

APPENDIX A

Notice of Preparation

CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

Notice of Preparation

for

Industrial Service Oil Company, Inc.
Hazardous Waste Facility Permit
Environmental Impact Report

October 12, 1995

SCH# :

NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT

INDUSTRIAL SERVICE OIL COMPANY, INC.
1700 SOUTH SOTO STREET
LOS ANGELES, CALIFORNIA

In accordance with the California Environmental Quality Act (CEQA), Public Resource Code Section 21000 et. seq., the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC) has been designated the Lead Agency and will prepare an Environmental Impact Report (EIR) on the Industrial Service Oil Company, Inc. application for a hazardous waste management permit. The purpose of this Notice of Preparation (NOP) is to inform the public and governmental agencies that an EIR is being prepared and to provide the intended scope of the EIR. The project's description, location, and potential environmental effects are summarily described in this NOP. Section 1.0 includes the general location and description of the facility and the NOP process. Section 2.0 provides a discussion of the potential environmental impacts of the project.

Due to time limits as mandated by California law, comments on this NOP must be submitted at the earliest possible date. The public comment period runs from October 12, 1995 through November 15, 1995.

Public and agency scoping meetings have been scheduled to discuss what should be considered in the EIR. The public scoping meeting will be held on November 4, 1995 at the Santa Isabel Church/School located at 918 South Soto St., Los Angeles, CA 90023, (213) 268-4065 at 1 P.M.

The agency scoping meeting will be held October 31, 1995 at the DTSC office, 1011 N. Grandview Ave., Glendale at 9:30 A.M.

**Section 1: FACILITY DESCRIPTION, OPERATING STATUS, AND
REGULATORY FRAMEWORK**

1.0 INTRODUCTION

The purpose of this NOP is to provide public notification that the California Environmental Protection Agency, Department of Toxic Substance Control (DTSC) will prepare an EIR per the CEQA for the Part B Permit application for an existing hazardous waste storage and treatment facility owned and operated by Industrial Service Oil Company, Inc., 1700 South Soto Street, Los Angeles, CA.

The DTSC is currently considering Industrial Service Oil Company Inc.'s (ISOCI) Part B Permit application (under the California Code of Regulations Title 22, Section 66270, Article 2, in accordance with the Federal Resource Conservation and Recovery Act - RCRA). The permit request is for the continuance of current operations that involve treatment, storage, and transfer of hazardous and non-hazardous wastes related to used oil, oil/water mixtures, and used antifreeze. The permit also requests expansion of some operations which will be explained in the NOP. DTSC is the Lead Agency for preparation of the EIR. An environmental consulting firm approved by the DTSC has been retained by ISOCI to prepare the Draft and Final EIR under the direction of the DTSC, Region 3 office.

This NOP is being issued to inform the general public and public agencies that an EIR is being prepared for ISOCI and to invite comments on the scope and content of the EIR. An Initial Study was not prepared for this project, since an EIR is mandatory per state law (California Public Resources Code Section 21151.1(a)(3)).

The project's description, location, and potential environmental effects are described in this NOP. DTSC will accept comments on the scope and content of the EIR as present in this NOP. Due to the time limits mandated by state law, comments must be submitted by November 15, 1995.

1.1 FACILITY LOCATION

The facility is owned and operated by ISOCI as a recycling and transfer facility. It is located on a 2.2 acre triangular lot at 1700 S. Soto St. in the City of Los Angeles (Los Angeles County). The facility is in an area zoned by the City of Los Angeles as heavy industry (M3-1). The adjacent industrial zones are principally M3-1, bordered by cities that are also zoned for heavy industry. The railroad tracks located adjacent at the northern side of the facility are used by Metrolink Trains. The southern adjacent area of the facility is used by a flour mill company. Residences nearest the facility are located approximately three quarters of a mile from the facility in the neighborhood of 8th Street and Olympic Boulevard.

1.2 PROJECT DESCRIPTION

The CEQA project (Public Resource Code 21065.(c)) is DTSC's permit decision for the Part B hazardous waste facility permit application and will be the subject of the EIR for the ISOCI. The Part B permit will allow ongoing operations and proposed modifications to the existing operations at the facility.

The ISOCI facility was purchased by its current owner and began operations in 1974. Operations included buying and selling machinery equipment, hauling of used oil and demolition activity. On January 9, 1986, ISOCI submitted a Part A application to DTSC for storage and treatment of waste oil/mixed oil. On May 23, 1986 DTSC issued an Interim Status Document (ISD) to ISOCI for storage, treatment and transfer of waste oil/mixed oil pursuant to section 25200.5 of the Health and Safety Code. Facilities operating under an ISD must comply with the Interim Status Standards specified in Chapter 15, Division 4.5, of the Title 22, California Code of Regulations. The facility is currently a recycler of used oil, oil-water mixtures and related petroleum mixtures. ISOCI also consolidates antifreeze for later transfer to a permitted facility for recycling.

Rail cars are currently used by ISOCI to receive and transfer incoming loads of fuel oil. These petroleum products are pumped from rail cars to tanker trucks or tanks located at the facility. The facility ships loads of recycled oil pumped from tanks into rail cars. The recycled oil has been processed by the facility. Waste oil/mixed oil may also be transferred from the facility via rail car.

1.2.1 CURRENT OPERATIONS

The facility is a petroleum recycling and transfer facility. The facility receives, stores, and processes petroleum products such as used oil, oil/water mixtures and antifreeze. The facility uses chemicals and heat to remove water and break emulsions to produce fuel cutter stock. There is no disposal of waste on-site. Materials that are not recycled such as solids from the treatment processes and pre-treated wastewater are transported to an off-site permitted recycling/disposal facility. The facility also collects antifreeze for storage and transfer to another treatment facility. ISOCI operates on a continuous basis, 24 hours per day, 365 days a year.

The major categories of waste streams processed at ISOCI are waste oil (also known as used oil), oil/water mixtures (also known as oily water), oil sludges, and antifreeze. Current maximum capacity of these wastes that can be stored or processed at the facility are listed below (gallons):

| Hazardous Waste Units (CURRENT OPERATIONS) | CURRENT MAXIMUM STORAGE CAPACITY (GALLONS) |
|---|--|
| WASTE OIL, USED OIL & WASTE WATER | 502,000 GALLONS |
| PRODUCT OIL STORAGE TANKS | 490,000 GALLONS |
| CONTAINERS | 11,000 GALLONS (200 CONTAINERS) |
| (OIL/WATER) PHYSICAL TREATMENT UNIT | 61,370 GALLONS/DAY |
| RAIL CAR | 165,000 GALLONS |

WASTE OIL, USED OIL & WASTE WATER:

Also known as used oil or crankcase oil, waste oil can contain contaminants such as gasoline, diesel, heavy fuels, non-RCRA

solvents and thinners, water, and dirt. It may also be contaminated with heavy metals, such as lead. Waste oils come to ISOCI from a variety of sources, such as community recycling centers; industrial activities which use oil and lubricants; and vehicle, factory and refinery maintenance. Waste oil is processed in the Used Oil Treatment Units.

OIL/WATER PHYSICAL TREATMENT UNIT:

Oil/water mixtures range from mostly oil to almost entirely water and may sometimes have high solid contents. Sources of this waste are spill cleanups, tank cleaning, sump cleaning and maintenance activities at refineries and factories. During treatment, oil is separated from the water and goes into the oil recycling processes at the facility. The solids recovered from the oil/water mixture are stored for shipment to an appropriate hazardous waste facility.

CONTAINERS STORAGE UNIT:

ISOCI currently leases a portion of the facility to Romic Chemical Company for use as a hazardous waste storage and transfer station. The transfer station receives manifested hazardous waste in drums or containers for temporary storage (no more than 144 hours) en route to a permitted treatment and/or disposal facility. Pursuant to the California Code of Regulations, Title 22, section 66263.18, the transfer station does not require a facility permit from DTSC. Wastes are received in containers or drums meeting the state requirements for transporting hazardous wastes, and remain in the same containers while stored and when being transported off site for treatment and/or disposal. No additional handling takes place.

RAIL CAR TRANSFER:

ISOCI is authorized under their current ISD to transfer fuel oil and waste oil from rail cars to tanks and tanker trucks. Hazardous waste and recycled oil treated at the facility are also transferred from tanks to rail cars for shipment.

TANK STORAGE UNIT:

Presently, the facility has a total product storage capacity in tanks of 490,000 gallons of recycled oil and hazardous wastes.

ANTIFREEZE:

Antifreeze wastes contain different glycols and water are obtained from sources such as community recycling centers and vehicle maintenance shops. Antifreeze is consolidated for later transfer to a permitted recycling facility.

1.2.2 PROPOSED MODIFICATIONS

The proposed modifications at ISOCI include the addition of: tanks in the tank storage unit; a waste water treatment unit; used oil/waste oil treatment units such as an ultrafiltration unit, plate and frame filtration unit; solvent recycling such as thin film treatment and a fractionation treatment unit; a solid waste treatment unit; a fuel blending unit; and rail car storage. In addition, a new hazardous waste storage area for drums and containers located in the existing tank farm will be used at the facility. These drums and containers will be used to temporarily store waste materials such as RCRA wastes (e.g. corrosives, solvents, ignitable, etc.), used oil filters, used oil, oil-water mixtures, used antifreeze, oily trash/solids and spent carbon. Containerized waste will be stored for treatment and transfer.

The hazardous waste management units and their current and proposed maximum capacities are listed below (gallons).

| HAZARDOUS WASTE UNIT (PROPOSED) | CURRENT MAXIMUM CAPACITY | PROPOSED MAXIMUM CAPACITY |
|--|------------------------------------|------------------------------------|
| TREATMENT TANKS FOR WASTE OIL & USED OIL & WASTE WATER | 502,000 GALLONS | 557,000 GALLONS |
| PRODUCT OIL STORAGE TANKS | 490,000 GALLONS | 350,000 GALLONS |
| CONTAINER STORAGE AREA | 11,000 GALLONS (200 CONTAINERS) | 22,000 GALLONS (400 CONTAINERS) |
| RAIL CARS | 165,000 GALLONS | 330,000 GALLONS |

| | | |
|---|--------------------|-----------------|
| WASTE WATER TREATMENT UNIT | NONE | 42,300 GAL/DAY |
| ULTRAFILTRATION UNIT | NONE | 42,300 GAL/DAY |
| (OIL/WATER) PHYSICAL TREATMENT UNIT | 61,370 GALLONS/DAY | 144,000 GAL/DAY |
| THIN FILM TREATMENT | NONE | 86,400 GAL/DAY |
| FRACTIONATION TREATMENT UNIT | NONE | 86,400 GAL/DAY |
| SOLIDS TREATMENT UNIT (WASTE GENERATED ON-SITE) | NONE | 842 TONS/YEAR |
| FUEL BLENDING UNIT | NONE | 4,000 GAL/DAY |
| GLYCOL DISTILLATION UNIT (ANTI-FREEZE) | NONE | 21,150 GALLONS |

Glycol Distillation Unit (Antifreeze):

Antifreeze wastes contain different glycols and water obtained from such sources such as community recycling centers and vehicle maintenance shops. Waste antifreeze is consolidated and processed by distillation/filtration through the antifreeze filtration unit and the ethylene glycol distillation unit. The process involves purification of glycol by filtration and/or distillation of glycol by heating antifreeze solution in a distillation column at a selected temperature until the glycol boils into vapor. The vapor is collected and condensed into pure liquid form and stored in a tank or container. The glycol can be used to blend new antifreeze with the addition of water, color and corrosion inhibitors.

Container Storage Unit:

ISOCI plans to use the existing container storage area located in the northwest portion of the existing tank farm. The proposed hazardous waste management unit will have a maximum storage capacity of 200 fifty-five gallon containers. This area will be used for transfer and storage of RCRA waste streams which include chlorinated solvent wastes that can be stored for a maximum of one year.

Tank Storage Unit:

Presently, the facility has a product storage capacity of 490,000 gallons of recycled oil and 185,000 gallons of liquid hazardous waste. The facility proposes to add 20,000 gallons of storage capacity for antifreeze recycling and 214,000 gallons of hazardous waste storage capacity.

Product Enhancement Units: The following units described below will be utilized for Product Enhancement.

Thin Film Treatment Unit:

ISOCI proposes to install product enhancement units such as thin film treatment and fractionation unit. Condensers will be used to condense vapors producing concentrated solvent. Waste solvent mixtures will be vaporized at different temperatures. Each of the compounds removed from the mixture will be condensed into a different storage tank or container for later testing and sale. Specific solvents can be sold or mixed into fuel blends for energy recovery depending upon heating value and purity.

Fractionation Column (Solvents):

Solvents and organic liquid mixtures containing significant portions of distillable solvents may be selected for fractional distillation. Specific solvents will be selected to be distilled in the fractionation column. These solvents with relatively low boiling points will be distilled by controlling the temperature in the column. More than one distillation can be accomplished by boiling specific compounds starting with those having the lowest boiling point. Each of the compounds removed from the mixture will be condensed into a different storage tank or container for later testing and sale. Specific solvents

distilled can be sold or mixed into fuel blends for energy recovery depending upon heating value and purity. Residues left in the column are called "bottoms". Bottoms may be stabilized in the solids management unit for later shipment and disposal at an off-site facility.

Fuel Blending Unit:

Tank number 600 will be used for fuel blending. The blended fuel will be sent off-site for energy recovery as fuel for a cement kiln. Treatment and disposal facilities specify the waste fuel parameters for blended fuels used for energy recovery. Some typical waste fuel parameters are listed below. Fuels are screened for the parameters and placed into a blend tank. Incompatible materials or fuels not meeting specifications are not mixed or blended.

PARAMETERS

| | |
|------------------|-------------------------|
| Heat Content | 10,000 BTU/lb (minimum) |
| Suspended solids | Less than 30% |
| Viscosity | Less than 100 cp |
| Extractable pH | 4 to 11 |
| Benzene | 0.5% (by weight) |
| Halogens | Less than 3% |

Solids Treatment Unit:

Solids are generated at the facility by various treatment processes that remove water. These solids are stabilized by addition of commercial chemicals prior to disposal off-site. The following equipment is utilized as part of the solids treatment unit: Plate and frame filter press, centrifuge and stabilization mixer. Solids are generated at the facility in screening filters and treatment tanks where they settle in the tanks. Distillation "bottoms" are the residues remaining after distillation of the recyclable portion of a waste solvent or glycol liquid. Wastewater/oily solids (bottoms) are pumped from storage and treatment tanks through a plate and frame filter press which retains the solids and passes liquid back to a tank. Bottom residues which are mostly solids are removed from other tanks and process vessels by pumping and are collected in a tank for further processing in the centrifuge and "stabilization" mixer. Proprietary chemicals and stabilization solids (e.g. kiln dust or cement) may be added to facilitate waste management and meet disposal criteria at various disposal facilities. The vents from

the centrifuge and stabilization mixer are directed into the emissions control system at the facility.

Ultrafiltration Unit (Used Oil/Waste Oil Treatment):

ISOCI proposes to add equipment to the used oil/waste oil treatment units. This equipment includes an ultrafiltration system and a plate and frame filter press. The purpose of ultrafiltration is to effectively separate the water from waste oil by passing it through a filter. After the filtration process a higher concentration of oil is obtained. The plate and frame filter press is equipment that will be used to separate liquids from solids. The waste is passed through a series of filter cloth screens, the solids are retained on the screens. The solids are later pressed to remove the excess liquids and produce a drier solid.

Additional Rail Cars:

The facility proposes construction of an additional rail spur near the existing rail spur, to increase the number of rail cars used for transfer of hazardous waste. The facility plans to transfer hazardous waste oil from rail cars to tanks for treatment. ISOCI proposes transferring waste in drums or containers to rail cars and trucks for shipment. Waste oil processed from the fuel blending treatment process will be transferred from tanks to rail cars or trucks for shipment from the facility.

1.2.3 CORRECTIVE ACTION

RCRA FACILITY ASSESSMENT

In June 1994, a RCRA Facility Assessment (RFA) was completed by DTSC for the ISOCI site which included two areas at the facility which were undergoing construction. The two areas were the exempt transfer station currently leased by Romac and the tank farm area. State and federal laws require all applicants for a hazardous waste facility permit to undergo such an assessment. The objective of the RFA was to identify whether any facility equipment is leaking or damaged, and whether any activities at the facility have caused or have the potential to cause, any releases of hazardous substances into the air, soil, or groundwater. The RFA process includes a review of company and historical records, visual site inspection and, if necessary, limited soil sampling.

The assessment conducted at ISOCI found that the facility had soil contamination in two locations (the tank farm area and at the east

end of the facility). Polychlorinated biphenyls (PCBs) (1.3 and 110 ppm) and oil (total petroleum hydrocarbon at 530 and 25,000 ppm) were found in samples taken in these two areas. The assessment recommended that a RCRA Facility Investigation (RFI) be conducted at the facility and that sources of air emissions be evaluated to determine appropriate mitigation measures because operations at the facility were not currently connected to any sort of vapor recovery or reduction system. The objective of the RFI is to investigate the nature and extent of contamination. The RFI will be required and completed either through an enforcement order or as a permit condition (if permit is issued).

1.3 FACILITY PERMIT STATUS

When California's hazardous waste management program was created in the late 1970s, all hazardous waste management facilities in the state were directed to file for a temporary operating permit until DTSC could do a more thorough review of each company's operations. ISOCI submitted the first part of its' permit application (the Part A application) on January 9, 1986. The facility was granted a temporary operating permit known as an Interim Status Document (ISD) on May 23, 1986. The facility must now obtain a full Part B permit from the DTSC to continue operating. On November 7, 1988, ISOCI submitted its' first Part B Permit application to DTSC. This application was determined to be inadequate by the DTSC in January 1990 and a revised Part B Permit application was requested.

The revised application involved preparation of a detailed operations plan which includes: health and safety procedures; chemical analyses of wastes handled on-site; financial liability; worker training procedures; emergency response procedures; closure plan; and other important aspects regarding the facility's operation. ISOCI began submitting the revised Part B Permit application in late September 1994. In June 1995, DTSC completed the review of the Part B application and has found it to be technically complete.

1.4 ENFORCEMENT HISTORY

Since 1992, DTSC has conducted several inspections. During these inspections some violations were cited. The violations found included failure to test recycled oil, non-compliance with financial responsibility and air emission standards, and failure to minimize releases of oil onto the ground. On June 30, 1995, DTSC issued an enforcement order for inspections conducted from 1992 to 1994. The enforcement order dealt primarily with tank