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TO: File for D/K Dixon

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DATE: November 5, 2008

SUBJECT: Changes from Draft Permit to Final Permit

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

1. On Title page the series of the permit changed from "Series C" to "Series B" due to response to comments in regards to facility storage capacity. In addition all references of "Series C" were removed and replaced by "Series B".
2. On page 5 of 35 the last sentence of page was corrected to reflect eight drums instead of only four drums of hazardous waste.
3. On page 8 of 35 the following was removed: "D. 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 Operation Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9)." Since it does not apply for the type of facility being permitted. In addition bullet E was changed to bullet D since D above was removed.
4. On Page 10 under the last paragraph was changed to read: "Storage Area 1 consists of 5 storage tanks and eight 55-gallon drums used to store non-RCRA hazardous waste. Tanks 1, 2, 3, and 4 store a maximum of 10,000 gallons of hazardous waste each; Tank 5 stores a maximum of 7,500 gallons of hazardous waste. In addition to the 5 tanks, Storage Area 1 allows for the storage of no more than eight 55-gallon drums in a clearly marked area either by white or yellow paint as specified in special condition F of this permit"
5. On page 14 of 34, condition F changed to read: "At no time shall the stored volume of off-site hazardous waste received at the Facility (for management within the authorized units) exceed 50,440 gallons of hazardous waste."

6. On page 15 of 34, condition L.5. was changed to read: "One representative composite sample shall be obtained per truck load, analyzed prior to receipt (except for PCB testing in used oil), and retained. Incoming shipments of wastes in drums shall be sampled in accordance with the drum sampling frequency specified in Section III of the Standardized Permit Application."

In addition condition L.6 was changed to read: "The Permittee shall maintain written results of all tests performed as part of the facility's operating record and the documents shall be retained at the Facility until closure of the Facility."

7. On page 17 conditions M.2.c.(1)(B), M.2.c.(1)(C), and M.2.c.(1)(E) where respectively changed to read: "The Permittee shall obtain from the transporter, at the time of delivery, a copy of the Generator's Waste Profile Worksheet (GWPW) and the analytical results for the halogen content used to rebut the presumption", "The Permittee shall review this documentation prior to accepting the waste and subsequently shall enter into the operating record evidence that the Permittee reviewed the documentation and verified that a) the GWPW is less than 365 days old; b) is based on a representative sample of the waste; and c) data used to rebut the presumption was analyzed by a laboratory certified in accordance with the Environmental Laboratory Accreditation Program by using the test methods specified in California Code of Regulations, title 22, section 66279.90(b).", and "After reviewing the documents obtained under paragraphs V.M.2.c(1)(B) and (D), the Permittee shall place the documents into its operating record. These documents shall demonstrate that the rebuttable presumption can be rebutted pursuant to California Code of Regulations, title 22, section 66279.10(b), (b)(1) and (2)."
8. On page 18 condition M.2.c.(3) changed to read: "**Option 3.** For used oil received from multiple generators in a single transport vehicle and when the transporter provides fingerprint test data for each generator using EPA Test Method 9077."
9. On page 19 condition M.2.c.(4) and condition M.2.c.(5) changed respectively to read: "**Option 4.** For used oil received from multiple generators and when the transporter cannot provide fingerprint data for each generator using EPA Test Method 9077, but the transporter has collected individual samples from each generator and retained the samples along with the load." and "**Option 5.** For used oil received from multiple generators and when the transporter cannot provide fingerprint data or retained samples as discussed in Options 3 and 4 above, the Permittee may rebut the presumption only through analytical testing in accordance with the test methods specified in California Code of Regulations, title 22, section 66279.90(b) to demonstrate that the rebuttable presumption is rebutted pursuant to California Code of Regulations, title 22, section 66279.10(b), (b)(1) and (2)."

10. On page 20 condition N.2.a.(4) was changed to read: "If the used oil contains PCBs at a concentration of 2ppm or greater, a second sample shall be obtained and tested. The second sample shall be obtained using sampling equipment that is new or has been cleaned using (i) the permanganate cleanup procedure (EPA Method 3665A); or (ii) an appropriate decontamination procedure that has been approved in writing by DTSC for use at the Facility."
11. On page 24 condition R now reads:
 - N. This Permit authorizes the change in usage of tanks, as authorized in Table 1 under the following conditions:
 1. The Permittee shall completely empty the wastes from the tank, until no more waste comes out to assure that the tank is empty when the usage is changed.
 2. The Permittee shall indicate in the Operating Log the change in service of a Tank.
 3. The Permittee shall clearly identify on the outside of the tank the type of waste stored in the tank.
12. On page 24 condition S was removed.
13. On page 25 condition W was added and reads: "Within 30 days after the effective date of this Permit, the Permittee shall submit to DTSC a revised Facility Plot Plan clearly showing where the containers of offsite hazardous waste are to be stored. The Permittee shall also clearly mark the area(s) at the Facility as the "Drum Storage Area" within 30 days of the effective date of this Permit. The marking shall be made either white or yellow paint."
14. Part VI, on page 26 and 27, of the permit was changed and now reads:
 1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Corrective action shall be carried out under: case # 480215 of the Central Valley RWQCB working with Solano County case # 80044.
 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 14 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 that Permittee identifies an immediate or potential threat to human health and/or the environment, or discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units not previously identified, the Permittee must notify DTSC, CVRWQCB, and SCDRM orally within 24 hours of discovery and in writing within 5 days of discovery summarizing the finding, including the immediacy and magnitude of any potential threat to human health and/or the environment.
5. DTSC may require the Permittee to conduct further corrective action at the facility pursuant to California Health and Safety Code sections 25187 and 25200.10, if DTSC determines that there has been a release of hazardous waste at or from the facility, based on the latest analytical results for soil samples or other information available to DTSC.

15. The maximum permitted capacity in Table 1, was changed for Tank # 4 and the 55-gallon containers to read: 10,000 gallons and 440 gallons respectively.
16. On page 32 the Task Activities and Documentation required for the task within the 60 days after the effective day of the permit where changed respectively to read: "The Permittee shall reapply a chemical resistant coating to Storage Area 1 and 2 in accordance to Cal. Code of Regs., title 22, section 66264.193(c)(1) prior to the installation of Tanks 1, 2, and 6. " and "The Permittee shall notify DTSC in writing and provide photographs of the applied chemical resistant coating."