



California Environmental Protection Agency  
Department of Toxic Substances Control

**HAZARDOUS WASTE FACILITY OPERATION  
AND POST-CLOSURE PERMIT**

Permit Number: 05-GLN-08

**Facility Name:**

Quemetco, Inc.  
720 South Seventh Avenue  
City of Industry, California 91746

**Owner Name:**

Quemetco West, LLC  
2777 Stemmons Freeway Floor 18  
Dallas, Texas 75207-2277

**Operator Name:**

Quemetco, Inc.  
720 South Seventh Avenue  
City of Industry, California 91746

Facility EPA ID Number: CAD 066233966

Effective Date of Permit: September 15, 2005

Expiration Date of Permit: September 15, 2015

Permit Modification History: None

Pursuant to Section 25200 of the California Health and Safety Code, this RCRA-equivalent Hazardous Waste Facility Operation and Post-closure Permit is hereby issued to Quemetco, Inc. The Issuance of this Permit is subject to the conditions set forth in Attachment A which consists of 68 pages.

*//Original Signed by Jose Kou//*

Jose Kou, Chief  
Southern California Permitting and  
Corrective Action Branch  
Department of Toxic Substances Control

Date: August 12, 2005

**QUEMETCO, INC.**  
**720 South Seventh Avenue**  
**City of Industry, California 91746**  
**EPA ID Number CAD 066 233 966**

**HAZARDOUS WASTE FACILITY OPERATION AND POST-CLOSURE PERMIT**

**TABLE OF CONTENTS**

---

**ATTACHMENT A**

PART I. DEFINITIONS .....	1
A. GENERAL APPLICABILITY .....	1
B. SPECIFIC DEFINITIONS .....	1
PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP .....	1
A. OWNER.....	1
B. OPERATOR .....	1
C. PERMITTEE .....	1
D. LOCATION .....	2
E. DESCRIPTION .....	2
F. UNIT SIZE AND TYPE FOR FEES .....	2
PART III. PERMITTED UNITS AND ACTIVITIES .....	5
A. INTRODUCTION .....	5
B. POST-CLOSURE AND OPERATING UNITS .....	5
PART IV. GENERAL CONDITIONS.....	40
A. PERMIT APPLICATION DOCUMENTS .....	40
B. EFFECT OF PERMIT .....	40
C. TERM OF PERMIT .....	41
D. ENVIRONMENTAL MONITORING AND RESPONSE PROGRAMS .....	41
E. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA).....	56
F. FINANCIAL RESPONSIBILITY .....	56
PART V. SPECIAL CONDITIONS APPLICABLE TO UNITS LISTED UNDER PART III OF THIS PERMIT .....	58
A. SPECIAL CONDITIONS APPLICABLE TO THE OPERATING UNITS .....	58
B. SPECIAL CONDITIONS APPLICABLE TO THE MISCELLANEOUS UNITS (CONTAINMENT BUILDING AND FURNACES).....	62
C. SPECIAL CONDITIONS APPLICABLE TO THE POST-CLOSURE CARE REGULATED UNITS .....	64
D. MITIGATION ACTIVITIES REQUIRED UNDER CEQA .....	68
E. COMPLIANCE SCHEDULE .....	68
PART VI. CORRECTIVE ACTION .....	68
A. CORRECTIVE ACTION.....	68
B. BACKGROUND.....	68

## ATTACHMENT A

### HAZARDOUS WASTE FACILITY OPERATION AND POST-CLOSURE PERMIT

Quemetco, Inc.  
720 South Seventh Avenue  
City of Industry, California 91746  
EPA ID Number: CAD 066 233 966

#### PART I. DEFINITIONS

##### A. GENERAL APPLICABILITY

1. 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 Title 22, California Code of Regulations Division 4.5 (Title 22 CCR), unless expressly provided otherwise by this Permit.

##### B. SPECIFIC DEFINITIONS

1. "DTSC" as used in this Permit means the California Department of Toxic Substances Control.
2. "Permittee" as used in this Permit means the Owner and Operator of the Facility.
3. "H&SC" as used in this Permit means the Health and Safety Code.
4. "Title 22, CCR" as used in this Permit means the California Code of Regulations, title 22, division 4.5.
5. Unless explicitly stated otherwise, all cross-references to items in this Permit shall refer only to items occurring within the same Part.

#### PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

##### A. OWNER

The Owner of the Facility is Quemetco West, LLC, a Delaware Limited Liability Company (hereafter "Owner")

##### B. OPERATOR

The Operator of the Facility is Quemetco, Inc., a Delaware corporation (hereafter "Operator").

##### C. PERMITTEE

The Permittee as used in this Permit means the Owner and Operator listed above (hereafter "Permittee").

August 12, 2005

**D. LOCATION**

The Quemetco Facility is located at 720 South Seventh Avenue in the City of Industry, County of Los Angeles, State of California. It is situated along Seventh Avenue near the Pomona (State Route 60) Freeway, roughly 15 miles east of downtown Los Angeles. The location of the Facility can be described by the Government Survey Method as: That portion of Rancho La Puente in the City of Industry, County of Los Angeles known as Lot 019, as shown on a record of survey recorded with the following Los Angeles County Assessors Parcel Numbers 8208-019-18, 8208-019-20, and 8208-019-21, on file in the Office of the County Recorder in said county (Fig. 1).

**E. DESCRIPTION**

The Facility sits on previously rural land and includes 44 operational units, and a closed surface impoundment unit. It is a secondary lead smelting facility that has been operating under an Interim Status Document dated May 16, 1983. It generates, treats, and disposed of hazardous waste. Because of the surface impoundment, the Facility was designated as a land disposal facility. The operating units treat lead-bearing wastes that primarily derive from spent lead-acid batteries. The operating units comprise approximately 1.92 acre and the closed surface impoundment unit comprises approximately .826 acres. These are within a 15-acre Facility which had been designated by the City of Industry (the local land use authority) for recycling and related activities (Fig.2) The Permittee filed a RCRA Part A notification on November 18, 1980 as a treatment, storage and disposal ("TSD") facility. This Part A identified storage of hazardous waste in waste piles and a surface impoundment, and the treatment of hazardous wastes in tanks, sumps, and a water filtration system. The Facility was issued an Interim Status Document (ISD) by the State of California Department of Health Services (DHS), DTSC's predecessor agency, on May 16, 1983. The waste piles and surface impoundment lost interim status on November 8, 1985, by operation of law. Closure activity on the surface impoundment was completed on December 13, 1994, and certification of closure, dated February 7, 1995, was submitted to the Department of Toxic Substances Control (DTSC). Additional closure information was submitted on February 17, 1995. Acknowledgment of the closure certification was provided by DTSC on June 28, 1995. The closed surface impoundment unit is currently under a post-closure care and maintenance program. A post-closure permit application was requested by DTSC on June 10, 1998. The Permittee submitted a post-closure permit application dated March 24, 2000, to DTSC.

**F. UNIT SIZE AND TYPE FOR FEES**

The Facility is categorized as a large hazardous waste treatment and storage facility for purposes of Health and Safety Code section 25205.19.

Figure 1: Facility Location Map

Figure 2: Facility Map

August 12, 2005

**PART III. PERMITTED UNITS AND ACTIVITIES**

*A. INTRODUCTION*

This Permit authorizes operation only of the specific 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 III. The lead extracted from the spent lead-acid batteries regulated under this permit is considered off-site waste. 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 title 22, CCR, chapter 20 and the Health and Safety Code.

*B. POST-CLOSURE AND OPERATING UNITS*

1. Descriptions are divided into two sections which are entitled "Post-closure Units" and "Operating Units". The Post-closure Units section consists of the closed Surface Impoundment unit and the inactive former Waste Piles unit. The Operating Units section is organized into subsections. The unit descriptions specify the immediate source of incoming material, as well as the immediate destination of outgoing material.

2. POST-CLOSURE UNITS

**a. Post-closure Land Disposal**

(1) Unit Name: Surface Impoundment (closed).

Location: The closed Surface Impoundment unit is located near the northern boundary of the Facility, immediately west of the Water Storage Tanks and Waste Water Treatment Plant.

Activity Type: Waste storage. The closed Surface Impoundment unit was used to collect storm water run-off and convey it to the Facility's Waste Water Treatment Plant.

Operation/Status: Closed. The closed Surface Impoundment unit was operated from 1975 to January 1986.

Activity Description: The closed Surface Impoundment unit was used to manage facility-derived rainfall run-off, periodic washdown water from trucks which had carried spent batteries, process waste water, neutralized battery acid and scrubber waste water. Essentially, truck wash-down water, rainfall run-off, and process waters flowed into a large, shallow, asphalt-paved basin. The area immediately around the impoundment was designated as the Truck Washout Area by U.S. EPA. A large unbermed area to the southeast of the closed Surface Impoundment unit was called the Battery Storage Area. Similarly, a large unbermed area, which contained waste piles (subsequently referred to as the Raw Material Storage Pile by the Permittee), was located to the southwest of the closed Surface Impoundment unit. Fugitive hazardous waste and/or hazardous waste constituents from storage and processing lead acid batteries and other lead-bearing hazardous wastes were transported by sheet wash from the unbermed scrap lead area,

August 12, 2005

polypropylene chip and hard rubber storage areas, the Reverberatory and Electric Furnaces slag storage areas, from parked trucks serving those areas during rainfall or during periodic wash-down operations at the Truck Washout Area into the closed Surface Impoundment unit. A portable pump was used to collect liquids and pump them to the Waste Water Treatment Plant.

Physical Description: The closed Surface Impoundment unit now has a gently sloping 6-inch thick, steel-reinforced concrete cap with surface water drainage system (small drainage swale and flow lines). The cap over the former impoundment was designed to withstand truck traffic since the area is also used to stage trailers with received batteries and factory scrap. The area is secured by a 6- to 10-foot security fence which surrounds the entire Facility.

Maximum Capacity: 0.834 million gallons per day.

Waste Source: Rain water with dissolved and suspended waste constituents from all surfaces of the Facility that directed rainfall run-off to the former impoundment; process water; neutralized battery acid; scrubber waste water; wash-down water from trucks.

Waste Type: Suspended and dissolved fugitive metals, acid, and casing particulates from spent lead acid batteries and other lead-bearing hazardous wastes such as dust, sludge and slag. Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, mercury, selenium, and zinc.

RCRA Hazardous Waste Codes: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit did not receive hazardous waste after June 12, 1996.

(2) Unit Name: Waste Piles (former, as shown in the 1980 Part A Application)

Location: As shown in the 1980 Part A Application, the former Waste Piles were located in a diffuse "Storage Area" which is coincident with an area subsequently referred to as the Former Raw Materials Storage Area (FRMSA) by the Permittee, mapped in the January 24, 1994, Interim Remedial Measures (IRM) work plan. The FRMSA was situated in the central portion of the property, northeast of the maintenance building and southwest of the closed Surface Impoundment. As defined in the September 30, 1987, RCRA Facility Assessment (RFA), the Hard Rubber Waste Pile was located between the Battery Crusher/Cracker and the main building, and next to the Plastic Chips Storage Area.

Activity Type: Waste storage. The former waste piles contained broken battery parts, including hard rubber and plastic chips, and slag from the Facility's furnaces.

Operation/Status: Inactive.

Activity Description: The former Waste Piles were used to store broken parts of spent batteries and slag from the furnaces. The former Waste Piles, shown in the 1980 Part A Application as "Storage Area", were located to the southwest of the closed Surface Impoundment unit. These were the scrap lead area, polypropylene chip and hard rubber storage areas, the Reverberatory and Electric Furnaces slag storage areas. One of the

August 12, 2005

areas, approximately 155 by 110 feet, became termed the FRMSA by the Permittee, was specifically described in the 1994 IRM as having been used to store lead plates, parts, and grids from batteries, and lead sulphate mud collected from the sink/float tanks. A large area to the southeast of the closed Surface Impoundment unit was called out as the Battery Storage Area in the 1987 RFA. The 1987 RFA describes the former Slag Waste Piles as being the result of molten slag from the Electric Furnace, poured into molds to cool, deposited in a concrete bin after cooling, broken up into that bin, placed into a roll-off bin, and then placed in the former Waste Piles. It was reportedly routinely containerized and transported off-site, although slag from the Reverberatory Furnace was also used as feedstock for the Electric Furnace. The slag generated from both furnaces was stored in the former Waste Piles.

Physical Description: The former waste piles varied in configuration and location. It is reported that the former Hard Rubber Waste Pile consisted of a concrete three-sided open bin approximately 10 by 10 feet across and 8 feet high [the rubber was either disposed off-site or used as a reducing agent for the Reverberatory Furnace unit]. It was believed to have been installed in the early 1970's. There is no description for the former Slag Waste Piles. The unit was started up in 1982 or 1983 according to the RFA, but slag had been generated since the Facility began operating in 1959. The former Slag Waste Piles were active in 1987 at the time that the RFA was performed. The FRMSA was excavated, contaminated soils removed, backfill emplaced and surfaced with concrete in 1994. It is situated within the Facility which is surrounded by a 6- to 10-foot security fence.

Maximum Capacity: Unknown

Waste Source: Spent batteries transported to the Facility; lead plates, grids, and other parts from the Battery Wrecker; polypropylene chips, hard rubber chips from the Battery Wrecker; lead sulphate mud from the sink/float tanks; and, lead slag from the Furnace units.

Waste Type: Broken lead battery components; chipped hard rubber and polypropylene casing pieces with adhered lead (dissolved or particulate), lead compounds, and acid; lead sulphate mud; lead slag. Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, mercury, selenium, and zinc.

RCRA Hazardous Waste Codes: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium). Non-RCRA waste may have included 441 (sulfur sludge).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit did not receive hazardous waste after June 12, 1996.

3. OPERATING UNITS

a. **Container/Battery/Raw Materials Storage**

(1) Unit Name: Battery Storage Area [ Unit #1].

Location: Directly adjacent (east) of the Battery Wrecker dock.

Activity Type: Waste storage for containers and batteries.

August 12, 2005

Operation/Status: Operating/Active.

Activity Description: The Battery Storage Area is used to store lead acid batteries and other lead-bearing hazardous wastes. Batteries are sent to the Battery Wrecker and once the batteries are crushed and broken, the lead-bearing hazardous waste is transported to the Containment Building. In addition to spent lead acid batteries, other lead-bearing hazardous waste is stored in this unit prior to delivery to the Containment Building or to the Reverberatory Furnace. Occasionally, on-site generated wastes are stored in this area prior to shipment off-site.

Physical Description: The Battery Storage Area is a trapezoidal shaped area, approximately 190 feet in length by 69 feet wide at the north end and 30 feet wide at the south end. The pad is covered by up to six inches of asphalt and surrounded by a three- to six-inch berm. Periodically the area is resurfaced with asphalt. During rainfall or during periodic wash-down operations, a sump is used to collect, and a portable pump is used to pump the liquid from the Battery Storage Area to the Water Treatment Plant.

Maximum Capacity: Approximately 72,000 cubic feet excluding aisle ways. This figure is based on an approximate surface area of 10,750 square feet and a storage height of 80 inches (the height of two pallets of 55-gallon drums stacked on top of each other).

Waste Source: The Battery Wrecker unit is the primary source, with lead-bearing waste being stored until transported to other units for storage or treatment. Occasionally, on-site generated wastes are also stored in this unit.

Waste Type: Lead acid batteries and other lead-bearing hazardous wastes. Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Codes D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), and K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(2) Unit Name: Containment Building/Batch House [Unit #2].

Location: Adjacent to the Furnace Department and the Refinery.

Activity Type: Waste storage and treatment. Lead-bearing hazardous waste is stored and batteries may also be stored. Treatment may consist of dismantling of oversized batteries.

Operation/Status: Operating/Active.

August 12, 2005

Activity Description: After batteries have been processed at the Battery Wrecker unit, the resulting hazardous waste is stored in the Containment Building unit for charging to the furnace units. Other lead-bearing hazardous waste may also be stored in this building prior to being charged to the furnace units or Refinery. Batteries may be stored in this unit and oversized batteries may be dismantled within the unit.

Physical Description: The Containment Building unit has a surface area of approximately 25,800 square feet. The floor design is layered from top to bottom with a PVC liner, sand, reinforced concrete and a replacement layer of aggregate. The Containment Building unit was designed with reinforced concrete tilt-up walls equipped with steel plates on top of the walls to prevent intrusion of hazardous waste. The roof design is a steel frame with wood diaphragm and decking. The primary barrier is made of a sacrificial concrete surface that is designed with a slope to drain liquids to a main sump. Periodically this concrete surface may be replaced as it becomes worn. A sump pump transfers the collected liquids to the Wastewater Treatment Plant unit. The secondary barrier consists of the PVC liner that is anchored to the foundation and sloped to an inspection well. To prevent visible emissions, the Containment Building unit is equipped with three HEPA baghouses for general ventilation.

Maximum Capacity: The Containment Building unit has a calculated volume of 767,000 cubic feet.

Waste Source: The Battery Wrecker unit and other on- and off-site sources provide the hazardous waste stored in this unit from dismantled batteries and other lead-bearing hazardous waste. Over-sized batteries which may be treated by dismantling in this unit are provided from off-site sources.

Waste Type: Lead acid batteries and lead-bearing hazardous waste. Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium) and K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

**b. Furnaces**

(1) Unit Name: Reverberatory Furnace [Unit #3].

Location: East of the Refinery and south of the Containment Building unit.

Activity Type: Waste treatment smelting of lead from spent batteries and other lead-bearing hazardous waste.

Operation/Status: Operating/Active

August 12, 2005

Activity Description: This furnace unit primarily receives lead-bearing hazardous waste from the Containment Building unit and smelts it. Impurities, together with a substantial amount of lead, may form a floating slag layer on top of denser molten metallic lead. The Reverberatory Furnace slag, with its high lead content, is the primary feed to the Slag Reduction Furnace unit.

Physical Description: The Reverberatory Furnace unit is a horizontally oriented furnace constructed of refractory brick with an exterior frame support. The dimensions of this unit are approximately 34 - 40 feet in length, 8 to 12 feet in width, and 7 to 10 feet in height. Periodically the furnace is disassembled and the refractory brick replaced. Worn refractory bricks may be replaced in accordance with prudent furnace operating practices. In order to comply with South Coast Air Quality Management District (SCAQMD) regulations, the Permittee is proposing to install a LoTox™ system as part of this furnace unit.

Maximum Capacity: The daily capacity throughput of the Reverberatory Furnace unit is set by the South Coast Air Quality Management District in combination with the Slag Reduction Furnace unit, at 1.2 million pounds per day. This shall be the maximum capacity authorized under this Permit.

Waste Source: Containment Building unit

Waste type: Hazardous waste consisting of crushed lead-bearing battery parts and other lead-bearing hazardous waste. Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption and is subject to the National Emission Standard for Hazardous Pollutants (NESHAP).

(2) Unit Name: Slag Reduction Furnace [Unit #4].

Location: Adjacent to the Reverberatory Furnace unit.

Activity Type: Waste treatment. Smelting of lead from spent batteries and other lead-bearing hazardous waste.

Operation/Status: Operational/Active.

Activity Description: This furnace unit receives Reverberatory Furnace slag directly from the Reverberatory Furnace unit and/or as cold slag from the Containment Building unit. This additional smelting process also results in non-lead materials along with small amounts of lead forming a floating layer of slag on top of the more dense molten metallic lead. This Reduction Furnace slag is typically destined for disposal.

August 12, 2005

Physical Description: The Slag Reduction Furnace unit is equipped with three electric resistance electrodes. This furnace is constructed of refractory brick. Its approximate dimensions are 18 - 23 feet in length, 10 - 12 feet in width, and 10 - 12 feet in height. Periodically the furnace is disassembled and the refractory brick replaced. Worn refractory bricks are replaced in accordance with prudent operating practices.

Maximum Capacity: The daily capacity throughput of the Slag Reduction Furnace unit is set by the South Coast Air Quality Management District in combination with the Reverberatory Furnace unit, at 1.2 million pounds per day. This shall be the maximum capacity authorized under this Permit.

Waste Source: Reverberatory Furnace and Containment Building units.

Waste type: Reverberatory Furnace slag and other lead-bearing hazardous waste. Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption and is subject to the National Emission Standard for Hazardous Pollutants (NESHAP).

c. **Battery Wrecker**

(1) Unit Name: Yard Sump Tank. [Unit #YS-1].

Location: Raw Material Storage Area.

Activity Type: Waste storage .

Operation/Status: Operating/Active.

Activity Description: This tank collects stormwater run-off and wash-down waters from process and raw material (reagents) storage areas and transfers them by pump through above-ground piping to Battery Wrecker Tanks or to TK-103 at the Wastewater Treatment Plant.

Physical Description: The tank is constructed of stainless steel and measures 10 feet in diameter by 9 feet in height. The tank is equipped with a level control alarm and has secondary containment.

Maximum Capacity: 5,288 gallons.

Waste Source: Raw Material Storage Areas and adjacent process areas.

August 12, 2005

Waste type: Stormwater run-off and wash-down waters. These liquids may contain dissolved and particulate metal, oxides, sulphates and casing components. Metallic constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with  $\text{pH} \leq 2$ ), 792 (liquid with  $\text{pH} \leq 2$  with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(2) Unit Name: Wrecker Sink Float Tank [Unit WSF-1]

Location: Battery Wrecker.

Activity Type: Treatment.

Operation/Status: Operating/Active.

Activity Description: In the Battery Wrecker unit, batteries are crushed and the crushed material dropped into the Wrecker Sink Float Tank unit (WSF-1). The tank acts to separate battery acid from solid battery components and is to gravimetrically separate the casing and metal components. Most of the casing waste (primarily plastic) is washed and pneumatically transferred into trailers for recycling off-site. The battery acid waste is transferred by pipe directly to the Battery Wrecker Sump unit (WS-1). The metal-bearing waste (primarily metallic lead, lead oxide, and lead sulphate) may be further separated into two groups in the Battery Wrecker by washing. The metallic lead battery components are conveyed by closed screw auger to the Containment Building unit for storage prior to being fed to the Reverberatory Furnace unit. The lead oxide and lead sulphide waste is subjected to chemical desulphurization prior to being conveyed to the Containment Building unit.

Physical Description: This tank is constructed of stainless steel and is approximately 6.5 feet in height, 2 feet wide and 8 feet in length. The clarifier tank is equipped with a manual cut-off valve and the area is sloped to drain to the battery wrecker sump.

Maximum Capacity: 2,100 gallons.

Waste Source: Battery Wrecker.

Waste type: Battery components. Components include solids and liquids. Solids consist of metallic lead, lead oxide, and lead sulphate as well as various casing materials that may include adhered metallic lead, lead oxide, and lead sulphate. Liquids include battery acid and wash water which may each contain dissolved metals, sulphate, etc. Metallic constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

August 12, 2005

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(3) Unit Name: Repulp Tank [RT-1].

Location: Battery wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/active.

Activity Description: Battery paste is mixed with sludge from the Waste Water Treatment Plant, water from the Containment building unit, and other recycled water in this treatment unit to form a slurry. This slurry is pumped to a filter press inside the Containment Building unit. This treatment unit is also used to provide backup service to Reactor Tank unit (DR-2) and Reactor Tank unit (DR-3).

Physical Description: This stainless steel tank is approximately 11 feet in diameter and 9 feet in height. This tank is equipped with a manual cut-off and overflows to the battery wrecker sump.

Maximum Capacity: 6,398 gallons.

Waste Source: Battery Wrecker.

Waste type: Battery paste, comprised of metallic lead, lead oxide, and lead sulphide, waste water containing dissolved metallic lead, lead oxide, lead sulphate, and lead particulates. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

August 12, 2005

(4) Unit Name: Reactor Tank 1 [Unit DR-1].

Location: Battery Wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This treatment unit (tank) receives the battery wrecker mud (primarily lead oxide and lead sulphate) from the clarifier. The pH is adjusted by addition of a basic solution. The neutralized slurry is then transferred via pump and above-ground pipe to the Repulp Tank unit (RT-1). The neutralized slurry is then pumped via above-ground piping to the Battery Wrecker filter press for de-watering. Reactor Tank 2 unit (DR-2) slurry can also be transferred into the Reactor Tank 1 unit via above-ground piping.

Physical Description: This stainless steel tank is approximately 6 feet in diameter and 8 feet high. It is equipped with a manual cut-off valve and is designed to drain to the battery wrecker sump.

Maximum Capacity: 1,489 gallons.

Waste Source: Battery Wrecker.

Waste Type: Battery paste, comprised of metallic lead, lead oxide, and lead sulphide, waste water containing dissolved metallic lead, lead oxide, lead sulphate, and lead particulates. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(5) Unit Name: Reactor Tank 2 [Unit DR-2].

Location: Within the Battery Wrecker.

Activity Type: Waste Treatment.

Operation/Status: Operating/Active.

Activity Description: This treatment unit (tank) collects overflow neutralized waste liquids from the Reactor Tank 3 unit (DR-3). The waste liquid is then transferred by pump and above-ground pipe to the Repulp Tank unit or to the Battery Wrecker filter press for de-watering.

August 12, 2005

Physical Description: This stainless steel tank is 6 feet in diameter and 8 feet in height.

Maximum Capacity: 1,676 gallons.

Waste Source: Battery Wrecker.

Waste Type: Waste water which may contain dissolved metallic lead, lead oxide, lead sulphate constituents, and lead particulates. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(6) Unit Name: Reactor Tank 3 [Unit DR-3].

Location: Within the Battery Wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This treatment unit is used to chemically desulfurize the paste from lead acid batteries by addition of neutralizing chemicals. The desulfurized battery paste is then transferred by above-ground pipe to the Reactor Tank 2 unit (DR-2) for further neutralization.

Physical Description: This stainless steel tank is approximately 6 feet in diameter and 8 feet high.

Maximum Capacity: 2,538 gallons.

Waste Source: Reactor Tank 2 (DR-2).

Waste Type: Battery paste, comprised of metallic lead, lead oxide, and lead sulphide, waste water containing dissolved metallic lead, lead oxide, lead sulphate, and lead particulates. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium),

August 12, 2005

723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(7) Unit Name: Low pH Transfer Tank [Unit TT-1].

Location: Within the Battery Wrecker.

Activity type: Waste storage.

Operation/Status: Operating/active.

Activity Description: This waste storage unit (tank) receives waste battery acid from the Battery Wrecker Clarifier 1 unit (WC-1) or effluent from the Battery Wrecker filter press. The low pH waste liquid is transferred via aboveground pipe to Waste Water Treatment Plant tank units TK-14-IT, TK-17-IT, and TTK-103.

Physical Description: This stainless steel tank is approximately 6 feet in diameter and 6 feet in height. It is equipped with a level controller set to 4 feet and will overflow to the Battery Wrecker Sump (WS-1).

Maximum Capacity: 1,269 gallons.

Waste Source: Battery Wrecker.

Waste Type: Waste liquids having a low pH and which may contain dissolved metallic lead, lead oxide, lead sulphate, and lead particulates. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(8) Unit Name: High pH Transfer Tank.

Location: Within the Battery Wrecker.

Activity type: Waste treatment.

Operation/Status: Operating/Active.

August 12, 2005

Activity Description: This waste treatment unit (tank) receives effluent from the dewatering presses. The liquid is transferred via above-ground pipe to tank unit TK-103 at the Wastewater Treatment Plant.

Physical Description: This stainless steel tank is approximately 6 feet in diameter and 6 feet in height. It is equipped with a level controller set to 4 feet.

Maximum Capacity: 1,269 gallons.

Waste Source: Battery Wrecker.

Waste Type: Waste water which may contain dissolved metallic lead, lead oxide, lead sulphate, and lead particulates. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(9) Unit Name: Battery Wrecker Clarifier [Unit WC-1].

Location: Within the Battery Wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit (tank) receives waste battery acid and other liquids from the battery breaking process via above-ground pipe. Solid materials are settled out in this waste treatment unit and form a sludge. The sludge is pumped via above-ground pipe to the Battery Wrecker filter press unit for de-watering. The acid and acidic liquids are transferred by gravity feed via above-ground pipe to the Tank TT-1 unit.

Physical Description: This stainless steel tank measures approximately 12 feet in diameter and 12.5 feet in height on the conical section and 12 feet in diameter and 10 inches in height on the straight section. This tank overflows to the Tank TT-1unit.

Maximum Capacity: 3,751 gallons.

Waste Source: Battery Wrecker.

Waste Type: Sludge, waste battery acid and other waste liquids. The waste battery acid and other waste liquids may contain dissolved metallic lead, lead oxide, lead sulphate, and suspended particulates (lead, battery casing material, etc.). The metallic

August 12, 2005

waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc. The sludge derived from metallic lead, lead oxide, and lead sulphate, and suspended particulates (lead, battery casing material, etc.).

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with  $\text{pH} \leq 2$ ), 792 (liquid with  $\text{pH} \leq 2$  with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(10) Unit Name: Battery Wrecker Sump [Unit WS-1].

Location: Within the Battery Wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: The liquids derived from the Battery Wrecker processes are collected in this sump. The liquids are transferred by pump via above-ground pipe to the Battery Wrecker Clarifier unit (WC-1).

Physical Description: This double walled stainless steel tank measures 9.5 feet in diameter and 4 feet in height.

Maximum Capacity: 2,121 gallons.

Waste Source: Battery Wrecker.

Waste Type: Battery acids and other process liquids. These waste liquids may contain dissolved metallic lead, lead oxide, lead sulphate, and suspended particulates (lead, battery casing material, etc.). The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with  $\text{pH} \leq 2$ ), 792 (liquid with  $\text{pH} \leq 2$  with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

August 12, 2005

(11) Unit Name: Primary Plastic Sink/ Float Tank [Unit PSF-1].

Location: Battery Wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit further separates heavy components from the crushed plastic and diverts them to the Containment Building unit via a closed auger system. The crushed plastic fragments are gravity fed to the Tank PSF-2 unit.

Physical Description: The tank is aboveground, stainless steel, rectangular tank. Approximate dimensions are 9.5 feet long, 3 feet wide and 3 feet 10 inches in height. This area is sloped to deposit liquids into the Battery Wrecker Sump unit. The tank is set within secondary containment on a concrete slab. Collected liquids in the tank are pumped out.

Maximum Capacity: 450 gallons.

Waste Source: WSF-1.

Waste Type: Battery components, including casing materials (primarily plastic). Battery components include metallic lead, lead oxide, lead sulphate, and crushed casing material with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

(12) Unit Name: Secondary Plastic Sink/Float Tank.

Location: Battery Wrecker.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit removes the remaining non-plastic solids. The remaining battery components are transferred to the Containment Building by closed augers. The plastic is washed across a shaker screen and then blown pneumatically through above-ground pipe to trailers for shipment.

August 12, 2005

Physical Description: Tank is aboveground, stainless steel. It is rectangular with approximate dimensions of 7 feet in length, 3 feet in width and 9 feet in height. It is located in an area sloped to the Battery Wrecker Sump. It is set within secondary containment.

Maximum Capacity: 450 gallons.

Waste Source: Plastic Sink/Float Tank unit (PSF-1).

Waste Type: Battery components, including casing materials (primarily plastic). Battery components include metallic lead, lead oxide, lead sulphate, and crushed casing material with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a hazardous waste recycling exemption.

**d. Wastewater Treatment Plant**

(1) Unit Name: Oxidation Tank 100 [ Unit TK-100].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit receives scrubber effluent. The waste liquid is oxidized in the tank to reduce the sulfites to sulphate. The treated effluent then overflows through above-ground piping to the Oxidation Tank 101 unit.

Physical Description: The tank is above-ground, vertical, constructed of stainless steel, approximately 16 feet in diameter and approximately 30 feet in height. It is situated within secondary containment.

Maximum Capacity: 40,609 gallons.

Waste Source: Air pollution control equipment.

Waste Type: Scrubber effluent. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, and casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

August 12, 2005

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(2) Unit Name: Oxidation Tank 101 [Unit TK-101].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit receives scrubber effluent. This waste liquid is oxidized to reduce the sulfites to sulphate. The treated effluent then overflows through above-ground piping to the Oxidation Tank 102 unit.

Physical Description: The tank is stainless steel and is approximately 16 feet in diameter and 30 feet in height. It is installed vertically above ground within secondary containment.

Maximum Capacity: 40,609 gallons.

Waste Source: Air pollution control equipment.

Waste Type: Scrubber effluent. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

August 12, 2005

(3) Unit Name: Oxidation Tank 102 [Unit TK-102].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit receives scrubber effluent. This waste liquid is oxidized to reduce the sulfites in the waste liquid. A basic pH solution is used to adjust the pH of the waste liquid. The waste liquid then overflows through above-ground piping to the Equalization Tank 103 unit.

Physical Description: The tank is stainless steel and is approximately 16 feet in diameter and 30 feet in height. It is installed vertically above ground within secondary containment.

Maximum Capacity: 40,609 gallons.

Waste Source: Air pollution control equipment.

Waste Type: Scrubber effluent. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(4) Unit Name: Equalization Tank. [Unit TK-103].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operating/Active.

Activity Description: This waste treatment unit receives waste liquids collected by the WS-1, TK-101, TK-102, YS-1, and RS-A. The waste liquids are mixed in the tank and then pumped through above-ground piping to the TK-1 unit. This tank also overflows to the TK-104 unit.

Physical Description: Tank is aboveground, stainless steel and approximately 30 feet in diameter and 27 feet in height.

August 12, 2005

Maximum Capacity: 134, 835 gallons.

Waste Source: Battery Wrecker Sump (WS-1) unit, oxidation tanks, and storm-water tanks.

Waste Type: Battery acid, scrubbing solutions and accumulated on-site facility storm-water. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(5) Unit Name: Storm-water Tank 104 [Unit TK-104].

Location: Wastewater Treatment Plant.

Activity Type: Waste storage.

Operation/Status: Operating/Active.

Activity Description This tank receives collected surface run-on/run-off and wash-down waste waters from areas next to the process areas (RS-A and RS-B) of the Facility. The waste liquid from this tank is pumped via above-ground piping to oxidation tank units (TK-100, TK-101, TK-102, TK-103) and waste water treatment plant tank units (TK-88-IT and TK-11-IT). The tank TK-104 unit also overflows to the TK-105 unit.

Physical Description: Tank is aboveground, single-walled steel. Approximate dimensions are 50 feet in diameter and 27 feet in height. It is set within secondary containment. The tank is connected by pipe to TK-103.

Maximum Capacity: 374, 543 gallons.

Waste Source: Site-wide fugitive sources and facility wash-down areas, lead, mercury, selenium, and zinc

Waste Type: Storm water and facility wash-down water which include airborne deposition subsequently accumulated in on-site facility storm-water as well as inadvertent overflow from process areas (RS-A and RS-B). Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying

August 12, 2005

concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

- (6) Unit Name: Storm-water Tank 105 [Unit TK-105].

Location: Wastewater Treatment Plant

Activity Type: Waste storage.

Operation/Status: Operating/Active.

Activity Description: This tank receives collected surface run-on/run-off and wash-down waste waters from areas next to the process areas (RS-A and RS-B) of the Facility. The waste liquid from this tank is pumped via above-ground piping to oxidation tank units (TK-100, TK-101, TK-102, and TK-103) or water recycling tank units (TK-8-IT and TK-11-IT). The TK-105 unit also overflows to the TK-104 unit.

Physical Description: Tank is aboveground, single-walled and steel. Approximate dimensions are 50 feet in diameter and 27 feet in height. The tank is set within secondary containment.

Maximum Capacity: 374, 543 gallons.

Waste Source: Sitewide fugitive sources which affect accumulated surface run-on/run-off and wash-down waters.

Waste Type: Stormwater and Facility wash-down waters which include airborne deposition subsequently accumulated in on-site Facility storm-water as well as inadvertent overflow from process areas (RS-A and RS-B). Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

August 12, 2005

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(7) Unit Name: Transfer Tank 17 [Unit TK-17-TT].

Location: Wastewater Treatment Plant.

Activity Type: Waste storage.

Operation/Status: Operating/Active.

Activity Description: This tank receives waste liquid from the Low pH Tank TT-1 unit, at the Battery Wrecker. The waste liquid is then transferred via above-ground pipes to the Clarifier C-2B unit or the Equalization Tank TK-103 unit.

Physical Description: Tank is aboveground, stainless steel. Approximate dimensions are 10 feet-4 inches in diameter and is 12 feet in height. The tank is set within secondary containment.

Maximum Capacity: 6,700 gallons.

Waste Source: Battery Wrecker.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(8) Unit Name: Transfer Tank 12 [Unit TK-12-TT].

Location: Wastewater Treatment Plant.

Activity Type: Waste storage.

Operation/Status: Operating/Active.

Activity Description: This tank receives waste liquid from clarifier C2-B. The waste liquid is then transferred via above-ground pipes to the Equalization Tank, TK-103 unit.

August 12, 2005

Physical Description: Tank is aboveground, fiberglass reinforced plastic (FRP). Approximate dimensions are 10 feet-4 inches in diameter and 16 feet in height. It is equipped with a level controller and set within secondary containment.

Maximum Capacity: 9,973 gallons.

Waste Source: Clarifier C2-B.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Code: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(9) Unit Name: Transfer Tank 13 [Unit TK-13-TT].

Location: Wastewater Treatment Plant.

Activity Type: Waste storage.

Operation/Status: Operational/Active.

Activity Description: This tank is used to store either waste battery acid from the Battery Wrecker or industrial-grade sulfuric acid for use in the Reactor Tank units (1 through 5). The waste and industrial-grade liquids are transferred via above-ground pipes.

Physical Description: This FRP tank is approximately 10 feet, 4 inches in diameter and is 10 feet in height.

Maximum Capacity: 6,233 gallons.

Waste Source: Battery Wrecker.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from

August 12, 2005

lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(10) Unit Name: Yard Sump Tank [Unit RS-A].

Location: Wastewater Treatment Plant.

Activity Type: Waste storage.

Operation/Status: Operational/Active.

Activity Description: The sump tank, situated below-grade in a secondary containment, receives run-on/run-off and wash-down waste waters. A pump then transfers the waste liquids through above-ground pipes to TK-103, TK-104, or TK 105 for processing at the Wastewater Treatment Plant.

Physical Description: This tank is constructed of stainless steel and measures 9 feet, 4 inches in diameter, is approximately 10 feet in height and equipped with a level controller.

Maximum Capacity: 4, 655 gallons.

Waste Source: Plant wash-down or storm water.

Waste Type: Fugitive materials including lead, lead oxide, lead sulphate, battery casing, and deposited combustion product particulates, residual battery acid and residual dissolved-phase lead, lead sulphate, and deposited combustion products. Metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(11) Unit Name: Reactor Tank 1 [TK-1].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operational/Active.

August 12, 2005

Activity Description: This tank receives waste liquid from the TK-103 or TK102 units. Ferric sulfate is added to precipitate metals. Basic and acidic solutions are used to adjust the pH. This treated waste liquid overflows via above-ground pipes to the TK-2 unit.

Physical Description: This FRP tank measures 12 feet in diameter and is 14 feet, 8 inches in height.

Maximum Capacity: 10,575 gallons.

Waste Source: TK-103.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(12) Unit Name: Reactor Tank 2 [Unit TK-2].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operational/Active.

Activity Description: This tank receives waste liquid from the TK-1 unit and ferric sulfate is added to precipitate metals. A basic solution is added to adjust pH. This treated waste liquid overflows to TK-3 via above-ground pipes.

Physical Description: This FRP tank measures 12 feet in diameter and is 14 feet in height.

Maximum Capacity: 10,575 gallons.

Waste Source: TK-103.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

August 12, 2005

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(13) Unit Name: Reactor Tank 3 [Unit TK-3].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

Operation/Status: Operational/Active.

Activity Description: This tank receives waste liquid from the TK-2 unit and ferric sulfate is added to precipitate metals. A basic solution is added to adjust the pH. This treated waste liquid overflows via above-ground pipes to the TK-4 unit.

Physical Description: This FRP tank measures 12 feet in diameter and is 14 feet, 8 inches in height.

Maximum Capacity: 10,575 gallons.

Waste Source: TK-103.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(14) Unit Name: Reactor Tank 4 [Unit TK-4].

Location: Wastewater Treatment Plant.

Activity Type: Waste treatment.

August 12, 2005

Operation/Status: Operational/Active.

Activity Description: This tank receives waste liquid from the TK-3 unit and ferric sulfate is added to precipitate metals. A basic solution is added to adjust the pH. The treated waste liquid overflows via above-ground pipes to the TK-5 unit.

Physical Description: This FRP tank measures 12 feet in diameter and is 14 feet in height.

Maximum Capacity: 10,575 gallons.

Waste Source: TK-103.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(15) Unit Name: Reactor Tank 5 [Unit TK-5].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: This tank receives waste liquids from the TK-4 unit. The waste liquids from this fifth stage of the precipitation process are transferred to the wastewater treatment plant clarifier units, C1-A, C1-B, and C2-A, via above-ground pipes.

Physical Description: This FRP tank measures 10 feet in diameter and is 10 feet in height.

Maximum Capacity: 5,288 gallons.

Waste Source: TK-103.

Waste Type: Battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead,

August 12, 2005

lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(16) Unit Name: East Product Solution Tank [Unit P-E].

Location: Wastewater Treatment Plant.

Activity Type: Waste Storage.

Operation/Status: Operational/Active.

Activity Description: This tank receives treated waste liquid from the sand filters. If the treated waste liquid is in conformance with the LACSD wastewater discharge permit, the treated waste liquid is discharged via the flume; if it is not, the incompletely treated waste liquid is transferred back to the TK-103, TK-104, TK-105, TK-8-IT or TK-11-IT units via above-ground pipes for additional treatment.

Physical Description: This stainless steel tank is 16 feet in diameter, 24 feet in height and equipped with a level control alarm.

Maximum Capacity: 36, 097 gallons.

Waste Source: Sand Filters.

Waste Type: Treated waste liquid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

August 12, 2005

(17) Unit Name: West Product Solution Tank [Unit P-W].

Location: Wastewater Treatment Plant.

Activity Type: Waste Storage.

Operation/Status: Operational/Active.

Activity Description: This tank receives treated waste liquid from the sand filters. If the treated waste liquid is in conformance with the LACSD wastewater discharge permit, it is discharged via the flume; if it is not, the incompletely treated waste liquid is transferred back to the TK-103, TK-104, TK-105, TK-8-IT, or TK-11-IT units via above-ground pipes for additional treatment.

Physical Description: This stainless steel tank is 16 feet in diameter, 24 feet in height and equipped with a level control alarm.

Maximum Capacity: 36,097 gallons.

Waste Source: Sand filters.

Waste Type: Treated waste liquid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(18) Unit Name: Sand Filter A [Unit S-A].

Location: Wastewater Treatment Plant.

Activity Type: Treatment.

Operation/Status: Operational/Active.

Activity Description: Treated waste liquid from the Sand Filter Feed Tank (TK-4-IT) unit is transferred via above-ground pipes to the sand filters to remove residual suspended solids. The treated waste liquid is transferred via above-ground pipes to the Product Solution Tank P-E and P-W units.

August 12, 2005

Physical Description: This coated steel tank is 4 feet in diameter and is 5 feet in height.

Maximum Capacity: 470 gallons.

Waste Source: TK-4-IT.

Waste Type: Treated waste liquid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(19) Unit Name: Sand Filter B [Unit S-B].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: Treated waste liquid from the Sand Filter Feed Tank (TK-4-IT) is transferred to the sand filters via above-ground pipes for filtration treatment to remove residual suspended solids. Treated waste liquid is transferred via above-ground pipes to the Product Solution Tank P-E and P-W units.

Physical Description: This coated steel tank is 4 feet in diameter and is 5 feet in height.

Maximum Capacity: 470 gallons.

Waste Source: TK-4-IT.

Waste Type: Treated waste liquid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with

August 12, 2005

cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. 40 Code of Federal Register (CFR), Part 264, Subpart CC, Air Emission Standards. The unit has a waste water exemption.

(20) Unit Name: Sand Filter C [Unit S-C].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: The treated waste liquid from the Sand Filter Feed Tank (TK-4-IT) is transferred to the sand filters via above-ground pipes to remove residual suspended solids. The treated waste liquid is transferred via above-ground pipes to the Product Solution Tank P-E and P-W units.

Physical Description: This coated steel tank is 4 feet in diameter and is 5 feet in height.

Maximum Capacity: 470 gallons.

Waste Source: TK-4-IT.

Waste Type: Constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(21) Unit Name: Sand Filter D [Unit S-D].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: Treated waste liquid from the Sand Filter Feed Tank (TK-4-IT) unit is transferred to the sand filters via above-ground pipes to remove residual suspended solids. Treated liquids is transferred via above-ground pipes to the Product Solution Tank P-E and P-W.

August 12, 2005

Physical Description: This coated steel tank is 4 feet in diameter and is 5 feet in height.

Maximum Capacity: 470 gallons.

Waste Source: TK-4-IT.

Waste Type: Treated waste liquid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(22) Unit Name: Sand Filter Feed Tank [Unit TK-4-IT].

Location: Wastewater Treatment Plant.

Activity Type: Waste Storage.

Operation/Status: Operational/Active.

Activity Description: This tank receives treated waste liquid from the waste water clarifier C1-A, C1-B, and C2-A units. The treated waste liquid is transferred by pump via above-ground pipes to the sand filter S-A, S-B, S-C and S-D units.

Physical Description: This FRP tank is approximately 10 feet, 4 inches in diameter and 10 feet in height.

Maximum Capacity: 5,640 gallons.

Waste Source: Wastewater Treatment Plant Clarifiers.

Waste Type: Treated waste liquid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with

August 12, 2005

cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(23) Unit Name: East Water Recycling Tank [Unit TK-11-IT].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment and Storage.

Operation/Status: Operational/Active.

Activity Description: Tank is used to store recycled water but was previously used to store a commercial ferric solution which was used in treatment.

Physical Description: This FRP tank is 5 feet in diameter, 5 feet in height and is equipped with a level controller.

Maximum Capacity: 734 gallons.

Waste Source:

Waste Type: Stormwater, wash-down water, and process water.. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit is inactive.

(24) Unit Name: West Water Recycling Tank [Unit TK-8-IT].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment and Storage.

Operation/Status: Operational/Active.

Activity Description: Tank is used to store recycled water but was previously used to store a commercial ferric solution which was used in treatment.

August 12, 2005

Physical Description: This FRP tank is 5 feet in diameter, 5 feet in height and is equipped with a level controller.

Maximum Capacity: 734 gallons.

Waste Source:

Waste Type: Stormwater, wash-down water, and process water. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit is inactive.

(25) Unit Name: Clarifier 1A [Unit C-1A].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: This treatment tank receives treated waste liquid from the Reactor Tank (TK-5) unit to settle out the solids. The treated waste liquid is transferred to the Sand Filter Feed Tank (TK-4-IT) unit via above-ground pipes.

Physical Description: The cylindrical section of the stainless steel tank is approximately 12 feet in diameter and 9.5 feet in height. The conical section measures approximately 12 feet in diameter at the top and 9.5 feet in height.

Maximum Capacity: 10,716 gallons.

Waste Source: TK-5.

Waste Type: Waste water containing battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal

August 12, 2005

sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(26) Unit Name: Clarifier 1B [Unit C-1B].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: This treatment tank receives treated waste liquid from the Reactor Tank TK-5 unit to settle out solids. The treated waste liquid is transferred to the Sand Filter Feed Tank, TK-4-IT unit via above-ground pipes.

Physical Description: The cylindrical section of the stainless steel tank is 12 feet in diameter and 9.5 feet in height. The conical section measures 12 feet in diameter at the top and 9.5 feet in height.

Maximum Capacity: 10,716 gallons.

Waste Source: TK-5.

Waste Type: Waste water containing battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(27) Unit Name: Clarifier 2A [Unit C-2A].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

August 12, 2005

Activity Description: This treatment tank receives treated waste liquid from the Reactor Tank TK-5 unit via above-ground pipe to settle out solids. Treated waste liquid is transferred to Sand Filter Feed Tank TK-4-IT unit via above-ground pipe.

Physical Description: The cylindrical section of the stainless steel tank is 12 feet in diameter and 9.5 feet in height. The conical section measures 12 feet in diameter at the top and 9.5 feet in height.

Maximum Capacity: 10,716 gallons.

Waste Source: TK-5.

Waste Type: Waste water containing battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium), D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH ≤ 2), 792 (liquid with pH ≤ 2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

(28) Unit Name: Clarifier 2B [Unit C-2B].

Location: Wastewater Treatment Plant.

Activity Type: Waste Treatment.

Operation/Status: Operational/Active.

Activity Description: This treatment tank receives treated waste liquid from the Reactor Tank TK-17 unit and settles out the solids. Treated waste liquid is transferred to the TK-12-TT Filter Press unit, via above-ground pipe.

Physical Description: The cylindrical section of the stainless steel tank is 12 feet in diameter and 9.5 feet in height. The conical section measures 12 feet in diameter at the top and 9.5 feet in height.

Maximum Capacity: 10,716 gallons.

Waste Source: TK-5.

Waste Type: Waste water containing battery acid. Waste constituents may include dissolved or suspended metallic lead, lead oxide, lead sulphate, casing material particulates with adhered lead, lead oxide, and lead sulphate, and casing material

August 12, 2005

combustion products. The metallic waste constituents may include varying concentrations of antimony, arsenic, barium, cadmium, chromium, lead, mercury, selenium, and zinc.

RCRA Hazardous Waste Number: D002 (corrosive waste), D004 (arsenic), D005 (barium) D006 (cadmium), D007 (chromium), D008 (lead acid batteries and lead compounds), D009 (mercury), D010 (selenium), K069 (emission control dust/sludge from lead smelter). Non-RCRA codes include; 132 (aqueous solution with metals), 171 (metal sludge), 172 (metal dust), 591 (baghouse waste), 721 (liquid with arsenic), 722 (liquid with cadmium), 723 (liquid with chromium), 724 (liquid with lead), 725 (liquid with mercury), 726 (liquid with selenium), 791 (liquid with pH  $\leq$  2), 792 (liquid with pH  $\leq$  2 with metals).

Air Emission Standards Subpart CC: This unit of the Facility is not subject to California Code of Regulations, title 22, chapter 14, article 28.5. The unit has a waste water exemption.

## PART IV. GENERAL CONDITIONS

### A. PERMIT APPLICATION DOCUMENTS

1. The permit application documents consist of the revised Part "A" Application dated December 22, 1999, the revised four-volume Part "B" Application entitled "Quemetco Inc., City of Industry, CA-RCRA Part B Application" dated October 1997, and the further revisions dated December 22, 1999, and April 27, 2001, hereafter referred to as "Operation Plan"; the "Post-closure Plan for the Surface Impoundment at Quemetco, Inc., City of Industry", dated March 24, 2000.

### B. EFFECT OF PERMIT

1. General
  - a. The Permittee shall comply with the provisions of Division 20 of the California Health and Safety Code (H&SC), and Division 4.5 of Title 22, California Code of Regulations (Title 22, CCR). No specific reference or citation used in this Permit shall be construed as excluding compliance with any other provision of California Code of Regulations, title 22, division 4.5. 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, at the Federal, State and local levels under all applicable laws, 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. By the issuance of this Permit, the permit application documents identified in Section A above are hereby approved subject to the conditions of this Permit. These permit application documents and any subsequent revisions thereto, subject to the permit modification requirements contained in California Code of Regulations, title 22, sections 66270.41 and 66270.42, are made part of this Permit by this reference.
  - c. The Permittee is permitted to store and treat hazardous waste and to perform post-closure care activities in accordance with the conditions of this Permit. Any treatment or storage of hazardous waste, or any post-closure care activities not specifically authorized in this Permit

August 12, 2005

is strictly prohibited. In the event of any conflict between this Permit and the Operation Plan referenced herein, the more stringent provisions, as determined by DTSC, shall control.

- d. 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.
- e. 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 of the permitted Facility.
- f. Failure to comply with any term or condition set forth in this Part of the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action and penalties pursuant to Health and Safety Code, section 25187 (H&SC, §25187).
- g. 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 the Permit. [Title 22, CCR, §66270.43].
- h. This Permit includes and incorporates by reference any conditions of Waste Discharge Requirements (WDRs) adopted 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.

## 2. Land Disposal Requirements

- a. The Permittee shall comply with applicable provisions of the land disposal restrictions provided in California Code of Regulations, chapter 18, and chapter 14, section 66264.73 (b)(16).

## C. *TERM OF PERMIT*

This Permit shall have a term of ten years from the effective date of the Permit, subject to a five-year review by DTSC. At the end of the first five years, DTSC will review the permitted operations to assure that the facility continues to comply with applicable requirements.

## D. *ENVIRONMENTAL MONITORING AND RESPONSE PROGRAMS*

The following environmental monitoring and response program requirements apply to the closed Surface Impoundment, former Waste Piles, and the Miscellaneous units.

### 1. Air Monitoring

- a. The Permittee shall establish an air monitoring and response program (AMRP) for the closed Surface Impoundment, the former Waste Piles, the Containment Building, the Reverberating Furnace, and the Slag Reduction Furnace. [Title 22, CCR, §66270.14(c)(6)(B), §66264.701(a), §66264.601 and §66264.602]
- b. The Permittee shall, within one hundred twenty (120) calendar days of the effective date of this Permit, submit to DTSC, an AMRP, in accordance with subsection (a) above to DTSC, for

August 12, 2005

review and approval. This AMRP shall include additional airborne particulate monitoring stations, as necessary, and shall incorporate sampling procedures and analytical protocols in accordance with the requirements of California Code of Regulations, title 22, sections 66264.600 et seq. and 66264.700 et seq. This AMRP shall be in addition to, and shall include, the sampling requirements-of the Permittee's Title V and September 30, 1999, (RECLAIM)) Facility Air Permits and all subsequent revisions thereto. The AMRP, any conditions of approval, and subsequent revisions to the AMRP shall be included as an exhibit to section 15.4 of the Operation Plan. [Title 22, CCR, §66264.601, §66264.701(a) and §66270.14(c)(6)(B)]

- c. The Permittee shall comply with the requirements of the local air district and any regulations subsequently promulgated by DTSC consistent with Title 40, Code of Federal Regulations, Part 264, Subpart CC.
  - d. If the Permittee or DTSC determines that any element of the AMRP does not satisfy the requirements of the California Code of Regulations, title 22, sections 66264.601, *et seq.* or 66264.700 et seq., the Permittee shall submit appropriate revisions to the AMRP for DTSC's review and approval within ninety (90) calendar days of notification to or by DTSC in accordance with the permit modification procedures in California Code of Regulations, title 22, sections 66270.41 and 66270.42.
2. Groundwater Monitoring
- a. Background
    - (1) The sporadic and historic detections of groundwater contamination at the closed surface impoundment unit are believed to have resulted from past practices of using an asphalt-lined impoundment to store storm water run-off and acidic waste water from facility operations such as truck washing. The surface impoundment unit was closed by removing most contaminated soils and by placing compacted backfill and topping by a concrete cover.
    - (2) Facility investigations over the years have identified hazardous constituents in the ground water underlying the Facility in certain areas. Site characterization work, performed pursuant to a January 4, 1988 Consent Decree entered into with the United States Environmental Protection Agency (U.S. EPA) and companion Administrative Consent Order entered into with the Department of Health Services (DHS), has progressed to a point where the Facility has been investigated to some extent.
    - (3) California Code of Regulations, title 22, section 66270.14(c)(4)(B) requires that the contamination in ground water in each plume of contamination be identified in terms of the extent, constituents, and maximum concentrations of each constituent. On-going study has provided data regarding the extent, constituents, and concentrations of constituents within historic contaminant plumes. Information on rates of plume movement within the shallow groundwater units have been developed from these data. These data have been presented in a number of documents, including the "RCRA Facility Assessment, Quemetco Inc., City of Industry, California", dated September 30, 1987, prepared by A.T. Kearney, Inc.; and "Comprehensive Ground Water Monitoring Evaluation Report, Quemetco Inc., RSR Corporation, City of Industry, California", dated March 8, 1996, prepared by DTSC.
    - (4) The direction and rate of contaminant migration appears to be dependent upon the fluvial lithology. Ground water and dissolved contaminants appear to move preferentially along permeable fluvial units and be at least partially constrained by finer-grained interbeds.

August 12, 2005

The hydrogeology, especially the nature of the shallow portion of the aquifer, has not been adequately characterized within the vicinity of the regulated units.

The San Jose Creek subdrain also appears to influence ground water and dissolved contaminant migration, at least within a few hundred feet of the channel.

b. General Monitoring and Response Program Requirements

- (1) The Permittee submitted the "Phase II Groundwater Monitoring Plan for the Quemetco Facility" (GMP) to the U.S. EPA and DTSC on September 16, 1999 and, based on approval conditions dated July 10, 2000 by DTSC, re-submitted the Phase II GMP on August 10, 2000, as the "Groundwater Quality Monitoring and Sampling Plan" (GWQMSP) that proposed wells, frequency of sampling, and analytical parameters to establish background levels for groundwater quality. This GWQMSP did not satisfy the recommendations of the March 8, 1996 Comprehensive Monitoring Evaluation (CME), DTSC's conditions of approval, nor the California Code of Regulations, title 22, chapter 14, article 6.
- (2) The Permittee shall, within one hundred twenty (120) calendar days after the effective date of this Permit, revise Exhibit 6.1-1 to the Operation Plan to include the specific conditions of Part IV.D.2 of this Permit in a Groundwater Monitoring and Response Plan (GWMRP) and submit it to DTSC for review and approval. The GWMRP shall incorporate the applicable requirements of California Code of Regulations, title 22, chapter 14, article 6. At a minimum, it shall provide the following: the methodologies for well and piezometer construction, including design, drilling, materials and installation, well development, and well decommissioning; statistical methodologies; sample acquisition, preservation, transport, chain-of-custody, water level measurement, well purging, and analytical methodologies; quality assurance and quality control; and, specific reporting, constituent, sampling and analysis, and monitoring well requirements identified in DTSC's March 8, 1996 CME inspection report. The Permittee shall comply with this Permit and the August 10, 2000 GWQMSP (excluding GWQMSP discussions on well decommissioning) until the GWMRP is approved by DTSC. If conflicts exist between the Permit and GWQMSP, the Permit shall govern. [Title 22, CCR, §66264.91(b), §66264.97(b), §66270.14(b)(6) and (7), §66270.14(b)(19), §66270.32(b)(2)]
- (3) The Permittee shall, within two hundred seventy (270) calendar days after the effective date of this Permit, submit a report containing detailed cross-sections utilizing data from wells specified in this Permit and the GWQMSP in addition to other hydrogeological data. This report shall specifically address the adequacy of existing wells to monitor horizontal and vertical flow and contaminant migration in the fluvial units. If the report suggests the existing wells are not adequate, the Permittee shall make appropriate modifications to the GWMRP within sixty (60) calendar days of DTSC's written approval of the report. [Title 22, CCR, §66270.14(b)(19) and §66270.32(b)(2)]
- (4) The Permittee shall establish adequate background groundwater monitoring. There are not sufficient groundwater wells in background locations to calculate statistically valid background concentrations for most monitoring parameters and constituents of concern. This Permit contains conditions in Part IV.D.2.c that require calculation and submittal of background groundwater quality concentrations of naturally occurring constituents. [Title 22, CCR, §66264.97(b)(1)(A)]

c. Background Groundwater Monitoring

August 12, 2005

Background: The Permittee's August 10, 2000, GWQMSP described the monitoring well locations for background groundwater monitoring: MW-2/MW-2A (shallow zone) and MW-10 (lower zone). Because of uncertainties in groundwater flow direction, contaminant sources, and possible variations in some inorganic monitoring parameters at these wells, which may be based upon lithology variations, other wells are needed to augment the required background monitoring. Therefore, at least two new background wells (one for the closed Surface Impoundment and one for the former Waste Pile) shall be utilized for background groundwater monitoring. [Title 22, CCR, §66264.97(b)(1)]

The closed Surface Impoundment and former Waste Pile units are currently under detection and evaluation monitoring. The GWPS used to monitor the units for statistically significant evidence of release(s) and changes in water quality requires the use, in part, of background concentrations.

- (1) The Permittee shall implement the background groundwater monitoring program utilizing, initially, wells MW-2 (shallow zone) and MW-10 (lower zone) until DTSC approves an updated program. Within one hundred twenty (120) calendar days after the installation of wells described in Part IV.D.2.g of this Permit, the Permittee shall provide a report on lithologic-based variations in non-organic monitoring parameters in the background and other wells and a work plan and schedule, if necessary, to construct or otherwise provide supplemental monitoring wells at appropriate locations to achieve a statistically valid background groundwater monitoring program. The Permittee shall also select at least two new background wells (one for the closed Surface Impoundment and one for the former Waste Pile) from those wells described in footnotes contained in Part IV.D.2.g of this Permit within one hundred twenty (120) calendar days after the wells are installed unless otherwise directed by DTSC. [Title 22, CCR, §66264.97(b)(1)(A)]
- (2) The Permittee shall sample and analyze all background groundwater monitoring wells on a quarterly schedule in accordance with the GWMRP. Sample parameters and constituents to be analyzed, and analytical methods, shall be in accordance with Part IV.D.2.c(4) of this Permit. [Title 22, CCR, §66264.97(e)(4) and (13)]
- (3) The Permittee shall record and report data in accordance with the GWMRP. Laboratory detection limits for applicable organic and inorganic parameters shall be defined as those identified in California Code of Regulations, title 22, division 4, chapter 15, articles 4 and 5.5. For parameters not listed in these articles, the Permittee shall adhere to protocol specified for specific analytical methods prescribed in U.S. EPA Test Methods for Evaluating Solid Waste, SW-846, Third Edition, July 2002 and any subsequent updates. [Title 22, CCR, §66264.97(e)(5)]
- (4) The Permittee shall sample all background groundwater monitoring wells specified in Part IV.D.2.c(1) of this Permit and analyze them for all constituents of concern including the following indicator parameters and constituents which shall be incorporated into the GWMRP. [Title 22, CCR, §66264.97(e)]:

---

August 12, 2005

Indicator Parameters	EPA Method
dissolved oxygen, field	360.1
pH, field	150.1
specific conductance (EC), field	120.1
temperature, field	170.1
turbidity, field	180.1
total dissolved solids (TDS)	160.1

Volatile Organic Compounds (EPA Method 8260B) Reporting at least:	
acetone	1,1-dichloroethene (DCE)
benzene	cis-1,2-DCE
bromodichloromethane	trans-1,2-DCE
bromoform	dichloropropane
bromomethane	1,2-dichloropropane
carbon tetrachloride	cis-1,3-dichloropropene
chloroethane	trans-1,3-dichloropropene
chlorobenzene	2-hexanone
chloroform	methylene chloride
2-chloroethylvinyl ether	1,1,2,2-tetrachloroethane
chloromethane	tetrachloroethene (PCE)
dibromochloromethane	1,1,1-trichloroethane (TCA)
o-dichlorobenzene (DCB)	1,1,2-TCA
trans-1,4-dichloro-2-butene	trichloroethene (TCE)
1,1-dichloroethane (DCA)	toluene
1,2-DCA	vinyl chloride

Inorganics			
Constituents	EPA Method	Constituents	EPA Method
antimony	6010B	mercury	7470
arsenic	6010B	nickel	6010B
barium	6010B	nitrate (as N)	300.0
cadmium	6010B	potassium	6010B
calcium	6010B	selenium	6010B
chloride	300.0	silver	6010B
chromium	6010B	sodium	6010B
copper	6010B	sulfate	300.0
iron	6010B	sulfide	376.2
lead	6010B	tin	6010B
magnesium	6010B	zinc	6010B
manganese	6010B		

(5) The Permittee may use alternate analytical methods to analyze parameters and constituents that achieve equal or lower detection limits, provided that the Permittee

notifies DTSC prior to using the new methods, and highlights new methods the first time results are presented in reports.

- (6) The Permittee shall prepare background groundwater concentration calculations and results for all inorganic monitoring parameters and constituents of concern using data available from the wells designated for background in Part IV.D.2.c(1) of this Permit. This information shall be included in the GWMRP and submitted to DTSC within one hundred twenty (120) calendar days after the effective date of this Permit and updated as necessary thereafter. [Title 22, CCR, §66264.97(e)(10)]
- (7) The Permittee shall perform data analyses and determine background groundwater quality in accordance with the GWMRP. [Title 22, CCR, §66264.97(e)(10) and (11)]
  - (a) If the Permittee determines that a background groundwater monitoring well is producing samples that contain constituents not expected to be found in the background ground water, or contains constituents that are at concentrations not expected to be found in background ground water, the Permittee shall notify DTSC by certified mail within seven (7) calendar days.
  - (b) If the deviation from background is repeated, the Permittee shall, within ninety (90) calendar days, submit to DTSC an application for a permit modification to revise the background groundwater monitoring program in accordance with the permit modification procedures in California Code of Regulations, title 22, section 66270.42.
    - (A) Wells exhibiting repeated deviations shall be deleted from the background groundwater monitoring program and suitable replacements shall be installed after approval by DTSC.
    - (B) Data from wells deleted from the background groundwater monitoring program shall be deleted from the calculations of background groundwater quality, and the background concentrations shall be re-calculated.
    - (C) The Permittee shall submit proposed revisions to the background groundwater monitoring system, and proposed background concentrations to DTSC, and obtain written approval prior to implementing the revisions.

d. Groundwater Protection Standards and Concentration Limits

The groundwater protection standard (GWPS) shall consist of the list of constituents of concern (COCs) [Title 22, CCR, 66264.93], concentration limits [Title 22, CCR, 66264.94], the points of compliance (POCs) and all monitoring points [Title 22, CCR, §66264.92 and §66264.95]

e. Constituents of Concern (COCs)

- (1) The COCs shall include, but not be limited to, the list of constituents provided in Table IV.D.2-a below and the Volatile Organic Compounds listed in Part IV.D.2.c(4) of this Permit shall.

Table IV.D.2-a
----------------

August 12, 2005

Constituents of Concern	
Antimony	Magnesium
Arsenic	Manganese
Barium	Mercury
Cadmium	Nitrate
Chloride	Selenium
Chromium	Silver
Copper	Sulphate
Iron	Tin
Lead	Zinc

- (2) The Permittee shall also include in the list of COCs, any appropriate constituents provided in Appendix VIII of the California Code of Regulations, title 22, division 4.5, chapter 11, article 5 to ensure that the COC list is comprehensive. The following shall also be considered COCs: (i) any constituent associated with the hazardous wastes types listed in Part IV.D.2.e(3) of this Permit; and (ii) constituents which have been observed as a result of quarterly, annual, and Appendix IX groundwater monitoring (unless the Permittee demonstrates to the satisfaction of DTSC that the constituent is not reasonably expected to be in or derived from the waste in the regulated units). [Title 22, CCR, §66264.93 and §66264.99(e)(6)]
- (3) The Permittee shall also include in the list of COCs, constituents from the various hazardous waste types in Table IV.D.2-b that the Permittee may have discharged/stored at the regulated units when they were active. The list of COCs shall also include the various combustion products of the various battery casing types burned in the furnaces. ). [Title 22, CCR, §66264.93 and §66264.99(e)(6)]

Table IV.D.2-b Hazardous Waste Types	
Acid Solution w/Metals Aqueous Solution w/Metals Organics	Metal Dust Oil Solvent, Halogenated Solvent, Hydrocarbon

- (4) Within thirty (30) calendar days after the effective date of this Permit, the Permittee shall revise section 4.0 (Water Quality Protection Standards) of Exhibit 6.1-1 of the Operation Plan to reflect all the COCs as described above. [Title 22, CCR, §66264.93 and §66264.99(e)(6)]

f. Concentration Limits

- (1) For each COC, the Permittee shall propose either a concentration limit not to exceed the background value of that constituent, or the concentration limit for that constituent will be equal to the background value of that constituent. [Title 22, CCR, §66264.94(a)]

g. Point of Compliance (POC)

- (1) The POC is defined as a vertical surface, located at the hydraulic downgradient limit of the waste management area that extends through the uppermost aquifer underlying the

regulated unit. It is specified for the Lower Zone of the aquifer for the closed Surface Impoundment unit and represents one location where groundwater monitoring is used to evaluate compliance with the Ground Water Protection Standard (GWPS) defined in California Code of Regulations, title 22, section 66264.92. [Title 22, CCR, §66264.95]

- (2) The Permittee shall, within thirty (30) calendar days after the effective date of this Permit, submit a schedule for providing sufficient Cone Penetrometer Test (CPT) or continuous/semi-continuous core data to evaluate the fluvial hydrostratigraphy associated with the regulated units. [Title 22, CCR, §66264.97(b)(1)(B)(3)]
- (3) Groundwater monitoring wells that define the location of the POC shall be:

Table IV.D.2-c Existing and New Monitoring Wells	
Closed Surface Impoundment	
[Shallow Zone] Insufficient wells and uncertain flow direction and saturated conditions. See footnote <sup>a</sup>	[Lower Zone] MW-11 MW-12 MW-13
Former Waste Pile	
Insufficient wells and uncertain flow direction. See footnote <sup>b</sup>	

[Title 22, CCR, §66264.95(a)]

<sup>a</sup> New wells MW-16, MW-17, and MW-18 shall be installed within sixty (60) calendar days after DTSC's approval of the Permittee's well installation workplan that specifies the location, design, and installation method for each well. Wells MW-16, MW-17, and MW-18 shall be installed at the west, south, and southeast edges respectively of the closed Surface Impoundment. Within ninety (90) calendar days after the effective date of this Permit, the Permittee shall submit this workplan to DTSC for review and approval. Shallow Zone POC wells and background well(s) shall then be selected from wells MW-5, MW-16, MW-17, and MW-18 based upon flow direction. The Permittee shall make this selection within one hundred twenty (120) calendar days after the wells are installed unless otherwise directed by DTSC.

<sup>b</sup> New wells MW-19, MW-20, and MW-21 shall be installed within sixty (60) calendar days after DTSC's approval of the Permittee's workplan that specifies the location, design, and installation method for each well. Wells MW-19, MW-20, and MW-21 shall be installed along the northwest, northeast, and southeast sides respectively of the former Waste Pile. Within ninety (90) calendar days after the effective date of this Permit, the Permittee shall submit this workplan to DTSC for review and approval. Depending on site conditions encountered during well installation, Shallow and/or Lower Zone wells shall be installed. POC wells and background well(s) shall then be selected from wells MW-19, MW-20, and MW-21 and possibly MW-9. The Permittee shall make this selection within one hundred twenty (120) calendar days after the wells are installed unless otherwise directed by DTSC. Well MW-21 may not need to be installed if wells MW-9, MW-19, and MW-20 can establish an adequate monitoring program for the former Waste Pile unit. The workplan should contain provisions and a schedule for omitting or installing well MW-21. DTSC will make the final determination whether well MW-21 should be omitted.

August 12, 2005

h. Compliance Period

- (1) The compliance period for the groundwater monitoring and response program shall be the post-closure care period specified in Part V.C.1.b of this Permit. [Title 22, CCR, §66264.117(b)(1), §66264.117(b)(2)(B), §66264.96(a), §66270.32(a), (b)(1) and (b)(2)]
- (2) The compliance period for the groundwater monitoring and response program will be periodically reviewed by DTSC and adjusted as DTSC determines necessary to protect human health and the environment. [Title 22, CCR, §66264.96(a), §66264.117(b)(2)(B), and §66270.32(b)(1) and (2)]

i. Detection Monitoring

For each monitoring point, the Permittee is required to determine whether there is statistically significant evidence of new release(s) to ground water from the closed Surface Impoundment. [Title 22 CCR 66264.98(g) and (i)] Lead remains in place in soils underlying the closed Surface Impoundment unit at concentrations which met health-risk based closure standards, but may threaten discharge to ground water under some conditions. Detection monitoring wells shall be incorporated into the GWMRP and sampled and statistically evaluated on a quarterly schedule. [Title 22, CCR, §66264.98, and §66264.98(g) and (i)]

- (1) Detection monitoring wells shall be:

Table IV.D.2-d Existing Detection Monitoring Wells	
["Shallow Zone"] MW-2 <sup>a</sup> MW-5 <sup>a</sup>	["Lower Zone"] MW-10 <sup>a</sup> MW-11 MW-12 MW-13

<sup>a</sup> Wells MW-2, MW-5, and MW-10 are temporary background and POC wells until new wells are selected for the closed Surface Impoundment and former Waste Pile [see Part IV.D.2.c(1) and Part IV.D.2.g(3)]. [Title 22, CCR, §66264.98(a), (b) and (g)]

- (2) The Permittee shall compare data collected at detection monitoring points with the background water quality data in accordance with Part IV.D.2.b(2) of this Permit. [Title 22, CCR, §66264.98(i)(1)]
- (3) The Permittee shall implement quarterly detection monitoring for all parameters and constituents cited in Part IV.D.2.c(4) of this Permit. [Title 22, CCR, 66264.98(e)]
- (4) The Permittee shall annually monitor all detection monitoring wells for all COCs and determine whether there is statistically significant evidence of a new release(s) for any COC. [Title 22, CCR, §66264.98(g)]
- (5) The Permittee shall determine whether there is statistically significant evidence of a new release(s) within thirty (30) calendar days of receiving analytical data from the laboratory. [Title 22, CCR, §66264.98(i)(2)]
- (6) Whenever the Permittee determines that, pursuant to California Code of Regulations, title 22, section 66264.98(g) or (i), there is statistically significant evidence of a release from the regulated units for any monitoring parameter or COC at a detection monitoring point,

August 12, 2005

the Permittee shall notify DTSC by certified mail within seven (7) calendar days of such determination. [Title 22, CCR, §66264.98(j)(1)]

j. Evaluation Monitoring

Groundwater evaluation monitoring is being performed to identify any presence of historic releases documented in the Facility's data base (e.g., lead, chromium, cadmium, and mercury previously detected in groundwater above Maximum Contaminant Levels). Wells downgradient of existing POC wells are required to make this assessment. The Permittee shall comply with the requirements specified in California Code of Regulations, title 22, section 66264.99.

- (1) Evaluation monitoring wells MW-22 and MW-23 shall be installed within sixty (60) calendar days after DTSC's approval of the Permittee's workplan that specifies the location, design, and installation method for each well. Lower Zone Wells MW-22 and MW-23 shall be installed off-site and down-gradient of wells MW-12 and MW-13. Within ninety (90) calendar days after the effective date of this Permit, the Permittee shall submit this workplan to DTSC for review and approval. [Title 22, CCR, §66270.14(b)(19), and §66270.32(b)(2)]
- (2) The Permittee shall implement quarterly evaluation monitoring for all parameters and constituents cited in Part IV.D.2.c(4) of this Permit in accordance with procedures presented in Part IV.D.2.b(2) of this Permit. [Title 22, CCR, §66264.99(e)]

k. Water Level Monitoring

- (1) Water level monitoring at the Facility shall be performed in all wells each quarter. [Title 22, CCR, §66264.91(b)]
- (2) The Permittee shall monitor water levels in accordance with the GWMRP. [Title 22, CCR, §66264.91(b)]
- (3) The Permittee shall monitor water levels in each new well or piezometer at least weekly, until water level recovery can be established, then quarterly thereafter. [Title 22, CCR, §66264.91(b)]
- (4) The Permittee shall submit a hydrograph (water elevations plotted through time) for each new well or piezometer demonstrating water-level recovery with the next scheduled monitoring report following the determination that water levels have recovered. [Title 22, CCR, §66264.91(b)]
- (5) The Permittee shall include quarterly groundwater elevation contour maps in the annual groundwater monitoring report due to DTSC on March 1 of each calendar year. [Title 22, CCR, §66264.97(e)(15)]
  - (a) The quarterly groundwater elevation contour maps shall include data from all non-pumping wells and piezometers. [Title 22, CCR, §66264.91(b)]
  - (b) Groundwater contour maps shall include arrows indicating the direction(s) of groundwater flow. [Title 22, CCR, §66264.91(b)]

l. Well Construction, Development, and Decommissioning

August 12, 2005

- (1) The Permittee shall drill and construct all monitoring wells, extraction wells and piezometers using applicable protocols contained in Department of Water Resources, U.S. EPA, and DTSC guidance documents. These applicable protocols shall be incorporated into the GWMRP in accordance with Part IV.D.2.b(2) of this Permit. All technical submittals and/or reports shall be signed by a registered professional as appropriate to the technical requirements of the work and the Business and Professions Code. [Title 22, CCR, §66270.14(b)(19) and §66264.97(e)(4), (5), (6), and (7), §66270.31(a), and §66270.32(a), (b)(1) and (b)(2)]
- (2) The Permittee shall submit all field activity logs, lithologic logs, geophysical logs, video logs, and monitoring well, extraction well, and piezometer construction details to DTSC within thirty (30) calendar days after construction of any system or series of monitoring wells or piezometers. Monitoring well or piezometer development time shall not be construed as part of the construction time and shall not be used to extend the thirty (30) calendar-day limit for reporting.  
[Title 22, CCR, §66264.97(e)(1) and (e)(2), §66270.14(c)(5), (7)(E), and (8)(D), and §66270.32(a), (b)(1) and (b)(2)]
- (3) The Permittee shall adequately develop each new groundwater monitoring well, extraction well and piezometer. [Title 22, CCR, §66264.97(b)(7), §66270.31(a), and §66270.32(a), (b)(1) and (b)(2)]
- (4) At a minimum, the Permittee shall demonstrate the proper functioning of each new groundwater monitoring well by:
  - (a) Ensuring that field parameters stabilize during well development; and,
  - (b) Ensuring that an initial round of sampling and analyses indicate that water quality parameters or constituents have not been impacted by well materials, construction, or development.  
[Title 22, CCR, §66264.97(b)(1) and (7), §66270.31(a) and (b), §66270.32(a), (b)(1), and (b)(2)]
- (5) The Permittee shall submit records of groundwater monitoring well development, for each new well installed, to DTSC within thirty (30) calendar days after completion of the well development for that system or series of wells. [Title 22, CCR, §66264.97(e)(16), §66270.31(c), and §66270.32(a), (b)(1) and (b)(2)]
- (6) If the Permittee or DTSC determines that a groundwater monitoring well or piezometer is no longer capable of yielding representative groundwater samples or groundwater piezometric measurements, the Permittee shall construct replacement wells and piezometers to adequately monitor the appropriate water-bearing zone.
  - (a) The Permittee shall decommission any well or piezometer in accordance with the protocols required in Part IV.D.2.l(1) of this Permit. [Title 22, CCR, §66270.31(c) and §66270.32(a) and (b)(2)]
  - (b) The Permittee shall certify well or piezometer decommissioning, for each device decommissioned, within sixty (60) calendar days after any system or series of devices is decommissioned. The certification shall include, at a minimum, the description of the failure, rationale for the decommissioning method, and if appropriate, a discussion of methods or changes in methods needed to prevent recurrence of the respective

type of failure. [Title 22, CCR, §66264.97(b)(4), (5), (6), and (7), §66270.31(a) and (c), and §66270.32(a) and (b)(2)]

(c) Except under conditions described in subsection (d) below, the Permittee shall not decommission any well or piezometer without prior written approval from DTSC. When proposing to decommission wells or piezometers, the Permittee shall provide written notice to DTSC that includes, at a minimum, the well or piezometer number, the reason(s) for the proposed decommissioning, and the proposed method of decommissioning in accordance with Part IV.D.2.1(1) of this Permit. [Title 22, CCR, §66270.31(a) and §66270.32(a) and (b)]

(d) The Permittee shall immediately decommission, in accordance with this Permit, any well or piezometer, under construction or completed, that the Permittee or DTSC determines to be improperly constructed or otherwise failing to seal all but the intended sampling interval or in any other way determined to be a pathway for contaminant migration. The Permittee shall not implement decommissioning plans until after receiving written and/or verbal approval from DTSC. [Title 22, CCR, §66264.97(b)(1), §66270.31(a), and §66270.32(a), (b)(1) and (b)(2)]  
[Title 22, CCR, §66270.31(c) and §66270.32(a) and (b)(2)]

m. Groundwater Monitoring System Maintenance

(1) Groundwater monitoring system maintenance shall be a scheduled activity, performed as preventive maintenance to ensure proper operation of all equipment and documentation of all inspections, repairs and modifications.  
[Title 22, CCR, §66264.91(b), §66270.30(e), §66270.31(a), and §66270.32(b)(2)]

(2) The Permittee shall maintain all monitoring wells and piezometers that are monitored pursuant to this Permit in good working condition.  
[Title 22, CCR, §66270.30(e), §66270.31(a), and §66270.32(a), (b)(1), and (b)(2)]

(3) The Permittee shall implement a preventive maintenance program that includes, but is not limited to, the following:

(a) Annual inspection of each well and piezometer to include inspection and documentation of:

- Protective well casing condition
  - Locking mechanism
  - Well labeling
  - Protective concrete pad and traffic barriers, except for traffic vaults
  - Traffic vault water tightness
  - Well-head condition
  - Well survey datum
  - Dedicated pump and/or appurtenances appearance and operation
  - Presence of sheen or immiscible layers
  - Total well depth
  - Other items of interest such as blockages, roots, bends in the casing
  - Work orders for deficiencies
  - Completion or correction of deficiencies
  - Comparison of measured total depth to as-built total depth
- [Title 22, CCR, §66270.30(e), §66270.31(a), and §66270.32(a), (b)(1), and (b)(2)]

(b) Well and piezometer maintenance schedules and logs shall be available for DTSC review at the Facility. [Title 22, CCR, §66270.30(h)]

n. Submittals, Reporting, and Record-keeping

- (1) The Permittee shall comply with applicable submittal, notice and other reporting, evaluation, and modification requirements of the California Code of Regulations, title 22, sections 66264.98(k), (l), and (m), 66264.99(h) and (i), and 66264.100(i) and (j). [Title 22, CCR, §66264.98(l) and (m), §66264.99(h) and (i), §66264.100 (i) and (j), §66270.32(b)(2), §66270.41, §66270.42, and title 22, CCR, chapter 20, Appendix I]
- (2) The Permittee shall submit all documentation required in Part IV.D.2 of this Permit in accordance with the following schedule (the first of these reports will become due for the first full quarter after the effective date of this Permit):

Samples Collected or Data Developed During the Quarter	All Summaries, Statistical Analyses, Interpretations, Logs and Data are Due to DTSC by the Following
January - March April - June July - September October - December	May 15 August 15 November 15 March 1 (include with annual report)

- (3) The Permittee shall submit an annual groundwater monitoring report by March 1 of each calendar year. [Title 22, CCR, §66265.97(e)(17)]
- (4) The Permittee shall notify DTSC in writing of any statistically significant evidence of a release from the regulated unit within seven (7) calendar days of the determination. [Title 22, CCR, §66264.98(j) and §66264.99(e)(6)]
- (5) The Permittee shall submit copies of all correspondence, findings, notifications, proposals, reports, or plans required by any other regulatory agency, concerning ground water, vadose zone, or surface water, to DTSC at the same time as the submittal is required to be sent to the respective regulatory agency. [Title 22, CCR, §66270.32(b)(1) and (2)]
- (6) The Permittee shall record and maintain all ground water, vadose zone, and surface water data obtained, in the Operating Record, in accordance with Part IV.D of this Permit. Documents or drawings not readily entered into the Operating Record or that would produce poor copies upon retrieval from the Operating Record must be referenced in the Operating Record and stored at the Facility in a manner that preserves the documents and allows retrieval. [Title 22, CCR, §66270.97(e)(16)]
- (7) The Permittee shall maintain groundwater monitoring and related records for the entire post-closure care period. [Title 22, CCR, §66270.30(j)(2)]

August 12, 2005

**3. Vadose Zone Monitoring [Soil-pore Liquid]****a. Background**

California Code of Regulations, title 22, section 66264.97(d) requires the Permittee to establish an unsaturated (vadose) zone monitoring system for each regulated unit. California Code of Regulations, title 22, section 66270.14(c)(6)(B) requires the Permittee to establish detection monitoring programs for all media, including soil-pore liquid and soil-pore gas. Based on the nature of the constituents-of-concern, and the potential for remobilization of residual vadose zone contamination pore-fluid monitoring shall be applicable at the closed Surface Impoundment and former Waste Pile units.

**b. General Monitoring Requirements**

- (1) Soil-pore liquid monitoring in the vadose zone is generally performed to provide detection monitoring of dissolved-phase and free liquid-phase releases from a regulated unit for earliest possible detection of a release and for data to evaluate changes in water quality due to a release. Historic releases have been determined to have occurred from the regulated units at the Facility and resultant water quality changes have been observed. Residual contamination exists in the vadose zone beneath the caps.
- (2) The Permittee shall establish a soil-pore liquid monitoring and response program for the closed Surface Impoundment and Waste Pile units. [Title 22, CCR, §66264.97(d) and §66270.14(c)(6)(B), and §66270.32(b)(2) ]
- (3) The Permittee shall, within ninety (90) calendar days-of the effective date of this Permit, submit to DTSC, a SPLMRP, in accordance with subsection (a) above, for review and approval. This SPLMRP shall include monitoring stations, as necessary, and shall incorporate monitoring and sampling procedures and analytical protocols in accordance with the requirements of California Code of Regulations, title 22, sections 66264.90 et seq. and 66264.600 et seq. The Permittee must also provide soil-pore liquid monitoring in accordance with the SPLMRP. The SPLMRP, any conditions of DTSC's approval, and subsequent revisions to the SPLMRP shall be included in Exhibit 1.8 of the Operation Plan. [Title 22, CCR, §66264.91(b), §66264.97(d), §66264.601, §66264.602, and §66270.14(c)(6)(B)]
- (4) If the Permittee or DTSC determines that the existing program does not satisfy the requirements of California Code of Regulations, title 22, sections 66264.97, 66264.98, 66264.99, or 66264.100, the Permittee shall, follow the applicable submittal, notice and other reporting, evaluation, and modification requirements in California Code of Regulations, title 22, sections 66264.98(k), (l) and (m), 66264.99(h) and (i), and 66264.100(i) and (j). In the event that the Permittee makes the determination, the Permittee shall notify DTSC by certified mail within seven (7) calendar days of such determination. [Title 22, CCR, §66264.98(l) and (m), §66264.99(h) and (i), §66264.100 (i) and (j), §66270.32(b)(2), §66270.42, and chapter 20, Appendix I]

**4. Vadose Zone Monitoring [Soil-pore-gas]****a. Background**

California Code of Regulations, title 22, section 66270.14(c)(6)(B) requires the Permittee to establish detection monitoring programs for all media, including soil-pore liquid and soil-pore gas. California Code of Regulations, title 22, section 66264.701(a) requires the Permittee to conduct a monitoring and response program for soil-pore gas for the

August 12, 2005

regulated units. Volatile organic compounds were reported in soil samples obtained during closure of the Surface Impoundment and the Permittee has not demonstrated that these releases did not come from the regulated unit

b. General Monitoring Requirements

- (1) The Permittee shall establish a soil-pore gas monitoring and response program (SPGMRP). The soil-pore gas at the closed Surface Impoundment unit is subject to detection monitoring. [Title 22, CCR, §66264.701(a), §66270.14(c)(6)(B), and §66270.32(b)(2) ]
- (2) The Permittee shall, within one hundred eighty (180) calendar days after the effective date of this Permit, submit to DTSC, a SPGMRP, in accordance with subsection (a) above, for review and approval. This SPGMRP shall include nested soil gas monitoring probes, as necessary, and shall incorporate sampling procedures and analytical protocols in accordance with the requirements of California Code of Regulations, title 22, section 66264.700 et seq. The SPGMRP, any conditions of DTSC's approval, and subsequent revisions to the SPGMRP shall be included as an exhibit to section 1.8 of the Operation Plan. [Title 22, CCR, §66264.701(a), §66270.14(c)(6)(B) and §66270.32(b)(2)]
- (3) If the Permittee determines that the existing program does not satisfy the requirements of California Code of Regulations, title 22, section 700 et seq., the Permittee shall follow the applicable submittal, notice and other reporting, evaluation, and modification requirements in California Code of Regulations, title 22, sections 66264.706(d) and (e), 66264.707(c), (d), (e) and (f), and 66264.708(h) at a minimum. [Title 22, CCR, §66264.706(d) and (e), §66264.707(c), (d), (e) and (f), §66264.708(h), and §66270.32(b)(2)]
- (4) Within ninety (90) calendar days after DTSC determines that a constituent of hazardous waste has migrated from a regulated unit, the Permittee shall submit a work plan to obtain samples of soil and determine how far and to what depth those constituents have migrated. [Title 22, CCR, §66264.707(g) and §66270.32(b)(2)]

5. Surface-water Monitoring

a. Background

- (1) California Code of Regulations, title 22, section 66264.97(c) requires the Permittee to establish a monitoring program for each surface water body that could be affected by a release from a regulated unit. California Code of Regulations, title 22, section 66270.14(c)(6)(B) requires the Permittee to establish detection monitoring programs for all media, including surface water. California Code of Regulations, title 22, section 66264.601 requires that appropriate environmental monitoring, such as for surface water, be performed for miscellaneous units. San Jose Creek, which is permanently channelized, is immediately adjacent to the Facility.
- (2) The Statewide General Industrial Activities Storm Water Discharge Permit (IASWDP) requirements under the State Water Resources Control Board (SWRCB) are not sufficient to meet the purposes of the surface-water monitoring requirements of this Part of the Permit.

b. General Monitoring Requirements

- (1) The Permittee shall, within thirty (30) calendar days of the effective date of this Permit, include the Facility's IASWDP in Exhibit 1.8 of the Operation Plan.

August 12, 2005

- (2) The Facility's IASWDP and all subsequent revisions, adopted by the State Water Resources Control Board, are hereby incorporated by reference into the environmental monitoring requirements of this Part of the Permit. [Title 22, CCR, §66270.32 (b)(2)]
- (3) The Permittee shall, within sixty (60) calendar days of the effective date of this Permit, attach a copy of the IASWDP and all subsequent revisions thereto into a new Exhibit to Section 15.4 of the Operation Plan. [Title 22, CCR, §66264.91(b) and §66270.32(b)(2)]
- (4) The Permittee shall, within one hundred twenty (120) calendar days of the effective date of this Permit, submit a Surface Water Monitoring and Response Plan (SWMRP) to DTSC, which shall incorporate the requirements of California Code of Regulations, title 22, sections 66264.97, 66264.98, 66264.99, and 66264.100. The SWQMRP shall be included as a new Exhibit to section 15.4 of the Operation Plan. Elements of the monitoring and sampling program shall include sample acquisition, preservation, transport, chain-of-custody, analysis methodologies, and reporting requirements. [Title 22, CCR, §66264.91(a)]
- (5) The Permittee shall, within ninety (90) calendar days of the effective date of this Permit, submit to DTSC a topographic map of the Facility with contour interval of 5-foot. [Title 22, CCR, §66270.32 (b)(2)]
- (6) Based on this topographic map, and any other appropriate information, the Permittee shall include in the SWQMRP appropriate monitoring points for surface water that accurately represent any flow of surface water across the perimeter of the Facility. [Title 22, CCR, §66270.32 (b)(2)]
- (7) The Permittee shall include in the SWQMRP appropriate sampling and analytical methods for surface water that accurately measure the concentration of each COC and the concentration or value of each monitoring parameter. [Title 22, CCR, §66264.91(b)]
- (8) If the Permittee or DTSC determines that any element of the SWQMRP does not satisfy the requirements of the California Code of Regulations, title 22, sections 66264.97, 66264.98, 66264.99, or 66264.100, the Permittee shall, at a minimum, follow the applicable submittal, notice and other reporting, evaluation, and modification requirements in California Code of Regulations, title 22, sections 66264.98(k), (l) and (m), 66264.99(h) and (i), and 66264.100(i) and (j). In the event that the Permittee makes the determination, the Permittee shall notify DTSC by certified mail within seven (7) calendar days of such determination. [Title 22, CCR, §66264.98(l) and (m), §66264.99(h) and (i), §66264.100 (i) and (j), §66270.32(b)(2), §66270.42, and chapter 20, Appendix I]

**E. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)**

An environmental impact report (EIR) has been prepared in accordance with the requirements of Public Resources Code Section 21000 et seq. and the CEQA Guidelines, Section 15070 et seq. of California Code of Regulations, title 14.

**F. FINANCIAL RESPONSIBILITY**

1. Cost Estimate for Operating Units Closure and Land Disposal Units Post-closure Care

August 12, 2005

- a. The Permittee's most recent operating unit's closure and land disposal unit's post-closure care cost estimates, prepared in accordance with California Code of Regulations, title 22, sections 66264.142 and 66264.144 are specified in the Operation Plan.
  - b. The Permittee shall, during the post-closure period specified in this permit, prepare new operating unit closure and post-closure cost estimates whenever a change in the Operation Plan increases the cost of closure or post-closure care, as required by California Code of Regulations, title 22, sections 66264.142(c) and 66264.144(c); or if changes made in accordance with compliance conditions in Part V.D of this Permit increase the cost of closure or post-closure.
  - c. The Permittee shall prepare an additional cost estimate to include the cost of performing the Corrective Measures Implementation. The Permittee shall submit the new estimate within one hundred twenty (120) calendar days of the effective date of the permit modification imposing the corrective measures remedy.
2. Financial Assurance for Operating Unit's Closure and Land Disposal Unit's Post-closure Care
- a. Closure Financial Assurance
    - (1) The Permittee shall demonstrate to DTSC compliance with applicable sections of California Code of Regulations, title 22, section 66264.145, by providing documentation of financial assurance for closure of operating and unclosed units in at least the amount of the cost estimates required in Part IV.F.1.a of this Permit.
    - (2) The Permittee, whenever the current closure cost estimate increases to an amount greater than the face amount of the policy during the closure period specified in this Permit, shall, within sixty (60) calendar days after the increase, either cause the face amount to be increased to an amount at least equal to the current closure cost estimate and submit evidence of such increase to DTSC, or obtain other financial assurance as specified in California Code of Regulations, title 22, article 8 to cover this increase. Whenever the current closure cost estimate decreases during the closure period, the face amount may be reduced to the amount of the current post-closure cost estimate following written approval by DTSC.
  - b. Post-closure Financial Assurance
    - (1) The Permittee shall demonstrate to DTSC compliance with applicable sections of California Code of Regulations, title 22, section 66264.145, by providing documentation of financial assurance in at least the amount of the cost estimates required in Part IV.F.1.a of this Permit.
    - (2) The Permittee may request reimbursements for post-closure care activities by submitting itemized request for partial release of financial assurance to DTSC. Within sixty (60) calendar days after receiving itemized expenditures for post-closure care activities, DTSC shall instruct the insurer to make reimbursements in those amounts as DTSC specifies in writing, based on DTSC's evaluation of the following criteria: (a) the post-closure care expenditures are in accordance with the approved post-closure plan or otherwise justified; (b) DTSC will review the annual report prepared by the Permittee and certified by an independent registered engineer documenting the post-closure care work performed and providing an updated post-closure cost estimate as specified in Part IV.F.1 of this Permit; (c) adequacy of the post-closure funds specified in the policy to cover the next year's estimated post-closure costs.

**PART V. SPECIAL CONDITIONS APPLICABLE TO UNITS LISTED UNDER PART III OF THIS PERMIT**

*A. SPECIAL CONDITIONS APPLICABLE TO THE OPERATING UNITS*

1. Waste Water Treatment Conditions

The Permittee shall conduct operations and maintenance of the Waste Water Treatment system in accordance with Section 4.2 (Tanks) of the Operation Plan.

- a. The mixing and blending of potentially incompatible materials and wastes is prohibited. [Title 22, CCR, §66270.32 (b)(2)]
- b. Hazardous wastes or treatment reagents shall not be placed in the treatment process or equipment if they may cause the treatment process or equipment to rupture, leak, corrode, or otherwise fail before the end of its intended life. [Title 22, CCR, §66270.32 (b)(2)]
- c. Hazardous waste shall not be placed in an unwashed container or tank that previously held an incompatible waste or material. [Title 22, CCR, §66270.32 (b)(2)]
- d. Any treated effluent which fails to meet the discharge criteria set by the Los Angeles County Sanitation Districts ("LACSD") in Industrial Wastewater Discharge Permit No. 3467 R-3 (Exhibit 1.8-3 of the Operation Plan) and any subsequent permits, for discharge, shall be recycled through the treatment plant until the discharge criteria are met. If the discharge criteria cannot be met, the effluent shall be managed as hazardous waste. [Title 22, CCR, §66270.32 (b)(2)]

2. Storage in Containers

a. Compatibility of Waste with Containers

- (1) The Permittee shall use container(s) made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. [Title 22, CCR, §66270.32 (b)(2)]

b. Containment

- (1) Each hazardous waste storage area containing wastes regulated under this permit shall have a base which is free of cracks or gaps and is sufficiently impervious to the waste stored and shall be designed and constructed so that any spills can be contained. [Title 22, CCR, §66264.175(d) and §66270.32 (b)(2)]
- (2) In addition to the requirements of item (1) above, the containment system shall be constructed so that surface water run-off is contained and surface water run-on is excluded. The containment system shall have sufficient capacity to contain ten percent of the volume of containers or the volume of the largest container, whichever is greater. Outdoor containment areas must also contain precipitation from a 24-hour, 25-year storm. [Title 22, CCR, §66264.175(d) and §66270.32 (b)(2)]

August 12, 2005

- (3) Spills, leaks, and precipitation shall be promptly removed from the containment area to prevent overflow. [Title 22, CCR, §66264.175(d)(1) and §66270.32(b)(1) and (2)]
- (4) Stored containers of incompatible hazardous waste shall be separated from the other materials or shall be protected from them by physical barriers such as berms, dikes, walls, or other device to ensure that commingling of incompatible hazardous wastes cannot occur, pursuant to California Code of Regulations, title 22, section 66264.177(c).

### 3. Analysis of Waste

- a. Upon the effective date of this Permit, the Permittee shall follow the written waste analysis plan as described in the Operation Plan. The analytical results shall be included in the annual report required by California Code of Regulations, title 22, section 66264.75.
- b. The analyses in the approved waste analysis plan shall be repeated, as necessary, to ensure that they are accurate and up-to-date.
- c. The Permittee shall verify the waste analysis plan as part of the quality assurance program. This quality assurance program will be in accordance with current U.S. EPA practices (Test Methods for Evaluating Solid Wastes: Physical/Chemical Methods SW-846, 3rd edition) or equivalent methods approved by DTSC; and, at a minimum, ensure that the Permittee maintains properly functional instruments; uses approved sampling, and analytical methods; assures the validity of sampling and analytical procedures; and, performs correct calculations.
- d. Samples taken for the purpose of monitoring shall be representative of the monitored activity.
- e. The Permittee shall retain records of all monitoring information, collected pursuant to any U.S. EPA-, DHS-, and DTSC-issued permits, as part of the operating record until closure of the Waste Water Treatment unit.
- f. Records of monitoring information shall include:
  - (1) The date, exact place, and time of sampling or measurement (including sample ID number);
  - (2) The individual(s) who performed the sampling or measurements;
  - (3) The date(s) analyses were performed;
  - (4) The individual(s) who performed the analyses;
  - (5) The analytical techniques or methods used (including quantitation limits);
  - (6) The results of such analyses (specifying units);
  - (7) The description(s) of disposal of collected water samples after analysis; and,
  - (8) The CAS number.
- g. The Permittee shall assure that laboratory work done for the purpose of monitoring and reporting required by this Permit in monitoring for the Waste Water Treatment unit shall be

August 12, 2005

performed by a laboratory certified by the State of California's Department of Health Services Environmental Laboratory Accreditation Program (ELAP). If the Permittee wishes to use its own laboratory, it must obtain certification pursuant to Health and Safety Code, chapter 6.5, division 20, article 8.5.

- h. The Permittee shall, within ninety (90) calendar days after the effective date of this Permit, revise Section 2.3.1 and Exhibit 2.3.1 of the Operation Plan to include all applicable state and federal waste codes.
  - i. The Permittee shall, within thirty (30) calendar days after the effective date of this Permit, revise Table 3.1.1 of section 3.0 (Waste Analysis Plan) to include the additional waste codes cited in Part III of this Permit.
4. Inspections
- a. The Permittee shall inspect the waste water treatment units for malfunctions and deterioration, operator errors, and discharges which may cause or may lead to the release of hazardous waste constituents to the environment or a threat to human health. The Permittee shall conduct these inspections often enough to identify problems in time to correct them before any problem harms human health or the environment. [Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]
  - b. The Permittee shall inspect all monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment (such as dikes and pumps) that are important to preventing, detecting, or responding to the environmental or human health hazards in accordance with the written inspection schedule in the Operation Plan. [Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]
  - c. The Permittee shall test and maintain all safety and emergency equipment (alarm systems, fire protection equipment, spill control equipment, decontamination equipment), as necessary, to ensure proper operation in the event of an emergency. [Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]
  - d. The Permittee shall inspect the tank systems in accordance with the written inspection schedule in the Operation Plan:
    - (1) Discharge and overfilling control equipment, at least once each operating day, to ensure that it is in good working order;
    - (2) Data gathered from monitoring equipment (described in exhibit 8.5-1 of the Operation Plan), at least once each operating day, to ensure that the tank is being operated according to its design;
    - (3) The level of waste in the tank, at least once each operating day, to ensure compliance with the Operation Plan;
    - (1) The construction materials of and the area immediately surrounding the tank, at least weekly, to detect corrosion or leaking of fixtures or seams. [Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]
  - e. The Permittee shall inspect in accordance with the written inspection schedule of the Operation Plan:

August 12, 2005

- (1) Treatment process equipment, at least weekly, to ensure that it is in good working order;
  - (2) Process and operations monitoring equipment (described in Exhibit 8.5-1 of the Operation Plan), at least once each operating day, to ensure that the treatment process or equipment is being operated according to its design;
  - (3) The construction materials of the treatment process or equipment, at least weekly, to detect corrosion or leaking of fixtures or seams; and
  - (4) The construction materials of, and the area immediately surrounding discharge confinement structures, at least weekly, to detect obvious signs of leakage.  
[Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]
- f. The Permittee shall remedy any functional deterioration or malfunction of equipment or structures related to the ability of the Waste Water Treatment System to safely and effectively treat wastewater that the inspection identifies as soon as possible to ensure that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred which may or does threaten human health and the environment, remedial action shall be taken immediately as described in the contingency plan.  
[Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]
- g. The Permittee shall record inspections in an inspection log or summary and shall keep these records for at least three years from the date of inspection.  
[Title 22, CCR, §6264.15(b), §66264.195, and §66270.32(b)(1) and (2)]
- h. The Permittee shall assure that at least once every two (2) years, or as specifically recommended in writing by the tank manufacturer, all tanks shall undergo an internal inspection to verify the integrity of the tank shell and of the internal coating or lining.
5. Ancillary Sumps and Piping
- a. The Permittee shall, for all portions of piping systems which are underground and are used to collect and/or convey hazardous waste, either install secondary containment and leak detection systems or replace all buried piping within one (1) year after the effective date of this Permit with above-ground piping. The California Code of Regulations, title 22, section 66264.193(f) requires that all ancillary equipment be provided with secondary containment that meets the requirements of the California Code of Regulations, title 22, sections 66264.193(b) and (c). Within one hundred twenty (120) calendar days of the effective date of this Permit, the Permittee shall submit a work plan and schedule to replace any underground piping and sumps/tanks which lack secondary containment.  
[Title 22, CCR, §66264.193, §66264.195, and §66270.32(b)(1) and (2)]
  - b. The Permittee shall visually inspect any aboveground portions of the piping systems which have no secondary containment for leaks on a daily basis in accordance with California Code of Regulations, title 22, section 66264.193(f). The California Code of Regulations, title 22, section 66264.195(b) requires inspections at least once each operating day of the above-ground portions of the tank systems, data from the leak detection systems, and construction materials and area immediately surrounding the tank systems. [Title 22, CCR, §66264.195 and §66270.32(b)(1) and (2)]

August 12, 2005

- c. The Permittee shall perform soil-pore-liquid monitoring of the below-ground portions of the pipelines until secondary containment is provided for them in order to detect a release of hazardous waste within 24 hours or at the earliest practicable time. Within sixty (60) calendar days of the effective date of this Permit, the Permittee shall submit a work plan and schedule to provide the required monitoring. [Title 22, CCR, §66264.195 and 66270.32(b)(1) and (2)]

#### 6. Seismicity

- a. The Permittee shall, within one hundred eighty (180) calendar days after the approval of the workplan required in Part V.C.2(f)(1) of this Permit, revise Section 2.3.1 and Exhibit 2.3.1 of the Operation Plan to meet requirements of California Code of Regulations, title 22, section 66270.14. Submittal of the 1999 revised California Division of Mines and Geology Special Publication 42, currently Exhibit 2.3.1, is not sufficient to treat seismic considerations. The revision to the Operation Plan shall utilize the technical report required in Part V.C.2(f)(2) of this Permit and the site analysis required in Part V.A.7.b of this Permit. [Title 22, CCR, §66270.32 (b)(2)]
- b. The Permittee shall conduct a site analysis that demonstrates that there is no fault within 200 feet from portions of the Facility where transfer, treatment, storage, or disposal of hazardous waste will be conducted. The Handorf fault reportedly lies near the 3000-foot radial boundary [California Code of Regulations, title 22, section 66270.14(b)(11)(A)(1) ] and there seems to be some evidence that this may be a Holocene fault. [Title 22, CCR, §66270.14(b)(11)(A)(2) and §66270.32 (b)(2)]
- c. The Permittee shall include the site analysis, required in Part V.A.7.b of this Permit and the technical work plan and report required in Part V.C.2(f)(1) and (2) of this Permit. [Title 22, CCR, §66270.32 (b)(2)]

### ***B. SPECIAL CONDITIONS APPLICABLE TO THE MISCELLANEOUS UNITS (CONTAINMENT BUILDING AND FURNACES)***

#### 1. Furnaces

- a. The Permittee shall operate, monitor, and maintain the furnace units as miscellaneous units in accordance with California Code of Regulations, title 22, section 66264.600 *et seq.* And in accordance with the following special conditions:
- b. The Permittee shall assure that air emissions from the furnace units , at a minimum, meet the criteria set by the South Coast Air Quality Management District (SCAQMD) in the December 7, 2001, Title V Permit to Operate (Exhibit 1.8-2 of the Operation Plan) and any subsequent permits. [Title 22, CCR, §66270.32(b)(2)]
- c. The Permittee shall not use the furnace units to process any plastic or rubber material that has been separated from the metal battery components. The Permittee may use the furnace units to process any plastic or rubber material that is not separable from the metal battery components. [Title 22, CCR, §66264.601]
- d. The Permittee shall comply with the environmental monitoring requirements of Part IV.1 of this Permit. [Title 22, CCR, §66264.601]

August 12, 2005

- e. If deemed necessary for the protection of the environment or public health, and to the extent applicable, DTSC may modify this Permit to impose additional terms, conditions or limitations regarding air emissions or environmental monitoring requirements, or impose additional requirements of California Code of Regulations, title 22, articles 9 through 15 and articles 27, 28, and 28.5 of chapter 14, chapter 20, 40 CFR Part 146, and article 5.5 of chapter 6.5 of division 20 of Health and Safety Code (commencing with section 25100). [Title 22, CCR, §66264.343(c) and §66264.601]
- f. The Permittee shall, within thirty (30) calendar days of the effective date of this Permit, revise the Operation Plan to include the Rotary Kiln in Exhibit 13.1-1. Section 1.9.6.1 of the June 9, 2000, Operation Plan describes the Rotary Kiln, but Exhibit 13.1-1 which provides the authorized unit descriptions, does not include the Rotary Kiln. [Title 22, CCR, §66270.32(b)(2)]
- g. The Permittee shall, within thirty (30) calendar days of the effective date of this Permit, revise section 1.9 of the "Operation Plan" to indicate that no additional plastic or rubber (plastic or rubber separated in the Sink/Float unit) may be placed in the Reverberatory Furnace unit. [Title 22, CCR, §66264.601 and §66270.32(b)(2)]

## 2. Monitoring

- a. The Permittee shall ensure that monitoring complies with California Code of Regulations, title 22, sections 66264.15, 66264.33, 66264.75, 66264.76, 66264.77, and 66264.601 as well as any additional requirements needed to protect human health and the environment as specified in this Permit. [Title 22, CCR, §66264.602]
- b. The Permittee shall ensure that monitoring addresses the full spectrum of protection of human health and the environment which includes, but is not limited to:
  - (1) Prevention of any release that may have adverse effects on human health and the environment due to the migration of waste constituents, hazardous constituents, or reaction products, in the air, considering a number of factors, such as the potential for emission of gases, aerosols, and particulates, etc. [Title 22, CCR, §66264.601(c)]
  - (2) Prevention of any release that may have adverse effects on human health and the environment due to the migration of waste constituents, hazardous constituents, or reaction products, in surface water, or wetlands, or on the soil surface, considering a number of factors, such as the proximity of the unit to surface water and potential for damage to wildlife by exposure to COCs, etc.. [Title 22, CCR, §66264.601(b)]
  - (3) Prevention of any release that may have adverse effects on human health and the environment due to the migration of waste constituents, hazardous constituents, or reaction products, in the ground water or subsurface environment, considering a number of factors, such as the potential for deposition or migration into subsurface physical structures. [Title 22, CCR, §66264.601(a)]
- c. The Permittee shall comply with the California Code of Regulations, title 22, section 66264.601 requirements for environmental performance standards and shall provide an AMRP, as specified in Part IV.D.1. c. [Title 22, CCR, §66264.602]
- d. The Permittee shall, within one hundred eighty (180) calendar days after the effective date of this Permit, revise Section 6.0 and Exhibit 1.8 of the Operation Plan to include a separate section providing protocols for the AMRP to assure that air monitoring produces

August 12, 2005

representative samples of suspended and deposited airborne waste constituents. [Title 22, CCR, §66264.601 and §66270.32(b)(2)]

3. Inspections

The Permittee shall comply with the California Code of Regulations, title 22, section 66264.75 requirements and include the monitoring and response program data in each year's Annual Report to be submitted each March 1. [Title 22, CCR, §66264.602]

4. Testing and Monitoring of Equipment

The Permittee shall comply with the California Code of Regulations, title 22, section 66264.33 requirements for testing and monitoring of equipment for the miscellaneous units. [Title 22, CCR, §66264.602]

5. Reports

The Permittee shall comply with the California Code of Regulations, title 22, section 66264.77 requirements for additional reports to be submitted with respect to the miscellaneous units. [Title 22, CCR, §66264.602]

C. *SPECIAL CONDITIONS APPLICABLE TO THE POST-CLOSURE CARE REGULATED UNITS*

1. Post-closure Care General Requirements

- a. The Permittee shall comply with the post-closure care requirements of this Permit. The closed Surface Impoundment unit was issued a certification of completion of closure by DTSC on June 28, 1995, which certified that closure was completed on December 13, 1994. Although the Permittee met the soil clean-up requirements established by U.S. EPA for the closure plan, ground water underlying the closed surface impoundment was shown to be contaminated by lead. Moreover, lead contamination below the clean-up levels established extended to ground water. Therefore, the closure certification was not for clean closure and post-closure care of the closed Surface Impoundment was required under the California Code of Regulations, title 22, sections 66270.1(c)(5) and (6). A post-closure permit application was requested on June 10, 1998. The Permittee submitted the application dated March 24, 2000. The former Waste Piles were accommodated under Interim Measures by the U.S. EPA. However, ground water at these former units appears to have been contaminated by lead. The California Code of Regulations, title 22, section 66264.90(a) defines surface impoundments, waste piles, land treatment units, or landfills as regulated units. Post-closure care for the regulated units and requirements for the Operating units have been combined into this Permit. [Title 22, CCR, §66270.14(b)(11)(A)(2) and §66270.32 (a), (b)(1) and (b)(2)]
- b. The Permittee shall conduct the post-closure care listed in Parts IV and V.C of this Permit for the regulated units. This care will continue for thirty (30) years after the date of completion of closure. The 30-year post-closure care period may be shortened upon application and demonstration approved by DTSC that the closed Surface Impoundment unit is secure, or may be extended by DTSC if it finds this is necessary to protect human health and the environment, as specified under the California Code of Regulations, title 22, section 66264.117. [Title 22, CCR, §66264.117(b)(1) and (b)(2)(B), §66270.14(b)(11)(A)(2), §66270.32 (a), (b)(1) and (b)(2), and §66270.50(d)]

August 12, 2005

- c. The Permittee shall, as part of post-closure care, conduct groundwater monitoring as specified in Part IV.D.2 of this Permit. [Title 22, CCR, §66264.90 *et seq.* and §66270.32 (b)(2)]
- d. The Permittee shall maintain the integrity and effectiveness of the final cover, including making repairs to the cap, as necessary, to correct the effects of settling, subsidence, erosion, storms, droughts and other events, pursuant to the California Code of Regulations, title 22, section 66264.310(b)(1). The integrity of the cap must be such as to prevent the downward entry of water into the "regulated units" throughout a period of 100 years, pursuant to the California Code of Regulations, title 22, section 66264.310(a)(1). [Title 22, CCR, §66264.310(a)(1), §66270.32 (a) and (b)(1) and (b)(2), and §66270.50(d)]
- e. The Permittee shall prevent run-on and run-off from eroding or otherwise damaging the final cover of all "regulated units", pursuant to the California Code of Regulations, title 22, section 66264.310(b)(4).
- f. The Permittee shall not allow any use of the "regulated units" described in Part III.B.3 of this Permit which will disturb the integrity of the final cover, any components of the environmental control (containment) systems, or the function of the "regulated unit's" monitoring systems during the post-closure care period. The Permittee shall provide to DTSC for review and approval, a technical report demonstrating that any use(s) proposed for the "regulated units" will meet the requirements of this Part of the Permit. The report shall be provided to DTSC at least one hundred and twenty (120) calendar days before such use is proposed to be initiated. [Title 22, CCR, §66264.117(d) and (f), §66270.32 (b)(2)]
- g. The Permittee shall conduct all post-closure care activities in accordance with the provisions of the Post-closure Plan described in the Operation Plan. [Title 22, CCR, §66264.117(e)]
- h. The Permittee shall mark all cracks and erosion in the cap in the field and repaired within twenty (20) calendar days, or before the next rainstorm, whichever occurs first. In the event of ponding, the Permittee shall eliminate standing water on the cover within forty-eight (48) hours after the end of the storm, and adjust the drainage within twenty (20) calendar days or before the next rainstorm, whichever occurs first. [Title 22, CCR, §66264.228(r), §66264.310(c) and (d), §66270.30(l)(6)(a), and 66270.32(b)(2)]
- i. The Permittee shall ensure that the "Qualified Person" discussed in the Operation Plan shall be an independent, qualified person, registered in California as a professional engineer or certified in California as an engineering geologist. The "Inspection Technician" shall be under the direct supervision of the "qualified person", who shall demonstrate span-of-control and who shall sign-off and approve all repairs. [Title 22, CCR, §66264.228(g)(4)]
- j. The Permittee shall ensure that repairs of the cap related to cracks, and gaps etc., shall be observed and documented by an independent, qualified person, registered in California as a professional engineer or certified in California as an engineering geologist. [Title 22, CCR, §66264.228(g)(4)]

2. Post-closure Care Special Conditions

a. Former Waste Piles and Concrete Sumps

- (1) The Permittee shall, within ninety (90) calendar days after the effective date of this Permit, submit a work plan for DTSC review and approval, to prepare a technical report using all available documentation, historical aerial photography, Sanborne maps, City of Industry Building and Safety Department records, Los Angeles County Sanitation Districts records, and any other data/information necessary, that documents the chronology of locations and uses of all of the former waste piles, former tanks and former concrete sump/tanks within the Facility. Copies of the aerial photographs and other data/information shall be provided with the report. The report is a technical engineering report and shall be prepared by or under the direction of, and shall be certified by, an engineer registered in California and any other registered professional appropriate to the technical requirements of the work. [Title 22, CCR, §66270.14]
- (2) The Permittee shall, within ninety (90) calendar days after written DTSC approval of the technical report in Part V.C.2(a)(1)-of this permit, revise section 11.0 of the Operation Plan and submit the revision to DTSC for review and approval. The revision shall provide for post-closure care for the former waste piles and former concrete sumps.  
[Title 22, CCR, §66270.14(b)(19)]

b. Rainfall Run-on and Run-off Controls

- (1) The Permittee shall, within ninety (90) calendar days after the effective date of this Permit, submit to DTSC for review and approval, a description of how the actual particulate accumulation in drainage facilities will be monitored and cleaned out as part of the drainage system maintenance. [Title 22, CCR, §66270.14(b)(19), §66264.32(a), (b)(1) and (b)(2)]
- (2) The Permittee shall, within sixty (60) calendar days after the effective date of this Permit, revise section 11.0 of the Operation Plan and submit the revision to DTSC for review and approval. The revision shall provide for inspection of the major drainage system components bi-weekly (every other week) during those periods of the rainy season (October 15 - April 15) which have had rain in the preceding two-week period and the next calendar day after every individual storm of 1.0 inch or more in twenty-four (24) hours. The inspection schedule plan shall list all elements of the drainage system, potential problems that each element shall be checked for, frequency of inspection, and the manner in which each item shall be inspected. [Title 22, CCR, §66270.14(b)(19), §66264.32(a), (b)(1) and (b)(2)]
- (3) The Permittee shall, within one hundred eighty (180) calendar days after the effective date of this Permit, submit a report for DTSC review and approval on the current and historical effectiveness of run-on/run-off controls from the date of the Surface Impoundment unit closure to the effective date of this Permit. The report must summarize any significant incidents, actions and outcomes relative to run-off from the unit. This is a technical report and shall be signed by a registered professional as appropriate to the technical requirements of the work and the Business and Professions Code. [Title 22, CCR, §66270.14(b)(19), §66264.32(a), (b)(1) and (b)(2)]

c. Seismic

August 12, 2005

- (1) The Permittee shall, within ninety (90) calendar days after the effective date of this Permit, submit a work plan for DTSC review and approval, to prepare a technical report using the most current information and data on the seismic hazards which may affect the integrity and effectiveness of the final cover of the closed Surface Impoundment, storage and treatment units, groundwater monitoring wells, conveyance piping and tanks. The work plan is a technical geological/geophysical report and shall be prepared by or under the direction of, and shall be certified by, a geologist registered in California and any other registered professional appropriate to the technical requirements of the work. [Title 22, CCR, §66270.14(a)] The information provided shall be of such quality as to be acceptable to geologists experienced in identifying and evaluating seismic activity. [Title 22, CCR, §66270.14(b)(11)(A)]
- (2) The Permittee shall, within one hundred and eighty (180) calendar days after the approval of the workplan, submit the technical report for DTSC review and approval. This report shall contain recommendations on actions that may need to be taken to prevent or mitigate any seismic-related hazard---such as surface rupture---from affecting the integrity and effectiveness of the final cover, further technical investigations to refine definition of the hazards---such as development and use of geophysical data and information, and proposed schedule to implement the foregoing. The report is a technical geological/geophysical report and shall be prepared by or under the direction of, and shall be certified by, a geologist registered in California and any other registered professional appropriate to the technical requirements of the work. [Title 22, CCR, §66270.14(a)] The information provided shall be of such quality as to be acceptable to geologists experienced in identifying and evaluating seismic activity. [Title 22, CCR, §66270.14(b)(11)(A)]
- (3) The Permittee shall, within ninety (90) calendar days after approval of the report by DTSC, revise and update Section 2.3-1 (Seismic Information) of the Operation Plan. [Title 22, CCR, §66270.14(b)(19), §66264.32(a), (b)(1) and (b)(2)]

### 3. Permit Modifications

The Permittee must request a permit modification to authorize a change in the Operation Plan. This request must be in accordance with applicable requirements of California Code of Regulations, title 22, section 66270.42, and must include a copy of the proposed amended Post-closure Plan for review and approval by DTSC. The Permittee shall request a permit modification whenever changes in operating plans or facility design affect the Operation Plan or other events occur that affect the Operation Plan. The Permittee must submit a written request for a permit modification at least sixty (60) calendar days prior to the proposed change in facility design or operation, or no later than sixty (60) calendar days after an unexpected event has occurred which has affected the Operation Plan, as required under California Code of Regulations, title 22, sections 66270.4 66264.118(d).

### 4. Certification of Completion of Post-closure Care

No later than sixty (60) calendar days after completion of the established post-closure care period for the hazardous waste disposal unit, the Permittee shall submit to DTSC, by registered mail, a certification that the post-closure care for the hazardous waste disposal unit was performed in accordance with the specifications in the Operation Plan. The certification must be signed by the Permittee and an independent professional engineer, licensed in the State of California. The certification must be prepared in accordance with California Code of Regulations, title 22, section 66270.11(d). Documentation supporting the independent, registered professional engineer's certification must be furnished to

August 12, 2005

DTSC upon request until DTSC releases the Permittee from the financial assurance requirements for post-closure care under California Code of Regulations, title 22, sections 66270.466264.145(j) and 66264.120.

*D. MITIGATION ACTIVITIES REQUIRED UNDER CEQA*

No mitigation measures have been addressed in the Environmental Impact Report:

*E. COMPLIANCE SCHEDULE*

1. Reporting Requirements

The Permittee shall submit reports of compliance or noncompliance with, or any progress reports on, interim or final requirements contained in any compliance schedule of this Permit no later than fourteen (14) calendar days after each scheduled date. [Title 22, CCR, §66270.30(l)(5)]

**PART VI. CORRECTIVE ACTION**

*A. CORRECTIVE ACTION*

The Permittee is required to conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. The Permittee is conducting and shall continue to conduct corrective action at the Facility in accordance with the following: (1) the Consent Decree [CV. 86-6644 RSWL (JRX)], entered into pursuant to the Federal Resource Conservation and Recovery Act ("RCRA"), to which Quemetco Inc. , RSR Corporation, and the U.S. Environmental Protection Agency ("U.S. EPA") are parties and which became effective on January 4, 1988; (2) the Remedial Action Order issued by the Department of Health Services, predecessor agency to DTSC (Document No. HWCA 85/86-005); (3) any Corrective Action Consent Agreement to be entered into between DTSC and the Permittee; and (4) any Enforcement Order for Corrective Action to be issued by DTSC to the Permittee.

*B. BACKGROUND*

This Permit does not terminate, alter, or amend any obligations in any agreement or order to which the Permittee and the U.S. EPA are parties.