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PACIFIC RESOURCE RECOVERY SERVICES HAZARDOUS WASTE FACILITY PERMIT

RECORD OF REVISION

The final Hazardous Waste Facility Permit (Permit) for the Pacific Resource Recovery Services (the facility) includes changes that the Department of Toxic Substances Control (DTSC) made after the draft version was released for public review in December 2011. The changes to the Permit occur in cover page, table of contents, Part II. Description of the Facility and Ownership, Part III. General Conditions, Part IV. Permitted Units and Activities, Units 1, 2, and 3, Part V. Special Conditions. Part. VI. Corrective Action, and Figure 3: Rail Space Map. An explanation of each change is provided below.

a. General Revisions: Administrative Changes are made in Cover Page, Header, and Table of Contents.

Reason for Changes: Administrative changes to delete the word “draft” and enter the actual issue date, effective date, and expiration date, and the reference page numbers in the table of contents.

- Change 1 Deleted Draft and inserted Issuance Date of Permit as May 23, 2012.
- Change 2 Deleted Draft and inserted Effective Date of Permit as June 27, 2012.
- Change 3 Deleted draft and inserted Expiration Date of Permit as June 26, 2022.
- Change 4 Deleted the word “Draft” from Header and Cover page and entered an effective date, May 23, 2012.
- Change 5 Deleted 28 and insert 29 pages in Attachment A.

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b. Specific Revisions:

Change 5 Page 3, PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP (Part II.), section 5. DESCRIPTION, first paragraph: Deleted the word "Facility" and added "real property that includes the Facility and the operations of related entities."

Reason for Changes: In response to Comment No. D-1 and to clarify the occupied acres of PRRS facility and other related entities at the same address.

Change 6 Page 4, PART II., section 5. DESCRIPTION, fourth paragraph: Deleted the word "Facility" and added "real property" after the last second sentence.

Reason for Changes: In response to Comment No. D-1 and to clarify the occupied acres of PRRS facility and other related entities at the same address.

Change 7 Page 4, PART II., section 5. DESCRIPTION, fourth paragraph: Deleted the word "55-gallon" and added "at the Processing Area, then transferred to, and" after the word "containers and before the word "stored".

Reason for Changes: In response to Comment No. D-4 and to clarify the real process at this area and the storage activities in the container storage area (Unit 1).

Change 8 Page 4, PART II., section 6. FACILITY HISTORY: Deleted the word "Facility" and added "real property" after the word "The".

Reason for Changes: In response to Comment No. D-1 and to clarify the occupied acres of PRRS facility and other related entities at the same address.

Change 9 Page 4, PART II., section 6. FACILITY HISTORY: Added "Partners, L.P." after the word "Berg Family".

Reason for Changes: In response to Comment No. D-5 and to clarify the ownership of PRRS real property.

Change 10 Page 4, PART II., section 6. FACILITY HISTORY: Added "under the trade name PCL System. In January 2011 PRRS purchased PCL System which included sales, marketing, delivery and billing and has re-branded this program under the name PRR System. " after the word "customers".

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Reason for Changes: In response to Comment No. D-5 and to clarify the relation between PRRS and PRR System.

Change 11 Page 4, PART II., section 6. FACILITY HISTORY: Added “at the property” after the word “sales volume”.

Reason for Changes: In response to Comment No. D-5 and to clarify the occupied acres of PRRS facility and other related entities at the same address.

Change 12 Page 4, PART II., section 6. FACILITY HISTORY: Added “typical” before the word “rail car”.

Reason for Changes: In response to Comment No. D-5 and to clarify the rail car specification and dimension which may vary.

Change 13 Page 6, PART III. GENERAL CONDITIONS, section 1. PERMIT APPLICATION DOCUMENTS: Added “typical” before the word “rail car”.

Reason for Changes: In response to Comment No. D-7 and to clarify the rail car specification and dimension which may vary.

Change 14 Page 6, PART III. GENERAL CONDITIONS, section 1. PERMIT APPLICATION DOCUMENTS: Deleted “loaning” and added “loading” after the word “and”.

Reason for Changes: In response to Comment No. D-6 and corrected a typographical error.

Change 15 Page 9, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.1, ACTIVITIES TYPE: Added “Sampling, transfer, and” before the word “storage”.

Reason for Changes: In response to Comment No. D-8 and to clarify the activities type at Unit No.1.

Change 16 Page 9, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.1, ACTIVITIES DESCRIPTION: Deleted the word “110” and added “350” before the word “gallons”.

Reason for Changes: In response to Comment No. D-8 and to clarify the activities at Unit No.1.

Change 17 Page 11, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.2,

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ACTIVITIES TYPE: Added "Transfer and" before the word "storage".

Reason for Changes: In response to Comment No. D-9 and to clarify the activities type at Unit No.2.

Change 18 Page 11, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.2, ACTIVITIES DESCRIPTION: Deleted the word "110" and added "350" before the word "gallons".

Reason for Changes: In response to Comment No. D-9 and to clarify the activities at Unit No.2.

Change 19 Page 12, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.3, ACTIVITIES TYPE: Added "Transfer, " before the word "storage".

Reason for Changes: Clarify the activities type at Unit No.3.

Change 20 Page 13, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.3, ACTIVITIES TYPE, T-84: Rewrote the description of blending and transfer activities at tank 84 as follows:

(b) Waste blending in tanks: Tank No. 84 is equipped with a top-mounted agitator (mixer) which is used for blending organic wastes as described above.

(c) Waste transfer activities: The organic wastes blended and stored in this tank are pumped to a rail car adjacent to the storage tank area or a transport truck for off- site shipment.

Reason for Changes: In response to Comment No. D-10 and to clarify the activities at tank No. 84 in Unit No.3.

Change 21 Pages 13 & 14, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.3, ACTIVITIES TYPE, T-85: Rewrote the description of blending and transfer activities at tank 85 as follows:

(b) Waste blending in tanks: Tank No. 84 is equipped with a top-mounted agitator (mixer) which is used for blending organic wastes as described above.

(c) Waste transfer activities: The organic wastes blended and stored in this tank are pumped to a rail car adjacent to the storage tank area or a transport truck for off- site shipment.

Reason for Changes: In response to Comment No. D-11 and to clarify the activities at tank No. 85 in Unit No.3.

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Change 22 Page 14, PART IV. PERMITTED UNITS AND ACTIVITIES, Unit No.3, MAXIMUM CAPACITY, T-59, T-61, T-81, T-82, T-84, T-85: Delete underline for all "T".

Reason for Changes: Correct typographic errors in Unit No.3.

Change 23 Page 24, PART IV. SPECIAL CONDITIONS, Item 1: Added ", except for intermediate bulk containers which either have a pallet integral to the container or are constructed to not need a pallet. Small containers (55-gallon or less) with support device to prevent tipping or falling during an earthquake or fire may only be stacked on pallets to a height equivalent to a 55-gallon container. Pallets with containers may be double-stacked." after the word of "pallets"

Reason for Changes: In response to Comment No. D-14 and to clarify the special condition requirements for intermediate bulk container holding hazardous waste on pallets.

Change 24 Page 26, PART V. CORRECTIVE ACTION, Item 1: Rewrote the sentence for "Corrective action shall be carried out under the Corrective Action Consent Agreement (CACA), Docket No. P3-10/11-006, dated March 14, 2012, between the Permittee and DTSC.

Deleted the following: "On March 30, 2010, DTSC sent a draft CACA to the Permittee.

The Permittee shall execute the CACA within six months after this Permit is in effect. If the Permittee fails to execute a CACA within six months after the effective date of this Permit, DTSC shall issue a Corrective Action Order pursuant to Health and Safety Code sections 25187 and 25200.10", and rewrote the second sentence as follows:

Reason for Changes: DTSC and PRRS both agreed and signed the Corrective Action Consent Agreement on March 14, 2012.

PRRS shall implement the CACA pursuant to the compliance schedule to implement corrective action activities. Changes were made per legal advice.

Change 25 Page 29, FIGURE 3: A revised Figure 3 will be inserted to reflect the correction of the typographical error for platform and the typical rail car specification and actual rail car dimensions and capacities may vary.

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Reason for Changes: In response to Comment No. D-17 and to correct typographic errors at Fig. 3.