facility, it is suggested that the sentence "The nearest sensitive receptors are children at a day care facility within 1000 feet of the Beckman Coulter facility." be removed from the Initial Study.

RESPONSE TO COMMENT 9

DSTC concurs. The last sentence in Section 7, Hazards and Hazardous Materials, subsection c on page 12 has been changed to state the distance of the day care facility is 0.5 miles from the Beckman Coulter, Inc. facility.

COMMENT 10 – Page 20 – Transportation and Traffic

The actual area of the facility under roof is approximately 614,000 square feet. The Initial Study incorrectly lists the area of the facility as 457,550 square feet..

RESPONSE TO COMMENT 10

DTSC concurs. The actual area under roof has been changed to 614,000 square feet.

COMMENT 11 – Page 21 – Utilities and Service Systems – Description of Environmental Setting

In the last sentence of the first paragraph – “All **solid** wastes generated.... as hazardous waste.” it is suggested that the word “solid” in bold be changed to hazardous.

RESPONSE TO COMMENT 11

DTSC concurs. The word “solid” has been deleted and the word “hazardous” has been substituted in the first paragraph of Section 16, Utilities and Service Systems, Description of Environmental Setting.

COMMENT 12 – Page 21 – Utilities and Service Systems – Description of Environmental Setting

In the second sentence it is suggested that Anaheim be changed to Fullerton. The same suggestion also applies to the third sentence.

RESPONSE TO COMMENT 12

DTSC concurs. The word “Anaheim” has been replaced with the word “Fullerton” in both the second and third sentence in the second paragraph of Section 16, Utilities and Service Systems, Description of Environmental Setting.