CHAPTER 2

PROJECT DESCRIPTION

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CHAPTER 2

PROJECT DESCRIPTION

This section provides a description of the existing and proposed operations at the ISOCI facility. The environmental analyses in the EIR are based on the project description outlined in this section. The information presented in this section is written in a non-technical manner for the general public, which is consistent with CEQA requirements. The project description herein summarizes the Part B Permit application submitted in September, 2000 (ISOCI, 2000). More detailed information is available in the ISOCI RCRA Part B permit application which is available for review at the DTSC's office located at 1011 North Grandview Avenue, Glendale, California.

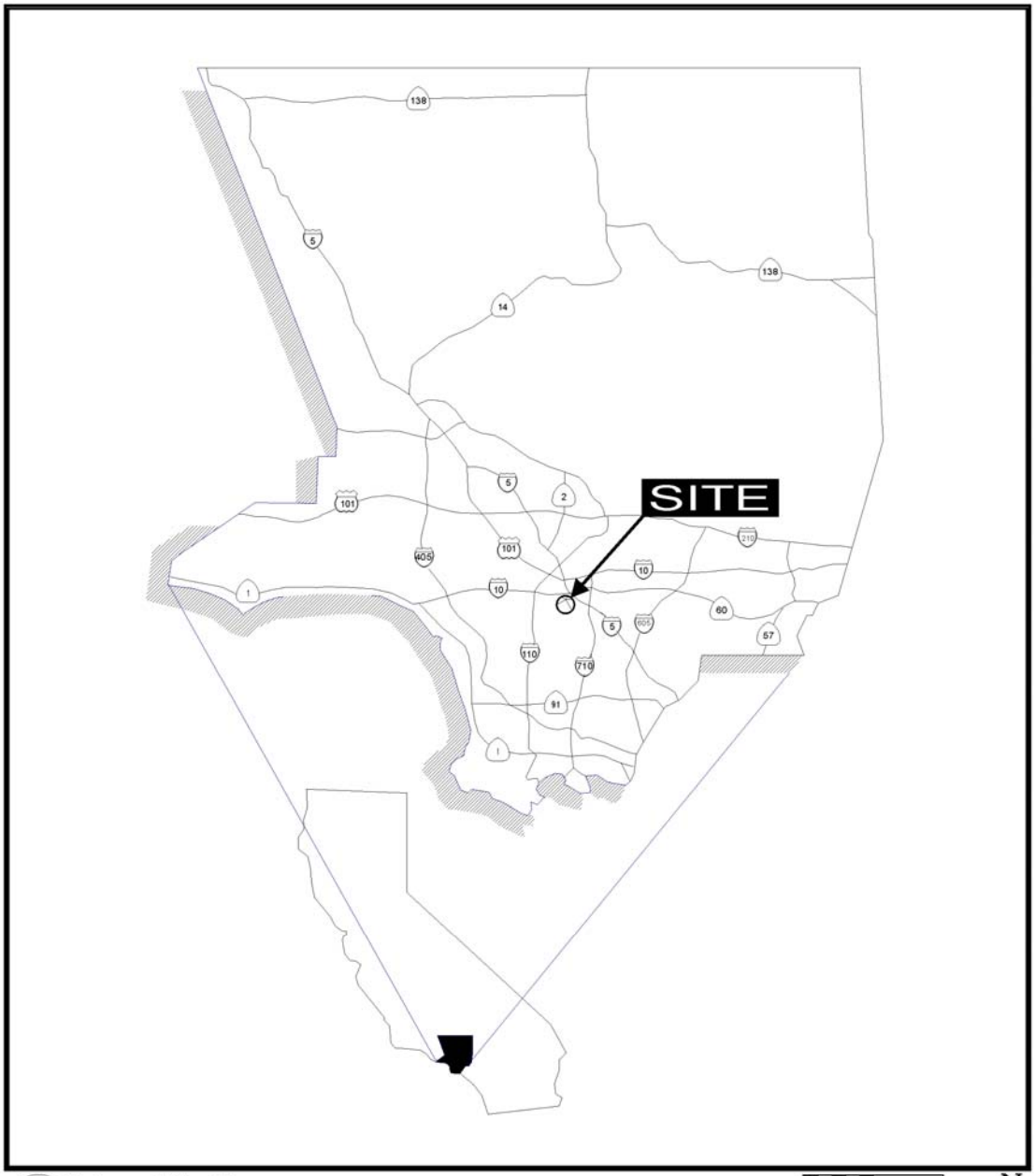
2.1 FACILITY LOCATION

The ISOCI facility is located at 1700 South Soto Street in the City of Los Angeles, County of Los Angeles (see Figure 2-1 and 2-2). The facility is located in an area zoned by the City of Los Angeles for heavy industry (HI). The immediate adjacent areas are principally zoned heavy industrial. The City of Vernon is located about 0.5 mile to the south of the facility and the entire City of Vernon is zoned for industrial uses. The City of Los Angeles surrounds the facility to the north, east and west, which includes residential, commercial, and some industrial land uses. The railroad tracks located adjacent to the northern facility boundary are used by Union Pacific Railroad and Metrolink trains. Virtually all of the area surrounding ISOCI is zoned for heavy industry with a few commercial areas interspersed with the heavy industry. The closest residences are located approximately 0.25 of a mile north of the facility, on the north side of Olympic Boulevard (see Figure 2-2).

2.2 FACILITY HISTORY

The ISOCI facility initially began operations in 1974 at the present facility location, on land leased from Thermo Electron Corporation. The original unused 2.2 acres were leased by ISOCI to use as a storage yard for buying and selling machinery and equipment recovered from demolition activities. A related business operating from the same property under the same ownership transported, stored, and recycled oil waste. The site primarily included storage tanks. The only permanent structure was the office and tool storage building. ISOCI purchased the site from Thermo Electron Corporation in 1991.

Construction of the first railroad spur began in November 1992. Construction of the second spur began in July 1995. The design of the rail spurs included secondary containment and piping.


SITE
138
5
14
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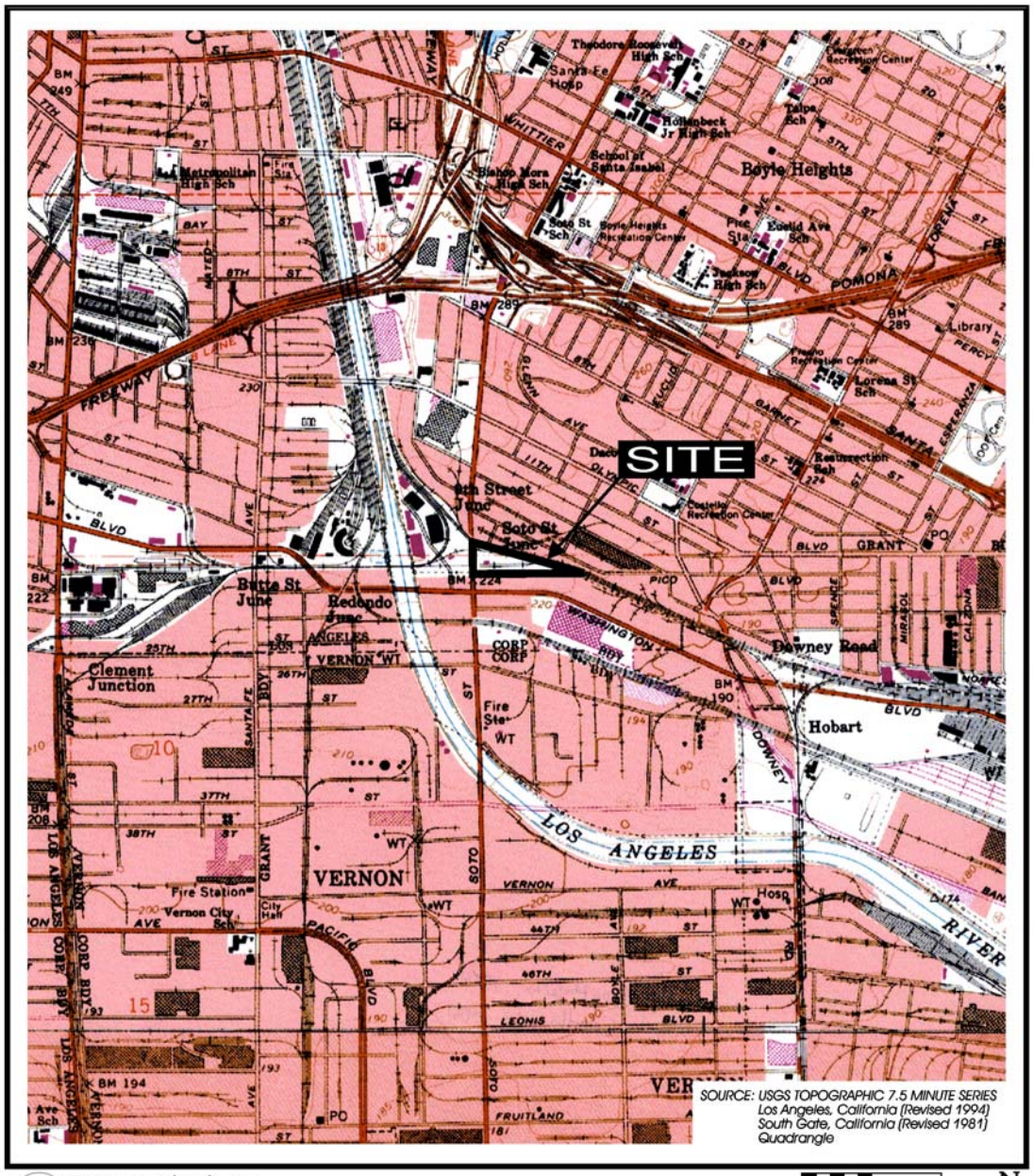
Environmental Audit, Inc.
NOT TO SCALE
N
REGIONAL LOCATION MAP
INDUSTRIAL SERVICE OIL COMPANY, INC.
1700 South Soto Street
Los Angeles, California
Project No. 1631
Figure 2-1
N:\1631\Rev.1\Figure 2-1 Regional Location Map.cdr



SITE LOCATION MAP
INDUSTRIAL SERVICE OIL COMPANY, INC.
1700 South Soto Street
Los Angeles, California

Project No. 1631

Figure 2-2

N:\1631\Rev.1\Figure 2-2 Site Location Map.cdr

The storage tanks at the original ISOCI facility did not include secondary containment. Construction of secondary containment at the site was required by law. The construction of secondary containment required temporary relocation of all existing tanks. The concrete for the first of two secondary containment structures was poured on March 9, 1993. Tanks 100, 200, 300, 400, 500, 600, and 700 were placed in the containment area on April 4, 1993.

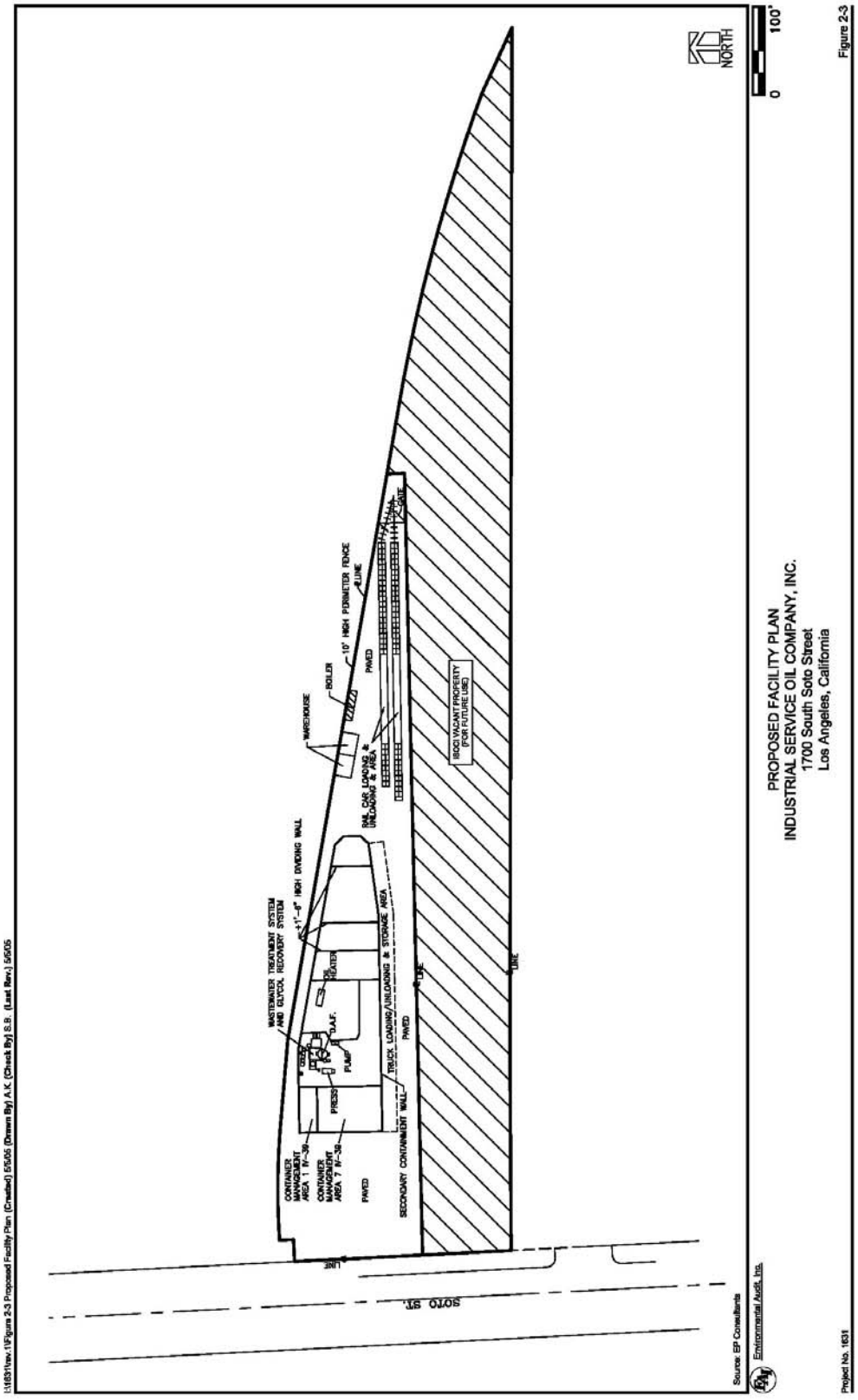
The facility currently recycles used oil, oil-water mixtures and related petroleum mixtures. Antifreeze is also being stored for later transportation to a permitted facility for recycling. In addition to ISOCI's current operational capabilities, the facility proposes to increase tank and container storage capacity as well as include the addition of a waste water treatment system, glycol distillation system, oil ultra-filtration system, fuel blending operations, solids stabilization treatment, and increased loading/unloading railcar operations. Additional waste streams, which will also be accepted and treated at the facility includes both California and RCRA regulated hazardous waste. There has not been disposal of hazardous waste on the original 2.2 acre site.

The Alameda Corridor Transportation Authority (ACTA) permanently condemned about 0.10 acres of the ISOCI facility along the northwest portion of the facility and took ownership of that land effective August 31, 2000. A construction easement was also granted to ACTA for a temporary period of construction along the westerly end of the facility. ISOCI proposed that ACTA provide approximately 0.6 acres of property adjoining the ISOCI site along the southwest boundary. ISOCI has obtained this property from Union Pacific Railroad. This acquisition is included in the Part B permit application and has increased the size of the ISOCI facility to approximately 2.7 acres (Figure 2-3).

2.3 FACILITY PERMIT APPLICATION HISTORY

When the State's hazardous waste regulatory program was founded in the late 1970s and the Resource Conservation and Recovery Act (RCRA) permitting provisions were adopted in the early 1980s, all hazardous waste management facilities that have historically handled or recycled hazardous waste were directed to file for an operating permit. The two-phased permitting program required each applicable facility to file for a temporary operating permit known as the Part A Permit. This allowed DTSC to do a more thorough review of every facility and it's operations. The second phase, known as the Part B Permit, contains a detailed operations plan, which upon review and subsequent approval completes the hazardous waste facility permitting process.

The materials that ISOCI handles (primarily used oil and antifreeze) are considered to be hazardous waste under state regulations. The Part A Application was originally submitted by ISOCI in 1986. The Department of Health Services (now DTSC) issued an Interim Status Document (ISD) to the facility on May 23, 1986, which allows the facility to continue operations pending the approval of the full (Part B) permit. The facility is currently operating under this ISD and is required to complete this environmental


NORTH
0
100'
PROPOSED FACILITY PLAN
INDUSTRIAL SERVICE OIL COMPANY, INC.
1700 South Soto Street
Los Angeles, California
Figure 2-3
Project No. 1631
Source: EP Consultants
Environmental Audit, Inc.
SOTO ST.
WASTEWATER TREATMENT SYSTEM AND GLYCOL RECOVERY SYSTEM
+1'-6" HIGH DIVIDING WALL
CONTAINER MANAGEMENT AREA 1 W-38
CONTAINER MANAGEMENT AREA 7 W-38
PAVED
SECONDARY CONTAINMENT WALL
TRUCK LOADING/UNLOADING & STORAGE AREA
PAVED
WAREHOUSE
BOILER
10' HIGH PERIMETER FENCE
PAVED
RAIL CAR LOADING & UNLOADING AREA
80X0 VACANT PROPERTY (FOR FUTURE USE)

impact report (EIR) as part of the full (Part B) permitting application process. ISOCI has filed several generations of permit applications. A revised Part A Permit Application and the first extensive Part B permit application were filed with DTSC in 1988. The Part B Permit contained a detailed operations plan, including health and safety procedures, chemical analyses of material handled onsite, financial responsibility, worker training, operational procedures, emergency response procedures, and other relevant aspects regarding the operation of the facility. A revised Part A was approved on March 9, 1989 and included the addition of used antifreeze management and construction on a new railspur for the transportation of wastes and recycled product. Revised Part B permit applications and supplemental information were provided to DTSC in 1994, 1997, September 2000, October 2002, November 2003, June 2004, and August 2004.

2.4 PROJECT OBJECTIVES

2.4.1 NEED FOR THE PROPOSED PROJECT

The DTSC is currently considering ISOCI's Part B Permit application (under Article 2, Chapter 20, Division 4.5, Title 22 of the California Code of Regulations) in accordance with the federal Resource Conservation and Recovery Act and California Hazardous Waste Control Act. The permit request is for the continuance of current operations that involve the treatment, storage, and transfer of hazardous wastes related to the recycling of used oil, storage of waste antifreeze, and expansion of the facility's operation. Current state law requires preparation of an EIR for the project (California Public Resources Code Section 21100). DTSC has been designated as the Lead Agency for the preparation of the EIR.

2.4.2 OBJECTIVES SOUGHT FOR THE PROPOSED PROJECT

California Code of Regulations (CCR) Title 14, Section 15124 specifies that a "statement of the objectives sought by the proposed project" be provided as part of the project description in an EIR. The objectives for the continued operation of the ISOCI facility in accordance with state and federal regulations are as follows:

- Continue the treatment and storage of hazardous wastes to allow the continued recycling of used oil and storage of used antifreeze.
- Modify manufacturing processes to increase operational efficiency.
- Increase existing tank and container storage capacities.
- Expand facility operational capabilities to include waste water treatment, glycol distillation, oil ultra-filtration, fuel blending, solids stabilization, and increased railcar loading/unloading operations.
- Accept additional waste streams at the ISOCI facility. This includes both California and RCRA regulated hazardous waste.

- Allow for the phased implementation of remedial measures consistent with maintenance of health and safety of workers and the general public.

- Discharge treated wastewater into the public sewer system.

2.5 FACILITY DESCRIPTION

For purposes of the EIR, it is important to determine the activities that are currently permitted under the Part A permit because they define the environmental baseline or setting conditions. These activities are described under section 2.5.1, "Existing Facility Operations", and include a number of changes that have occurred to the ISOCI facility since the issuance of the Part A permit (e.g., installation of secondary containment and development of rail spurs, section 2.5.1.1). A description of existing operations will provide an understanding of the current site configuration and the level of construction of activities that may be required at the facility. The types of wastes and treatment processes proposed under the Part B application, to be accepted at the ISOCI facility, are described under section 2.5.2 "Proposed Facility Operations" below. The proposed facility plot plan is represented in Figures 2-3, 2-4 and 2-5. Table 2-1 provides a summary of existing and proposed activities. Table 2.1 compares the changes in waste treatment and storage capacity from the existing facility plan to the proposed facility plan.

All current and proposed hazardous waste streams managed by ISOCI from on-site and off-site sources are described under section 2.5.3 "Hazardous Wastes Managed by the Facility". The ISOCI facility also produces recycled product that is described under this section. Various waste management activities at the site such as container organization, liquid bulking activities, transportation, and pipeline operations are described under section 2.5.4 "Waste Management Activities". Finally, waste acceptance and analysis procedures are described under section 2.5.5 "Waste Analysis Plan".

TABLE 2-1

ISOCI PROJECT DESCRIPTION SUMMARY

EXISTING FACILITY OPERATIONS	PROPOSED FACILITY OPERATIONS	
Waste Handled Waste/Used Oil Oil/Water Mixtures Antifreeze California Waste Codes 221, 222, 223, 134 & 135	Waste Handled Same as Existing Additional RCRA Waste Codes (see Appendix B)	
Treatment Operations Oil Treatment: 64,000 gal./day	Treatment Operations Oil Treatment: Upgrade to existing operations Wastewater Treatment Fuel Blending Glycol Recovery Railcar Loading/Unloading Waste Solids Treatment	Treatment Capacity 228,600 gal/day 84,600 gal/day 25,000 gal/day 86,400 gal/day 150,000 gal/day 14,400 gal/day
Container Storage = 100,000 gal. Railcar Storage = 125,000 gal.	Container Storage = 46,200 gal. - Total Railcar Storage = 250,000 gal. - Total	
Secondary Containment on all tanks and units, Activation of one railspur for hazardous waste activities.	Secondary Containment on all tanks and units. Activation of one railspur for hazardous waste activities.	
45 trucks/day 2 rail spurs (hazardous waste & product) 5 railcars per/day	100 trucks/day - Total 2 rail spurs (both hazardous waste) 10 railcars/day 35 railcars/week	
Site size = 2.2 acres	Site size = 2.7 acres	

TABLE 2-1 (CONT.)

EXISTING FACILITY CONFIGURATION				PROPOSED FACILITY OPERATIONS							
Existing Tank Configuration:				Proposed Tank Configuration:				Proposed Tank Configuration (cont.):			
				Reassignment of Existing Tanks:				Proposed New Tanks:			
Tank NO.	Contents	Function [1]	Capacity [2]	Tank NO.	Contents	Function [1]	Capacity [2]	Tank NO.	Contents	Function [1]	Capacity [2]
21	Used Oil	R/S/T	28,064	100	Used/Recycled Oil	S	71,025	800	Spill Containment	S	58,748
22	Used Oil	R/S/T	31,071	200	Used/Recycled Oil	S	71,025	44	Wastewater/Antifreeze/ Waste Glycol (RCRA)	R/S	20,150
23	Used Oil	R/S/T	31,071	300	Used/Recycled Oil	S	71,025	45	Wastewater/Antifreeze/ Waste Glycol (RCRA)	R/S	20,150
24	Used Oil	R/S/T	28,064	400	Used/Recycled Oil	S	71,025	46	Oily Wastewater/Antifreeze/ Waste Glycol	S	20,150
25	Used Oil	R/S/T	28,064	500	Used/Recycled Oil	S	71,025	48	Oily Wastewater/Antifreeze/ Waste Glycol	R/S	20,150
26	Used Oil	R/S/T	28,064	600	Used/Recycled Oil/ RCRA Waste	R/S/T	71,025	49	Oily Wastewater/Antifreeze/ Waste Glycol	R/S	20,150
27	Used Oil	R/S/T	28,064	700	Used/Recycled Oil	S	71,025	51	Antifreeze/Waste Glycol	R/S	20,150
40	Used Oil	R/S	20,293	21	Oil Treatment	R/S/T	28,064	52	Oily Wastewater Treatment/Oxidation	S/T	20,150
41	Used Oil	R/S	20,293	22	Oil Treatment	R/S/T	31,071	53	Oily Wastewater Treatment/Oxidation	S/T	
42	Used Oil	R/S	19,458	23	Oil Treatment	R/S/T	31,071	54	Oily Wastewater Treatment/Oxidation	S/T	20,150
43	Used Oil	R/S	19,458	24	Oil Treatment	R/S/T	28,064	56	Sludge Thickening	R/S/T	10,000
47	Waste Antifreeze	R/S	6,143	25	Oil Treatment	R/S/T	28,064	OWS-150	Oil/Water Separation	S/T	1,786
50	Used Oil & Water	S/T	6,143	26	Oil Treatment	R/S/T	28,064	CFT	Coagulation/Flocculation	S/T	1,650
4	Used Oil	R/S/T	2,114	27	Oil Treatment	R/S/T	28,064	DAF	Dissolved Air Floatation	S/T	3,000
5	Used Oil	R/S/T	2,114	40	Oily Wastewater/ Antifreeze/ Waste Glycol	R/S	20,093	T-1	Vapor Compression Tower	T	317
Chemical Reagent tanks not listed				41	Oil Treatment	R/S	20,093	T-2	Glycol Distillation Tower	T	660
298,478 Gallon Capacity for Regulated Tanks				42	Oil Treatment Treatment/Oxidation	R/S	19,458	T-3/E-5	Glycol Side Stripper/Reboiler	T	264
Non-regulated tanks				43	Used Oil & Water	R/S	19,458	V-1	T-1 Reflux	T	140
100	Used/Recycled Oil	S	71,025	47	Antifreeze/Chemical Product	R	6,143	V-2	T-2 Reflux	T	140
200	Used/Recycled Oil	S	71,025	50	Used Oil & Wastewater (recirculation tank)	S/T	6,143	WT-2	Brine	T	52
300	Used/Recycled Oil	S	71,025					WT-3	Effluent	T	500
400	Used/Recycled Oil	S	71,025					WT-5	Sludge Conditioning	T	2,000
500	Used/Recycled Oil	S	71,025					WT-6	Sludge Collection	T	500
600	Used/Recycled Oil	S	71,025								
700	Used/Recycled Oil	S	71,025					261,107 Gallon Capacity for Regulated Tanks			
497,175 Gallon Capacity for Non-Regulated Tanks				791,425 Gallon Capacity for Regulated Tanks							
Total Existing Tank Capacity				**Non-regulated tanks**				**Non-regulated tanks**			
795,653 gal.				4	Used Oil/Glycol Product/ Chemical Reagent	S	2,114	55	Glycol Products	R/S	10,000
				5	Used Oil/Glycol Product/ Chemical Reagent	S	2,114	WT-1	Chemical Product	T	500
								WT-4	Pre-Coat	T	500
				4,228 Gallon Capacity for Non-Regulated Tanks				11,000 Gallons Capacity for Non-Regulated Tanks			
1 Tank Function: R –Receiving S – Storage T - Treatment								Total Proposed Regulated Tank Capacity:			1,052,532 gal.
2 Capacity in gallons								Total Proposed Non-Regulated Tank Capacity:			15,228 gal.
								Total Proposed Tank Capacity:			**1,067,760 gal.**

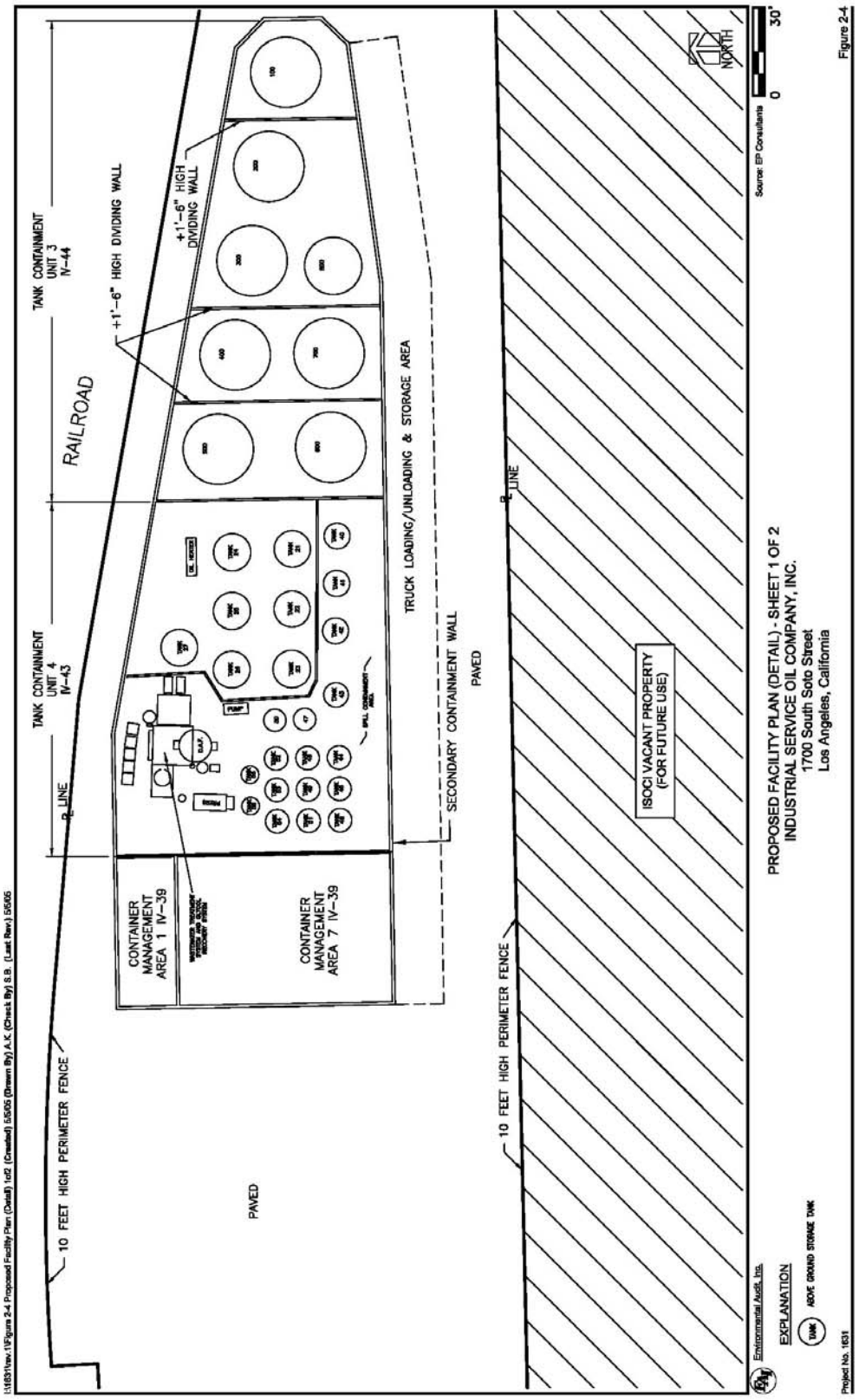
2.5.1 EXISTING FACILITY OPERATIONS

Used Oil Treatment System: ISOCI's used oil treatment system consists of a series of strainers, storage tanks, and treatment tanks which use heat and chemicals to produce "recycled oil". Used oil is transferred from trucks, railcars, or containers through strainers or grinder pumps to reduce the solids concentration. The used oil is pumped into storage tanks that feed the treatment tanks. Treatment chemicals and heat are added to the treatment tanks separating and removing water and contaminants from the used oil. The water, oily sludge (contaminants), and oil phases are allowed to settle and separate in the tank. The water and oily sludge are pumped out separately and containerized for temporary storage and subsequent off-site disposal. The recycled oil product is pumped out into storage tanks for analytical certification. The used oil is considered to be "recycled" oil once it meets the recycled oil criteria specified in the California Health & Safety Code (H&SC) section 25250.1. Recycled oil can be sold for fuel, cutter stock, or refinery feed stock. The existing used oil treatment system is located within Containment Unit #4 on the east side of the facility, adjacent to Containment Unit #3. All recycled oil product as well as used oil awaiting recycled oil certification are stored in tanks in Containment Unit # 3 (Figure 2-4).

Container Transfer Unit: A portion of the ISOCI facility was designated for use as a hazardous waste transfer station. The Container Transfer Unit could handle about 200 55-gallon containers or any combination of large and small containers ranging in size from 55-gallons to 5-gallons, which may total 11,000 gallons maximum. The transfer station was once used for receiving manifested hazardous waste in drums or other containers for temporary storage (no more than 144 hours) before being shipped off-site to a permitted treatment and/or disposal facility. This area has been acquired by ACTA and the container transfer unit is no longer in operation.

Container Storage Unit: A portion of the ISOCI facility is used for waste and reagent container storage. The authorized container storage capacity is 100,000 gallons (or approximately 1,818 each, 55-gallon containers). Containers may be stored in this area for up to one year.

Transfer Activities: "Transfer" means the loading, unloading, pumping, or packaging of hazardous waste. This includes unloading from and loading to railcars from tank trucks. Hazardous wastes manifested to the ISOCI facility may be transferred from tank trucks to railcars at the facility. The hazardous wastes transferred are authorized for acceptance by ISOCI under the company's Interim Status Document. The railcars containing the hazardous wastes are not stored at the facility for longer than ten (10) days.


TANK CONTAINMENT UNIT 3 IV-44
TANK CONTAINMENT UNIT 4 IV-43
RAILROAD
+1'-6" HIGH DIVIDING WALL
+1'-6" HIGH DIVIDING WALL
℄ LINE
℄ LINE
TRUCK LOADING/UNLOADING & STORAGE AREA
SECONDARY CONTAINMENT WALL
PAVED
CONTAINER MANAGEMENT AREA 1 IV-39
CONTAINER MANAGEMENT AREA 7 IV-39
10 FEET HIGH PERIMETER FENCE
10 FEET HIGH PERIMETER FENCE
PAVED
ISOCI VACANT PROPERTY (FOR FUTURE USE)
NORTH
0
30'
Source: EP Consultants
PROPOSED FACILITY PLAN (DETAIL) - SHEET 1 OF 2
INDUSTRIAL SERVICE OIL COMPANY, INC.
1700 South Soto Street
Los Angeles, California
Environmental Audit, Inc.
EXPLANATION
ABOVE GROUND STORAGE TANK
Project No. 1631
Figure 2-4

There are two railspurs with secondary containment, located on the far east side of the facility (Figure 2-5). Currently, one railspur is authorized to handle 125,000 gallons of hazardous waste. In addition, recycled oil product treated at the facility is transferred from tanks and tank trucks to railcars for shipment off-site. Each railspur can hold 5 railcars each for a 25,000-gallon capacity, for a maximum total capacity of 250,000-gallons.

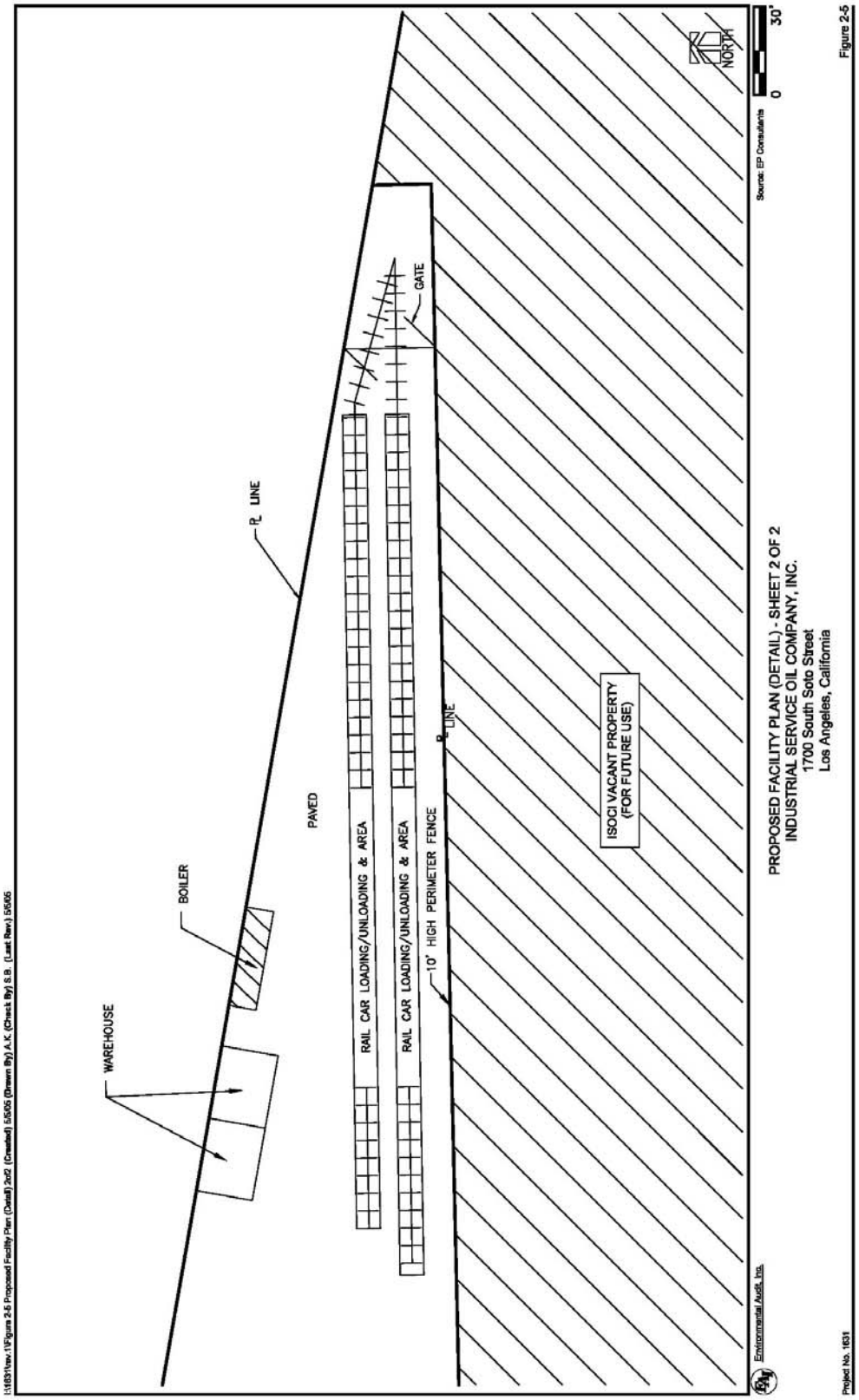
Tank Storage: The ISOCI facility has an authorized tank storage capacity of 350,000 gallons for the storage of used oil. Most of these tanks are incorporated in the used oil treatment system.

Antifreeze: ISOCI is currently authorized to consolidate antifreeze in a tank with a maximum capacity of 6,143-gallons for storage up to one year. The antifreeze wastes are subsequently transferred to an off-site permitted recycling facility. The antifreeze waste storage tank is located in Containment Unit #4 (Figure 2-4).

Secondary Containment: Secondary containment is provided for process and storage tanks using an above ground reinforced concrete structure designed to contain spills from the tanks located within the unit. All tanks are located in tank Containment Units #3 and #4. Containment Unit #4 is generally used for treatment activities and Containment Unit #3 is generally used for used oil storage. The secondary containment system for the ISOCI tank storage area has been designed and constructed to surround the tanks and to prevent any contact between underlying or surrounding soils and the contents of the secondary containment area in the event that wastes are released from the tanks. The containment units are constructed with a 12-inch thick concrete foundation with reinforced steel and the surface of the structure is coated with epoxy to render it impermeable. The walls are reinforced eight-inch thick concrete masonry. The impervious sealed concrete secondary containment structure surrounding the tank storage area is designed to contain precipitation from a 24-hour, 25-year storm, plus 10 percent of the total volume of all tanks or 100 percent of the capacity of the largest tank within the tank storage area, whichever is greater. Internal dividing walls are provided within the containment structure as required by Los Angeles fire codes.

The secondary containment system is also designed to prevent run-on or infiltration of precipitation from outside the tank storage area. Sumps are provided to collect spills or rain water. Tanks have additionally been bolted down to resist earthquake forces. The tank storage areas are equipped with secondary containment as required by 22 CCR 66264.193. A Registered Civil Engineer has certified that secondary containment at the ISOCI facility meets the requirements of 22 CCR 66264.193.

After secondary containment units were constructed at the ISOCI facility, tanks were relocated within the containment units.


WAREHOUSE
BOILER
PAVED
℄ LINE
RAIL CAR LOADING/UNLOADING & AREA
RAIL CAR LOADING/UNLOADING & AREA
10' HIGH PERIMETER FENCE
GATE
℄ LINE
ISOCI VACANT PROPERTY
(FOR FUTURE USE)
NORTH
0
30'
Source: EP Consultants
Environmental Audit, Inc.
PROPOSED FACILITY PLAN (DETAIL) - SHEET 2 OF 2
INDUSTRIAL SERVICE OIL COMPANY, INC.
1700 South Soto Street
Los Angeles, California
Project No. 1631
Figure 2-5

2.5.2 PROPOSED FACILITY OPERATIONS

*Additional Tank Capacity***:** The ISOCI facility proposes to change the tank capacity from 795,653 gallons to 1,067,760 gallons total (Table 2-1). This will increase total permitted tank capacity by 272,107 gallons. Both Containment Units #3 and #4 will hold the additional tank capacity. The additional tank storage capacity is due in part to the proposed addition of other treatment processes at the ISOCI facility.

*Container Storage Capacity***:** ISOCI proposes to use the area located in the northwest portion of the site for container storage (Referred to as Container Management Area No. 1 and No. 7 in Figure 2-4). Container Management Area No. 1 will have a maximum storage capacity of 200 each, 55-gallon containers, or about 11,000 gallons. Issuance of the Part B permit will allow this area to be used for the transfer and storage of RCRA waste streams that can be stored for a maximum of one year. Waste can also be consolidated in roll-off bins. Ignitable or reactive waste will not be stored in this area. Secondary containment will be provided for this storage area. Other activities in this area include inspection, sorting, sampling, labeling, and preparing of containers for transport.

Container Management Area No. 7 will have a maximum storage capacity of 640 each, 55-gallon containers, or about 35,200 gallons. Issuance of the Part B permit will allow this storage area to be used for the transfer and storage of RCRA waste streams that can be stored for a maximum of one year. Ignitable and reactive wastes may be stored in Container Management Area No. 7 under the condition that these wastes are stored greater than 50 feet from the property lines. Secondary containment will be provided for this storage area. Other activities in this area include the loading and unloading of containers from trucks, inspection, sorting, sampling, storing, emptying, shipping and consolidating waste in containers; and labeling and preparing containers for transport.

*Railcars***:** ISOCI proposes to operate the two existing rail spurs as a hazardous waste container storage and transfer unit (Figure 2-5). A 58,748-gallon tank will remain empty for railcar spill containment only. Railcar loading and unloading operations include: off-loading of oil, waste waters, and antifreeze for treatment at ISOCI into tanks or tank trucks; loading of Non-RCRA hazardous liquid wastes from tank trucks to railcars; loading and off-loading of containers of waste (using forklifts) for treatment, storage, and transfer at ISOCI; and loading of RCRA and Non-RCRA hazardous waste from any tank in the ISOCI facility into a railcar. Ignitable RCRA waste is prohibited from being stored on the rail spur for any period. Hazardous waste may be stored in 10 each, 25,000-gallon railcars, at ISOCI prior to disposal for a maximum of one year by regulation. ISOCI estimates that about 35 railcars per week will arrive/depart from the facility. Hazardous waste from an estimated 30 trucks per day will be directly loaded into railcars. The purpose of the transfer and railcar storage activity is to facilitate rail and truck transport of RCRA and California regulated hazardous wastes.

*Wastewater Treatment System***:** ISOCI proposes to treat hazardous wastewater contaminated with oil, organic compounds and metals in the wastewater treatment system. The wastewater treatment system is located in Secondary Containment Unit #4

(Figure 2-4). The wastewater treatment system consists of several above ground enclosed tanks that will be used for: equalization (EQ), oil/water separation (OWS), coagulation/flocculation (CFT), dissolved air flotation (DAF), advanced oxidation processing (AOP), solids management (SM), and storage.

Raw wastewater is first accumulated in storage tanks, where it will be held until it is ready to be processed through the OWS, the CFT, and/or the DAF. Variable drive feed pumps will equalize the flow to prevent the overfilling of tanks. Levels in the storage tanks and the feed pumps will be monitored to prevent overflow.

After equalization, wastewater will be pumped to the OWS, which will separate free and demulsified oil. Recovered oil will be collected in a 55-gallon collection drum. Sludge bottoms will be discharged by gravity into a sludge collection tank.

From the OWS, wastewater will flow onto the three-chamber CFT. Treatment chemicals will be added to control pH and enhance coagulation/flocculation, and sensors will monitor pH and liquid levels. Bottom sediments from the CFT will be collected in the effluent holding tank.

Wastewater from the CFT will gravity feed to the DAF. The DAF will separate floating material and sediment, that will be gravity fed to a sludge collection tank and will further treat the residue in the sludge conditioning tank and filter press. Wastewater from the DAF is then gravity fed to an effluent holding tank. The effluent holding tank will serve as the distribution point for wastewater to flow either to the AOP tanks, or the vacuum compression feed tank. The effluent holding tank will receive filtrate from solids dewatering and water draining from the DAF. The DAF will include three level switches to control effluent pumps when operated in the automatic mode. Each effluent pump will be equipped with variable frequency drives for controlling the flow rate to the AOP and vacuum compression feed. When a high-high condition is reached in the effluent holding tank, the DAF feed pumps will be shut off automatically.

The AOP will operate in batch mode, while the contents of the oxidation contact tanks are recirculated through the “Clorin” and e-OX systems. Oxidizing gases will be drawn into the recirulating water stream through a series of jet mixers in the recycle contact tank pumps. Each pump, when operating in automatic mode, will be controlled by level switches in the oxidation contact tanks. These pumps will recirculate water from the oxidation contact tanks through the “Clorin” and e-OX generators, thereby providing transferring oxidizing gases into the liquid stream through jet mixers. The “Clorin” generators, which are served by a common brine tank, will be controlled by an in-line residual chlorine monitor, which will stop “Clorin” generation at an established chlorine concentration. A level switch in the brine tank will actuate a solenoid valve for control of feed (city) water. Pressure sensors in the “Clorin” generator discharge piping will automatically turn off each generator upon reaching a pressure set point. When the pressure set point is reached, the AOP will stop and wastewater treated in the oxidation contact tanks will be tested before batch discharge in accordance with the City of Los Angeles wastewater discharge permit.

OWS bottom solids, DAF float, and DAF bottom solids will be collected in a 500-gallon sludge collection tank, which will be equipped with an inductive type level switch. At high level, sludge will be automatically transferred to a 2,000-gallon sludge conditioning tank that will be equipped with a mixer. A float switch will automatically turn off the solids transfer pump at high level. Sludge may be conditioned with diatomaceous earth or similar material prepared in the pre-coat preparation tank. Pre-coat slurry will be prepared and recirculated through the filter press to deposit a porous protective "pre-coat" layer on the filter cloth. Conditioned sludge will be pumped through the recessed chamber filter press for dewatering. Dewatered sludge cake will be discharged to a self-tipping dumpster cart for subsequent disposal. The WWTS will be equipped with a comprehensive safety shut down system. Shut down will occur in the event of low and high levels in the storage and treatment tanks, low flow in pumps, or high pressures in the "Clorin" generators.

Wastewater shall be treated to meet sewer discharge standards before batch discharge into the sewer system.

This system will process about 84,600 gallons/day and the associated tank storage capacity is 228,040 gallons.

Sewer Discharge Line: With the addition of the wastewater treatment system, a sewer discharge line will be constructed and operated by the ISOCI facility. The sewer discharge line will only be connected to designated sewer discharge tanks. Pre-treated wastewater will be discharged to the public sewer system via the constructed sewer discharge line.

*Oil Treatment System***:** ISOCI will continue to use the existing heat and chemically enhanced used oil treatment system and plans to expand the number of tanks in the oil treatment system. Alternatively, the tanks may be heated by direct steam injection. Wastewater that was previously disposed of off-site will now be sent to the wastewater treatment system and treated prior to sewer discharge. Water that cannot be adequately treated to meet sewer discharge specifications onsite at the ISOCI facility will be treated as hazardous waste and shipped off-site for disposal.

The solids pumped to the filter press are collected as filter cake while the filtrate is returned to the circulation tank. When the filter press is full, the contents are emptied, by gravity into a bin and the filter cloths are cleaned and inspected. The solids are subsequently shipped off-site for disposal.

The new oil treatment system will have a capacity of 84,600 gallons per day which, combined with the existing oil treatment system, will result in a total oil treatment capacity of 228,600 gallons per day. The maximum tank storage capacity is 628,612 gallons.

*Fuel Blending Unit***:** ISOCI proposes to blend hazardous waste (BTU value greater than 5,000) at the facility in the RCRA fuel blending system. The fuel-blending tank will be located in Secondary Containment Unit #3 (Figure 2-4), centrally located in the ISOCI

facility. Organic liquids will be received in two each 20,150-gallon tanks and then blended in one each 71,025-gallon tank. The large tank is agitated to ensure complete mixing of the liquid. The blended fuel will be sent off-site for energy recovery as fuel for cement kilns, incineration facilities or other energy recovery facilities. Treatment and disposal facilities specify the desired parameters for blended waste fuels used for energy recovery. By blending greater than 5,000 BTU organic waste streams together, the composite hazardous waste liquid can be designed to meet the required parameters for receipt and disposal at an off-site facility.

The fuel blending system has a process capacity of 25,000 gallons per day with a maximum tank storage capacity of 111,325 gallons.

*Waste Solids Treatment Unit***:** The waste solids treatment unit is located in the eastern portion of Container Management Area No. 1 (Figure 2-4). The purpose of this treatment unit is to eliminate free liquids from the waste so that it can be shipped off for land disposal. The waste solids treatment unit consists of a sludge thickening tank, centrifuge, and cement mixer. The waste is collected in a 10,000-gallon sludge thickener tank. The tank is designed to dewater sludges by gravity settling. Sludge is drawn from the bottom of the tank and pumped to the centrifuge. The centrifuge further separates and concentrates the solids from the liquids. Solids build up on the inside of a rotating bowl as the liquids pass through holes. The liquid collects inside the centrifuge tank and is eventually pumped to the circulation tank in the oil treatment system. The waste solids are collected and transferred to the stabilization unit.

The stabilization unit is a conventional 6 cubic yard cement mixer. Waste solids, stabilizing materials and/or reagents are all mixed in the unit for a predetermined time. The stabilizing agents and reagents aid in the solidification of the waste mixture. After thorough mixing, the stabilized material is transferred from the stabilization unit into a container for off-site disposal. Wastes generated from this process are analyzed to determine chemical and physical characteristics.

The capacity of this unit is 14,400 gallons per day. The tank storage capacity is 10,000 gallons.

Glycol Recovery System: The glycol recovery system (GRS) is located in Secondary Containment Unit #4 (Figure 2-4). The GRS will treat antifreeze and other waste glycols from off-site sources and on-site treatment of used oil and oily wastewater. Glycol will be recovered through two distinct processes: vapor compression and glycol distillation.

Antifreeze and other waste glycols will be treated in tanks by the addition of reagents to enhance the separation of oil, water, and glycol. Some antifreeze requiring special processing may be pretreated in the wastewater treatment system. After separation the glycol will be fed to a heat exchanger that leads to a vapor compression tower. The liquid phase will then flow continuously through an auxiliary heat exchanger. The heat exchanger will separate the liquid into a product stream (consisting of glycol and wastewater) and a vapor stream. The vapor stream, consisting mainly of water, will be

condensed in a vapor compressor. Once condensed, the vapor will be used for reflux and then sent to the wastewater treatment system for further processing before being discharged to the sewer. The product stream will be sent to the glycol distillation tower for processing.

The glycol distillation tower will separate the product stream into three components: (1) a water-rich distillate, which will be condensed and used for reflux before being sent to the wastewater treatment system; (2) an intermediate cut of glycol product, which will be sent to glycol side stripper and reboiler; and (3) a viscous heavy bottom that will be sent to the wastewater treatment system prior to sewer discharge. The intermediate cut of glycol product will be heated and then tested to meet glycol product specifications. That which does not meet product specifications will be sent for further processing.

The capacity of this unit is 86,400 gallons per day. The tank storage capacity is 28,035 gallons.

2.5.3 HAZARDOUS WASTES MANAGED BY THE FACILITY

ISOCI currently manages used oil and antifreeze. The Part B Permit also proposes future waste streams that will be managed at the facility. Appendix B presents the hazardous waste codes associated with all waste streams proposed to be accepted into the ISOCI facility.

2.5.3.1 Off-Site Hazardous Wastes Currently Managed by the Facility

Used oil is currently the primary waste handled at the ISOCI facility. Used oils come to ISOCI from a variety of off-site sources such as community recycling centers; generators who use oil and lubricants in industrial activities; and generators that are involved in activities concerning machinery maintenance. The used oil is generally produced from oil tank cleanings, oil spills, sump cleaning, vehicle oil changes, and factory equipment maintenance. Used oil is not ignitable, corrosive, or reactive but can contain contaminants such as gasoline, diesel fuel, non-RCRA solvents and thinners, water and dirt. It may also be contaminated with heavy metals, such as lead.

Antifreeze is the other waste stream currently managed at the ISOCI facility. Antifreeze consists mostly of ethylene glycol with some lesser ingredients added as corrosion inhibitors. Antifreeze is used in automotive and other internal combustion engine cooling systems. Antifreeze wastes come to ISOCI from off-site sources such as community recycling centers and vehicle maintenance facilities. It is generally produced from maintenance activities that require disassembly of the cooling system and draining of the coolant. Waste antifreeze is a California Hazardous Waste and most antifreeze is not considered to be a RCRA Hazardous waste (Non-RCRA). Waste antifreeze is not ignitable, corrosive, or reactive but can contain contaminants such as oil, fuels, metals, and solids.

2.5.3.2 Off-Site Hazardous Wastes Proposed to be Managed by the Facility

In addition to used oil and antifreeze, ISOCI proposes to accept other California Hazardous Waste as well as RCRA Hazardous Waste. The ISOCI facility will not be accepting dioxins, explosives, or any pyrophoric material. The new waste streams proposed to be accepted by the facility are directly related to the planned additions of the facility's capabilities.

Additional Container Storage Capacity: The addition of Container Management Areas #1 and #7 will allow the facility to receive containerized RCRA and Non-RCRA liquids and solids. Wastes to be stored in these areas come from various off-site sources. Industries and business of all kinds generate containers of hazardous waste. These industries may include, but are not limited to:

Electronics Industry
Aviation Industry
Metal Plating Industry
Oil Refineries
Dry Cleaners
Metal Parts Manufacturing

The processes producing the waste include, but are not limited to:

Spills
Tank cleanings
Vehicle maintenance
Sump cleaning
Factory maintenance
Refinery maintenance
Electronic parts cleaning
Metal parts cleaning
Painting activities
Laboratory activities
Vehicle and aircraft washing
Metal finishing and coating

Liquid, solid, and semi-solid hazardous wastes will be stored in Container Management Area #1. These wastes include, but are not limited to:

Stabilized solid wastes
Sludges to be stabilized
Empty containers
Containers storing reagent chemicals
Metal containing sludges and solids
Used oil sludges

Oil filters
Crushed containers

Waste consolidated in roll-off bins will also be stored in Container Management Area #1. The wastes to be consolidated in the roll-off bins include, but are not limited to:

Stabilized metal sludges
Contaminated solids containing metals
Contaminated solids containing oil and organics
Contaminated rags
Contaminated personal protective equipment
Screening debris
Empty filters
Solid spill cleanup debris
Absorbents
Used oil solids and crushed empty containers

Liquid, solid, and semi-solid hazardous wastes will be stored in Container Management Area #7. These wastes include the same wastes specified for Container Management Area #1 in addition to the following list. These wastes include, but are not limited to:

Waste waters
Off-specification chemicals
Contaminated soil
Household hazardous waste
Aqueous waste contaminated with metals
Used/waste oil and other oily wastes
Acids and bases (corrosives)
Fuels
Solvents

Wastewater Treatment System: The Wastewater Treatment System will be able to treat waste waters from off-site sources (such as facilities with sumps and clarifiers). Wastewater is generally produced from commercial washing activities involving automobiles, aircraft, industrial plants, and equipment. Wastewater is also generated from sump cleaning, spill clean-up, and tank and equipment decontamination. Examples of these wastes include but are not limited to:

Rail water
Rinse water
Contaminated groundwater
Oil spill clean up water
Bilge water
Sewer clarifier cleaning water
Tank cleaning rinse water
Collected rainfall

Wastewater can be classified as RCRA or Non-RCRA Hazardous Waste. The wastewater managed at the ISOCI facility can be contaminated with oil, organic compounds, or metals.

Fuel Blending Unit: The Fuel Blending Unit will be able to blend wastes from off-site sources such as manufacturing and metal finishing facilities, industries with painting activities, and facilities with vehicle and refinery maintenance. Fuel blending wastes are generated from fuel tank cleaning operations, vehicle maintenance, metal parts cleaning activities, and coating removal activities. Examples of these wastes include, but are not limited to:

Solvent mixtures
Contaminated waste/used oil
Waste fuels
Fuel oil mixtures
Paint related material

Fuel blending waste is ignitable and classified as RCRA Hazardous Waste. These wastes managed at the ISOCI facility can be contaminated with solvents, thinners, gasoline, and diesel.

Waste Solids Treatment Unit: The Waste Solids Treatment Unit will be able to solidify wastes from off-site sources such as facilities with car and aircraft washing activities, facilities utilizing industrial washing and rinsing activities, and metal plating industries. Solids are generated from tank settling operations, filtration units, and dewatering activities. Examples of these wastes include, but are not limited to:

Oily sludges/solids
Tank bottoms
Solid residues from washing/rinsing
Solid residues from clarifiers
Solid residues from plating activities

Solids can be classified as RCRA or Non-RCRA Hazardous Waste. These wastes managed at the ISOCI facility can be contaminated with metals.

*Additional Railcars***:** The generators and processes associated with these wastes have been previously discussed. The wastes managed on the two rail spurs include, but are not limited to:

Used oil
Wastewater
Waste antifreeze
Containerized waste

The rail spur can manage wastes classified as RCRA or Non-RCRA hazardous waste. However, ignitable RCRA waste is prohibited from being stored on the rail spur for any period.

Oil Treatment System: See section 2.5.4.1

2.5.3.3 On-Site Hazardous Wastes Currently Managed by the Facility

The facility primarily generates wastes associated with the oil treatment process. The facility does not treat antifreeze wastes however, they store it and subsequently ship the waste off-site for proper waste management. Wastes associated with the oil treatment process include:

Sludges and solids from treatment and storage tank bottoms
Water/Oily Water mixtures from dewatering activities
Screen debris

Other wastes generated onsite include:

Sludge and solid from the antifreeze storage tank
Tyvek suits, gloves, rags, absorbent pads, used absorbent, filter cartridges

Most of these wastes are generated during the course of hazardous waste treatment and equipment decontamination procedures. All of these waste materials will be placed in appropriate containers and shipped off-site for treatment and/or disposal at permitted facilities. They may be temporarily stored in the container storage areas at the facility for a period of up to one year prior to being shipped off-site.

2.5.3.4 On-Site Hazardous Wastes Proposed to be Managed by the Facility

In addition to the current hazardous wastes generated on-site, proposed operations will contribute to the wastes already managed by ISOCI. Sludge and solids from treatment and storage tank bottoms from the wastewater treatment system, glycol distillation system, and fuel blending will be new waste streams generated on-site. Other waste streams include:

Water/Oily water from the oil ultra-filtration unit
Water removed from the antifreeze ultra-filtration unit
Water removed from the glycol distillation unit
Water removed in the air emissions control system
Water removed from the waste solids treatment unit
Spent carbon from the oil treatment system
Spent carbon from the air emissions control system
Fuel blended waste

All sludges and solids generated on-site will be processed through the Waste Solids Treatment Unit. The resulting solidified waste will be containerized and sent off-site for disposal. These wastes are usually contaminated with heavy metals and oily waste.

All water generated on-site will be processed through the Wastewater Treatment Unit. All treated wastewater will be discharged to the sewer system. All treated wastewater is tested to make sure it meets the requirements specified in their sewer discharge permit prior to discharge. Water that does not meet sewer discharge specifications will either be re-processed or containerized and disposed of as hazardous waste.

The spent carbon is shipped off-site for regeneration or hazardous waste disposal.

Fuel blended waste is shipped off-site via tank truck for energy recovery as fuel for cement kilns, incineration facilities or energy recovery facilities.

Any waste received by the facility that cannot be treated on-site by the facility will be stored for up to one year prior to shipment off-site for proper waste management. These wastes include:

Acidic and basic waste streams
Oxidizing waste material
Highly toxic waste (e.g. cyanides)

2.5.3.5 Recycled Product Generated at the Facility

ISOCI currently produces recycled oil for shipment off-site to be sold and used for fuel, cutter stock, or refinery feed stock. In addition to recycled oil, the facility proposes to recycle glycol and antifreeze. Glycol product will be stored and shipped off-site for future use in coolant solutions. Recycled antifreeze will either be further distilled into glycol product or shipped off-site for use in coolant solutions.

2.5.4 WASTE MANAGEMENT ACTIVITIES

The following waste management activities are currently implemented at the ISOCI facility. These activities will continue to be implemented after the proposed modifications to the facility.

Bulk Liquid Wastes: Bulk liquid wastes received via railcars are stored in the railcars until pumped into facility tanks for storage and/or treatment. Bulk liquid wastes arriving via trucks are pumped to appropriate storage and/or treatment tanks upon arrival. Wastes are not stored in trucks at the ISOCI facility. All tanks at the ISOCI facility have been designed and constructed in accordance with applicable federal, state, and local regulations and codes. Table 2-1 provides information about the number, size and use of the storage and treatment tanks, which are or will be located at the ISOCI facility. No underground storage tanks are or will be installed or used at the ISOCI facility.

Containers: All containers arriving at the facility are segregated according to their contents. All containers are stored in designated storage areas for up to one year. During storage, containers are elevated on pallets to avoid contact with standing water. All containers are required to be properly labeled as to their contents and handling procedures in accordance with federal, state and local regulations.

Containers used for the storage and transfer of hazardous waste may consist of any U.S. Department of Transportation (DOT) approved container for the shipment of hazardous materials or wastes, including drums, pails, bottles, carboys, supersacks, and so forth. DOT approved or exempt portable tanks as well as fiber boxes and bags may also be stored at the facility. Containers that will deteriorate in rain or sun (i.e., cardboard boxes or fiber stacks or drums) will not be stored longer than 90 days. The container management areas are inspected daily. Containers that are leaking or in poor condition will have their contents transferred to an adequate compatible container in order to prevent ruptures or leaks. Roll-off containers and bins approved by the DOT under 49 Code of Federal Regulations (CFR) for the transportation of bulk hazardous waste may also be stored at the ISOCI facility.

The contents of containers with pumpable organic liquids are pumped (using above ground pipelines and an on-site pump) into bulk storage tanks for further processing through the on-site treatment systems. If ISOCI is unable to treat the container contents at their facility, the container will be shipped off-site for further management and disposal.

Transportation: Hazardous wastes and other materials will continue to arrive at the ISOCI facility via railcars and trucks. Railcars enter the facility on either of the two spur lines that will be located in the eastern portion of the facility. These spur lines are connected to major rail lines located east and north of the facility, providing access to the regional and national rail system. Modifications to the facility are expected to increase the number of railcars that visit the site from 5 to 35 railcars per week. Up to 10 railcars may remain on the rail spurs located in the eastern portion of the facility.

Approximately 45 trucks currently enter the ISOCI facility each day, following an established clockwise truck route within the facility to and from designated loading and unloading areas. An estimated 100 trucks per day will enter the facility following the proposed modifications. Trucks access the facility via Soto Street, which runs along the western boundary of the facility (see Figure 2-2).

ISOCI uses forklifts, drum dollies, and pallet jacks to unload or load trucks and to move containers around within the confines of the facility. Transporters of containers often have lift gates on vehicles for handling ease and safety. These lift gates allow for easier loading and unloading of containers from the vehicle bed to the ground.

Employees park their vehicles on-site in designated parking areas.

Pumps and Pipelines: ISOCI operates the tank treatment and transfer facility using pumps and pipelines as a principal method of transporting hazardous waste and oil products from one holding vessel (tank, tank truck, or railcar) to another. The transfer of hazardous waste and recycled oil products at the ISOCI facility is accomplished by short pipelines that are contained within the facility secondary containment systems. The majority of these pipelines are above ground and lie within secondary containment areas constructed for the tank storage areas. The remainder of the pipelines lie within a secondary containment conduit trench in the ground which has been constructed of steel and may be visually inspected to ensure that the pipelines have not ruptured or failed. The pipelines used for transfer of hazardous waste and recycled oil products are constructed of welded steel with appropriate flanges and valves.

The major liquid transfer pumps at the ISOCI facility are manually operated to ensure that an operator is present and supervising the pumping operation during use of the pump. The four-inch Roper pumps provided for railcar loading and off-loading are equipped with cable connected remote controls for use by an operator standing on a railcar during the loading or unloading operation. This feature enables safe and positive control of the loading or off-loading operation by an operator visually observing the process and who is in communication with the receiving tank operator by two-way radio. Pumps are also used to empty transportation vehicles and containers during decontamination washing activities. An air operated pump is located at the low end of the pipe conduit near the east end of the facility where the railroad enters and exits the facility for the purposes of removing accumulated water or any spilled material within the conduit.

2.5.5 WASTE ANALYSIS PLAN

The following waste analysis plan is currently being implemented at the ISOCI facility. This waste analysis plan will continue to be implemented after the proposed modifications to the facility.

*Pre-Acceptance Testing***:** Prior to accepting any waste stream at ISOCI, the waste stream will go through a pre-acceptance process. The exception is used oil or other waste subject to milk run or modified manifest procedures (CCR Title 22, Section 66263.42). The generator of a waste stream has to complete a waste profile sheet and submit an analysis of a representative sample accomplished by a certified laboratory. The generator can also submit a representative sample to the facility and ISOCI will obtain an analysis accomplished by a certified laboratory. The waste profile sheet can be completed through generator knowledge, knowledge of the process generating the waste, and analytical data. In the case of off-specification commercial chemicals, the generator may attach a material safety data sheet in lieu of analysis of a representative sample.

*Waste Acceptance Screening***:** When railcars or trucks arrive at the ISOCI facility, personnel collect the shipping documents from the transporter. The shipping documents are identifying documents, which travel with the waste at all times. These documents include the hazardous waste manifest, waste data sheet, and other required or relevant information. The documents are reviewed for errors or incomplete information, and

compliance with the facility's waste acceptance criteria. ISOCI personnel inspect all railcars, tank trucks, and containers upon receipt for appropriate labels, seals, and physical condition.

Facility personnel will sample the waste according to ISOCI's waste sampling plan. The samples are analyzed according to the facility's screening acceptance criteria at the on-site laboratory, which is equipped to handle most routine screening analyses. In general, sampling and analysis is conducted in accordance with U.S. Environmental Protection Agency guidelines as outlined in Publication SW-846 "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods." The samples will be analyzed (fingerprinted) by ISOCI, or a certified independent laboratory, for various parameters, which vary depending on the waste stream, but can include: heat content, total halogens, pH, specific gravity, total suspended solids, heavy metals, polychlorinated biphenyls, chloride content, compatibility, reactivity, flash point, oil and grease, radioactivity, treatability, solids, and water. Other test methods may be used, as appropriate to accommodate the acceptance of new waste streams. Waste "fingerprint" tests for the purposes of screening and determining compatibility of the waste with processes and other wastes are to be accomplished each time the waste is received at the facility. The test results will be recorded and compared against the pre-acceptance information to determine whether the waste will be accepted at the ISOCI facility or rejected and shipped back to the generator. ISOCI attempts to resolve waste discrepancies with the generator before rejecting the waste. As an alternative to shipping rejected waste back to the generator, ISOCI may arrange with the generator to ship the waste to another approved facility for treatment and/or disposal.

Recycled oil, wastewater for discharge and other waste shipped off-site will be analyzed to ensure they meet appropriate specifications and/or limitations (California Health and Safety Code Section 25250.1). The analyses include such parameters as flash point, heavy metals, total halogens, and polychlorinated biphenyls.

All waste streams will be reviewed on an annual basis and each customer will be required to recertify that no significant changes in the waste stream or the process(es) generating the waste have occurred. The waste analysis will be repeated anytime there is a change in the process from which the waste is generated or at any time the screening indicates that the waste has changed in character.

2.6 CLOSURE, POST-CLOSURE, AND FINANCIAL RESPONSIBILITY

Closure Plan: The Closure Plan, included in the ISOCI Part B permit application, identifies the steps that will be necessary to completely close the ISOCI facility. The Closure Plan, designed to comply with Article 7, Chapter 14, Division 4.5, of Title 22 CCR includes: Sampling and Analysis Plan; procedures for decontamination of equipment and treatment; a schedule of closure; and a cost estimate for closure.

At closure, all hazardous materials will be removed from all treatment and storage locations within the facility. All hazardous wastes will be transported off-site to an appropriate treatment, storage, and disposal facility. Equipment and structures will be decontaminated. The nature of ISOCI activities are such that complete decontamination of the facility is anticipated, thereby allowing its later use for other industrial purposes. Therefore, the demolition of structures is not planned in the ISOCI closure activities. Tanks, process vessels, piping, and pumps will be recycled at a scrap metal facility off-site if possible. Concrete and pavement debris will be sent off-site for land disposal or possible recycling into paving materials. Any decontaminated equipment or debris not suitable for recycling will be disposed of at an appropriate treatment, storage, and disposal facility. Soil borings will be taken to assess contamination, if any, and contaminated soil will be disposed/treated using the best available and cost effective technologies at the time of closure. This approach eliminates the possibility of post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground surface water or to the atmosphere. No portion of the facility will be left unclosed after the Closure Plan has been implemented.

Within 60 days of completion of closure, ISOCI will submit to the DTSC certification, both by ISOCI and by an independent registered professional engineer, that the facility has been closed in accordance with the specifications in the DTSC approved Closure Plan.

Post-Closure Plan: Since there are no land disposal units at the ISOCI facility and all hazardous waste management units will be removed or decontaminated after closure, a post closure and/or contingent closure plan is not required.

Financial Responsibility: ISOCI has chosen insurance coverage as the financial assurance mechanism to ensure the availability of adequate funding for closure. For sudden, accidental occurrences, ISOCI maintains an insurance policy for liability coverage. ISOCI has not and will not operate any land disposal units at the facility. Therefore, no financial assurance mechanism for post-closure or coverage for non-sudden accidental occurrences is required. In addition, ISOCI maintains pollution liability insurance.

2.7 CORRECTIVE ACTION PLAN

Corrective action is required for any releases of hazardous wastes or constituents from any solid waste management unit (SWMU) at a hazardous waste treatment, storage or disposal facility that is applying for a Part B Permit (California Health and Safety Code Section 25187). A solid waste management unit is a unit, device or area where solid wastes are or have been stored, treated or disposed. These wastes may be considered as hazardous waste or hazardous constituents under the Resource Conservation and Recovery Act (RCRA) if the wastes are those identified in Title 40 Code of Federal Regulations Part 261.

The Corrective Action Program was initiated with the RCRA Facility Assessment. RCRA and state regulations (Cal. Code Regs., tit. 22, §68400) require all applicants for a hazardous waste facility permit to undergo a RCRA Facility Assessment (RFA), which will determine if future clean-up, or corrective action, is necessary. The RFA identified whether activities at the facility have caused or have the potential to cause a release of hazardous substances into the air, soil, or ground water. This assessment features a review of company and historical records, visual site inspection, and if deemed necessary, limited soil sampling.

An RFA was conducted at ISOCI in June 1994 to determine whether any contamination resulted from current or previous operations at or adjacent to the site (DTSC, 1994). The RFA concluded that SWMUs in the past were operated without secondary containment and identified 58 SWMUs and two areas of concern that either have released or may have released hazardous waste or hazardous constituents into the environment. Since the completion of the RFA, many of the SWMUs have been removed, replaced or relocated and are identified in the Part B permit. The RFA concluded that the facility had soil contamination in two locations (the tank farm area and at the east end of the facility). Hazardous waste and hazardous waste constituents of concern at the facility include petroleum hydrocarbons, volatile organic compounds (e.g., perchloroethylene, trichloroethylene, benzene, xylene, toluene, and ethyl benzene), semivolatile organic compounds (e.g., phenanthrene), Polychlorinated biphenyls (PCBs), and metals.

Based on the findings of the RFA, DTSC determined that a RCRA Facility Investigation (RFI) was required for the entire facility to investigate the nature and extent of the soil contamination. In addition, sources of air emissions were also to be evaluated to determine appropriate mitigation measures, since emissions resulting from operations at the facility are not currently processed through a vapor recovery or reduction system. An RFI has been required as part of a Corrective Action Consent Agreement, executed between ISOCI and DTSC.

The first step in the RFI process requires that a plan be prepared that outlines the areas to be characterized, identifies the pollutants of concern, identifies the number of samples to be taken, identifies the media (soil, subsurface, ground water) to be tested, identifies the types of laboratory tests that will be required, and provides provisions for quality control and quality assurance. The plan must be approved by DTSC before it is implemented. Once the plan is approved, the facility investigation will be conducted which includes soil sampling and laboratory analyses. This provides a more accurate evaluation of the type of contamination, the extent of contamination, and the potential sources of contamination. Completion of the facility investigation will allow ISOCI to propose remediation activities, if necessary.

Corrective action, if required at the site, will continue regardless of the final permit determination. The extent of contamination, sources of contamination, and appropriate remediation efforts, if required, are considered speculative at this time and will not be known until the RCRA Facility Investigation has been completed.

ISOCI will be required to prepare a Corrective Measures Study (CMS), if contaminant concentrations identified in the RFI exceed health-based action levels and/or if DTSC determines that the contaminant releases pose a potential threat to human health and/or the environment. A CMS work plan may be required which details the methodology for developing and evaluating potential corrective measures to remedy any contamination at the facility. Treatability studies may be required to demonstrate the effectiveness of proposed measures. DTSC will review and evaluate the CMS and provide the public with an opportunity to review and comment on the report. Corrective measures will be selected by DTSC.

A Corrective Measures Implementation Work plan (CMIW) is required if corrective measures have been required. The CMIW is required to facilitate the design, construction, operation, maintenance, and monitoring of the corrective measures at the facility. The need for this CMIW at ISOCI will be based on the RFI and CMS, if required.

2.8 DTSC OVERSIGHT AND INSPECTION

Health and Safety Code Section 25185 authorizes the DTSC to conduct inspections at facilities, sites, or establishments were hazardous waste is generated, stored, handled, processed, disposed of, or treated. Inspections may include sample activities, record reviews, and photographing. The DTSC will conduct inspections at least annually, but the frequency and type of inspection may vary according to the violation history, and unresolved issues that may arise concerning the facility. The purpose of inspection is to ensure that the facility complies with the operating standards set forth by the permit conditions and Title 22, California Code of Regulations. The DTSC's inspector is required to write an inspection report for each inspection conducted. A report of violations will be issued and a penalty may be assessed in the case of a major violation.

2.9 ENFORCEMENT HISTORY

During inspections conducted in May 1992, February 1993, September 1993, and July 1994, ISOCI was cited by DTSC for several alleged violations that included the following:

- Deficiency in the Waste Analysis Plan which did not specify the frequency of sampling and the method of obtaining representative samples;
- Failure to comply with financial responsibility requirements;
- Failure to minimize the release of oil, sludge, and water onto the ground;
- Non-compliance with air emission standards for equipment leaks;

- Failure to test all recycled oil using an approved method and certified laboratory; and

- Employing activities not specified in the Part A application, such as accepting, transferring, and storing waste antifreeze.

On June 30, 1995, the DTSC issued ISOCI an Enforcement Order for the inspections conducted from 1992 to 1994. The enforcement order dealt primarily with tank assessment issues. Additional alleged violations listed in the enforcement order were subsequently dropped in October of 1995 by the DTSC. These additional alleged violations included items such as exceeding the capacity originally stated in the Part A application; not marking equipment so it can be easily distinguished; not monitoring equipment monthly; not complying with record keeping requirements; and not completing assessments on tanks No. 104 and 06. A majority of the violations were corrected. The DTSC and ISOCI entered into a Consent Agreement on April 12, 1996, to settle the Enforcement Order. ISOCI agreed to pay for administrative costs and expenses related to the Enforcement Order, and agreed to use test methods approved or required by the DTSC to ensure that the oil meets the standards of purity for recycled oil. ISOCI also agreed to follow the revised waste analysis plan that was submitted to the DTSC as part of their permit application (ISOCI, 1997).

The DTSC inspected the ISOCI facility again on April 23, 1996. During this inspection, the facility was cited for five alleged violations. The first two violations were for failure to provide adequate secondary containment for tanks No. 15W and 14W, and for not performing leak tests on these two tanks. The tanks were being used temporarily at the facility, and one week later ISOCI removed and destroyed both subject tanks. The remaining three alleged violations consisted of failure to follow the waste analysis plan; storing hazardous waste for over 90 days without permission from the DTSC; and failure to keep the appropriate written operating records onsite. DTSC required ISOCI to immediately begin following the waste analysis plan; to immediately maintain the facility operating log onsite; and to, within 30 days, legally dispose of all hazardous wastes that had been stored onsite for more than 90 days. ISOCI reports that they have corrected the recent violations.

More recent inspection and enforcement information regarding the ISOCI facility is provided in Table 2-2.

The facility has not received any violation notices from other agencies, e.g., City of Los Angeles, South Coast Air Quality Management District, or any other regulatory agency.

TABLE 2-2
Summary of ISOCI Recent Inspection and Enforcement Activities

Inspection Date	*Summary of Violations*	*Report Date*	*Settlement Date for Class 1 Violations*	*Outcome*
4/23/1996	*Failure to provide adequate secondary containment to tanks; Failure to perform annual leak tests on tanks; Failure to follow the Waste Analysis Plan by failing to test the flashpoint of used oil.*	*6/24/1996*	*6/24/1997*	*All violations were corrected by the facility.*
6/25/1997	*Accepting hazardous waste unauthorized by the Department.*	*9/4/1997*	*3/27/1998*	*All violations were corrected by the facility.*
6/24/1998	*Storing oily waste water in railcars without authorization; Failure to report to the Department that ISOCI did not receive a copy of the manifest with handwritten signature of the TSD within 35 days.*	*8/24/1998*	*No Class 1 violations*	*All violations were corrected by the facility.*
6/2/1999	*Case was dismissed on 12/20/2000.*	*8/18/1999*	*Case dismissed on 12/20/2000*	*All violations were corrected by the facility.*
5/19/2000	*ISOCI made false representation regarding the test results for incoming waste antifreeze; Failure to inspect the facility for malfunction or deterioration and discharge; Failure to submit to the Department a copy of a manifest.*	*8/30/2000*	*Minor violations only*	*All violations were corrected by the facility.*
6/28/2001	*Failure to maintain two containers holding hazardous waste; Failure to record deficiencies on secondary containment systems.*	*2/11/2002*	*3/2/2005 (Violations from 2001-2003 were all settled with one Order)*	*All violations were corrected by the facility.*
8/20/2002	*Failure to record transfer and storage of hazardous waste in tanks; Accepting used oil with total halogens greater than 1,000 ppm without rebuttals; Stored processed used oil in storage tanks without a permit from the Department; Failed to identify each individual tank on Daily Inspection Logs.*	*10/24/2002*	*3/2/2005 (Violations from 2001-2003 were all settled with one Order)*	*All violations were corrected by the facility.*
5/27/2003	*Failure to obtain handwritten signature of the transporter on manifests; Failure to complete the waste section of manifests correctly; Accepting unauthorized hazardous waste (used oil with total halogens greater that 1,000 ppm); Mismanagement of used oil; Failure to inspect hazardous waste transfer area to railcars.*	*8/18/2003*	*3/2/2005 (Violations from 2001-2003 were all settled with one Order)*	*All violations were corrected by the facility.*
8/2/2004	*Storing hazardous waste (used oil and antifreeze) in unauthorized tanks; Treating hazardous waste (used oil and antifreeze) without authorization.*	*10/20/2004*	*6/10/2005*	*All violations were corrected by the facility.*
4/21/2005	*Failure to submit a generator copy of manifests to the Department.*	*6/6/2005*	*No Class 1 violations*	*All violations were corrected by the facility.*
9/26/2006	*Failure to attempt to reconcile manifest discrepancies with the waste generator or transporter.*	*12/12/2006*	*No Class 1 violations*	*All violations were corrected by the facility.*

2.10 ENVIRONMENTAL PERMITS

ISOCI requires environmental permits to operate its facility from a variety of federal, state, and local agencies. Presently the ISOCI possesses permits from DTSC (a temporary permit known as an Interim Status Document) and the City of Los Angeles (sewer discharge and sewer connection permit, various building permits). In addition to these permits, ISOCI has also filed a Hazardous Materials Business Plan with the City of Los Angeles Fire Department. A Storm Water Pollution Prevention Plan was filed with the State Water Resources Control Board (SWRCB).

ISOCI is also in the process of obtaining other permits with various federal, state, and local agencies. A Hazardous Waste Storage and Treatment Facility Permit application (Part A and Part B) has been filed with DTSC. A Notice of Intent has been filed with the SWRCB to qualify under the General Industrial Activities Storm Water Permit. It is expected that the oil heater will require a South Coast Air Quality Management District permit. A permit to discharge industrial wastewater to the sewer has been filed with the City of Los Angeles to allow treated water from the oil recycling process. Also, the City of Los Angeles has indicated the proposed facility modifications will require a conditional use permit. The City of Los Angeles qualifies the ISOCI facility as a "Deemed to be Approved" conditional use because the facility and operation existed prior to passage of the ordinance requiring a conditional use permit for hazardous waste facilities even when they are located in heavy industrial zones.

A listing of the required permits for the ISOCI facility is shown in Table *2-3* ~~2-4~~.

TABLE *2-3* ~~2-2~~

Federal, State and Local Agency Permits and Applications

Agency Approval	Requirement	Applicability to Project
State Level		
California Environmental Protection Agency, Dept. of Toxic Substance Control (DTSC)	Interim Status Document (CCR Title 22, Division 4.5, Chapter 15)	Temporary Hazardous Waste Facility Operating Permit.
	Hazardous Waste Facility Permit (Part B), (CCR Title 22, §66270, Article 2)	Permanent Hazardous Waste Facility Operation Permit.
	California Environmental Quality Act (CEQA) Review/Environmental Impact Report (EIR)	DTSC is the lead agency for certification of the Part B Application EIR (CEQA Guidelines, Chapter 2.5, §21069).
State Water Resources Control Board (SWRCB)	General Industrial Activities Storm Water Permit (CCR 23, Division 3, et. seq.)	Compliance with SWRCB permit guidelines.
Caltrans	Transportation Permit (CCR 21, Division 2, et.seq.)	Application to transport overweight, oversize, and wide loads on state highways.
CalOSHA	Construction-Related Permits (CCR Title 8, Division 1, Chapter 4)	Excavation, construction, demolition and tower and crane erection permit.
Local Level		
South Coast Air Quality Management District (SCAQMD) (concluded)	Permits to Construct	SCAQMD Rule 201: Permit to Construct. Applications are required to construct or modify air emission sources. (SCAQMD Rules and Regulations Book)
	Permits to Operate	SCAQMD Rule 203: Permit to Operate. Applications are required to operate air emissions sources. (SCAQMD Rules and Regulations Book)
	Standards for Approving Permits	SCAQMD Rule 212: Permits cannot be issued if air contaminants create a public nuisance or exceed capacity limits. Also requires public notification of significant project. (SCAQMD Rules and Regulations Book)
	BACT and Modeling	SCAQMD Regulation XIII, New Source Review: New or modified permit units must apply BACT, obtain offsets and perform modeling of new emissions increases. (SCAQMD Rules and Regulations Book)

TABLE *2-3* ~~2-2~~

Federal, State and Local Agency Permits and Applications (concluded)

Agency Approval	Requirement	Applicability to Project
SCAQMD (cont.)	T-BACT and Risk Assessment	SCAQMD Rule 1401: NSR of Carcinogenic Air Contaminants. New or modified permit units must comply with maximum allowed risk levels. (SCAQMD Rules and Regulations Book)
County Sanitation Districts of Los Angeles	Industrial Wastewater Discharge Permit (CA Health & Safety Code, Division 6, Chapter 4, Article 1, §6521	Required to discharge wastewater into sewer.
City of Los Angeles	Building Permit	Required for foundation, buildings, to assure compliance with UBC etc.
	Hazardous Materials Business Plan	Required to Store Hazardous Materials
	Conditional Use Permit	Land use approval required for hazardous waste facilities
	Sewer Connection Permit	Required for sanitary sewer discharge

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