



**California Environmental Protection Agency  
Department of Toxic Substances Control**

**HAZARDOUS WASTE FACILITY PERMIT**

Permit Number: 06-SAC-07

Facility Name: Safety-Kleen Systems, Inc.  
2120 South Yale Street  
Santa Ana, California 92704

Owner Name: Safety-Kleen Systems, Inc.  
5400 Legacy Drive, Cluster II, Building 3  
Plano, Texas 75024

Operator Name: Safety-Kleen Systems, Inc.  
5400 Legacy Drive, Cluster II, Building 3  
Plano, Texas 75024

Facility EPA ID Number:  
CAT000613976

Effective Date:  
May 23, 2007

Expiration Date:  
May 23, 2017

Pursuant to Section 25200 of the California Health and Safety Code, this RCRA-equivalent Hazardous Waste Facility Permit is hereby issued to: Safety-Kleen Systems, Inc. for the operation at Santa Ana Branch.

The Issuance of this Permit is subject to the conditions set forth in Attachment A and the revised Part "B" Application (Operation Plan) of February 17, 2006. The Attachment A consists of 16 pages.

//original signed by//

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Raymond Leclerc, P.E.  
Team Leader  
Permit Renewal Team  
Department of Toxic Substances Control  
Date:

**SAFETY-KLEEN SYSTEMS INC.  
SANTA ANA BRANCH  
2120 SOUTH YALE AVENUE  
SANTA ANA, CALIFORNIA  
HAZARDOUS WASTE FACILITY PERMIT  
ATTACHMENT "A"  
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HAZARDOUS WASTE FACILITY PERMIT

**Safety-Kleen Systems, Inc.  
Santa Ana Branch  
2120 South Yale Avenue  
Santa Ana, California**

**PART I. DEFINITIONS**

All terms used in this Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5 and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **"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.
3. **"RCRA"** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. section 6901 et seq.)
4. **"Facility"** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under division 4.5 of title 22 of the California Code of Regulations, hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

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

1. Property Owner

Safety-Kleen Systems, Inc.  
5400 Legacy Drive, Cluster II, Building 3  
Plano, Texas 75024

2. Operator

Safety-Kleen Systems Inc.  
5400 Legacy Drive, Cluster II, Building 3  
Plano, Texas 75024

3. Location

Safety-Kleen, Santa Ana is located at 2120 South Yale Avenue in Santa Ana, Orange County, California (Facility). The Facility occupies approximately 2.5 acres of land. The legal description includes Parcel A which is Parcel 3 of Parcel Map Number 91-186 as shown on a Map filed on December 17, 1993 in Book 272, Page 12 and 13 of Parcel Maps, Records of Orange County, California; and Parcel B which is the easements as contained in the document entitled "Agreement For The Establishment Of Covenants, Conditions And Restrictions And Grant Of Reciprocal Easements" executed by and between Johnston Family Trust and Safety-Kleen Systems, Inc., recorded October 7, 1992 as instrument No. 92-676079 of official records. The Parcel "A" Number is APN 408-124-1.

The Facility is located in a light industrial complex. The closest intersection is Yale Avenue and Warner Avenue. The confined channel of Santa Ana River is on the boundary of the Facility to the west. There is a vacant land to the north. To the east, in the same industrial complex, are other light industrial businesses. The nearest residential building is approximately 3,000 feet east of the Facility. The San Diego Freeway (Interstate 405) is approximately 2 miles south of the Facility. The Facility's site plan is attached as Attachment B.

4. Description

Safety-Kleen began operation in 1968 to provide mineral spirit solvent reclamation and supply service for customers primarily engaged in vehicle repair shops, industrial maintenance, and dry cleaning. The Facility provides parts cleaning services, which involve parts degreasing units, consisting of a sink affixed to the top of a 16- or 30-gallon drum of cleaner solvent. Safety-Kleen is also engaged in providing generators with aqueous corrosive cleaners,

and immersion cleaners (carburetor cleaner) for use in the degreasing units. The units are emptied and the hazardous materials are refilled by the Safety-Kleen truck operators at customer sites, and the trucks transport the used materials back to the Facility. The hazardous waste solvents from the Facility are eventually transported to the Safety-Kleen's Reedley Recycle Center or another permitted facility for recycling, treatment and/or disposal.. The Facility stores and transfers hazardous wastes in drums/containers and tanks as described in Part IV of this Permit.

The Permittee provides the following services which lead to the off-site generation of hazardous waste that the Permittee transports back to the Facility.

1. Petroleum-Based Cleaners (Mineral Spirits)
2. Aqueous-Based Parts Washing Solution
3. Safety-Kleen Immersion or Carburetor Cleaner Service
4. Safety-Kleen Dry Cleaner Service
5. Safety-Kleen Paint Collection Service
6. Safety-Kleen Used Oil Service
7. Safety-Kleen Used Antifreeze/Coolants Service
8. Miscellaneous Containerized Waste Services

5. Facility History

On September 17, 1994, DTSC issued a Hazardous Waste Facility Permit to the Permittee. During the term of the Permit, the Permittee requested modifications to the Permit including the October 13, 1994 changes to the container stacking heights, the March 10, 1995 authorization to handle photographic wastes, the July 7, 1998 change of corporation name, the September 7, 2001 authorization to store paint, thinner and dry cleaning wastes, the February 21, 2002 authorization to store mineral spirits drum washer wastes, the September 5, 2002 replacement of one of the drum washer units, and the June 29, 2005 revisions to the waste analysis plan. The Permit expired on September 17, 2004. The above-mentioned modifications are now part of the DTSC-approved Operation Plan.

6. Facility Size and Type for Fees

The Facility is categorized as a small storage facility for purposes of Health and Safety Code section 25205.19.

### **PART III. GENERAL CONDITIONS**

#### **1. PERMIT APPLICATION DOCUMENTS**

- (a) The Part "A" Application dated March 15, 2004, the revised Part "B" Application (Operation Plan) dated February, 17 2006 are hereby approved by DTSC and made a part of this Permit by reference.

#### **2. EFFECT OF PERMIT**

- (a) The Permittee shall comply with the provisions of the Health and Safety Code, and division 4.5 of California Code of Regulations, title 22. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes or regulations or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to store hazardous wastes in accordance with the conditions of this Permit. Any storage of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) Compliance with the terms of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (d) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (e) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including but not limited to penalties pursuant to Health and Safety Code, section 25187.
- (f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is

grounds for revocation of this Permit (Cal. Code of Regs., title 22, §66270.43).

- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

A CEQA Notice of Exemption has been prepared in accordance with the requirements of Public Resources Code Section 21000 et seq. and the CEQA Guidelines, Section 15301 et seq. of Title 14, California Code of Regulations.

4. ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

#### **PART IV. PERMITTED UNITS AND ACTIVITIES**

##### Unit 1:

Underground Storage Tank and Return and Fill Unit

##### Location:

Western side of the Facility

##### Activity Type:

This Unit is for storage of hazardous waste.

##### Activity Description:

Spent parts washer solvents (mineral spirits) are stored in the Underground Storage Tank. Used oil and anti-freeze held in drums/containers are held up to 24 hours in the Return and Fill Unit for bulking purposes. The Return and Fill Unit is an ancillary unit for the Underground Storage Tank for the purpose of emptying and rinsing drums/containers that hold spent mineral spirits. Drums/containers holding spent mineral spirits are received from Safety-Kleen customers and other Safety-Kleen facilities and unloaded into the Return and Fill Unit. Four above-ground Drum/Container Washers are used to empty and rinse the drums/containers when and after the spent mineral spirits are poured from the drums/containers.

##### Physical Description:

This Unit is comprised of a 12,000-gallon (8' in diameter and 32' long) double-walled steel and fiberglass-coated Underground Storage Tank with double-walled piping connecting it to the Return and Fill Unit.

The Return and Fill Unit includes four above-ground Drum/Container Washers. Each Washer has a capacity of 155 gallons. Two of the Washers process approximately 45 gallons of spent mineral spirits per minute and two process approximately 50 gallons of spent mineral spirits per minute. Each of the four steel-fabricated Washers is 4'9" long, 2'9" wide and 1'10" high.

There is a 155-gallon catch basin in each of the four Washers. The spent mineral spirits are poured from the drum/container into a Washer which is designed to remove coarse solids and metal parts that may come with the spent mineral spirits and to remove any remaining wastes from the drum/container. The liquid mineral spirits flows through a metal screen into the catch basin and then into the Underground Storage Tank. The drum/container is then inverted and placed diagonally over the brushes of

the Washer.

The Washer is turned on and two streams of spent mineral spirits are pumped from the catch basin and sprayed from two nozzles to rinse the drum/container. One nozzle sprays the outside of the drum/container and the other nozzle sprays the inside. There is a 170-gallon pan underneath each Washer that serves as a collection pan for each of the 155-gallon catch basin. After drums/containers are emptied in the Washer, they are situated upside down on top of the standing grills over these collection pans, which are connected to three 5-gallon containers (one container for each pan). These 5-gallon containers are emptied back into the Washer after they are full or at the end of each operating day, whichever comes first. There is a 25' by 39' concrete bermed area on north side of the Return and Fill Unit to capture incidental spills from drums/containers that are to be emptied in the Washers. This secondary containment system holds 1,212 gallons.

Maximum Capacity:

12,000 gallons for the Underground Storage Tank

Waste Types:

Spent Parts Washer Solvents (Mineral Spirits), Used Oil, and Anti-freeze

RCRA Hazardous Waste Codes:

D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, and California Waste Codes Number 133, 134, 211, 213, 221, 222, 223, 241, 342, 343, 352, 491, 741, 751.

Unit Specific Conditions:

1. The Underground Storage Tank shall be recertified for tank system integrity by an independent professional engineer registered in the State of California pursuant to California Code of Regulations, title 22, section 66264.191 no later than March 2, 2010 and every three years thereafter. The latest certification was completed in March 2007.
2. The drums/containers must be "empty" as that term is defined in California Code of Regulations, title 22, section 66261.7(b) before they exit this Unit. Any drum/container that meets the "empty" definition and standard in section 66261.7(b) is no longer subject to hazardous waste regulations.
3. The Permittee may only use the spent mineral spirits from the Washer catch basin to spray and rinse the drums/containers that held spent mineral spirits. The Permittee may further spray or rinse an empty drum/container with virgin or recycled mineral

spirits; on such occasions, the Permittee may deposit the rinsate into the Washer prior to moving the drum from the Unit for refilling.

4. The Permittee shall keep the lid of any of the four Washers tightly closed at all times when the Washer is not in use.

5. The Permittee shall not store spent mineral spirits in the Underground Storage Tank in excess of one year from the date such hazardous waste arrives at the Facility. The Permittee shall not store spent mineral spirits in this Unit, outside the Underground Storage Tank, in excess of 24 hours. The Permittee shall not hold used oil or anti-freeze in the Return and Fill Unit in excess of 24 hours.

Air Emission Standards:

This Unit contains more than 500 ppmw of organic liquids and is subject to the applicable requirements of California Code of Regulations, title 22, chapter 14, article 28.5. Inspections of this Unit are required each operational day.

Unit 2:

Drum/container Storage Area Number 1

Location:

Northern side of the Warehouse Building

Activity Type:

This Unit is for storage of hazardous waste held in drums/containers.

Activity Description:

Storage of hazardous waste held in drums/containers inside a building on a secondary containment area

Physical Description:

Drums/containers holding hazardous waste are stored on pallets within the secondary containment area. The area is 51.5' long by 23.5' wide. The floor is concrete with a chemical-resistant coating surrounded by a 6" wide by 4" high concrete curbing and sump. The containment area occupies approximately 1,080 square feet. The total capacity of the sump is 974 gallons.

Maximum Capacity:

8,600 gallons

Waste Types:

Paint Thinners, Paint Wastes, Used Oil, Anti-Freeze, Immersion Cleaner, Dry Cleaning Solvents, Spent Parts Washer Solvents (Mineral Spirits), Aqueous-Based Parts Washing Solution, Industrial Solvents, Drum Washer Bottom Sediments, and Tank Bottom Sediments

California and RCRA Hazardous Waste Codes:

D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F002, F003, F005, and California Waste Codes Number 133, 134, 211, 212, 213, 221, 222, 223, 241, 342, 343, 352, 461, 491, 741, and 751.

Unit Specific Conditions:

1. Within 60 days from the effective date of this Permit, the Permittee shall submit to DTSC a plan for the design and construction of a secondary containment system for the transfer operations that take place outside of this Unit. The Permittee shall complete the construction of a secondary containment system in accordance with a DTSC-approved plan and schedule.

Air Emission Standards:

This Unit contains liquids with vapor pressure more than 5.2 KPa and organic liquids above 500 ppmw and is subject to the requirements of California Code of Regulations, title 22, chapter 14, article 28.5. Daily inspections are required.

Unit 3:

Drum/container Storage Area Number 2

Location:

Northern side of the Warehouse Building

Activity Type:

This Unit is for storage of hazardous waste held in drums/containers.

Activity Description:

Storage of hazardous waste held in drums/containers inside a building on a secondary containment area

Physical Description:

Drums/containers holding hazardous waste are stored on pallets within the secondary containment area. The area is 59' long by 23.5' wide. The floor is concrete with a chemical-resistant coating surrounded by a 6" wide by 4" high concrete curbing and sump. The containment area occupies approximately 1,270 square feet. The total capacity of the sump is 1,010 gallons.

Maximum Capacity:

9,900 gallons

Waste Types:

Paint Thinners, Paint Wastes, Used Oil, Anti-Freeze, Immersion Cleaner, Dry Cleaning Solvents, Spent Parts Washer Solvents (Mineral Spirits), Aqueous-Based Parts Washing Solution, Industrial Solvents, Drum Washer Bottom Sediments, and Tank Bottom Sediments

California and RCRA Hazardous Waste Codes:

D001, D004, D005, D006, D007, D008, D009, D010, D011, D018, D019, D021, D022, D023, D024, D025, D026, D027, D028, D029, D030, D032, D033, D034, D035, D036, D037, D038, D039, D040, D041, D042, D043, F002, F003, F005, and California Waste Codes Number 133, 134, 211, 212, 213, 221, 222, 223, 241, 342, 343, 352, 461, 491, 741, and 751.

Unit Specific Conditions:

1. Within 60 days from the effective date of this Permit, the Permittee shall submit to DTSC a plan for the design and construction of a secondary containment system for the transfer operations that take place outside of this Unit. The Permittee shall complete the construction of a secondary containment system in accordance with a DTSC-approved plan and schedule.

Air Emission Standards:

This Unit contains liquids with vapor pressure more than 5.2 KPa and organic liquids above 500 ppmw and is subject to the requirements of California Code of Regulations, title 22, chapter 14, article 28.5. Daily inspections are required.

**PART V. SPECIAL CONDITIONS APPLICABLE TO ALL OF THE UNITS.**

1. The Permittee is prohibited from conducting any hazardous waste transfer, storage, treatment or other management activity unless it is specifically described in this Permit.
2. The Permittee shall take all measures necessary to prevent any spills of hazardous waste into the drainage systems of the City of Santa Ana.
3. The Permittee shall not store hazardous waste in any of the permitted storage units in excess of one year from the date such hazardous waste arrives at the Facility.
4. For the purposes of calculating the permitted capacity or volume for storage and for secondary containment, all hazardous waste that is stored or located in a permitted unit shall be included in the volume calculations for that unit, including any hazardous waste that is covered by the Transfer Facility Exemption under California Code of Regulations, title 22, section 66263.18.
5. The Permittee shall not be designated as the Treatment, Storage or Disposal Facility on the manifests for any exempt transfer activities conducted pursuant to California Code of Regulations, title 22, section 66263.18.
6. The Permittee shall submit a closure plan to DTSC to address the Discontinued Drum Storage Area (currently Loading/Unloading Area) within 120 days from the effective date of this Permit.
7. The Permittee shall submit a Closure Certification Report to DTSC for the 10,000-gallon Discontinued Underground Waste Mineral Spirits Tank, the Discontinued Mineral Spirits Return and Fill Area, and the 1,000-gallon Discontinued Underground Waste Mineral Spirits Tank within 180 days from the effective date of this Permit.
8. Drums or containers of hazardous waste shall be stored on pallets and shall not be stacked more than six feet high.
9. Any drum/container that previously held hazardous waste and is not "empty" as that term is defined in California Code of Regulations, title 22, section 66261.7(b) shall be managed as a hazardous waste.

## **PART VI. CORRECTIVE ACTION**

DTSC prepared a Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) Report for the Facility in March 1992. RFA identified eight Solid Waste Management Units (SWMUs) and two Area of Concerns (AOCs). The SWMUs and AOCs are listed below:

- SWMU #1 - Drum Storage Area #1
- SWMU #2 - Drum Storage Area #2
- SWMU #3 - 12,000 Gallon Underground Waste Mineral Spirits Tank
- SWMU #4 - Mineral Spirits Return and Fill Area
- SWMU #5 – Discontinued Mineral spirits Return and Fill Area
- SWMU #6 – Discontinued Drum Storage Area
- SWMU #7 - 10,000 Gallon Discontinued Underground Waste Mineral Spirits Tank
- SWMU #8 - 1,000 Gallon Discontinued Underground Waste Mineral Spirits Tank
- AOC #1 - 10,000 Gallon Discontinued Underground Product Mineral Spirits Tank
- AOC #2 – 12,000 Gallon Underground Product Mineral Spirits Tank

The Permittee submitted a RCRA Facility Investigation (RFI) Workplan to DTSC on November 29, 1995 in compliance with a permit condition. DTSC approved the RFI Workplan on December 14, 1995. The Permittee conducted the RFI in 1996 to determine the impacts from the former Underground Storage Tanks. The RFI Report concluded that the potential for additional or future impacts within the areas of SWMU Nos. 5, 7, and 8 and AOC No. 1, is unlikely; however, laboratory analyses of downgradient groundwater samples indicated contamination. The RFI Report also noted that the constituent concentrations in groundwater were decreasing. DTSC approved the RFI Report on December 19, 1996.

The Permittee initiated a Corrective Measures Study (CMS) in 1997 with a focus on evaluating the monitored natural attenuation as the proposed remedy. Monitoring was conducted as part of the CMS from 1997 through 1999, and from 2001 through 2003. The monitoring data showed that the constituent concentrations in groundwater had attenuated to levels below the Maximum Concentration Levels (MCLs) and it verified that soils were not a continuing source of groundwater contamination. As a result, the Permittee, in a progress report submitted to DTSC dated April 29, 2003, requested DTSC to make a finding of "no further action" with respect to all the SWMUs. There have been no corrective action activities at the Facility since 2003 when the Permittee discontinued the monitoring of the groundwater. SWMU No.6 has not been included during the past investigation activities.

Within six months after the effective date of this Permit, the Permittee shall enter into a Corrective Action Consent Agreement with DTSC, or DTSC shall issue an Enforcement

Order for Corrective Action to the Permittee, pursuant to Health and Safety Code sections 25187 and 25200.10 to address the remaining corrective action process required at the Facility. The Corrective Action Consent Agreement or the Enforcement Order for Corrective Action will require the Permittee to (1) conduct sampling of the groundwater to ensure that the contaminants in the groundwater are still below the MCLs; (2) conduct further investigation, and, if necessary, remediation to complete the required corrective action process based on DTSC's review of a CMS Report and/or a Corrective Measures Implementation Report, and groundwater monitoring reports; and (3) conduct any necessary investigation and/or remediation of SWMU No. 6 if the closure activities for SWMU No. 6 indicate the need for corrective action.

Safety-Kleen Systems, Inc.  
Santa Ana Branch  
Hazardous Waste Facility Permit, Attachment "B"

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**ATTACHMENT B**

