

FIRST NOTICE OF DEFICIENCY (NOD)  
FOR  
Filter Recycling Services, Inc.  
180 West Monte Avenue  
Rialto, California 92316  
EPA I.D. No. CAD 982 444 481

**PERMIT APPLICATION**

Bold section numbers and subsection numbers used in this NOD correspond to those used in the permit application, dated February 28, 1992, which Filter Recycling Services, Inc., submitted for its Rialto facility. Questions and requests for information requiring additional responses have been re-stated here in bold for clarity. For minor corrections, such as changing a number, it is acceptable to cross out the old number, make the correction, initial and date the correction, and then re-submit that page of the application. Where more significant changes or additions are required, re-do the appropriate page and, if necessary, add additional pages.

**Section II - FACILITY LOCATION**

**Subsection A. DETAILED TOPOGRAPHIC MAP (22 Cal. Code Regs. 66270.14 (b) (18)).**

You did not provide topographic map (1 inch to 200 feet) with your Standardized Permit application. In your response, please provide a topographic map that has the following:

1. A scale of 1 inch equal to not more the 200 feet and encompassing an area 2,000 feet around the facility.
2. Date.
3. North pointer.
4. Any surface water within 2,000 feet of the facility.
5. Wind rows that show prevailing wind speed and direction. This information can be obtained from the South Coast Air Quality Management District (Mr. Joe Cassmassi) at (909) 396-3155 ext 3155.
6. The legal boundary of the facility. ✓
7. Wells on the property or within 2,000 feet of the facility.

8. 100-year floodplain area, with a flood insurance map or other documentation to show whether your facility is in a 100-year floodplain.

9. The surrounding land uses (residential, commercial, agricultural, recreational). This data is required to assess California Environmental Quality Act (CEQA) requirements. Please submit the following information in your response:

a. The name and addresses of all your neighbors, both residential and business, immediately adjacent to and surrounding your facility. The pertinent addresses are those located within the 1/4-mile radius circle drawn on the map included in the NOD as Attachment 4.

b. The type of business of the neighbors, if applicable.

c. The names, addresses, and distances of the nearest:

(1) Hospital;

(2) Eatery;

(3) Park/recreation area;

(4) Nursing home;

(5) Day care center; and

(6) Business doing environmentally sensitive activities.

### PROCESS FLOW DIAGRAM/SOLID WASTE PROCESS FLOW CHART

The diagram submitted does not illustrate the process flow for each of the incoming off-site waste and generation point of on-site generated waste. This will be necessary to clearly show which treatment units are treating which waste and minimize needless waste mixing. Please use the waste stream letter in Table 2 to illustrate the process for each of these waste streams.

For each waste stream letter, please provide a Process Flow Diagram that will show, at a minimum:

1. How each waste arrives at the facility,
2. Methods used to transfer each waste to the treatment process,
3. Storage process for each waste,
4. How the treatment process works different wastes,
5. How the waste is removed from the process, and
6. Other waste-handling activities.

#### PIPING LAYOUT

You did not submit a piping layout diagram with your application. Please provide a piping layout diagram (to scale) that shows all piping throughout the facility connecting tanks, containers, treatment units, etc. Include in the piping layout diagram(s) the following:

1. Pipe sizes (inner and outer dimensions),
2. Pipe material,
3. Pumps,
4. Valves,
5. Flanges, and
6. Other applicable ancillary equipment.

The piping layout must coincide with the process flow diagram.

**FACILITY PLOT PLAN**

A facility plot plan was not submitted with your application. Please provide a facility plot plan with your response. The facility plot plan must indicate the following:

1. Access control (fences, gates);
2. Building, transfer, treatment, or storage operations;
3. Barriers for drainage or flood control;
4. Where hazardous waste is or will be transferred, treated, or stored (including equipment cleanup areas);
5. Give dimensions of units and secondary containment;
6. Legal property boundaries of the facility;
7. The name of each operation (e.g., precipitation tank, drum storage area, etc.);
8. All containment systems;
9. A North arrow;
10. Dimensions of the property;
11. boundaries of each storage and treatment area;
12. Permanent access and internal roads;
13. Power lines, pipelines, easements; and
14. Storm water management (e.g., storm drains, sewer access, drainage control).

**Subsection G. LEGAL DESCRIPTION OF PROPERTY (22 Cal. Code Regs. 66270.14 (b) (18) (G) .**

A written legal description of the facility was not submitted. The legal description of the property is used to describe your facility in the standardized permit and the California

Environmental Quality Act (CEQA) documents. Please provide a written legal description of the property. A legal description of the property can be obtained from the local county recorder or from a title company. The written legal description shall include the longitude and latitude coordinates of your facility.

### Section III. WASTE ANALYSIS PLAN

The process flow diagram provided does not identify the sampling location and the location for wastes entering the facility, wastes generated in the facility, or wastes exiting the facility. Please reflect these locations on your process flow chart, and please be sure that the description of waste in Table 2 agrees with the locations.

#### **Table 2 - Description of Waste.**

Waste stream G is too vague to describe this incoming waste. Please re-define this waste stream by having separate waste streams for pipe-line filters, vessel systems, contaminated rags, and any other incoming waste. Please revise Tables 2 through 7 with these new waste streams. This will clarify which waste you are accepting and help provide the necessary information to determine which wastes are compatible with each type of treatment and other waste streams on site. Also in Table 2, please list each waste's U.S. EPA Code and California Waste Code.

The treatment of solvent waste is prohibited under the standardized permit tier. The treatment of solvent-contaminated materials is not allowed. In order to treat such waste, you will need to obtain a full permit.

Waste stream C should clearly be identified as "on-site generated." This should also be illustrated on the process flow chart. On page 8 of the application, your reply of "no waste streams are created within the facility is NOT APPLICABLE." This is incorrect. Please submit a revised page 8 with the correction, with it initialized and dated.

Waste stream D appears to be made of two separate waste streams: off-site acceptance and aerosol can treatment. These waste streams also need to be reflected in the process flow chart.

In the solid waste process flow chart, it is shown that you accept Used Oil Filters, but no such waste stream is identified in Table 2. Please explain the handling process of the used oil filters that are received by your facility and any further processing of the used oil. As stated above, the flow chart should clearly identify where each of the waste streams identified in Table 2 is handled or generated. Additionally, the self-cleaning overhead magnetic unit separates the metal portion of our solid recyclable materials. Please clarify what self-cleaning activity is occurring in this unit.

**Table 3 - Physical Properties of Waste.**

The waste stream **B**, the anti-freeze specific gravity of 1.4-1.7. is high. Please provide an explanation of the high specific gravity or provide the correct specific gravity. Additionally, the pH is typically 9 to 10. Please explain the low range of 6-8.

For waste stream **G**, please provide your basis for the specific gravity and pH. In Table 2, this waste stream is identified as organic-contaminated solids.

**Table 4 - Hazardous Properties of Waste.**

The terms "combustible" and "flammable" in column 4 are incorrect. The terms "combustible" and "flammable" are not defined in regulations. Please provide an explanation of these terms or simply replace with "ignitable."

In column 6, aerosol cans are regulated because of their reactivity. The toxicity for aerosol cans should be none. The toxicity from the paint will be identified in the new waste stream when waste stream **D** is split into two waste streams.

Waste steam **B** toxicity is usually from heavy metals; specifically, lead, copper, and zinc, and toxicity to animals. Please add the specificity of the metals into column 3 and ethylene glycol and/or propylene glycol.

The term "varies" is not adequate. Please provide the major constituents in a waste stream; for aerosol, none can be used.

Waste stream D hazardous constituents should be lead, chromium, and copper. Please explain the expected ignitability of this waste stream.

Please clarify how waste stream E is expected to be toxic because of heavy hydrocarbons. Please explain why hydrocarbons in section 66261.24 are considered heavy or define the term "heavy hydrocarbons." Please list the expected hydrocarbons in column 3.

Waste streams F and G refer to halogens, but no explanation of which activities/businesses generate halogens. Also, which type of halogens are expected in these waste streams? Column 3 should identify which constituents are causing the waste to contain the characteristics of toxicity.

**Table 5 - Sample and Analysis of Waste.**

For all waste streams listed on Table 5 (A through G), Section 3. List the constituent(s) to be analyzed - not "T.S.D.F. ACCEPTANCE PARAMETERS."

Section 4. List appropriate test method for each constituent - not "APPLICABLE ACCEPTANCE METHODS."

Section 5. List the detection limits for each constituent - not "REG. LIMIT."

Section 9. How often do you sample? What happens when the waste changes? How can you be sure of what you are receiving? Sampling frequency needs to be specific as to when would the generator need to confirm his/her waste and if it is acceptable at your facility.

Section 11. Describe the sampling procedure for each waste. Your attached WASTE ANALYSIS PLAN is vague. Please explain the steps of your list (Plan). Also, list the instructions the State-certified lab will give you concerning sample method, equipment to be used, and the proper containers for sampling.

Waste Stream B - Please remove the ETC in item 3. Also, please describe which metals will be analyzed. Item 5 needs to reflect the specificity of item 3.

Waste Stream C - Please enclose a Table 5 for PETROLEUM SLUDGE.

Waste Stream D - You state that the sampling will occur at the generator site, but this waste also includes waste generated on site. When you separate this waste stream, please add sampling and analysis for the on-site generated waste.

Waste Stream G - As with other areas in this application, this waste stream is too vague to appropriate or to know which tests are appropriate in order to handle at your facility. This waste stream needs to be broken into more specific waste streams in order to identify their hazardous constituents.

**Table 6 - Treatment Standards.** Please add the other new and specific waste streams.

**Table 7 - Quality Assurance and Quality Control.** Question 2 - Describe the procedure to determine if the waste stream has changed over time and please describe the procedure to determine if the Waste Analysis Plan is still applicable to the changed waste stream.

#### Section IV - FACILITY DESIGN (CONTAINERS)

##### **Subsection A.3. CONTAINERS.**

Please give a brief explanation why overpacking does not apply.

**Subsection C.1. OPERATION PROCEDURE FOR STORAGE AND USE OF CONTAINERS (22 Cal. Code Regs. 66270.14)b) (19), 66264.171, 66265.1710.** You do not explain how hazardous wastes inside of containers in poor condition are transferred into good containers, or otherwise managed, to prevent any spills, leaks, or releases. Please give a brief explanation how this transfer is performed.

**Subsection C.2. OPERATION PROCEDURE FOR STORAGE AND USE OF CONTAINERS.** (22 Cal. Code Regs. 66270.14(b) (19), 66264.172, 66265.172). You did not complete this section. In your response, please complete this section for each type of container. Please describe how you will ensure compatibility of waste with containers. Provide the following information:

- b. For each type of container and liner (if applicable), include information from the manufacturer's specification and the scientific and engineering references to show that the containers, liners, or coatings are compatible with the hazardous waste contained inside.

**Subsection D. SECONDARY CONTAINMENT SYSTEM FOR CONTAINERS.**

Please complete this section for your totally enclosed chemically sealed and bermed T.S.D.F. containment.

**Subsection E. CERTIFICATION OF CONTAINMENT SYSTEM.** For your totally enclosed chemically sealed and bermed T.S.D.F. containment, you need a certified statement by an independent, qualified professional engineer registered in California (22 Cal. Code Regs., section 66264.175). Please provide an engineer's certification statement with your response which includes:

1. Plan drawings,
2. Profile drawings, and
3. Containment calculations.

The certification shall include the following documents and information:

1. Name of registered engineer;
2. Registration number;
3. Engineering discipline; and
4. Expiration date of engineer's registration.

Certification statement required by 22 Cal. Code Regs., section 66270.11(d). If required, this certification can be combined with the engineer's certification required for tanks in Section V of this NOD.

**Section V - FACILITY DESIGN (TANKS).**

Each of your storage and treatment units are considered tanks. Please complete this section for each of the tanks you have specified in your application. The tanks will include:

	NAME	Unit ID Number
1.	Waste holding tank	930724-012
2.	Waste holding tank	930724-013
3.	Waste holding tank	930724-014
4.	Industrial Waste Water/ Sludge Separator	930724-008
5.	Mechanical Separator	930724-001

(Which is comprised of the following subunits:

- a. Primary Granulator,
- b. Pre-Shredder,
- c. Centrifugal Separator,
- d. Industrial Bailer,
- e. Magnetic Separator, and
- f. Above Ground Clarifier.

**SECTION VI - STANDARDIZED PERMIT CLOSURE PLAN**

**Subsection A. INTRODUCTION.** Summarize the procedure how the facility will handle contaminated equipment.

**Subsection B.1.a. MAXIMUM INVENTORY ESTIMATES (Section 66265(b)(3) and (4)).** Please provide an itemized list of the Maximum Waste Inventory at the facility, including tanks. Show all volumes and calculations.

**Subsection B.1.b.** Please complete this subsection to reflect the Section V - Tanks.

**Subsection D.1.a.** Please circle "1.a. Tanks" for equipment, structures, and buildings your facility plans to decontaminate. Identify all circled items on a plot plan.

**Subsection D.1.a.** Please include in your description the procedures used to decontaminate tanks.

**Subsection E. CONFIRMATION SAMPLING PLAN FOR STRUCTURES, EQUIPMENT AND BUILDINGS.** Please describe how your method for Non-Detect clean-up level will be completed, including tanks.

**Subsection G. ANALYTICAL TEST METHODS.** Describe how the statistical sampling method will require no analysis be performed on samples. The description of the analysis that will be performed on samples shall include:

1. Waste constituents being analyzed,
2. Preparation method,
3. Analysis method, and
4. Detection limit.

**Subsection H. CLOSURE-COST ESTIMATE.** Please revise "Table 2: Closure-Cost Estimate" to include Removal/Disposal/Treatment of tanks and waste in tanks.

#### PHASE I ENVIRONMENTAL ASSESSMENT CHECKLIST

**Section III: Facility History (Page 9).** Question 1 - Has a copy of the environmental assessment and/or site investigation report been submitted to DTSC?

**Section VI: Facility History (Page 20).** The "Signature and Certification for Standardized Permit" page was not properly completed. The owner did not certify that "further investigation, including sampling and analysis, is / is not (circle one) necessary to determine whether a release has occurred, or to determine the extent of a release from a solid waste management unit or a hazardous waste management unit." Circle either the is or the is not. Additionally, an independent professional engineer, geologist, or environmental assessor who is registered in the State of California must also sign the "Signature and Certification for Standardized Permit" page. Please submit a completed "Signature and Certification for Standardized Permit" page with your response.

**ENVIRONMENTAL INFORMATION.** Question 3 - Will the facility use water? You answered "YES" - please complete the following:

1. Quantity,
2. Gallons per month,
3. From what source, and
4. For what purpose.

**DISCLOSURE STATEMENT.** Your disclosure statement was found to be complete.

**FINANCIAL RESPONSIBILITY.** Until the required information has been submitted, DTSC cannot determine if the deposit is sufficient to cover all closure costs. When DTSC receives the closure information, DTSC will complete its evaluation of your financial responsibility mechanism. If you have any questions concerning the review of your financial responsibility documents, please contact Ms. Eileen Smith at (916) 324-3140.