**Response to**
**Notice of Deficiencies (NOD) for the Permit Renewal Part B Application for EWT**
**March 24, 2016**

***Comment 1: Remove proposed new tanks (31 ABC, 32 ABC, and 34 ABC) throughout the application including the Operation Plan, Section 3, pg 3-36 "Table 3-3 Hazardous Waste Design Standards"; Appendix J, Tank Summary Table #1, Hazardous Waste Tank Design Standards"; and tank tables in Appendix G.***

Response to Comment 1: These revisions have been made and included in the updated Part B Application.

***Comment 2: Remove 3 levels of drum stacking throughout the Part B application such as in Appendix C, page 2-9, 2nd paragraph, and the Operation Plan, Section 3.2.3.4, pg 3-11.***

Response to Comment 2: These revisions have been made and included in the updated Part B Application.

***Comment 3: Revise Closure Plan to match the Closure Cost Estimate that was validated by DTSC ESPO and Permitting.***

Response to Comment 3: The Closure Plan has been revised to match the Closure Cost Estimate that was validated by DTSC ESPO and Permitting. The updated Closure Plan has been included in the updated Part B Application.

***Comment 4: Include standard operating procedures for rinsing portable tanks between waste loads. Add clarity to the text in Appendix D Waste Analysis Plan.***

Response to Comment 4: Portable tanks are used for overflow or emergency situations. The following procedures have been added to Section 3.2.3.2 of the Part B Application and in Section 2.1.4.6 of the WAP:

*Prior to re-using containers (including portable tanks) for different waste types, the containers are cleaned using the following procedure, as appropriate for the specific container and waste type:*

- *Remove free liquids by pumping and/or draining.*
- *Pressure wash and remove all loose materials.*
- *If necessary, manually scrape muck or scale and bag all hardened/calcified deposits.*
- *If necessary, perform a second pressure wash and remove any remaining debris.*
- *Collect rinse water in containers and and/or pump into Area III for consolidation, treatment, recycling, and/or transfer.*
- *Follow all safety requirements specific to the container/portable tank and waste type.*

***Comment 5: In Appendix J Containment Calculation, on Figure 9 for Containment Area 8, please show the designated drum storage area for long term (1 year) storage. Include circles to represent the***

***maximum amount of drums that will be stored in this area. Label the 3 circles and 1 square currently located next to the pump station. Label the pump station.***

Response to Comment 5: The pump station and other structures have been identified in Figure 9. Please see response to the Informal NOD dated April 11, 2016 Comment Number 2 in regards to adding circles to the figure to represent designated 55 gallon drum locations.

**Comment 6*: Provide physical dimensions of the filter presses (FP1, FP2, FP3, FP4, FP5, FP6, and FP8). Provide the maximum capacity and maximum treatment capacity of the filter presses in Appendix g, Tank Tables.***

Response to Comment 6: The following provides the physical dimensions and maximum treatment capacity of the Filter Presses:

| FP | Make | Model | Total Volume CuFt | Total Area SqFt | Vol/Chamber CuFt | Chambers | Plate Style |
|---|---|---|---|---|---|---|---|
| 1 | JWI | 4700 | 47 | 540 | 0.9 | 50 | Non-gasketed |
| 2 | JWI | 4700 | 47 | 540 | 0.9 | 50 | Non-gasketed |
| 3 | Augerot | 48A D-1-1200-100-30-3 | 60 | 1200 | 1.2 | 50 | Non-gasketed |
| 4 | Augerot | 48A D-1-1200-100-30-3 | 60 | 1200 | 1.2 | 50 | Non-gasketed |
| 5 | J-Press | 1200N32-50/83-60/100SN | 100 | 1210 | 1.2 | 83 | Non-gasketed |
| 6 | J-Press | 1200N32-50/83-60/100SN | 100 | 1210 | 1.2 | 83 | Non-gasketed |
| 8 | J-Press | 800N32-39-20SYLW | 20 | 413 | 0.5 | 39 | Non-gasketed |

Maximum Treatment Capacity:

Filter Press 1 370 gallons/minute
Filter Press 2 370 gallons/minute
Filter Press 3 370 gallons/minute
Filter Press 4 370 gallons/minute
Filter Press 5 370 gallons/minute
Filter Press 6 370 gallons/minute
Filter Press 8 220 gallons/minute

***Comment 7: Describe vapor monitoring equipment for open top tanks in Appendix G, Tank Tables.***

Response to Comment 7: A description of vapor monitoring has been added to Appendix G, Tank Tables.