

NOTICE OF EXEMPTION

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

From: Department of Toxic Substances Control
Permit Renewal Team
8800 Cal Center Drive
Sacramento, CA 95826-3200

Project Title: Safety-Kleen Systems, Inc., Los Angeles Branch, Hazardous Waste Storage Facility Permit Renewal

Project Location: 2918 Worthen Avenue, City of Los Angeles

County: Los Angeles County

Project Description:

The Safety-Kleen Systems, Inc., Los Angeles Branch is permitted hazardous waste storage and bulking facility. The Hazardous Waste Facility Permit was last issued on July 15, 1997 (permit). The permit renewal allows the facility to continue operations for the next 10 years.

The Safety-Kleen Systems, Inc., Los Angeles Branch (Safety-Kleen) leases parts cleaning equipment and provides solvents delivery and pickup to its customers. Its customers are a variety of service-oriented businesses including automotive repair shops, aircraft maintenance operations, and machine shops. Hazardous wastes received from its customers include used parts washer solvent including petroleum-based parts washing solutions or aqueous-based parts washing solutions, spent immersion cleaner, dry cleaning wastes, spent antifreeze, used oil, and paint waste/lacquer thinner. Other hazardous wastes stored at the facility include wastes generated by Safety-Kleen on-site, and wastes stored on a transfer basis only (stored for less than 10 days).

Hazardous wastes storage units at the facility include two nominal 12,000-gallon underground storage tanks (USTs) and two drum storage areas located within a warehouse. Drum storage areas total permitted capacity is 5,540 gallons. Aqueous-based parts washing solutions are brought to the facility in containers and are taken to the Return and Fill area. The containers are opened and the contents poured into the drum washer units located at the Return and Fill area. The drum washer units, which are connected to the hazardous waste solvent storage UST, are equipped with removable upper screens. The screens are designed to remove course solids and metal parts that may come with the containerized waste solvent. The solvent settles at the bottom of the drum washer units and flows into the hazardous waste solvent UST. Periodically, a Safety-Kleen truck is dispatched to the Los Angeles Branch to collect and transport the wastes to a designated Safety-Kleen recycle center or a treatment facility for treatment or an accumulation center for consolidation. The other UST used to be the old underground hazardous material tank which is now used for the storage of used oil. The used oil UST is not connected to the Return and Fill Unit.

The hazardous waste storage units are designed with secondary containment in a case, a spill occurs. The USTs are double-walled and equipped with a leak detection system, the drum washer unit is placed over secondary containment with a capacity of approximately 155 gallons, and the drum storage areas are equipped with curbs, a concrete floor, and trenches to contain any spill and prevent flow of waste to the outside. The permit renewal authorizes the facility to continue to store hazardous waste in drums/containers and the USTs. The permit renewal also allows the additional waste management practice of bulking and storage of used oil and antifreeze into drums/containers and into bulk vacuum trucks and vice versa. This bulking operation is limited to small loads of used oil and antifreeze that are picked up from small quantity generators and commercial customers that have less than full truckloads. All transfer will occur within existing Return and Fill unit or drum storage areas. The bulking or storage in UST of used oil practice does not require new equipment at the facility.

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

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

Exemption Status: (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
 Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec.15269(a)]
 Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec.15269(b)(c)]
 Categorical Exemption: [State type and section number]

Statutory Exemptions: [State code section number]

General Rule [CCR, Sec. 15061(b)(3)]

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

Reasons Why Project is Exempt:

The project is an existing facility and the renewal of the Hazardous Waste Facility Permit will allow the facility to continue operations for the next 10-year term of the permit. The allowed types of wastes handled and stored will not change. Also, no physical expansion of the facility is proposed. The Hazardous Waste Facility Permit includes a minor change in waste handling, which is to allow bulking of used oil and used antifreeze into containers and to hold the containers at the Return and Fill Unit for less than 24 hours. The other change is to use the old underground hazardous material tank for the storage of used oil. These operations will occur within existing secondary containment.

This project will not result in a significant impact because:

1. Specific procedures have been included in the Operations Plan of the permit that will assure safe storage to minimize the potential for spills and allow efficient response to control any spills. Provisions are also included to assure worker safety during the operations.
2. The integrity of the underground storage tanks and piping systems and secondary containment structures were inspected and certified by a licensed engineer in California on February 7, 2008.
3. The City of Los Angeles Planning Department has reviewed the permit renewal project. The facility is located in the heavy Industrial zoning district and is currently permitted. Therefore, the facility is consistent with local zoning and no new local land use permit will be required.
4. The Los Angeles Facility is on the Hazardous Waste and Substances Sites List compiled pursuant to Government Code 65962.5. The source of the listing is the State Water Resources Control Board's Leaking Underground Fuel Tank database. The listing pertains to the former UST used in the solvent recycling operations that was installed in 1978 and removed in 1993. Corrective action monitoring has been performed from 1993 through 1999.
5. The USTs are permitted for storage of aqueous-based parts washing solutions wastes and used oil which requires no air permit. The hazardous waste facility permit authorizes the waste solvent storage UST to be used for the storage of petroleum-based parts washing cleaners as well as aqueous-based parts washing solutions. However, prior to using the UST for petroleum-based parts washing cleaners, the facility shall obtain a permit from South Coast Air Quality Management District (SCAQMD) to authorize the operation. The facility shall send a copy of the SCAQMD's permit to DTSC for review. The facility shall not be authorized to store any petroleum-based parts washing cleaners in USTs until the facility receives written acknowledgement from DTSC that DTSC has reviewed and accepted the SCAQMD's permit. Safety-Kleen solvents are low in volatility and are stored in the waste solvent underground storage tank. The USTs are designed so that all cover openings can be kept closed with no visible gaps, holes, cracks, or other open spaces into the interior of the tank. The cover and all cover openings operate with no detectable emissions when in a closed position. Cover openings are maintained in a close position at all times except when adding or removing used oil or either petroleum-based or aqueous-based solvents from the tanks, or when necessary for sampling, or repair/maintenance is performed. Also, the drum washing units at the facility are kept closed except when adding or removing wastes, sampling, or performing routine maintenance that requires the lids to be open. The facility anticipates an increase in amount of waste while reducing in the storage of hazardous material product. As a result of these changes, a reduction in potential air pollution is anticipated..
6. The Los Angeles Facility's existing USTs are double-walled and are designed to prevent any releases or off-site migration of contamination. There are monitoring devices in places which provide continuous monitoring to ensure that any leak may be detected and if it is detected, an appropriate measure will be taken pursuant to the Facility's Contingency Plan. Additionally a California Environmental Quality Act analysis will also be conducted for any future closure activity related to the permitted units.
7. The facility is located in an industrial/business park area of Los Angeles. It is a paved site and no riparian habitat or other sensitive natural community is located on site, or at any location in Los Angeles near to the facility. Therefore, continued operation of the existing facility will not impact biological resources. Los Angeles lies in a highly urbanized area where very little open space exists in the form of natural resource areas. The Safety-Kleen permit renewal process is not anticipated to result in any modification to the facility that will impact any habitat or

natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

- 8. The facility drainage system design meets local regulations and will withstand hydrostatic and hydrodynamic loads due to 24-hour probable maximum storm. Renewal of the existing hazardous waste facility permit does not involve any physical changes to the facility and therefore will not alter the drainage pattern of the site or area. Hazards related to excessive storm flows are considered to be minimal in Los Angeles.

Underground storage tanks (UST) were replaced at the facility in 1993. Contamination was detected in various soil samples collected from the UST basin. As a result, groundwater monitoring wells were installed in 1993. Wells were sampled quarterly from 1993 through 1996. It was determined that the constituents detected in groundwater samples were below Maximum Contaminant Levels (MCLs) for drinking water. DTSC also conducted a Resource Conservation and Recovery Act (RCRA) Facility Assessment in June 1995 and determined that the area in which the USTs existed was a Solid Waste Management Unit which needed additional investigation.

Safety-Kleen monitored the groundwater up to 1999 and discontinued monitoring after the May 7, 1999 letter to DTSC. Additionally, DTSC inserted a corrective action permit condition in the July 15, 1997 permit. Safety-Kleen prepared a corrective action summary report since no future corrective action activities were warranted. The report dated May 1, 1998 summarized the UST removal/replacement and documented results of previous investigations, which supported no additional corrective action activities. In addition, soil gas investigation was conducted in response to the Regional Water Quality Control Board (RWQCB) Well Investigation Program. The soil gas investigation was conducted in June 1999 in accordance with a RWQCB-approved workplan. The soil investigation results were presented in a July 30, 1999 report. Based on the soil gas investigation results, the RWQCB concluded in a letter dated April 18, 2000 that "no further assessment or cleanup is warranted" at the facility. RWQCB also requested the monitoring wells be plugged and abandoned. However, DTSC requested the wells remain in place. The wells were again sampled in 2002 and 2003, in accordance with a DTSC request. These results verified that groundwater was not impacted. S-K summarized the monitoring results and requested DTSC concurrence with no further action in a March 24, 2003 progress report.

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