NOTICE OF EXEMPTION

To: Office of Planning and Research
State Clearinghouse
P.O. Box 3044, 1400 Tenth Street, Room 212
Sacramento, CA 95812-3044

From: Department of Toxic Substances Control
N. Calif. Permitting and Corrective Action Branch
8800 Cal Center Drive
Sacramento, CA 95826-3200

Project Title: SK Highland Hazardous Waste Storage Facility, Permit Renewal

Project Location: 7979 Palm Avenue, City of Highland

County: San Bernardino

Project Description:

The Safety-Kleen (SK) Highland Branch is an existing hazardous waste storage facility. The facility's Hazardous Waste Facility Permit was last issued on February 16, 1993. The permit renewal allows the facility to continue operations for the next 10 years.

The SK Highland Branch, which covers 1.8 acres, distributes parts washer solvents and collects waste solvents that are used in a variety of businesses engaged in services such as automotive repair and industrial maintenance. The facility manages wastes received from its customers. These wastes include used parts washer solvent, spent immersion cleaner, dry cleaning wastes, spent antifreeze, waste oil, and paint waste/lacquer thinner. Other wastes stored at the facility include wastes generated by SK and wastes stored on a transfer basis only (stored for less than 10 days).

At the facility, there are two buildings, each covering 1,200 square-feet. One building is used for storage of empty containers, transfer waste and product and equipment storage. The second building houses the administrative offices and is also used for the storage of non-regulated product and containerized hazardous waste. Hazardous wastes container management includes loading, unloading, and storage of hazardous wastes in a permitted container storage room. The containment area occupies approximately 1,100 square feet with a storage capacity of 4,320 gallons. The SK Highland Branch has one 11,000-gallon hazardous waste underground storage tank (UST) and one 12,000-gallon UST for solvent product. Used aqueous solvent is brought to the facility in containers and is taken to the Return and Fill area where drums are opened and the contents poured into drum washer units. The drum washer units are connected to the hazardous waste UST and are equipped with removable upper screens. The screens are designed to remove course solids and metal parts that may come with the returned solvent. The aqueous solvent settles at the bottom of the drum washer units and flows into the UST.

The units are designed with secondary containment should a spill occur. The hazardous waste UST is double-walled and equipped with leak detection systems. The container storage area is equipped with curbs, a concrete floor and trenches to contain any spills and prevent flow of waste to the outside. The drum washers associated with the UST have secondary containment with a capacity of about 1,000 gallons. The permit renewal authorizes the facility to continue storage of hazardous waste in drums/containers and the UST. The permit renewal also allows the facility to bulk non-RCRA hazardous used oil and used antifreeze into drums/containers and into bulk vacuum trucks and vice versa. This bulking operation is limited to small loads of used oil and antifreeze that are picked up from small quantity generators and commercial customers that have less than full truckloads. One or two containers of the bulked waste will be held at the Return and Fill area for less than 24 hours. These operations will occur within existing secondary containment.
No new equipment is needed for the bulking operation.

Name of Public Agency Approving Project: Department of Toxic Substances Control

Name of Person or Agency Carrying Out Project: Safety-Kleen Systems, Inc.

Exemption Status: (check one)

☐ Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
☐ Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
☐ Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
☐ Categorical Exemption: [State type and section number]
☐ Statutory Exemptions: [State code section number]
X General Rule [CCR, Sec. 15061(b)(3)]

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Exemption Title: With Certainty, No Possibility of a Significant Effect

Reasons Why Project is Exempt:

The project is an existing facility and the renewal of the Hazardous Waste Facility Permit will allow the facility to continue operations for the next 10-year term of the permit. The allowed types and volumes of wastes handled and stored will not change. Also, no physical expansion of the facility is proposed. The Hazardous Waste Facility Permit includes a minor change in waste handling, which is to allow bulking of used oil and used antifreeze into one or two containers and to hold the containers at the rinse and fill dock for less than 24 hours. These operations will occur within existing secondary containment.

This project will not result in a significant impact because:

1. Specific procedures have been included in the Operations Plan of the permit that will assure safe storage to minimize the potential for spills and allow efficient response to control any spills. Provisions are also included to assure worker safety during the operations.

2. The integrity of the underground storage tank and piping system and secondary containment structures were inspected and certified by a licensed engineer in California in April 2004.

3. The parts washer solvents at Highland are aqueous-based. The average concentration of volatile organic compounds (VOCs) from 96 aqueous parts washer (APW) samples (taken in 2002-2005) is 0.35 ppm. The maximum annual quantity of APW processed at the Highland facility is 7,000,000 pounds per year or about 27,000 pounds per day. Assuming average VOC content of 0.35 ppm, and conservatively assuming that all VOCs are emitted, a maximum of 0.09 pounds per day of emissions is estimated. This number is the average of VOCs detected in all SK facilities in California that process aqueous-based detergent solution, which is more than the average VOC concentrations for Highland from 2002-2005 (0.28 ppm). The maximum VOC emissions are less than 3 pounds per day (the quantity that if exceeded, the equipment would require an air permit), which meets the exemption in Rule 219(m)(1)(A((ii) of the South Coast Air Quality Management District rules.

4. Regarding surface water, the California Regional Water Quality Control Board does not require any changes to the Stormwater General Permit nor does the proposed project need Waste Discharge Requirements.

5. The City of Highland Planning Department has reviewed the permit renewal project and determined that the facility is currently permitted "by right of zone." Therefore, the facility is consistent with local zoning and no local land use permit will be required. The facility is located in an area zoned for industrial use. The surrounding land uses are industrial and commercial. There are no sensitive receptors in the vicinity of the facility. The closest school is about a mile from the facility.

6. There are no aspects of the Permit Renewal project that would affect the existing transportation system wither at or in the vicinity of the site. The facility operates 15-20 truck routes per day. There is no proposed increase in truck trips as part of the permit renewal. Based on the City of Highland, General Plan and Development Code Update, Environmental Impact Report of September 2005, the Level of Service (LOS) volume to capacity ratio, at the intersection of Palm Avenue and 3rd Street is level "C" for both morning and afternoon traffic. The intersection of Palm Avenue and 5th Street is level "D" for morning and afternoon traffic. Level C is described as "stable operation continues" with a volume to capacity ratio of 0.71 to 0.80. Level D is described as "encompasses a zone of increasing restriction approaching instability" with a volume to capacity ratio of 0.81 to 0.90. Based on the City of Highland's criteria, intersections that operate at LOS "E" or "F" require mitigation to provide acceptable (LOS "D" or better) levels of service. Therefore, none of the routes discussed are known to be impacted or have problem intersections that would result in significant impacts on the continued operation of the Safety Kleen at its authorized volumes.

7. The Highland facility is on the Hazardous Waste and Substances Sites List compiled pursuant to Government Code 65962.5. The facility is listed in the State Water Resources Control Board's Leaking Underground Fuel Tank database. This listing pertains to the former USTs, used in the solvent recycling operations that were removed from service in 1993, in accordance with the site's Partial Closure Plan. SK conducted a Resource Conservation and Recovery Act (RCRA) Facility Investigation (RFI) at the facility in 1994 (Phase I) and in 1996 (Phase II). Groundwater samples taken in 1996-1997 did not contain detectable concentrations of petroleum hydrocarbons as mineral spirits (TPHms) or volatile organic compounds (VOCs).

A soil vapor extraction (SVE) system began in November 1996 to recover TPHms and VOCs from soil. No VOCs were detected in influent samples to the SVE system in February and April 2000, and TPHms were not detected in the influent sample in May 2000.

SK prepared a draft Corrective Measures Study (CMS) Workplan that:

- summarizes the RFI and Corrective Action Measures completed at the Facility,
- provides a proposal for additional subsurface investigation activities to evaluate the effectiveness of previously completed corrective action measures at the Facility,
- describes specific corrective measure technologies and/or alternatives which could potentially be utilized at the Facility to further reduce constituent concentrations and ensure adequate protection of public health and the environment.

DTSC has not yet concurred with this report or approved its conclusions. DTSC will review the draft Workplan for adequacy and evaluate the past corrective action activities for effectiveness.

As a permit condition, Safety-Kleen will enter into a Corrective Action Consent Agreement with DTSC to address any release of hazardous waste from or at the facility. The Corrective Action Consent Agreement will require Safety-Kleen to conduct further investigation and remediation *as* necessary to complete the required corrective action process for the facility.

This permit condition will assure that by the completion of the consent agreement, the past contamination will not result in a potential for significant groundwater impacts or significant threats to human health from surface soil vapor exposure. Based on the 1994-1996 reports and preliminary review of the May 2000 data there are no imminent threats to groundwater or offsite receptors that require immediate action prior to the completion of the work required by consent agreement.

Janice S. Yonekura	Hazardous Substances Scientist	(916) 255-3711
Project Manager Name	Project Manager Title	Phone #
Branch Chief Signature		Date
James M. Pappas, P.E.	Chief, Northern California Permitting and Corrective Action Branch	(916) 255-3574
Branch Chief Name	Branch Chief Title	Phone #

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