Matthew Rodriquez
Secretary for
Environmental Protection

Department of Toxic Substances Control

Barbara A. Lee, Director
8800 Cal Center Drive
Sacramento, California 95826-3200

Edmund G. Brown Jr.
Governor

JUNE 14, 2018

Richard Watson
Integrated Waste Specialist
University of California Riverside
900 University Avenue
Riverside, California 92521

EMERGENCY PERMIT FOR TREATMENT OF HAZARDOUS WASTE, UNIVERSITY OF CALIFORNIA RIVERSIDE, RIVERSIDE COUNTY EPA ID: CAD073134777

University of California Riverside (UCR) has requested an emergency permit from the Department of Toxic Substances Control (DTSC) to allow Clean Harbors Environmental Services (CHES) to treat hazardous waste at this facility. The hazardous waste includes the following items:

Description	Quantity	Hazard Designation	Container Size
Acetaldehyde	1	Peroxide Former	250milliliter
Ethyl Vinyl Ether	3	Peroxide Former	1 X 4L, 2 X 500 ml
4-Vinyl Pyridine	1	Peroxide/Monomer	500 milliliter
Potassium	1	Solid, Peroxide Former	1 X 250 milliliter
Diethyl Azodicarboxylate	4	Shock-Sensitive	4 x 25 grams
Ethyl Diazoacetate	5	Shock-Sensitive	5 X 25 milliliter
Diphenylphosphoryl Azide	2	Shock-Sensitive	2 X 25 milliliter
Diazald	2	Temperature Sensitive	2 x 100 grams
Benzoyl Peroxide	2	Temperature Sensitive	1 x 50 grams, 1 x 10 grams
Chloroperoxybenzoic Acid	2	Temperature Sensitive	2 x 100 grams
Borane THF	1	Temperature-Sensitive	1 X 100 milliliter
2,2 Azobisisobutyronitrile	1	Temperature-Sensitive	1 x 25 grams

These chemicals are expired and currently being stored at CHES located at 900 University Avenue. It has been determined that these chemicals may be unstable and should be chemically stabilized as a safety precaution prior to transportation off site by CHES. The treatment of the hazardous waste involves the addition of a solution to the containers to reduce the reactive or ignitable characteristics of the chemicals.

Once the chemicals are treated, they will be transported offsite to a hazardous waste facility. CHES personnel are tentatively scheduled to arrive at the facility sometime between June 15, 2018 and August 13, 2018 to conduct the treatment operation, in an exclusion zone set up and maintained at the location outside the building (see Section 7.1 of the Permit Application).

Based on the authority in Title 22, California Code of Regulations (22 CCR), section 66270.61, DTSC finds there to be imminent and substantial endangerment to human health and the environment, and by way of this letter, issues this emergency permit toUCR. The emergency permit Is a temporary measure, which allows UCR to have CHES personnel treat the chemicals so they can be safely transported offsite for proper management.

This permit is not transferable to any other party and may not be used in any othercapacity or for any other activity. This permit may be revoked by DTSC at any timewithout process if it is determined that termination is appropriate to protect human health and the environment.

The emergency permit is effective beginning June 15, 2018 and shall expire on August 13, 2018. The treatment activities will be conducted by qualified Reactive Materials Technicians from CHES.

The following requirements are specific conditions of this permit. Failure to comply with any of the following conditions may cause an immediate revocation of this permit pursuant to 22 CCR, section 66270.61(b)(4), and could subject UCR to enforcement action.

1. The treatment of the items mentioned above must be conducted by qualified personnel from CHES and shall take place within the designated exclusion zoneas illustrated in the workplan submitted to DTSC by CHES on May 31, 2018. Only CHES reactive material technicians with proper health and safety equipment and attire shall be allowed within 25 feet of the items during the treatment and during the movement of the items from the storage location to theexclusion zone.
2. UCR must have a predetermined route from the storage location to the exclusion zone that allows for unobstructed movement for CHES reactive materialtechnicians. Building Management and occupants must be notified of the treatment activity and any occupants must be moved as needed to meet the requirements of permit condition #1.

3. All items to be treated must be appropriately labeled and marked before CHES personnel arrive to the facility.
4. UCR must notify the Certified Unified Public Agency (CUPA) and local Fire Department that this emergency permit has been issued by DTSC by the effective date.
5. In the event that UCR identifies any releases of hazardous waste, UCR must notify DTSC's Permitting Division orally within 24 hours of discovery.
6. The area must be inspected after treatment to ensure that there is no release of hazardous waste from the area. Any untreated waste must be immediately retreated or removed.
7. UCR must allow inspection *pf* records and of the facility by any duly-authorized representative of DTSC, in order to carry out the requirements of Chapter 6.5, Division 20 of the California Health and Safety Code.
8. Only the items listed in the table above may be treated. Additional quantity or type of hazardous waste may be treated if they follow the same treatment procedures listed in the May 31, 2018 workplan submitted to DTSC by CHES. UCR must notify and request authorization from DTSC for any additional items that are discovered and that require a treatment process not described in the workplan.
9. The issuance of this Permit by DTSC does not release UCR from any liability or duty imposed by federal or state statutes or regulations, or local ordinances. UCR must obtain permits required by other governmental agencies, including but not limited to, the applicable land use planning, zoning, air quality, and water quality laws for the treatment operations.
10. Within 10 business days following the expiration of this permit or the execution of the treatment operation in whichever is shorter, UCR must submit a report signed, in accordance with Title 22 CCR, section 66270.11(d) to DTSC and the nearby Certified Unified Program Agency (CUPA). The report must contain following certification statement, "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

    The report must state whether the treatment area has been cleared of all residual hazardous waste generated from this emergency treatment, and if all waste has been properly managed. The report must also contain a list of all the hazardous waste that was treated by CHES and a description of any deviations from the established guidelines of this emergency permit, or information submitted to DTSC.

This emergency permit is effective beginning June 15, 2018 and shall expire on August 13, 2018.

If you have any questions, please contact me at (916) 255-6531 or Matthew.Mullinax@dtsc.ca.gov

Sincerely,

Matthew Mullinax
Hazardous Substance Engineer
Permitting Division
Hazardous Waste Management

Program Cc (Emailed):

Robert Kou
Environmental Program Manager I (Sup)
Chatsworth Enforcement Branch
Hazardous Waste Management Program
Department of Toxic Substances Control
Robert.Kou@dtsc.ca.gov

Diana Peebler
Sr. Environmental Scientist (Sup)
Berkeley Enforcement & State Oversight Branch
Hazardous Waste Management Program
Department of Toxic Substances Control
Diana.Peebler@dtsc.ca.gov