



DTSC's Response to the IRP's Request for Information Regarding CEQA Compliance and Human Health Risk Assessments in Permit Decisions

In its April 21, 2016 quarterly report to the Governor and Legislature, the Department of Toxic Substances Control (DTSC) Independent Review Panel (IRP) requested information about DTSC's compliance with the California Environmental Quality Act (CEQA) and preparation of human health risk assessments regarding each permitted facility. Specifically, in the *DTSC Independent Review Panel Second Report to the Governor and the Legislature Pursuant to Health and Safety Code Section 57014(f)*, the Panel made the following request:

By September 1, 2016, provide IRP with information on whether a Statement of Overriding Considerations was used, what type of CEQA document (EIR, addendum, negative declaration, exemption, etc.) was used, and whether a human health risk assessment was prepared for each permitted hazardous waste facility.

This document is prepared in response to the above request. Table 1 identifies the type of CEQA document that was used for each facility that is currently permitted, whether DTSC adopted a statement of overriding considerations, and those facilities for which a human health risk assessment was performed to assess the impacts of hazardous waste operations. If the permit decision relied on a CEQA document prepared for a prior permit, that CEQA document is reflected in the table.

Background on CEQA

When a public agency makes a discretionary decision, CEQA generally requires state and local government agencies to inform decision makers and the public about the potential environmental impacts of proposed projects, and to reduce those environmental impacts to the extent feasible. If a project subject to CEQA will not cause any adverse environmental impacts, a public agency may adopt a brief document known as a Negative Declaration. If the project may cause adverse environmental impacts, the public agency must prepare a more detailed study called an Environmental Impact Report (EIR). An EIR contains in-depth studies of potential impacts, measures to reduce or avoid those impacts, and an analysis of alternatives to the project. Some projects may cause adverse environmental impacts that can be mitigated such that they are no longer significant; in such cases, the agency can prepare what is known as a



Mitigated Negative Declaration (MND). Review under CEQA is not required for ministerial decisions, that is, decisions that are not discretionary on the part of the agency.

Often, more than one public agency has a role in decisions to authorize permits. The environmental documents described above are prepared by the public agency that is the “lead agency” for the decision, and other agencies that have a regulatory role related to the decision are considered to be “responsible agencies”. Responsible agencies provide input to the lead agency, and then rely on the determinations and documents prepared by the lead agency. Local land use agencies are often the lead agency in permit decisions to allow the construction of new facilities or new installations or operations at existing facilities.

A key feature of the CEQA process is the opportunity for the public to review and provide input on both Negative Declarations and EIRs. DTSC has enhanced its permitting process to expand the opportunities for public engagement and input (see the Draft DTSC Permitting Process: Public Participation and Environmental Justice Enhancements Flow provided to the IRP on August 10, 2016). These enhancements provide for public input beyond what is required under CEQA regardless of whether a project is subject to review under CEQA.

Background on Permit Decisions

DTSC makes decisions on different types of permit applications, including applications for:

- Permits for new facilities that treat or store hazardous waste, or accept it for disposal;
- Renewal of permits for existing facilities that treat or store hazardous waste, or accept it for disposal;
- Modifications to permits for existing facilities that treat or store hazardous waste, or accept it for disposal, including:
 - Class 1: Class 1 modifications are minor changes to the facility operations and do not require prior approval by DTSC;
 - Class 1*: Class 1* modifications are minor changes to the facility operations and require prior approval by DTSC before modification can be made;
 - Class 2: Class 2 permit modifications are changes that enable a permittee to make alterations that are not substantial to facility operations.
 - Class 3: Class 3 modifications substantially alter the facility or its operations.
- Other types of permits including:
 - Emergency Permits
 - Standardized Permits



DTSC has a defined process for determining what actions are required pursuant to CEQA for each application it receives (see the Permitting Process Flow Chart provided to the IRP on December 8, 2015). When DTSC receives an application for a permit, the Department evaluates whether DTSC or another agency is the lead agency, and if another agency is the lead agency, whether environmental documents have been prepared. If the application concerns a renewal of the permit for an existing facility, DTSC analyzes CEQA documents that were prepared for prior permit decisions to determine if they can be used for renewal decisions. This analysis considers changes that have occurred since the prior permit decision, including land use changes in the area surrounding the facility; new CEQA analysis requirements, such as greenhouse gas emissions; and changes in proposed operations. The evaluation identifies additional studies and analyses that may be needed, as well as the type of CEQA document appropriate for the renewal decision. It is not uncommon for the permit renewal decision to rely, at least in part, on the initial permit CEQA document. Addendums to Negative Declarations or EIRs, Supplemental EIRs, or Subsequent EIRs are prepared where appropriate. The CEQA analysis is always made available to the public during the public comment period.

The CEQA process applies to all discretionary decisions by DTSC, including those permit modifications that are subject to DTSC approval. The permit modifications subject to DTSC approval are the Class 1* (pronounced “one star”), Class 2, and Class 3 permit modifications.

Background on Health Risk Assessments

One tool to evaluate potential impacts from a facility is a Human Health Risk Assessment (health risk assessment, or HRA). Health risk assessments identify the emissions or releases from a facility that may expose the public to hazardous substances, the physical characteristics of those emissions or releases, and distances and other factors affecting the dispersion of hazardous substances emitted or released. In addition HRAs consider personal exposure factors such as body weight, breathing rate, the potential for ingestion or absorption through skin, the duration of exposure during the day, and the length of time the exposure is likely to continue. The result of the assessment is a statistical prediction of the maximum potential increase in cancer and non-cancer risks from exposure to site conditions. Assessment of risk from hazardous waste management units for which a permit is being sought is typically based on routine emissions from hazardous waste operations. Air emissions are the most common source of exposure. Hazardous waste regulations require health risk assessments before a permit may be issued for specific types of hazardous waste management units that routinely have emissions – such as incinerators, boilers, industrial furnaces, and operations involving open burning/ open detonation of explosives. DTSC also requires health risk assessments



where potentially significant impacts to air quality are identified in the California Environmental Quality Act (CEQA) analysis.

DTSC is one of several authorities overseeing permitted hazardous waste management operations. Federal, state, and local government agencies that regulate, for example, land use, water discharge, and air emissions may also regulate these facilities. Each of these authorities permits acceptable activities based on a variety of factors, including environmental impacts. For example, the local Air Quality Management District (AQMD) has regulatory authority over air emissions. At facilities where the AQMD has determined that emissions are adequately controlled and has issued a permit or exemption, DTSC typically relies on that determination. Where needed or required, however, DTSC performs additional assessments of health risks posed by air emissions.

The following two tables describe the CEQA documentation and any human health risk assessments prepared for each facility permitted by DTSC. Table 1 identifies—for each facility—the type of CEQA document prepared, whether a statement of overriding considerations was issued, and whether a human health risk assessment was performed. Table 2 provides additional details regarding the statements of overriding considerations that were issued. This table describes the significant and unavoidable impacts the facility would generate, as well as the overriding considerations that justified issuing the permit despite those impacts.



TABLE 1. SUMMARY OF CEQA AND HUMAN HEALTH RISK ASSESSMENT PERFORMED FOR EACH PERMITTED FACILITY			
Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
1. ACME FILL CORPORATION	Notice of Exemption (NOE)	No	No. Facility is currently closed and in post-closure care.
2. ADVANCED ENVIRONMENTAL INC	Negative Declaration	No	No. There are no routine emissions from the hazardous waste units or other circumstances that would warrant an HHRA.
3. AERC COM INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
4. AEROJET ROCKETDYNE INC	Environmental Impact Report (EIR) (1997)	Yes. See Table 2	Yes. As part of the 1997 EIR, an HHRA predicted an increased cancer risk of 1 in a million. The units that posed the risk have been closed and the two operating units—container storage and tank treatment—pose no significant risk.
5. AGRITEC INT DBA CLEANTECH ENVIRONMENTAL INC	EIR (2015)	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
6. AMERICAN OIL	Negative Declaration (2006)	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
7. ASBURY ENVIRONMENTAL SERVICES - CERES	NOE*	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
8. ASBURY ENVIRONMENTAL SERVICES CHICO	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
9. ASBURY ENVIRONMENTAL SERVICES-CHICO II LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.



TABLE 1. SUMMARY OF CEQA AND HUMAN HEALTH RISK ASSESSMENT PERFORMED FOR EACH PERMITTED FACILITY			
Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
10. ASBURY ENVIRONMENTAL SERVICES-FORTUNA	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
11. ATLAS PRECIOUS METALS INC	NOE	No	No. Emissions are addressed through AQMD permit.
12. BAKERSFIELD TRANSFER INC DBA COLES ENVIRONMENTAL	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
13. BAYSIDE OIL II INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
14. BENSON RIDGE FACILITY	Negative Declaration	No	No. Facility is currently closed and in post-closure care.
15. BEST ENVIRONMENTAL LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
16. BIG BLUE HILLS PESTICIDE CONT DISPOSAL	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
17. CALIFORNIA RESOURCES ELK HILLS LLC	NOE	No.	No. Facility is currently closed and in post-closure care.
18. CENTRAL WIRE INC	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
19. CHEMICAL WASTE MANAGEMENT INC KETTLEMAN	EIR (2008), Subsequent EIR (2009), Addendum (2013)	Yes. See Table 2.	Yes. Risk assessment performed to analyze impacts of operation of commercial hazardous waste landfill. Permit requires annual submittal of updated risk



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
			assessment.
20. CHEVRON CHEMICAL CO	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
21. CHEVRON EL SEGUNDO REFINERY	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
22. CHEVRON USA INC RICHMOND REFINERY	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
23. CLEAN HARBORS BUTTONWILLOW LLC	EIR (1988) / Supplemental EIR (1994) *	Yes. See Table 2.	Yes. Risk assessment performed as part of EIR to analyze impacts of operation of commercial hazardous waste landfill.
24. CLEAN HARBORS ENVIRONMENTAL SERVICES INC PORT OF REDWOOD CITY	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
25. CLEAN HARBORS LOS ANGELES LLC	Negative Declaration	No	Yes. Risk assessment was performed as part of EIR to evaluate impacts of exposure to emissions related to operational activities. Risks determined to be below the significance threshold
26. CLEAN HARBORS SAN JOSE LLC	EIR (1990)*, Addendum (2001)	No	Yes. Risk screening done for emission controls by BAAQMD.
27. CLEAN HARBORS WESTMORLAND LLC	EIR (1991)*	Yes. See Table 2.	Yes. Risk assessment performed to analyze impacts of operation of commercial hazardous waste landfill.
28. CLEAN HARBORS WILMINGTON LLC	EIR (1995)	Yes. See Table 2.	Yes. Risk assessment was performed as part of EIR to evaluate impacts of exposure to emissions related to operational activities. Risks determined to be below the significance threshold.



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
29. CRANE'S WASTE OIL INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
30. CROSBY & OVERTON	Negative Declaration	No	Yes. No mitigation measures were required based on risk assessment results.
31. D K DIXON	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
32. D/K ENVIRONMENTAL	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
33. DAVID H FELL AND COMPANY INC	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
34. DEMENNO/KERDOON	EIR (2000), Addendum (2016)	Yes. See Table 2.	Yes. No mitigation measures were required based on risk assessment results.
35. DEPT OF AIR FORCE VANDENBERG AFB	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
36. DUCOMMUN AEROSTRUCTURES	Negative Declaration	No	No. Facility is currently closed and in post-closure care.
37. DYNEGY MOSS LANDING, LLC	Negative Declaration	No	No. Regulatory limitations on wastes placed in the units make emissions minimal.
38. ECOLOGY CONTROL INDUSTRIES	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
39. ECS REFINING	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
40. EDWARDS AIR FORCE BASE	EIR (2003)	No	Yes. Risk assessment is being performed to evaluate impacts from open burning/ open detonation of explosives.



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
41. EPC WESTSIDE DISPOSAL FACILITY	Negative Declaration	No	No. Facility is currently closed and in post-closure care.
42. EVOQUA WATER TECHNOLOGIES LLC	EIR (1996)	Yes. See Table 2.	Yes. Risk assessment was performed as part of EIR to evaluate impacts of exposure to emissions related to operational activities. Risks determined to be below the significance threshold.
43. FILTER RECYCLING SERVICES INC	Negative Declaration	No	No. Emissions are addressed through AQMD regulations.
44. FORMER INTERNATIONAL LIGHT METAL CORP FACILITY	NOE	No	No. There are no routine emissions from the post closure permitted hazardous waste units or other circumstance that would warrant an HHRA.
45. FORWARD LANDFILL	Negative Declaration	No	No. Facility is currently closed and in post-closure care.
46. GEM OF RANCHO CORDOVA LLC DBA PSC ENVIRONMENTAL SVS OF RANCHO CORDOVA	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
47. GENERAL ELECTRIC INTERNATIONAL INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
48. GLENCORE RECYCLING INC	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
49. GOLDEN EAGLE REFINERY	NOE	No	No. Facility is currently closed and in post-closure care.
50. HERAEUS METAL PROCESSING LLC	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
51. HGST INC	EIR (2005)	No	Yes. Risk assessment performed as part of the 2005 EIR for redevelopment project to assess risk posed by soil contamination following demolition of structures. Cleanup actions implemented to reduce risks to acceptable levels.
52. HONEYWELL	NOE	No	No. Facility is currently closed and in



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
INTERNATIONAL INC FORMER BARON- BLAKESLEE			post-closure care.
53. INDUSTRIAL SERVICE OIL CO INC	EIR (2006)	Yes. See Table 2.	Yes. Risk assessment was performed as part of EIR to evaluate impacts of exposure to emissions related to operational activities. Risks determined to be below the significance threshold.
54. J&B REFINING DBA J&B ENTERPRISES	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
55. JOHN SMITH ROAD LANDFILL	NOE	No	No. Facility is currently closed and in post-closure care.
56. KAISER VENTURES INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
57. KEARNEY-KPF	Negative Declaration	No	Yes. Risk assessment for the post closure permit is under review to determine appropriate control measures.
58. KINSBURSKY BROTHERS SUPPLY INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
59. KW PLASTICS OF CALIFORNIA	Negative Declaration	No	No. . There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
60. LAWRENCE BERKELEY NATIONAL LABORATORY	EIR (1990)* Addendum (2003)	No	Yes. Risk assessment performed to analyze airborne hazardous and radioactive constituents in normal operations and accident scenarios for radioactive-mixed waste management.
61. LAWRENCE LIVERMORE NATIONAL LABORATORY - MAIN SITE	Negative Declaration, Addendum	No	Yes. Risk assessment performed to analyze airborne hazardous and radioactive constituents in normal operations and accident scenarios for radioactive-mixed waste



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
			management.
62. LAWRENCE LIVERMORE NATIONAL LABORATORY - SITE 300	Negative Declaration	No	Yes. Risk assessment performed to evaluate impacts from open burning/ open detonation of explosives.
63. LIGHTING RESOURCES LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
64. MONTEZUMA HILLS FACILITY	NOE	No	No. Facility is currently closed and in post-closure care.
65. NATIONAL AERONAUTIC AND SPACE ADMINISTRATION SANTA SUSANA FIELD LAB	Programmatic EIR in Progress	No	Yes. Risk assessment prepared for the closure of the unit to determine appropriate cleanup levels.
66. NAVAL AIR STATION NORTH ISLAND	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
67. NAVAL AIR WEAPONS STATION CHINA LAKE	Negative Declaration	No	Yes. Risk assessment performed to evaluate impacts from open burning/ open detonation of explosives.
68. NAVAL BASE CORONADO MIXED WASTE STORAGE FACILITY	Mitigated Negative Declaration	No	Yes. Risk assessment performed to analyze airborne hazardous and radioactive constituents in normal operations and accident scenarios for radioactive-mixed waste management.
69. NAVAL STATION SAN DIEGO	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
70. P KAY METAL INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
71. PACIFIC GAS & ELECTRIC/ DIABLO CANYON	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
72. PACIFIC RESOURCE RECOVERY SERVICES INC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
73. PACIFIC SCIENTIFIC ENERGETIC MATERIALS CO	Negative Declaration	No	Yes. Risk assessment will be performed to evaluate impacts from open burning/ open detonation of explosives in the pending renewal application.
74. PANOCHÉ FACILITY	EIR (1998)	Yes. See Table 2.	Yes. Risk assessment was performed as part of EIR to evaluate impacts of exposure to emissions related to operational activities. Risks determined to be below the significance threshold.
75. PHIBRO-TECH INC	Negative Declaration, Addendum	No	Yes. Human health risk assessment was performed and indicated no risks with current operations.
76. PHILLIPS 66 CO LOS ANGELES REFINERY - WILMINGTON PLANT	NOE	No	No. There are no routine emissions from the post closure permitted hazardous waste units or other circumstance that would warrant an HHRA.
77. PHILLIPS 66 CO LOS ANGELES REFINERY CARSON PLANT	NOE	No	No. There are no routine emissions from the post closure permitted hazardous waste units or other circumstance that would warrant an HHRA.
78. PHILLIPS 66 COMPANY - SAN FRANCISCO REFINERY	NOE	No	No. There are no routine emissions from the post closure permitted hazardous waste unit or other circumstance that would warrant an HHRA.



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
79. QUEMETCO INC	EIR (2008)	No	Yes. The risk assessment evaluated risks from measured emissions sources from normal facility operation and fugitive dust emissions from truck traffic and wind erosion.
80. RAMOS ENVIRONMENTAL SERVICES	Negative Declaration, Addendum	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
81. RAYTHEON SPACE AND AIRBORNE SYSTEMS	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
82. RHO-CHEM LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
83. RIVERBANK OIL TRANSFER, LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
84. SAFETY-KLEEN - FRESNO	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
85. SAFETY-KLEEN OF CALIFORNIA INC - NEWARK	Negative Declaration	No	Yes. Risk assessment performed in 1998 and revised in 2003 to evaluate potential impacts from entire project including non-hazardous waste operations
86. SAFETY-KLEEN OF CALIFORNIA INC - CARSON	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
87. SAFETY-KLEEN OF CALIFORNIA INC - DAVIS	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
			units or other circumstance that would warrant an HHRA
88. SAFETY-KLEEN OF CALIFORNIA INC – FRESNO	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
89. SAFETY-KLEEN SYSTEMS INC - LOS ANGELES	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
90. SAFETY-KLEEN SYSTEMS INC HIGHLAND SERVICE CENTER – HIGHLAND	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
91. SAFETY-KLEEN SYSTEMS INC –SACRAMENTO	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
92. SAFETY-KLEEN SYSTEMS INC -SANTA ANA	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
93. SAFETY-KLEEN OF CALIFORNIA INC - SANTA MARIA	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
94. SAN DIEGO GAS & ELECTRIC COMPANY	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
95. SAN DIEGO GAS & ELECTRIC MIRAMAR	EIR (1991)*	No	No. There are no routine emissions from the permitted hazardous waste



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
			units or other circumstance that would warrant an HHRA.
96. SANDIA NATIONAL LABORATORIES	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units.
97. SHELL MARTINEZ REFINERY (Submitted for closure but still operating)	Negative Declaration	No	Yes. HHRA conducted in 2006 to evaluate risk to off-site receptors of CO Boiler operation. Predicted risks are below acceptable thresholds.
98. SOLAR TURBINES INC	Negative Declaration	No	No. Facility is currently closed and in post-closure care.
99. SOUTHERN CALIFORNIA EDISON CO SAN ONOFRE NUCLEAR GENERATING STATION	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
100. SOUTHERN CALIFORNIA GAS CO – LOS ANGELES	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
101. SOUTHERN CALIFORNIA GAS CO – PICO RIVERA	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
102. SQUARE D COMPANY	Negative Declaration	No	No. There are no routine emissions from the post closure permitted hazardous waste units or other circumstance that would warrant an HHRA.
103. TESORO CARSON REFINERY	NOE	No	No. There are no routine emissions from the post closure permitted hazardous waste units or other circumstance that would warrant an HHRA.
104. TESORO REFINING & MARKETING COMPANY- LOS ANGELES REFINERY	NOE	No	No. There are no routine emissions from the post closure permitted hazardous waste units or other



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
			circumstance that would warrant an HHRA.
105. TFX AVIATION INC	NOE	No	Yes. Risk assessment prepared for closure of the unit to determine appropriate cleanup levels.
106. THE BOEING CO-CANOGA PARK	Programmatic EIR in Progress	No	Yes. Risk assessment prepared for closure of the unit to determine appropriate cleanup levels.
107. THE CHEMOURS COMPANY FC LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
108. THE DOW CHEMICAL CO	Negative Declaration	No	Yes. Regulations require risk assessment of emissions from Boiler/ Industrial Furnace.
109. TP INDUSTRIAL INC	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
110. TRAVIS AIR FORCE BASE	NOE	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.
111. UNITED TECHNOLOGIES CORP PRATT AND WHITNEY ROCKETDYNE SAN JOSE	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
112. USS-POSCO INDUSTRIES	NOE	No	No. Facility is currently closed and in post-closure care.
113. VEOLIA ES TECHNICAL SOLUTIONS LLC AZUSA	Negative Declaration	No	No. Emissions related to permitted hazardous waste management unit operations are addressed by South Coast Air Quality Management District permits.
114. VEOLIA ES TECHNICAL SOLUTIONS LLC RICHMOND	EIR (1993)*	No	Yes. An evaluation dated January 31, 2007, addressed potential releases and impacts due to consolidation of petroleum-



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Project Name	CEQA Document Used for Permit Decision	Statement of Overriding Considerations?	Human Health Risk Assessment (HHRA)?
			impacted soil, accidental chemical release at the site, traffic accident involving transportation of containerized wastes to or from the facility, and a fire at the facility.
115. VINE HILL COMPLEX	EIR (1995)	No	Yes. Risk assessments were performed in 1994-1995 for closure activities involving groundwater migration and management.
116. WEST COUNTY LANDFILL INC	NOE	No	No. Facility is currently closed and in post-closure care.
117. WIT SALES AND REFINING	Negative Declaration	No	No. Emissions are addressed through AQMD permit.
118. WORLD OIL - SAN JOAQUIN LLC	Negative Declaration	No	No. There are no routine emissions from the permitted hazardous waste units or other circumstance that would warrant an HHRA.

* DTSC was not the lead agency for the CEQA determination.



TABLE 2. SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS, AND OVERRIDING CONSIDERATIONS FOR ALL PERMITTED FACILITIES WITH STATEMENTS OF OVERRIDING CONSIDERATION	
Facility Name	Summary
1. Aerojet Rocketdyne Inc.	<p>The Aerojet Rocketdyne Inc. facility is a rocket manufacturing and testing facility located in Sacramento, California, permitted to store and treat hazardous waste. A Master Environmental Impact Report (MEIR) was prepared to evaluate the environmental impacts of a 1997 RCRA hazardous waste permit application that sought to consolidate several permitted and non-permitted (interim status and/or temporary authorization) RCRA complexes (buildings or groups of building with multiple permitted units) into one RCRA permit, immediately close six existing complexes, and close three more existing complexes within five years.</p> <p>The MEIR concluded that all significant unavoidable and adverse impacts from the proposed project could be adequately mitigated except for the following cumulative impacts:</p> <ul style="list-style-type: none"> • Cumulative Air Quality Impacts: The project would contribute substantially to existing and projected regional non-compliance with state and federal air quality standards for ozone and PM10; and • Cumulative Public Health Impacts from Toxic Air Contaminants: The project, in conjunction with other stationary and mobile sources in the vicinity of the facility, would result in toxic air contaminant emissions. The toxic air emissions from the other sources are estimated to result in an existing cancer risk in excess of one in a million beyond the Aerojet property boundary. <p>The MEIR determined there would be a net reduction in air impacts related to traffic associated with the management of hazardous waste at the facility because the permit would allow for hazardous waste to be stored for greater than 90 days, thus minimizing off-site transportation of partial loads.</p> <p>DTSC granted the permit, finding that benefits of approving the project outweighed the significant and unavoidable impact to air quality (related to cumulative impacts) identified in the MEIR because the permit would:</p> <ul style="list-style-type: none"> • Ensure compliance with RCRA by allowing the RCRA complexes that were operating under interim status or temporary authorization to be fully permitted; • Ensure the continued on-site treatment of hazardous wastes generated at Aerojet, thus reducing off-site treatment and transportation impacts; • Allow for the continued employment of technical professionals; and



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	<ul style="list-style-type: none"> Allow for the continuation of operations at Aerojet that are of importance to national security and technological advancement.
2. Chemical Waste Management Inc. Kettleman	<p>The Chemical Waste Management Inc. Kettleman Hills facility is a large hazardous waste treatment and disposal facility. A Class III Hazardous Waste Facility Permit Modification Application, submitted to the Department in 2008, sought to expand the capacity of the landfill by increasing the footprint and elevation.</p> <p>A Final Subsequent Environmental Impact Report (FSEIR) was originally prepared for the expansion of hazardous waste disposal units B-18 and B-20. DTSC prepared an Addendum to the FSEIR and Initial Study, dated May 2013, when the proposed modifications to those units were altered.</p> <p>The following Significant and Unavoidable Impacts from the permit modification were identified:</p> <ul style="list-style-type: none"> Air Quality from Periodic Construction: Project impacts include significant impacts from equipment operation on particulate matter, reactive organic gases, nitrous oxide, and ozone. Cumulative Air Quality Impact: Emissions from equipment operation will contribute to cumulative significant impacts on particulate matter, reactive organic gases, nitrous oxide, and ozone. Cumulative Public Health Impact from Toxic Air Contaminants: Emissions from equipment operation would contribute to cumulative impacts of toxic air contaminants. Cumulative Traffic Impact: Traffic from the proposed project would contribute to cumulative impacts that will degrade the level of service for multiple roads and highways within the vicinity of the Kettleman Hills Facility. Cumulative Greenhouse Gases Impact: Emissions from the proposed project would contribute to cumulative significant impact of greenhouse cases. <p>DTSC authorized the permit modification despite the significant and unavoidable impacts to air quality, traffic, and public health identified in the CEQA analysis, citing the following overriding considerations:</p> <ul style="list-style-type: none"> Expansion of the facility would allow California to meet the increasing demand for disposal of hazardous waste; Without the expansion, either a new facility would need to be constructed or the transportation of hazardous waste for disposal



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	would increase; and <ul style="list-style-type: none"> Expansion of the facility would allow U.S. businesses with facilities in Mexico to continue to take back the hazardous waste produced in Mexico for disposal in California, in compliance with the North American Free Trade Agreement.
3. Clean Harbors Westmorland LLC	<p>The Clean Harbors Westmorland facility is a large hazardous waste landfill. Permitted activities at the Facility include storage, treatment, and on-site disposal of hazardous waste. A permit renewal application was submitted to the Department in 1991 to renew the existing permit and add additional units through the expansion of the Facility. An Environmental Impact Report was prepared by Imperial County in 1991 for the expansion of the Facility.</p> <p>The EIR identified the following significant and unavoidable impacts for the project that could not be mitigated:</p> <p>Project and Cumulative Air Quality Impacts: Emissions related to construction activities (vehicles and earth movement) and hazardous waste facility operations (handling, storage, treatment, and transportation) would contribute ozone and particulate matter (PM10) to an area where background levels of ozone and particulate matter (PM10) already exceed the thresholds of significance. Any additional contribution to the background PM10 and ozone were considered significant and not mitigatable.</p> <p>Despite the significant and unavoidable impact to air quality, the EIR concluded that the mitigated project would reduce “more environmental impacts to non-significant levels than the no project alternative or any of the alternative designs,” and that the project, with all recommended mitigation measures, was “environmentally superior.”</p>
4. Clean Harbors Buttonwillow, LLC	<p>The Clean Harbors Button Willow facility is a commercial hazardous waste management and disposal facility located approximately 36 miles west of Bakersfield, CA. A 1995 Hazardous Waste Facility permit application proposed to: consolidate 22 surface impoundments and 8 small hazardous waste landfill units into one large hazardous waste landfill and increasing the capacity of the landfill, create a new hazardous waste storage area, operate a new transfer station, and implement several facility improvements.</p>



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	<p>Kern County, which issued a Conditional Use Permit for the facility, acted as the lead agency for the permit application and prepared a Supplemental Environmental Impact Report (SEIR) to analyze the impacts of the proposed project. The SEIR supplemented previous environmental impact analyses related to proposed projects at the facility. The SEIR identified the following significant and unavoidable adverse impacts for the project:</p> <ul style="list-style-type: none"> • Cumulative Transportation and Circulation Impacts: –. The project-related cumulative impacts to traffic operations may be significant at certain roadways and intersections. The sources of traffic impacts were identified as hazardous waste trucks travelling to and from the Facility and vehicles other than hazardous waste trucks, such as employee vehicles, reagent trucks, construction vehicles, and nonhazardous waste trucks. The contribution from hazardous waste trucks travelling to or from the Facility could be mitigated to a level below significance through the implementation of alternate routes for these vehicles. Additional road improvements have been incorporated into this mitigation measure to further reduce this impact. A contribution to this cumulative impact would still occur due to vehicles other than hazardous waste trucks, such as employee vehicles, reagent trucks, construction vehicles, and nonhazardous waste trucks. • Project and Cumulative Air Quality Impacts. Total emissions of NO_x would increase by more than the 10 tons/year threshold of significance. The sources of the NO_x were primarily traffic related due to transportation of hazardous waste and non-hazardous waste vehicles. Furthermore, as an ozone precursor, these emissions would contribute cumulatively to the San Joaquin Valley’s ozone nonattainment problem resulting in a cumulatively significant and unavoidable adverse impact. • Cumulative Noise Impacts. Noise related to traffic associated with the proposed project would be a cumulatively significant and unavoidable adverse impact. Potential impacts from hazardous waste trucks on noise on Highway 58 could be mitigated to a level below significance through the implementation of alternate routes for these vehicles. However, a small contribution to this cumulative impact would still occur due to vehicles other than hazardous waste trucks, such as employee vehicles, reagent trucks, construction vehicles, and nonhazardous waste trucks. <p>The Kern County Board of Supervisors approved the project despite the</p>



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	<p>significant and unavoidable impacts identified in the CEQA analysis, based on the following overriding considerations :</p> <ul style="list-style-type: none"> • The project would allow for the safe management of hazardous waste and help to meet the projected increase in demand; • The project would provide additional jobs; • The project would generate additional revenue through taxes; • Without the project, there would be a greater need to open more hazardous waste facilities and would require additional transportation. Also, it would increase the likelihood of illegal and harmful disposal practices thus threatening public health and the environment.
5. Clean Harbors Wilmington LLC (Formerly ENSCO West)	<p>Clean Harbors Wilmington, LLC provides services that include hazardous waste treatment, waste transfer, storage, consolidation, laboratory packing/de-packing, liquid fuel blending, solvent recycling, and solvent distribution. The maximum storage capacity of the facility is 112,120 gallons for containers and 144,750 gallons for tanks. The maximum allowable treatment capacity is 50,000 gallons during any 24 hour period. Hazardous wastes managed at the facility include oily waste, distillation residues, industrial solvents, acids, wastewater, metals, and contaminated soils.</p> <p>An Environmental Impact Report (EIR) was prepared in 1995 to analyze the potential impacts from issuing a treatment and storage permit to a facility that was operating under Interim Status.</p> <p>The 1995 EIR identified one potentially significant and unavoidable adverse impact:</p> <ul style="list-style-type: none"> • Cumulative Air Quality Impacts. Cumulative emissions of criteria air pollutants associated with construction that will be undertaken at the facility, at nearby refineries (which are being modified to accommodate the production of reformulated fuels), and as part of the port improvements project. The sources of the unavoidable impacts were from the short term construction activities; and not related to the management of hazardous waste. <p>The Department authorized the permit, despite the significant and unavoidable impacts to air quality based on the following overriding considerations:</p>



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	<ul style="list-style-type: none"> The Facility is socially and environmentally beneficial/necessary because it will manage hazardous wastes generated by large and small businesses, ensure adequate treatment and storage capacity, and reduce the overall toxicity and other hazardous characteristics of the waste stream. It helps meet the overall State goals of pollution prevention, and waste minimization. As a result of the issuance of the Permit it will be subject to more stringent and environmentally protective requirements.
6. Demenno/Kerdoon	<p>Demenno/Kerdoon (DK) operates a Hazardous Waste Management facility and is authorized to store, treat, transfer, and recycle various types of hazardous wastes, including used oil, oily water, oily waste, oily solids, used antifreeze and other similar types of petroleum derivative materials.</p> <p>An Environmental Impact Report (EIR) was prepared in 2001 to analyze the potential impacts from issuing a permit authorizing the treatment and storage of hazardous waste.</p> <p>The EIR identified the following significant and unavoidable adverse environmental impacts:</p> <ul style="list-style-type: none"> Project and Cumulative Air Quality Impacts: The Proposed Project and cumulative projects, when considered with other stationary and mobile sources in the South Coast Air Basin would contribute substantially to existing and projected regional non-compliance with state and federal ambient air quality: standards for NO_x(Oxides of Nitrogen), CO (Carbon Monoxide), and ROG (reactive organic gases). Transportation/Circulation: The Proposed Project is projected to increase the number of average daily vehicular trips at the DK facility to a level of significance. However, potential construction of the rail spur would reduce this impact to less than significant. The cumulative projects, when considered with other background traffic projections will also contribute to the projected LOS (level-of service) F at El Segundo/ Alameda (West) intersection. The projected increase in average daily trips at the site and the increased delay at the El Segundo/Alameda (West) intersection would be considered a significant and unavoidable cumulative impact. Cumulative Noise Impacts: The construction of the proposed rail spur at the DK facility would cause significant increases to noise levels if these activities occur in conjunction with construction of



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	<p>the Alameda Corridor project. These impacts were considered to be short-term.</p> <p>The Department authorized the permit, despite the significant and unavoidable impacts to air quality, transportation, and noise identified in the CEQA analysis, based on the following overriding considerations:</p> <ul style="list-style-type: none"> • The project would provide for the long-term disposal needs of the region, using facilities and equipment that already are in place, and that have been extensively upgraded to meet environmental requirements, thereby eliminating the need for future siting and permitting of a new facility or the significant expansion of an existing facility, with probable significant delays in the capacity becoming available; the construction related effects of a new facility or facility expansion at the alternative location; and the displacement of most or all of the environmental effects of the Proposed Project to the alternative location. • The project would minimize region-wide transportation associated risks and impacts, because of the central location of the proposed Project with respect to the community of hazardous waste generators and haulers, and the accessibility of the facility to truck routes and rail transport services. Transportation-related risks and impacts that would be minimized include: region-wide air emissions from transport trucks; risk of truck accidents; and Region-wide traffic congestion.
<p>7. Evoqua Water Technologies (Formerly Norris Environmental Services)</p>	<p>Evoqua Water Technologies LLC is a wastewater treatment facility located in Vernon, California. The facility is permitted to treat, store, and transfer hazardous waste. An Environmental Impact Report (EIR) was prepared in 1996 to analyze the environmental impacts from the facility’s hazardous waste storage and treatment facility permit application.</p> <p>The EIR identified the following significant and unavoidable adverse cumulative impacts:</p> <ul style="list-style-type: none"> • Cumulative Air Quality Impacts: The Project and cumulative projects, when considered with other stationary and mobile sources in the South Coast Air Basin, would contribute substantially to existing non-compliance with state and federal ambient air quality standards. • Cumulative Noise Impacts: Cumulative noise associated with the operation of the Alameda Corridor will concentrate rail and truck



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	<p>traffic along Alameda Street, thus reducing overall noise on other highways and railways but increasing the noise levels along Alameda Street by eight or nine decibels at certain residential areas along the corridor.</p> <ul style="list-style-type: none"> • Cumulative Land Use and Zoning Impacts: Cumulative land use impacts were identified for the Alameda Corridor Project because development would require the taking of residential, commercial, and industrial property and relocation of residents and businesses along the proposed alignments. • Cumulative Risk of Upset Impacts: Cumulative risk of upset impacts was considered to be significant due to the potential for a spill associated with the Pacific Pipeline. Cumulative risk of upset impacts were considered to be significant in the event of a major disaster (e.g., earthquake) a number of upset events could be triggered including spills, fires, building damage, etc. It is likely that emergency resources would be severely impaired during a major emergency because the resources may be required at numerous locations at the same time. The emergency resources in the event of a major disaster are likely to be inadequate to handle short-term emergency impacts (immediately after the disaster through about 24 hours). • Cumulative Transportation/Circulation Impacts: Cumulative transportation/circulation impacts were considered to be significant since construction of the Alameda Corridor and Pacific Pipeline were determined to have potential severe traffic impacts. Also, general population growth (assuming a one percent per year growth rate through 2010) may lead to significant traffic impacts on local intersections. <p>Alternatives considered during the environmental analysis (“no project”, “alternative sites”) identified potentially worse environmental impacts due to the need to reroute waste streams over longer distances. Therefore, DTSC determined that the benefits of the proposed project outweighed the potential unavoidable adverse effects on the environment, and that the unavoidable adverse effects were acceptable because the project would:</p> <ul style="list-style-type: none"> • Ensure better compliance with RCRA with the Permit replacing the temporary authorization; • Ensure on-site treatment of hazardous waste to reduce off-site



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	<p>treatment and transportation, thus preventing potential need for transporting 20.7 million gallons of hazardous waste by rail or truck.</p> <ul style="list-style-type: none"> • Allow for continued employment of highly trained technical professionals at the facility; • Allow continued operation to help the County of Los Angeles achieve goals of wastes generated within the County to be treated within the County; • The Facility’s contribution to the cumulative adverse impacts is less than significant because most of the cumulative adverse impacts are associated with the related projects in the Vernon area due to the development of the Pacific Pipeline and the Alameda Corridor.
8. Industrial Service Oil Company	<p>The Industrial Service Oil Company facility is a large hazardous waste treatment, storage, and transfer facility in Los Angeles, California, that stores and processes petroleum products, used oil, and antifreeze. Operations at the facility include: used fuel blending; antifreeze collection and transfer; RCRA fuel blending; wastewater treatment; used oil treatment; used antifreeze recycling; waste solids treatment; rail spur; and container storage.</p> <p>An EIR was prepared to analyze the impacts of issuing a new RCRA-equivalent Hazardous Waste Facility Permit submitted to DTSC in September 2000, which proposed to increase the capacity of the hazardous waste storage at the facility, increase railcar loading and unloading operations, expand the type of waste streams permitted, and increase waste treatment operations. The EIR identified the following potentially significant and unavoidable adverse impacts:</p> <ul style="list-style-type: none"> • Air Quality Impacts due to Facility Operations/Construction. The operational NOx are expected to exceed the applicable significance thresholds. The dominant operational source of NOx is from truck traffic transporting materials to and from the Facility. Other sources of NOx are railcar activities, i.e. railcar idling. The overlap of construction NOx emissions related to the proposed project and the existing NOx emissions from the Facility operations are expected to exceed the applicable significance thresholds. • Cumulative Air Quality Impacts due to Facility Operations. Construction and operational of the proposed project, along with other stationary cumulative projects in the vicinity, are expected to contribute to emissions of CO, VOC, NOx, SOx, and PM10 to levels



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	<p>that are above the applicable significance thresholds. A health risk assessment was prepared to assist in the evaluation of air impacts.</p> <p>The Department authorized the permit, despite the significant and unavoidable impacts to air quality identified in the CEQA analysis, based on the following overriding considerations:</p> <ul style="list-style-type: none"> • The project will provide for a portion of the long-term hazardous treatment needs of the region, eliminating the need for siting, permitting, and construction of a new facility. • The project would minimize transportation (traffic and air impacts) and associated risk and impacts due to the central location of the Facility and proximity to used oil and waste antifreeze generators and haulers. • The analyses of the significant adverse impacts were based on conservative assumptions regarding the construction and operation of the proposed project. The actual project impacts (e.g., emission estimates) are expected to be less than estimated in the EIR.
9. Panoche	<p>The Panoche facility operated as a Class I hazardous waste treatment, storage, and disposal facility from 1968 until approximately 1986. In 1988, the facility submitted a Closure and Post-Closure Plan (Plan) to DTSC. The Plan included installation of a groundwater extraction and treatment system and creation of a corrective action management unit. An Environmental Impact Report was prepared to evaluate the impacts of the Plan. DTSC determined that the proposed project was not acceptable and prepared a Modified Closure Plan similar to an alternative identified in the original Plan (Groundwater Divide) and evaluated in the EIR. The EIR identified the following significant and unavoidable adverse impacts of the Groundwater Divide alternative:</p> <ul style="list-style-type: none"> • Short-Term Increase in Oxides of Nitrogen Emissions Exceeding Bay Area Air Quality Management District Thresholds. The EIR estimated that the Groundwater Divide Alternative would generate 114.7 pounds per day (ppd) and 14.3 tons per year (tpy) of NO_x, which would exceed the Bay Area Air Quality Management District significance threshold for NO_x of 80 ppd and 14 tpy. The primary sources of NO_x emissions for the project would be construction equipment exhaust. • Cumulative Air Quality Impacts in the San Francisco Bay Area. The Groundwater Divide Alternative would contribute to the cumulative violation of ozone and PM₁₀ ambient air quality standards in the



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	<p>Bay Area. The primary source is NOx and PM from construction activities.</p> <p>The project activities that will contribute the significant and unavoidable adverse impacts include:</p> <ul style="list-style-type: none">• Excavation, hauling, treatment, and redispisal of hazardous waste and• Excavation and hauling of clean borrow soils and construction of closure covers over areas where waste will be closed in place. <p>The Department authorized the permit, despite the significant and unavoidable impacts to air quality identified in the CEQA analysis, based on the following overriding considerations:</p> <ul style="list-style-type: none">• The activities in the DTSC Modified Closure Plan were required by the Code of Regulations to protect public health and the environment.• All alternatives evaluated in the EIR had significant and unavoidable adverse impacts on air quality. The selected alternative in the DTSC Modified Closure Plan provided the greatest protection of public health and the environment.