



California Environmental Protection Agency
Department of Toxic Substances Control

HAZARDOUS WASTE FACILITY PERMIT

Facility Name:

McCormick Selph, Incorporated
3601 Union Road
Hollister, California 95023

Owner and Operator Name:

McCormick Selph, Incorporated
3601 Union Road
Hollister, California 95023

Permit Number:

06-BRK-03

Facility EPA ID Number:

CAD009220898

Effective Date of Permit:

May 12, 2006

Expiration Date of Permit:

May 11, 2016

Pursuant to Section 25200 of the California Health and Safety Code, this RCRA-equivalent Hazardous Waste Facility Permit is hereby issued to: McCormick Selph, Incorporated. The issuance of this Permit is subject to the conditions set forth in Attachment A and the Part "A" and Part "B" Application (Approved Permit Application), dated January 4, 2006. The Permit consists of 33 pages, including this cover page and Attachment A.

Mohinder S. Sandhu, P.E., Chief
Standardized Permitting and Corrective Action Branch
Department of Toxic Substances Control

Date: _____

McCormick Selph, Incorporated
3601 Union Road
Hollister, California 95023

**HAZARDOUS WASTE FACILITY PERMIT
ATTACHMENT "A"**

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HAZARDOUS WASTE FACILITY PERMIT

McCormick Selph, Incorporated
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Hollister, California 95023
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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. **"BATF"** as used in this Permit means the federal Bureau of Alcohol, Tobacco, and Firearms.
2. **"DoD"** as used in this Permit means the Department of Defense.
3. **"DTSC"** as used in this Permit means the California Department of Toxic Substances Control.
4. **"EHW"** as used in this Permit means explosive hazardous waste.
5. **"EHWS"** as used in this Permit means explosive hazardous waste in solvents.
6. **"Facility"** as used in this Permit means the 290-acre property under the control of McCormick Selph, Incorporated, including structures, other appurtenances, and improvements on the land used for the treatment, transfer, and storage of hazardous waste, consistent with the definition of "hazardous waste facility" in California Code of Regulations, title 22, section 66210.10.
7. **"Health and Safety Code"** as used in this Permit means the California Health and Safety Code.
8. **"Permittee"** as used in this Permit means the Owner and Operator, which is McCormick Selph, Incorporated.
9. **"VOCs"** as used in this Permit means volatile organic compounds.

Unless explicitly stated otherwise, all references to items in this Permit shall refer only to items occurring within the same part.

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. OWNER

The Facility owner is McCormick Selph, Incorporated (hereafter "Owner").

2. OPERATOR

The Facility operator is McCormick Selph, Incorporated (hereafter "Operator").

3. LOCATION

The Facility address is 3601 Union Road, Hollister, California 95023. The Facility is located at latitude 36° 50' 00" N and longitude 121° 27' 05" W, in San Benito County, approximately 3 miles southwest of the center of Hollister, near the intersection of Union Road and State Highway 156. (See Figure 1.) The following San Benito County Assessor's parcel numbers describe the Facility property: 021-140-001 and 021-140-048. The legal description of the Facility property is provided in Section II.C.1 of the Approved Permit Application.

4. DESCRIPTION

The Facility occupies approximately 290 acres. Twenty (20) acres were added adjacent to and to the south of the original 270-acre facility in 1992 to provide additional buffer area. The Facility has historically been in a sparsely developed area bounded by agricultural and grazing lands. The Operator and its predecessor companies have manufactured explosives and explosive devices for aerospace, military, and commercial applications and produced specialty chemicals on a contract basis at the Facility since 1971. Hazardous wastes generated from these activities include: solvents, toxic chemicals, metal powders, reactive compounds, explosives, flammable liquids, and corrosive solids and liquids. Hazardous wastes generated at the Facility are either treated at the Facility or sent to an approved off-site treatment or disposal site. The Operator does not accept at the Facility any hazardous wastes generated at off-site locations. Hazardous waste management activities at the Facility are: storage of containers of hazardous waste; volume reduction of explosives contaminated water by evaporation in open tanks; open burning of organic liquids (solvents) containing explosives; open burning/open detonation of reactive (explosive) materials; and, mixing two-part epoxy materials in containers.

5. FACILITY HISTORY

The Facility was built at this location in 1971 by Teledyne, Incorporated, which purchased McCormick Selph Associates in 1964. The original Part "A" application was submitted November 19, 1980. An Interim Status Document (ISD) was issued on April 6, 1981. A permit to store hazardous waste in tanks and containers was issued to Teledyne, Inc., on November 7, 1983. Other hazardous waste activities such as treatment in tanks, storage and treatment in surface impoundments, and thermal treatment of explosive wastes continued under the ISD until a new permit was issued on July 28, 1993. As a result of internal reorganization, the corporate name for the July 1993 permit was Teledyne Ryan Aeronautical/McCormick Selph Ordnance (Teledyne Ryan). In July 1999, McCormick Selph was sold and became McCormick Selph, Incorporated (MSI). In July 2003, MSI was acquired by Pacific Scientific Energetic Materials Company. The 1993 permit expired on July 31, 2003, but it continued to be in effect while DTSC processed MSI's permit renewal application pursuant to California Code of Regulations, title 22, section 66270.51.

6. FACILITY SIZE AND TYPE FOR FEES

The Facility is categorized as a Small Treatment and Storage facility for purpose of Health and Safety Code, Section 25205.19.

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The "Facilities Hazardous Waste Operations Plan," dated February 28, 1991, as revised through January 4, 2006, including the Part "A" Application and the Part "B" Application, are hereby approved (collectively, the Approved Permit Application), and made a part of this Permit by reference.

2. EFFECT OF PERMIT

- (a) The Permittee shall comply with the provisions of the Health and Safety Code, and division 4.5 of California Code of Regulations, title 22. 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, 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 treat and store hazardous wastes in accordance with the conditions of this Permit. Any treatment or storage of hazardous wastes not specifically authorized in this Permit is strictly prohibited
- (c) Compliance with the terms 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 the 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, section 25187.

- (f) In addition, 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 of Regs., tit. 22, §66270.43).
- (g) In case of conflicts between the Approved Permit Application and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued 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)

A Negative Declaration has been prepared in the accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines, California Code of Regulations, title 14, section 15070 et seq..

4. WASTE MINIMIZATION CERTIFICATION

Pursuant to Health and Safety Code section 25202.9, the Permittee shall certify annually, by March 1 for the previous year ending December 31, that:

- (a) The Facility has a program in place to reduce the volume and toxicity of all hazardous wastes outlined in Section III of the Approved Permit Application which are generated by the Facility operations to the degree, determined by the Permittee, to be economically practicable.
- (b) The method of storage or treatment is the only practicable method or combination of methods currently available to the Facility which minimizes the present and future threat to human health and the environment.

The Permittee shall make this certification, in accordance with California Code of Regulations, title 22, section 66270.11. The Permittee shall submit the certification to Chief, Standardized Permitting and Corrective Action Branch, Department of Toxic Substances Control, 8800 Cal Center Drive, Sacramento, California 95826-3200, and shall record and maintain onsite such certification in the Facility Operating Record.

5. WASTE MINIMIZATION CONDITIONS

- (a) The Permittee shall comply with the Hazardous Waste Source Reduction and Management Review Act (SB 14) requirements that are specified in the Health and Safety Code sections 25244.19, 25244.20 and 25244.21, and any subsequent applicable statutes or regulations promulgated thereunder. This would include submittal of SB 14 documents to DTSC upon request.
- (b) DTSC may require the Permittee to submit a more detailed status report explaining any deviation from, or changes to, the approved waste minimization plan.

6. SAMPLING/ACCESS

- (a) Sampling
 - (1) The Permittee shall provide confirmatory samples to DTSC within the time requested by DTSC to determine if there is a threat to human health and/or the environment. The sampling shall be done in accordance with guidance that DTSC supplies to the Permittee.
 - (2) The Permittee shall notify DTSC in writing at least fourteen (14) days prior to beginning any confirmatory sampling requested by DTSC. If the Permittee believes it must commence emergency confirmatory sampling without delay, the Permittee may seek emergency telephone authorization from DTSC's Standardized Permitting and Corrective Action Branch Chief or, if the Branch Chief is unavailable, his/her designee to commence such activities immediately. At the request of DTSC, the Permittee shall provide or allow DTSC or its authorized representative to take split or duplicate samples of all samples collected by the Permittee pursuant to Part VI of this Permit.
 - (3) The Permittee shall submit to DTSC upon request the results of all sampling and/or tests or other data generated by its employees, divisions, agents, consultants or contractors pursuant to this Permit.
 - (4) Notwithstanding any other provisions of this Permit, DTSC retains all information gathering and inspection authority rights including enforcement actions related thereto, under Health and Safety Code and any other applicable State or federal statutes or regulations.

- (b) Access
- (1) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility pursuant to the entire Permit 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; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit and Division 20, Chapter 6.5 of the Health and Safety Code. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Permittee's Facility and any other property to which access is required for implementation of any provision of this Permit and any provision of Division 20, Chapter 6.5 of the Health and Safety Code 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.
- (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 thirty (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 thirty (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 (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.

- (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) Nothing in Part VI of the 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 or store hazardous waste in any unit other than those specified in this Part IV. 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 Regulations, title 22, section 66270.42.

The eight (8) units authorized under this Permit are as follows:

1. TSU-1, Open burn/open detonation
2. TSU-2, Open burn
3. TSU-3, Bay A, Container storage
4. TSU-3, Bay B, Container storage
5. TSU-3, Bay C, Container storage
6. TSU-3, Bay D, Container storage
7. TSU-8, Treatment in tanks
8. Solidification of Two-Part Epoxy Materials

UNIT NAME:

TSU-1

LOCATION:

TSU-1 is located in the southern portion of the Facility. (See Figure 2)

ACTIVITY TYPE:

Open burn/open detonation

ACTIVITY DESCRIPTION:

Explosive hazardous waste (EHW) and EHW contaminated waste is burned/detonated. Subsequent secondary and tertiary burning is conducted as needed to ensure complete treatment of the reactive materials. Over 95% of the EHW treated at TSU-1 is contained in explosive devices made of metal. The Explosive Hazardous Waste in Solvents (EHWS) residue from TSU-2 makes up about 5% of the waste treated. Prior to treatment, EHW and EHW contaminated wastes are stored in secure locations in accordance with State, Bureau of Alcohol, Tobacco, and Firearms (BATF), and Department of Defense (DOD) requirements. Ash generation is limited to the cellulose fuel used, to small amounts from EHW contaminated organic material, and to loose EHW in the form of granules, pellets, or billets. Ash from TSU-1 with lead content is collected and managed as hazardous waste through TSU-3. Other ash from TSU-1 is managed as non-hazardous waste, as is scrap metal.

PHYSICAL DESCRIPTION:

TSU-1 contains two 10-foot diameter, reinforced concrete pipes (burn tubes) which are enclosed in a reinforced, expanded metal mesh cage (22' W x 28' D x 10'10" H). The mesh cage is surrounded by concrete walls, installed in 2002, and on three sides by an earth bank and earth barricades over 15 feet high. The pipes rest on a six-inch thick concrete slab reinforced with steel bars. The cage is bolted to the concrete slab and structurally supported by cantilever supports attached to external foundation blocks. The dimensions of the concrete slab are 54-foot W x 50-foot D. There is a 66-foot by 62-foot, corrugated metal roof structure over the mesh cage and concrete slab.

MAXIMUM CAPACITY:

The maximum capacity is 500 pounds gross weight of hazardous waste per day for open burning and 100 pounds Net Explosive Weight (NEW) per day for detonation. Not over six (6) pounds NEW of material, which is expected to mass detonate, is allowed in each burn tube.

WASTE TYPES:

The general types of hazardous wastes allowed to be treated at TSU-1 are: ordnance parts, scrap, and explosive/reactive raw materials and residues. The waste types treated in TSU-1 are listed in Table III-1 of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D001	D003	D007	D008	D011
F003	F005	U002	U003	U154
U160	U234	NA	NA	NA

CALIFORNIA HAZARDOUS WASTE CODES:

172	181	212	213	214
343	352	791	NA	NA

UNIT SPECIFIC SPECIAL CONDITIONS:

1. No construction related activity is allowed within a 90-foot radius of TSU-1 without prior approval from DTSC. The area within a 90-foot radius of TSU-1 currently consists of open space.
2. Permittee shall not exceed the maximum capacity limits for TSU-1 specified above.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

The air emission standards in California Code of Regulations, title 22, section 66264.1080 do not apply to operations at TSU-1.

UNIT NAME:

TSU-2

LOCATION:

TSU-2 is located in the central portion of the Facility, south of Lake Teledyne and west of TSU-8. (See Figure 2)

ACTIVITY TYPE:

Open burning

ACTIVITY DESCRIPTION:

Explosive hazardous waste in solvent (EHWS) is burned in open horizontal, split steel troughs supported by steel racks in a double boiler arrangement. Contaminated solvents containing relatively more water or lower volatility are placed in the upper container. The fire is initiated remotely in the lower container. EHWS is not placed into the unit until just before burning is started. Treatment is not done during periods of expected rain. Between treatments, the upper troughs contain less than five gallons of material with free liquid and the lower troughs contain dry ash. If not empty, the troughs are covered. If empty, the troughs and secondary containment pans are removed or inverted during expected periods of rain. Residue from TSU-2 is treated in TSU-1 to ensure complete treatment of its reactivity.

PHYSICAL DESCRIPTION:

TSU-2 consists of four sets of open, horizontal, split steel troughs supported by steel racks in a double boiler arrangement. The troughs are made from 55-gallon carbon or stainless steel drums cut on the height axis to have a volume for 30 gallons of fluid and a five-inch freeboard. Two racks with eight troughs rest in a 0.1875-inch thick welded, stainless steel secondary containment pan. There are two secondary containment pans. One is four feet by ten feet and 0.489 feet deep (146 gallons). The other secondary containment pan is 4.98 feet wide by ten feet and 0.489 feet deep (183 gallons).

MAXIMUM CAPACITY:

The treatment capacity is 300 gallons per day. The maximum volume of fluid in each trough is 30 gallons.

WASTE TYPES:

The types of hazardous wastes allowed to be treated at TSU-2 are the explosive hazardous wastes in solvent mixtures listed in Table IV-3 of the Approved Permit Application. Table III-1 of the Approved Permit Application also lists waste streams treated at TSU-2.

RCRA HAZARDOUS WASTE CODES:

D001	D003	D005	D007	D008
F003	F005	U002	U003	U154
U213	NA	NA	NA	NA

CALIFORNIA HAZARDOUS WASTE CODES:

212	213	214	343	NA
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UNIT SPECIFIC SPECIAL CONDITIONS:

1. Only the following solvent and solvent/water mixtures containing explosive waste particles shall be burned at TSU-2: acetone, acetonitrile, butyl acetate, ethanol, isopropanol, methanol, pyridine, and tetrahydrofuran.
2. Permittee shall not exceed the maximum fluid capacity of 30 gallons per trough.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

The air emission standards in California Code of Regulations, title 22, section 66264.1080 do not apply to operations at TSU-2.

UNIT NAME:

TSU-3, Bay A

LOCATION:

TSU-3 is located in the central portion of the Facility, southeast of Lake Teledyne. Bay A is the southernmost discrete secondary containment area at TSU-3. (See Figure 2)

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of containers of hazardous wastes generated at the Facility. Hazardous wastes are segregated into the Bays at TSU-3 based on chemical compatibility. Bay A is used to store caustics, cyanides, sulfides, and aqueous solutions with pH of 5 to 9. A variety of types and sizes of containers may be stored and typical containers used at the Facility are listed in Table IV-1 of the Approved Permit Application.

PHYSICAL DESCRIPTION:

TSU-3 has a 6-inch thick reinforced concrete slab surrounded on three sides by a concrete block berm. TSU-3 is fully covered by a roofed building with open sides. The un-bermed front side of TSU-3 has individual grated sumps for each of the four Bays which prevent run-on and collect spills and any rain which may blow into the Bays. The Bays are separated from each other by reinforced concrete dikes, which are bolted and epoxy bonded to the coated concrete floor of the Bay. The dimensions of Bay A are 17-foot 3-inches wide by 59-foot 3-inches long (inside dimensions). The volume of the sump for Bay A is 1,077 gallons (172.5 cubic feet).

MAXIMUM CAPACITY:

The maximum capacity of Bay A is 192 55-gallon drums, four drums per pallet, stacked two pallets high. The maximum quantity of liquid wastes and wastes containing free liquids is 4,140 gallons, which is equivalent to 75 55-gallon drums.

WASTE TYPES:

The types of hazardous wastes allowed to be stored in Bay A are: caustics, cyanides, sulfides, and aqueous solutions with pH of 5 to 9. The waste types stored in Bay A are listed in Table III-1 of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D002	D005	D006	D007	D008
D009	D011	D035	NA	NA

CALIFORNIA HAZARDOUS WASTE CODES:

122	132	172	181	343
512	513	722	723	791
792	NA	NA	NA	NA

UNIT SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not place containers of hazardous waste, non-hazardous waste, or chemical product in TSU-3, Bay A, in excess of the maximum capacity of TSU-3, Bay A. For the purpose of determining compliance with the maximum capacity, all containers in TSU-3, Bay A, will be considered to be full, regardless of the actual volume of material in each container.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

Pursuant to California Code of Regulations, title 22, section 66264.1086 (Standards: Containers), the Permittee shall control air pollutant emissions from containers in accordance with the Container Level 1 standards.

UNIT NAME:

TSU-3, Bay B

LOCATION:

TSU-3 is located in the central portion of the Facility, southeast of Lake Teledyne. Bay B is north of Bay A and south of Bay C. (See Figure 2)

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of containers of hazardous wastes generated at the Facility. Hazardous wastes are segregated into the Bays at TSU-3 based on chemical compatibility. Bay B is used to store halogenated hydrocarbons, non-flammable liquids, and aqueous solutions with pH of 5 to 9. A variety of types and sizes of containers may be stored and typical containers used at the Facility are listed in Table IV-1 of the Approved Permit Application.

PHYSICAL DESCRIPTION:

TSU-3 has a 6-inch thick reinforced concrete slab surrounded on three sides by a concrete block berm. TSU-3 is fully covered by a roofed building with open sides. The un-bermed front side of TSU-3 has individual grated sumps for each of the four Bays which prevent run-on and collect spills and any rain which may blow into the Bays. The Bays are separated from each other by reinforced concrete dikes, which are bolted and epoxy bonded to the coated concrete floor of the Bay. The dimensions of Bay B are 16-foot 6-inches wide by 59-foot 3-inches long (inside dimensions). The volume of the sump for Bay B is 1,025 gallons (160 cubic feet).

MAXIMUM CAPACITY:

The maximum capacity of Bay B is 192 55-gallon drums, four drums per pallet, stacked two pallets high. The maximum quantity of liquid wastes and wastes containing free liquids is 3,650 gallons, which is equivalent to 66 55-gallon drums.

WASTE TYPES:

The types of hazardous waste allowed to be stored in Bay B are: halogenated hydrocarbons, non-flammable liquids, and aqueous solutions with pH of 5 to 9. The waste types stored in Bay B are listed in Table III-1 of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D001	D007	D008	D011	D022
D035	D039	F001	F002	U044

CALIFORNIA HAZARDOUS WASTE CODES:

172	181	211	214	343
352	512	513	741	NA

UNIT SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not place containers of hazardous waste, non-hazardous waste, or chemical product in TSU-3, Bay B, in excess of the maximum capacity of TSU-3, Bay B. For the purpose of determining compliance with the maximum capacity, all containers in TSU-3, Bay B, will be considered to be full, regardless of the actual volume of material in each container.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS

Pursuant to California Code of Regulations, title 22, section 66264.1086 (Standards: Containers), the Permittee shall control air pollutant emissions from containers in accordance with the Container Level 1 standards.

UNIT NAME:

TSU-3, Bay C

LOCATION:

TSU-3 is located in the central portion of the Facility, southeast of Lake Teledyne. Bay C is north of Bay B and south of Bay D. (See Figure 2)

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of containers of hazardous wastes generated at the Facility. Hazardous wastes are segregated into the Bays at TSU-3 based on chemical compatibility. Bay C is used to store acids. A variety of types and sizes of containers may be stored and typical containers used at the Facility are listed in Table IV-1 of the Approved Permit Application.

PHYSICAL DESCRIPTION:

TSU-3 has a 6-inch thick reinforced concrete slab surrounded on three sides by a concrete block berm. TSU-3 is fully covered by a roofed building with open sides. The un-bermed front side of TSU-3 has individual grated sumps for each of the four Bays which prevent run-on and collect spills and any rain which may blow into the Bays. The Bays are separated from each other by reinforced concrete dikes, which are bolted and epoxy bonded to the coated concrete floor of the Bay. The dimensions of Bay C are 16-foot 6-inches wide by 59-foot 3-inches long (inside dimensions). The volume of the sump for Bay C is 1,025 gallons (160 cubic feet).

MAXIMUM CAPACITY:

The maximum capacity of Bay C is 192 55-gallon drums, four drums per pallet, stacked two pallets high. The maximum quantity of liquid wastes and wastes containing free liquids is 3,330 gallons, which is equivalent to 60 55-gallon drums.

WASTE TYPES:

The type of hazardous wastes allowed to be stored at Bay C is acids. The waste types stored in Bay C are listed in Table III-1 of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D001	D002	D007	NA	NA
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CALIFORNIA HAZARDOUS WASTE CODES:

343	512	513	791	792
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UNIT SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not place containers of hazardous waste, non-hazardous waste, or chemical product in TSU-3, Bay C, in excess of the maximum capacity of TSU-3, Bay C. For the purpose of determining compliance with the maximum capacity, all containers in TSU-3, Bay C, will be considered to be full, regardless of the actual volume of material in each container.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

Pursuant to California Code of Regulations, title 22, section 66264.1086 (Standards: Containers), the Permittee shall control air pollutant emissions from containers in accordance with the Container Level 1 standards.

UNIT NAME: TSU-3, Bay D

TSU-3, Bay D

LOCATION:

TSU-3 is located in the central portion of the Facility, southeast of Lake Teledyne. Bay D is north of Bay C and is the northernmost Bay at TSU-3. (See Figure 2)

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of containers of hazardous wastes generated at the Facility. Hazardous wastes are segregated into the Bays at TSU-3 based on chemical compatibility. Bay D is used to store flammable liquids, reducing agents, metal catalysts, carbon, fuels, and combustible liquids. A variety of types and sizes of containers may be stored and typical containers used at the Facility are listed in Table IV-1 of the Approved Permit Application.

PHYSICAL DESCRIPTION:

TSU-3 has a 6-inch thick reinforced concrete slab surrounded on three sides by a concrete block berm. TSU-3 is fully covered by a roofed building with open sides. The un-bermed front side of TSU-3 has individual grated sumps for each of the four Bays which prevent run-on and collect spills and any rain which may blow into the Bays. The Bays are separated from each other by reinforced concrete dikes, which are bolted and epoxy bonded to the coated concrete floor of the Bay. The dimensions of Bay D are 17-foot 3-inches wide by 59-foot 3-inches long (inside dimensions). The volume of the sump for Bay D is 1,077 gallons (172.5 cubic feet).

MAXIMUM CAPACITY:

The maximum capacity of Bay D is 192 55-gallon drums, four drums per pallet, stacked two pallets high. The maximum quantity of liquid wastes and wastes containing free liquids is 3,100 gallons, which is equivalent to 56 55-gallon drums.

WASTE TYPES:

The types of hazardous wastes allowed to be stored in Bay D are: flammable liquids, reducing agents, metal catalysts, carbon, fuels, and combustible liquids. The waste types stored in Bay D are listed in Table III-1 of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D001	D003	D005	D006	D007
D008	D035	F003	F005	U002
U003	U031	U056	U154	U159
U161	U213	NA	NA	NA

CALIFORNIA HAZARDOUS WASTE CODES:

172	181	212	213	214
221	331	343	352	461
512	513	NA	NA	NA

UNIT SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not place containers of hazardous waste, non-hazardous waste, or chemical product in TSU-3, Bay D, in excess of the maximum capacity of TSU-3, Bay D. For the purpose of determining compliance with the maximum capacity, all containers in TSU-3, Bay D, will be considered to be full, regardless of the actual volume of material in each container.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

Pursuant to California Code of Regulations, title 22, section 66264.1086 (Standards: Containers), the Permittee shall control air pollutant emissions from containers in accordance with the Container Level 1 standards.

UNIT NAME:

TSU-8

LOCATION:

TSU-8 is located in the central portion of the Facility, south of Lake Teledyne and east of TSU-2. (See Figure 2)

ACTIVITY TYPE:

Treatment in tanks

ACTIVITY DESCRIPTION:

Safety Bucket Water containing explosives is naturally evaporated in two open troughs. When enough water has evaporated to result in a thick turbidity, the concentrated hazardous waste is transferred to TSU-1 or TSU-2, added to other EHWS and burned. No volatile organic compounds are present in the Safety Bucket Water. Daily evaporation varies from near zero during cold rainy weather when precipitation covers are in place, to over ten gallons during hot, dry, windy weather.

PHYSICAL DESCRIPTION:

TSU-8 consists of two evaporation troughs within a concrete secondary containment pad filled by a gravity feed pipe from an unloading area. Safety Bucket Water is siphoned or hand-pumped from a container in an environmental support vehicle into the feed pipes in the unloading area which empty into the evaporation troughs. The feed pipes are pipe-in-pipe construction with a 2-inch diameter stainless steel inner pipe and a 4-inch diameter polyvinyl chloride (PVC) outer pipe. The troughs are constructed of three-sixteenths of an inch thick carbon steel with welded heads. The troughs are coated with a 100% solids coal tar polyurethane elastomer (Endura-Flex 1947) coating to a minimum thickness of 100 mils. The troughs are half cylinders with slightly domed ends. Each trough is approximately 4.32 feet in diameter and 11.3 feet long.

MAXIMUM CAPACITY:

The maximum capacity of each treatment trough, with an operational freeboard of six inches, is approximately 505 gallons. The treatment capacity is approximately 1,100 gallons per year, based on an observed average evaporation rate of three gallons per day.

WASTE TYPES:

The type of hazardous wastes allowed to be treated in TSU-8 is Safety Bucket Water. The waste types treated at TSU-8 are listed in Table III-1 of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D003	NA	NA	NA	NA
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CALIFORNIA HAZARDOUS WASTE CODES

343	NA	NA	NA	NA
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UNIT SPECIFIC SPECIAL CONDITIONS:

1. The fluid level in the troughs shall not exceed the level of a 6-inch minimum freeboard.
2. Construction of a modified TSU-8 is described in Chapter IV, Section C.4, of the Approved Permit Application. Permittee shall notify DTSC of the date TSU-8 will be removed from service for construction of the modified TSU-8 not later than seven (7) days prior to removing TSU-8 from service.
3. Permittee shall not place hazardous waste into the modified TSU-8 until Permittee has submitted, and DTSC has acknowledged receipt of, the engineering certification for the installation of the modified TSU-8 required by California Code of Regulations, title 22, section 66264.192.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

The air emission standards in California Code of Regulations, title 22, section 66264.1080 do not apply to operations at TSU-8.

UNIT NAME:

Solidification of Two-Part Epoxy Materials

LOCATION:

Solidification of two-part epoxy materials in containers in conducted at TSU-3, Bay D.
(See Figure 2).

ACTIVITY TYPE:

Treatment in containers

ACTIVITY DESCRIPTION:

Two-part epoxy paints, potting compounds, adhesives, and insulating materials are mixed according to the manufacture's specifications in either the original containers or in one-gallon, open steel cans in TSU-3, Bay D. Open quantities of these materials at manufacturing work stations greater than one liter and larger quantities in unopened containers become excess to production needs through expiration of shelf life and when inspection reveals the material to be off-specification. These materials are accumulated and transported to TSU-3, Bay D, for storage and treatment by mixing.

PHYSICAL DESCRIPTION:

The treatment takes place in the original containers or in one-gallon, open steel cans.

MAXIMUM CAPACITY:

The process capacity listed in the Approved Permit Application is 20 gallons per day.

WASTE TYPES:

The types of hazardous wastes allowed for treatment in containers at TSU-3, Bay D are: two-part epoxy paints, potting compounds, adhesives, and insulating materials. The waste types treated by solidification are listed in Table III-1, line 46, of the Approved Permit Application.

RCRA HAZARDOUS WASTE CODES:

D001	D006	D007	D008	D035
F002	F003	NA	NA	NA

CALIFORNIA HAZARDOUS WASTE CODES:

213	214	331	343	NA
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UNIT SPECIFIC SPECIAL CONDITIONS:

1. None.

AIR EMISSION STANDARDS FOR CONTAINERS, TANKS, AND SURFACE IMPOUNDMENTS:

Pursuant to California Code of Regulations, title 22, section 66264.1086 (Standards: Containers), the Permittee shall control air pollutant emissions from containers in accordance with the Container Level 1 standards.

**PART V. SPECIAL CONDITIONS WHICH APPLY TO ALL OF
THE FACILITY'S STORAGE AND/OR TREATMENT UNITS.**

1. The Permittee shall only manage hazardous waste generated at the Facility by the Permittee.
2. The Permittee shall only manage the hazardous waste streams identified in Table III-1 of the Approved Permit Application.
3. Except as specifically authorized by this Permit, Permittee shall not dispose of hazardous waste at the Facility. In accordance with California Code of Regulations, title 22, section 66260.10, "disposal" means: (a) the discharge, deposit, injection, dumping, spilling, leaking or placing of any waste or hazardous waste into or on any land or water so that such waste of hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters; (b) the abandonment of any waste.
4. The Permittee shall not store hazardous wastes in containers at the Facility for more than one year.
5. The Permittee shall maintain aisle space at TSU-3 to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of TSU-3 in an emergency. The minimum allowable aisle space is 30 inches.

PART VI. CORRECTIVE ACTION

1. The Permittee is required to conduct corrective action at the Facility pursuant to Health and Safety Code section 25200.10. Allegheny Technologies, Incorporated (Allegheny) is the parent company of a previous owner, operator and permittee at this Facility. Allegheny is continuing to conduct corrective action for groundwater contaminated with perchlorate and volatile organic compounds (VOCs) at the Facility under the oversight of the Regional Water Quality Control Board (RWQCB), Central Coast Region (CCR), pursuant to a Corrective Action Plan (CAP) approved by the RWQCB-CCR on February 13, 2003. DTSC reserves its right under Health and Safety Code sections 25200.10 and 25187 to require the Permittee to comply with additional corrective action requirements for the protection of human health and the environment.
2. The Permittee shall collect soil samples in the vicinity of TSU-1 annually, by May 1 of each year. Soil Samples shall be collected in accordance with the *Corrective Measures Study Final Report for Lead-Affected Soils RCRA Unit TSU-1, July 7, 1998, Revision 3.0*.
3. Within forty five (45) calendar days of soil collection in the vicinity of TSU-1, the Permittee shall submit to DTSC a report detailing, at a minimum, the following:
 - (a) Interpretation of the analytical soil results; and,
 - (b) Evaluation of the effects from the burn operations on the soil media.
4. The Permittee shall remediate the remaining lead contaminated soil in the vicinity of TSU-1 to meet the closure performance standards of California Code of Regulations, title 22, section 66264.111 when operation of TSU-1 ceases. (During final closure of TSU-1.)
5. 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.

6. 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 releases of hazardous waste and/or hazardous constituents. For newly identified SWMUs, the Permittee is required to conduct corrective action. Corrective action will be carried out either under the Corrective Action Consent Agreement or Unilateral Corrective Action Order pursuant to Health and Safety Code, Section 25187.

Figure 1 – Site Location Map



Figure 2 – Hazardous Waste Management Unit Location Map

