



Linda S. Adams
Secretary for
Environmental Protection



Department of Toxic Substances Control

Maureen F. Gorsen, Director
8800 Cal Center Drive
Sacramento, California 95826-3200



Arnold Schwarzenegger
Governor

**RESPONSE TO COMMENTS
HAZARDOUS WASTE FACILITY PERMIT
SAFETY-KLEEN SYSTEMS, INC.
EL MONTE ACCUMULATION CENTER
LOS ANGELES COUNTY
APRIL 2008**

This document is the Department of Toxic Substances Control's (DTSC's) response to comments received on the draft Hazardous Waste Facility Permit for Safety-Kleen Systems, Inc., El Monte Accumulation Center (Safety-Kleen) during the public comment period ending March 31, 2008. DTSC received comments from Mr. Peter Wang of El Monte on February 25, 2008, Mr. and Ms. David and Elizabeth Reyes (Velasco) (E-Mail) on March 3, 2008, and Ms. Nahid Toossi of Safety-Kleen Systems, Inc. on February 19, 2008. No other member of the public or regulatory agencies made any comments.

COMMENT 1

Mr. Wang stated "the hazardous waste storage is too close to the resident area, and in order to avoid the hazardous waste pollution for not influencing the health of the residents, the facility's hazardous waste storage shall be located close to any trash dumping site or far suburb. Let have the pollution as less as possible to the people".

RESPONSE TO COMMENT 1

Although Safety-Kleen is located in a mixed residential, commercial and industrial neighborhood, Safety-Kleen's hazardous waste facility permitted area is located within a controlled environment with entry restrictions, spill control devices and 24-hour monitoring systems. DTSC has reviewed the application and the supporting documentations, and determined that the storage of hazardous wastes at the permitted areas will not significantly increase any risk to human health and/or environment.

Also, Safety-Kleen collects the City of El Monte's hazardous wastes from the generators and later transports the hazardous wastes to their Reedley Recycle Center Facility for recycling. This recycling process will minimize the possibility of illegal dumping in the City of El Monte.

COMMENT 2

Mr. and Ms. David and Elizabeth Reyes (Velasco) stated “although I understand that California Environmental Quality Act (CEQA) evaluates my concern about the possibility of future impacts to human health and environment, I do not believe that disposing these hazardous materials in a residential area near an elementary school is the proper location for this type of disposal. Ms. Velasco also stated that she is terrified knowing that there is a chance that Safety-Kleen’s hazardous wastes could leak or spill because of a major earthquake”.

RESPONSE TO COMMENT 2

Safety-Kleen’s hazardous waste facility permit will only authorize the facility to store hazardous wastes in drums and/or tanks. No disposal of hazardous wastes is authorized by the hazardous waste facility permit.

Also, the possibility of a spill or a leak caused by a major earthquake to the hazardous waste facility permitted areas has already been addressed in the facility’s Operation Plan. DTSC has reviewed the Operation Plan for all the risks associated with major catastrophes including a major earthquake. As a result, DTSC has determined that the storage of hazardous waste in the permitted areas will not significantly increase any risk to the neighboring community. In the case of the major earthquake, all the spilled hazardous wastes will be collected in their respective secondary containments and/or the whole facility containment. The containment for the entire facility will prevent any spills to run-off off the facility boundaries.

COMMENT 3

Ms. Toossi of Safety-Kleen stated ”maximum capacity to Unit 3 should be changed to 19,070 gallons instead of 19,050 gallons as stated in the draft permit.

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RESPONSE TO COMMENT 3

DTSC has changed the permit to reflect the minor capacity change.

COMMENT 4

Ms. Toossi stated “clarify that the capacity for Unit 3 excludes the truck loading/unloading area”.

RESPONSE TO COMMENT 4

DTSC has changed the permit to exclude the truck loading/unloading area in Unit 3.

COMMENT 5

Ms. Toossi stated “under unit-specific conditions for drum storage areas, it has been prohibited to open any drums or containers holding paint thinners, paint waste, used oil, anti freeze or dry cleaning solvents for any purpose. This prohibition must be changed for at least Unit 3 to allow for sampling.

RESPONSE TO COMMENT 5

DTSC reviewed your comment and agrees that the sampling of drums may be a necessary requirement, therefore, the permit is modified to allow opening of the drums for sampling only at Unit 3.