

**California Environmental Protection Agency
Department of Toxic Substances Control**

HAZARDOUS WASTE FACILITY PERMIT

Facility: Rockwell International Corporation
Energy Technology Engineering Center
Santa Susana Field Laboratory
Santa Susana Mountains
Ventura County, California

Owner: U. S Department of Energy
1301 Clay Street, Room 700N
Oakland, CA. 94612-5208

Operator: Rockwell International Corporation
633 Canoga Ave.
Canoga Park, CA. 91303

Regional Permit No.: 93-3-TS-002

EPA ID Number: CAD 000629972

Effective Date: 11/30/1993

Expiration Date: 11/30/2003

Pursuant to Section 25200 of the California Health and Safety Code, this Hazardous Waste Facility Permit is hereby issued to Rockwell International Corporation, Energy Technology Engineering Center.

The issuance of this Permit is subject to the conditions set forth in Parts I through IV which consists of 26 pages.




Jose Kou, Chief
Facilities Management Branch
Department of Toxic Substances Control
Region 3, Glendale

Date: *October 25, 1993*

**California Environmental Protection Agency
Department of Toxic Substances Control**

HAZARDOUS WASTE FACILITY PERMIT

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PART I

DESCRIPTION OF FACILITY

A. Ownership, Operations, and Location

Both Rockwell International Corporation (permittee) and the Department of Energy (owner) applied to the California Environmental Protection Agency, Department of Toxic Substances Control (Department) for a Hazardous Waste Facility Permit to continue operating an onsite hazardous waste treatment and storage units in the Energy Technology Engineering Center (ETEC) of the Santa Susana Field Laboratory (SSFL).

The SSFL is located at the end of Woolsey Canyon Road, 5 miles west of the town of Chatsworth, in Ventura County, California. Figure 1. is a general location map of the SSFL.

The onsite hazardous waste treatment and storage units consist of the two buildings; Buildings T029 and T133. Figure 2 is a layout of Area IV showing the location of these two buildings. Building T029 is dedicated to storage of sodium and/or sodium-potassium in containers. Building 133 has two above ground storage tanks, one underground storage tank and a treatment unit. The treatment operation involves burning of metal wastes (sodium or sodium potassium) producing a hydroxide solution. The hydroxide solution is stored in tanks until it is disposed of at a permitted hazardous waste facility or recycled off-site. Figures 3 and 4 are the layouts of buildings T029 and T133 respectively.

This Permit authorizes the following, subject to the conditions set forth herein:

- ▶ Storage of on-site generated hazardous waste in containers in Building T029.
- ▶ Storage of sodium hydroxide/potassium hydroxide in tanks T1 and T3 of building T133.
- ▶ Storage of sodium-potassium (NaK) in tank T-2 of Building T133.
- ▶ Treatment of on-site generated Alkali metal wastes (Sodium or Sodium Potassium): Alkali metals are placed in a treatment pan and heated, inside the Treatment Chamber of building T133, using natural gas burner until the metal melts. The oxide fumes are absorbed by a wet scrubber and the remaining crust on the pan is washed down with water.

- ▶ corrective action for identified and newly identified releases of hazardous waste or hazardous constituents at the facility.

B. Compliance with California Environmental Quality Act (CEQA)

The Department prepared a negative declaration in accordance with CEQA (California Public Resources Code, Section 21000, et seq.) and the State guidelines. The Department has determined that this particular project will not have a significant effect on the environment. The negative declaration was approved on October 25, 1993.

C. Effect of RCRA Final Authorization

Pursuant to the Resource Conservation and Recovery Act (RCRA), (42 U.S.C. section 6901 et. seq.), a RCRA permit is required for the transfer, storage and treatment of hazardous wastes at the Facility. Since the RCRA final authorization was received by the Department on August 1, 1992, the Department's hazardous waste program has also been operated in lieu of the federal RCRA program. Therefore, this Permit constitutes a RCRA-equivalent permit. No additional permit or other grant of authorization under RCRA is required in order to perform the activities authorized by this Permit.

PART II

GENERAL PERMIT CONDITIONS

A. References and Terminology

- 1. All parts of this Permit are identified by Roman numerals. The items set forth in each part, in addition to the items set forth in any preceding and/or following part of this Permit, shall apply to the Owner, Operator, and/or Facility. Unless explicitly stated otherwise, all cross-references to items in this Permit shall refer only to items occurring within the same part.**
- 2. Division 4.5, "Environmental Health Standards for the Management of Hazardous Waste", of Title 22, California Code of Regulations (CCR) is referred to as "Title 22" in this Permit. Each section in Title 22 is cited as 22 CCR [section number]. Similarly, specific portions of the Code of Federal Regulations are cited as [Title Number] CFR [Part and Section Number].**
- 3. Chapters 6.5 through 6.98 of Division 20 of the California Health and Safety Code are referred to as the "Health and Safety Code" in this Permit.**
- 4. For purposes of this Permit, terms used herein shall have the same meaning as those in the Health and Safety Code or 22 CCR unless this Permit specifically provides otherwise. Where terms are not defined in the statutes, the regulations or this Permit, such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.**

B. Effect of Permit

- 1. Unless otherwise specifically provided in this permit, the permittee shall comply with the Health and Safety Code and Title 22. The issuance of this Permit by the Department does not release the permittee from any liability or duty imposed by federal or state statutes and regulations or local ordinances, except the obligation to obtain this Permit. The permittee shall obtain all the required permits issued by other governmental agencies, at the federal, state or local levels.**

2. The issuance of this Permit by the Department does not preclude the Department from adopting or amending regulations, issuing administrative orders, or obtaining judicial orders which impose requirements which are in addition to, or more stringent than, those in existence at the time this Permit was issued, and does not prevent the enforcement of these requirements against the permittee. The permittee shall comply with any such additional or more stringent requirements in addition to the requirements and conditions specified in the Permit. Where appropriate, this Permit is also subject to Health and Safety Code Sections 25159.6 and 25159.7 relating to the incorporation of Federal regulations in the absence of equivalent State regulations.
3. This Permit does not convey any property rights of any sort or any exclusive privilege.
4. The permittee is permitted to treat and store on-site generated hazardous waste in accordance with the conditions of this Permit. The permittee shall perform the hazardous waste management activity authorized by this Permit in accordance with plans and specifications approved by the Department. The permittee shall not conduct any hazardous waste management activities prohibited by this Permit, nor shall the permittee engage in any other hazardous waste management activities not authorized in this Permit, unless otherwise specifically required in the California Hazardous Waste Control Law (Health and Safety Code) and regulations adopted thereunder.

C. Requirement to Submit Information

1. A copy of any information, report, submittal or notice required by the Department (including that required by this Permit, Title 22, and the Health and Safety Code), the Water Board, the U.S. EPA, Ventura County Air Pollution Control District, the local land-use/zoning authority or the local fire authority shall be submitted by certified mail or other means that establish proof of delivery within the time as specified or, if no submittal date is specified, within thirty (30) calendar days after the requirement is put into effect to:

Department of Toxic Substances Control
Region 3
1011 North Grandview Ave.
Glendale, CA 91201
Attn: Facilities Management Branch Chief

2. Failure to submit the information required in this Permit, or falsification of any submitted information, is grounds for termination of this Permit as specified in 22 CCR 66270.43.
3. The permittee shall ensure that all plans, reports, notifications, and other submissions to the Department initially and specifically required in this Permit are signed and certified in accordance with 22 CCR 66270.11. Two (2) copies of these plans, reports, notifications or other submissions shall be submitted to the Department.
4. Upon written request, proof of each submission shall be made available to any authorized representatives of the Department.

D. Consent to Entry by Department Representatives

The permittee, by accepting this Permit, consents to entry by any authorized representative of the Department, the State Water Resources Control Board, the Regional Water Quality Control Board, or the local health officer at any reasonable hour of the day in order to carry out the purposes of the Hazardous Waste Control Law (Health and Safety Code Section 25100 et. seq.), including but not limited to the activities listed in 22 CCR 66270.30(i).

E. Specific Conditions

1. The permittee shall demonstrate to the Department continuous compliance with the financial assurance requirements in 22 CCR 66264.140 through 66264.148, 66264.197 and 66270.40(b).
2. The permittee shall comply with the general facility standards contained in Title 22, Chapter 14, Article 2.
3. The permittee shall comply with preparedness and prevention requirements contained in Title 22, Chapter 14, Article 3.
4. The permittee shall comply with the contingency plan and emergency procedures requirements contained in Title 22, Chapter 14, Article 4.
5. The permittee shall comply with the manifest system, recordkeeping and reporting requirements contained in Title 22, Chapter 14, Article 5, and Sections 66270.30(l) (7), (8) and (9).

6. The permittee shall comply with the closure and post-closure requirements, if applicable, contained in Title 22, Chapter 14, Article 7.

F. Land Disposal Restrictions

1. The permittee shall comply with applicable provisions of the land disposal restrictions as found in Title 22, Chapter 18 and Sections 66264.73 (b) (11), (15) and (16).
2. The permittee shall retain on-site, until closure of the Facility, a copy of all notices, certifications, demonstrations, waste analyses data, and other documentation related to the management of all wastes (for on-site or off-site treatment, storage or disposal) subject to land disposal restrictions.
3. The permittee shall retain onsite a waste analysis plan describing how and when wastes or treatment residues will be tested to comply with the land disposal restriction regulations.
4. The permittee shall comply with Title 22, Chapter 18 pertaining to the certification language.

G. Permit Actions

This Permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination or a notification of anticipated noncompliance or planned changes except as provided in 22 CCR 66270.42, does not stay any permit condition. Except as provided in 22 CCR 66270.42, a new facility permit condition shall become effective on the date specified in the Department's written notice of approval of the permit modification, pursuant to 22 CCR 66270.42 and/or 66271.14.

H. Need to Halt or Reduce Activity

It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.

I. Severability

The provisions of this Permit are severable, and if any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby. [22 CCR 66271.15(a)]

J. Permit Expiration

In accordance with 22 CCR 66270.51, this Permit and all conditions therein will remain in effect beyond the permit expiration or termination date, until the effective date of a new permit, if the permittee has submitted a timely, complete application (both Part A and Part B) for a new permit and the Department through no fault of the permittee, has not issued a new permit. In accordance with 22 CCR 66270.10(h), a timely and complete application for a new permit must be submitted at least one-hundred and eighty (180) calendar days before this Permit expires, unless permission for a later date is granted in writing by the Department.

K. 24-Hour Reporting

The permittee shall report any incidents of noncompliance, with the conditions of this Permit and/or any of the provisions of Title 22 or Health and Safety Code, which may endanger human health or the environment to the Department within twenty-four (24) hours after becoming aware of such circumstances. The report shall include the information required in 22 CCR 66270.30 (I) (6) (A) and (B).

L. Notice of Planned Physical Changes

The permittee shall give notice to the Department as soon as possible and at least thirty (30) calendar days in advance of any planned physical alterations or additions to the permitted Facility.

M. Operation at Night

When the Facility is operated during hours of darkness, the permittee shall provide sufficient lighting to ensure safe, effective management of hazardous wastes.

N. Part B Permit Application (Operation Plan)

1. By the issuance of this Permit, the Part B Permit Application, titled "Operation Plan, Hazardous Waste Management Facility, Rockwell International Corporation, Santa Susana Field Laboratory, Energy Technology Engineering Center", dated December 17, 1992 and Part B Addendum dated April 22, 1993 is hereby approved. This Part B Permit Application and any subsequent revisions thereto, subject to the permit modification requirements contained in 22 CCR 66270.41 and 66270.42, are made part of this Permit by this reference.
2. The permittee shall operate and maintain the two buildings, buildings T029 and T133, in accordance with the Part B Permit Application, unless otherwise specifically stated elsewhere in this Permit.
3. In the event of any conflict between this Permit and the Part B Permit Application referenced herein, the more stringent provisions shall control.
4. The part B Permit Application and this document shall be maintained at the Facility and place of business at all times until closure is completed.

O. General Responsibilities

1. Compliance

The permittee shall comply with all conditions of this Permit in accordance with 22 CCR 66270.30. The permittee shall comply with all laws, regulations, permits, zoning conditions, and all other requirements established by federal, state, and local agencies.

2. Transfer of the Permit

This Permit may be transferred to a new owner and/or operator only if it is modified or revoked and reissued pursuant to 22 CCR 66270.40. The permittee shall notify the appropriate Department Facilities Management Branch Chief, in writing, of a proposed change of ownership of this facility no later than 90 days prior to the date of transfer. A copy of the notification, required under Title 22, shall be submitted to the Department prior to the transfer.

3. Operation and Maintenance

- a. The permittee shall at all times maintain and operate these Units in a manner that minimizes the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, surface water, or groundwater which could threaten human health or the environment.
- b. The permittee shall maintain all equipment, pipes, and lines used at the Facility to handle, transfer, pump, or store hazardous wastes in a manner that prevents the leaking and spilling of hazardous wastes.
- c. The Permittee shall at all times properly operate and maintain the two Units in accordance with 22 CCR 66270.30 (e).

4. Submittal of Requested Information

The permittee shall furnish to the Department any relevant information which the Department may request, within the time specified by the Department in its request, to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. Upon request, the permittee shall also furnish copies of records required to be kept by this Permit to the Department.

5. Hazardous Waste List

The permittee shall maintain at the Facility a current list of hazardous wastes handled by the Facility. The permittee shall, as necessary, update the hazardous waste list presented in the approved Part B Permit Application, in accordance with the permit modification requirements contained in 22 CCR 66270.42 (a), (b) or (c). Any addition to the list must be approved by the Department in accordance with the requirements in 22 CCR 66270.41 and/or 66270.42, prior to their inclusion.

6. Anticipated Noncompliance

The permittee shall give advance notice to the Department of any planned changes in the permitted Facility or activity which may result in noncompliance with permit requirements, in accordance with 22 CCR 66270.30 (l) (2).

7. Noncompliance

- a. In the event of noncompliance with this Permit, the permittee shall take all reasonable steps to minimize or correct releases to the environment, and shall carry out all measures as are reasonable to prevent and correct adverse impacts on human health or the environment.
- b. The permittee shall report to the Department in writing all instances of noncompliance not specifically required in this permit, at the time as specified in permit Condition II.C.

8. Incomplete and/or Incorrect Information

Where the permittee becomes aware that any relevant facts were not submitted in a permit application, or that incorrect information was submitted in a permit application or in any report to the Department, the permittee shall promptly submit such facts or information to the Department.

P. Signatory Requirement

1. The owner shall comply with the signatory requirements in 22 CCR 66270.11 for all applications, reports, or information submitted to the Department.
2. The permittee shall maintain documentation of an agreement for operation of the Facility between the property owner and the Facility owner, if the Facility owner is different from the property owner. Whenever there is a change in the agreement, the permittee shall submit a copy of the new or revised agreement to the Department within thirty (30) calendar days of such a change.

Q. Waste Minimization

Waste Minimization Certification:

The permittee shall certify annually, by March 1 for the previous year ending December 31, that:

1. The facility has a program in place to reduce the volume and toxicity of all hazardous wastes which are generated by the operations of the two units to the degree, the permittee determines to be economically practicable.
2. The method of storage, treatment or disposal is the only practicable method or combination of methods currently available to the facility which minimizes the present and future threat to human health and the environment.

The permittee shall make this certification in accordance with 22 CCR 66270.11. The permittee shall submit the certification to the appropriate Department Facilities Management Branch Chief and shall record and maintain such certification onsite in the facility operating record.

Waste Minimization Conditions:

1. The permittee shall comply with the Hazardous Waste Source Reduction and Management Review Act requirements that are specified in the Health and Safety Code Sections 25244.19, 25244.20 and 25244.21, and any subsequent applicable promulgations thereunder.
2. The permittee shall submit a copy of all reviews, plans, plan summaries, reports and report summaries required by Section II Q 1 above, to the Department no later than ninety (90) days calendar days after the effective date of this permit and by March 1 every four years thereafter.

R. Documents to be Maintained at the Facility

The permittee shall maintain the approved Part B Permit Application and its subsequent amendments, this Permit, personnel training records, operating records and all other documents required by this Permit at the Facility, until closure is completed and certified by an independent California-registered professional engineer. However, training records of former employees may be kept for only three years from the date the employee last worked at the Facility.

PART III

SPECIAL CONDITIONS

A. Prohibition of Disposal

Pursuant to Health and Safety Code Section 25203, hazardous wastes shall not be permanently disposed of at the Facility unless such disposal is properly permitted or authorized by the Department under a permit or grant of interim status.

B. Storage in Containers at Building T029

1. This permit authorizes the permittee to store on-site generated hazardous wastes in containers at building T029 as follows:

Description of Hazardous Waste	USEPA (or CA) Hazardous Waste Number	Maximum Volume
Sodium Metal ¹	D001, D003 (CA # 181)	5500 gallons
Sodium-Potassium ¹ Metal	D001, D003 (CA # 181)	Included within the 5500 gallons specified above

2. All containers holding the above listed hazardous waste shall be stored inside building T029. The maximum number of containers to be stored in this building at any one time is 100 55-gallon drums or their equivalent volume². Containers shall be stored along the perimeter of the building as specified in the Part B Addendum, page 23.

¹ The metal wastes may also contain metal oxides and/or hydroxides.

² The B-25 and B-12 boxes (containers), listed in the Part B Addendum, page 47, of the operation plan, have volumes of 912 gallons and 330 gallons respectively.

- a. Containers shall not be stacked more than eight (8) feet or three (3) containers high, whichever is less. A restraint system shall be employed to prevent stacked containers from falling.
 - b. The permittee shall not use any containers in building T029 other than the types specified in the Part B Addendum, page 47. These containers shall meet the requirements specified in Part III B.2.c of this permit.
 - c. Every container shall be stored in its most stable position, and meet the applicable requirements of 49 CFR Parts 171 through 179 concerning intended uses while the containers are at the Facility.
 - d. A minimum of ten (10) feet of aisle space shall be maintained between rows of containers in building T029.
3. The permittee shall ensure that water does not come in direct contact with the hazardous waste stored in building T029.
- a. Containers holding hazardous waste in building T029 shall remain closed. The permittee shall not open containers holding hazardous waste in building T029 except as provided in Part III B.4.d of this permit.
 - b. The permittee shall ensure that water does not penetrate the structure of building T029. Building T029 shall not have cracks, gaps or holes in the walls and roof. The permittee shall inspect the building at least four (4) times a year. The permittee shall document these inspections and maintenance activities in its operating record.
 - c. The floor at building T029 shall be constructed of reinforced concrete. This concrete shall be free of cracks or gaps.
4. Storage Conditions
- a. The permittee shall not store hazardous waste at building T029 for longer than one year from the date the waste is first accepted for storage.
 - b. A container holding hazardous waste shall not be handled or stored in a manner which might rupture the container or cause it to leak.

- c. Containers used for storing hazardous waste shall be in good condition so that they may be safely transported handled or moved.
- d. If a container holding hazardous waste is not in good condition, the permittee shall transfer the hazardous waste to a container that is in good condition.
- e. A label shall be maintained on each container holding hazardous waste. All labels shall be visible for inspection. Labels shall have the following information:
 - 1. Composition and physical state of the waste.
 - 2. Special safety recommendations or precautions for handling the waste.
 - 3. Hazardous properties of the waste.
 - 4. Name and address of the facility producing the waste.
 - 5. Date accumulation of waste began.
 - 6. Date the waste accepted for storage.
- f. The total number of containers storing hazardous waste at building T029 shall not exceed the designated capacity.
- g. Empty containers contaminated with hazardous waste shall be stored and handled as hazardous waste.

5. Closure Requirements

- a. Upon closure of building T029, the permittee shall comply with the requirements of 22 CCR 66264.178 and the procedures in section XIII of the operation plan and Part B Addendum, page 146.

C. Storage and Treatment at Building T133

Highlights

- 1. This permit authorizes the permittee to treat only the type of on-site generated wastes listed in Part III B.1 of this permit in the Treatment

Chamber of building T133 (refer to Treatment Building T133 Plot Plan included herein as Figure 4) . No containers other than the types specified in the Part B Addendum, page 47, shall be brought to building T133.

2. The permittee shall not store hazardous waste containers at building T133 except as provided in Part III.C.3 and Part III.C.4 of this permit. The permittee shall not have at any time more than one container of hazardous waste at building T133.
3. If the contents of a container cannot be treated in one batch, then the treatment shall continue from one batch to the other and in consecutive working days, until all the contents of the container are treated. If treatment is interrupted by a breakdown in the tank system³, the permittee shall document the incident (date, time and description) and comply with 22 CCR 66264.196 (b)(7) for certification of major repairs.
4. Treatment preparation and processing of the waste in the containers shall begin within two (2) hours from the time the containers arrive at building T133. The permittee shall document the date and time these containers arrive at building T133.
 - a. The permittee shall not store 55-gallon drums or smaller containers at building T133 longer than three (3) calendar days, or five (5) calendar days if treatment is interrupted by a breakdown in the tank system.
 - b. The permittee shall not store containers larger than 55-gallon drums at building T133 longer than fifteen (15) calendar days, or seventeen (17) calendar days if treatment is interrupted by a breakdown in the tank system.
 - c. All containers at building T133 shall be placed in a secondary containment in compliance with 22 CCR 66264.175 (b).
5. All waste transfer activities, in and out of containers, at building T133 shall be conducted in a secondary containment in compliance with 22 CCR 66264.175 (b).
6. All treatment activities at building T133 shall be conducted inside the Treatment Chamber. The floor and sump inside the Treatment Chamber shall be impervious to the wastes handled at building T133.

³ The tank system include all tanks, equipment and piping used in the treatment process at Building T133.

7. All rinsing activities shall be conducted inside the Treatment Chamber.
8. This permit authorizes the permittee to store on-site generated hazardous waste in tanks T1, T2 and T3 in building T133 as follows:

Tank No.	Maximum Storage (Gallons)	Dimensions of Tank	Waste Description	USEPA (or CA) Hazardous Waste No.
T1	1300	61" Wide 128" Long 39" Deep	Sodium hydroxide/ Potassium Hydroxide	D002 ⁴ (CA # 122)
T2	300	36" Dia. 60" Straight	Sodium-Potassium	D001, D003 (CA # 181)
T3	5000	120" Dia. 106" High	Sodium Hydroxide/ Potassium Hydroxide	D002 ³ (CA # 122)

6600 lbs 833 lbs
792.3

9. Waste Identification

- a. The permittee may treat only the following on-site generated hazardous wastes by direct heating of the alkali metals in a treatment pan inside the Treatment Chamber of building T133.

Description of Hazardous Waste	California Hazardous Waste Code	U.S. EPA Hazardous Waste Number
Sodium, Sodium-Potassium	181 ⁵	D001, D003

- b. The permittee shall not treat hazardous wastes in excess of the following quantities:

⁴ This waste may have traces of Chromium, whose EPA hazardous waste number is D007, incidental to the treatment of component parts process.

⁵ Kerosene is used for purpose of packaging this waste. The waste may have traces of kerosene, whose California hazardous waste number is 223.

Hazardous Waste	Quantity per year
Sodium metal	10,000 pounds
Sodium-Potassium	1000 pounds

- c. The permittee shall not store any hazardous waste in the waste tank system for a period more than one year from the date the waste is first placed into the tanks.
- d. The permittee is prohibited from treating any hazardous waste, at building T133, that is not identified in Part III C.9.a of this permit.
- e. The kerosene, used for packaging purposes in the hazardous waste containers, shall be handled as hazardous waste.

10. Operating Requirements

- a. The permittee shall comply with the general operating requirements of 22 CCR 66264.194.
- b. All treatment and rinsing activities shall be conducted inside the Treatment Chamber. The floor and sump inside the treatment chamber shall be impervious to the waste handled at Building T133.
- c. The permittee shall not store any hazardous waste at building T133 except as provided in Part III C.4 and Part III C.8 of this permit.
- d. The permittee shall prevent spills and overflows from the tanks or containment systems. The permittee shall monitor the tanks and above ground ancillary equipment for any leaks, spills and overflow at all times during treatment process and/or filling of tanks. After waste transfer from tank T1 to T3, the permittee shall ensure that no waste liquids are left in the tank fill-pipe (pipe that connects T1 to T3).
- e. The permittee shall assess the tank system condition according to the following schedule:
 - 1. Biennially unless otherwise specified below.

2. When the tank thickness is within 10% of the design value, the tanks shall be inspected semiannually.
3. When the tank thickness is within 3% of the design value, the tank must be replaced.

This assessment shall address the potential for cracks or leaks, corrosion or erosion that may lead to cracks or leaks or wall thinning to less than the design thickness. The permittee shall note the results in the Facility operating record within five (5) calendar days after its completion.

- f. Ancillary equipment shall be coated annually with a corrosion resistant material. This activity shall be documented in the Facility operating record.
- g. All tanks and ancillary equipment shall have secondary containment pursuant to 22 CCR 66264.193. The permittee shall inspect all containers and tanks at building T133 daily for any leaks, cracks or spills and document the result in the Facility operating record.
- h. Truck trips from Building T133 shall be limited to off peak commute periods.

11. Closure and Post-Closure Care

- a. At the time of closure of the waste tank system, the permittee shall comply with the requirements of 22 CCR 66264.197(a) and this Permit, and follow the procedures specified in the Closure Plan, as provided in Section XIII of the Part B Permit Application and the Part B Addendum.

D. Special Provisions for Ignitable, Reactive, Incompatible, Recyclable or Incinerable Wastes

1. The permittee shall take precautions to prevent accidental ignition or reaction of ignitable or reactive waste as required by 22 CCR 66264.17(a).
2. The permittee shall not locate containers holding ignitable or reactive waste within 15 meters (50 feet) of the Facility's property line as specified in 22 CCR 66264.176, unless otherwise specifically approved by the local fire authority and the Department.

3. The permittee shall comply with the applicable requirements of the National Fire Protection Association and any local fire authority for storing wastes in tank systems. Provide documentation of compliance with such requirements to the Department within sixty (60) calendar days after the effective date of this Permit. [22 CCR 66264.198(b)]

E. General Waste Analysis Requirements

Unless otherwise specifically stated elsewhere in this Permit, the permittee shall follow the written Waste Analysis Plan as described in Section V of the Part B Permit Application. [22 CCR 66264.13]

F. Personnel Training Requirements

The permittee shall provide and implement the programs as required by 29 CFR 1910.120 and 8 CCR 5192 for workers involved in hazardous waste operations at the Facility.

1. The permittee shall maintain training documents and records in accordance with 22 CCR 66264.16(d), 22 CCR 66264.16(e), 29 CFR 1910.120 and 8 CCR 5192. These records shall demonstrate compliance with the above indicated Sections.
2. All employees who are designated to perform the waste sampling shall be trained in proper sampling techniques and implementation of the waste analysis plan described in Section V of the Part B Permit Application. This training shall be provided in addition to the training required by 22 CCR 66264.16, 29 CFR 1910.120 and 8 CCR 5192. The permittee shall also provide annual refresher courses for such training to all personnel handling hazardous wastes.
3. The permittee shall ensure that all employees designated to accept for the Facility or initiate from the Facility a shipment of hazardous waste are familiar with the current manifest procedures and requirements through proper training.

G. Inspection Schedules and Procedures

1. The permittee shall inspect the Facility in accordance with the Inspection Schedule as specified in the Part B Permit Application, and shall comply with the requirements of 22 CCR 66264.15, 66264.174 and 66264.195.

2. The permittee shall inspect tanks and treatment systems. At a minimum, such inspections shall be conducted in accordance with the schedule specified in 22 CCR 66264.195(c) to ensure that such systems are functioning properly.
3. The permittee shall conduct a tank assessment as specified in 22 CCR 66264.191(c) and in accordance with Part III C.10.e of this permit. A written tank assessment report shall be submitted to the Department within thirty (30) calendar days after its completion.
4. Inspections shall be performed by the designated employees who have been properly trained and assigned to such duties. An inspector's signature is required for each inspection.

H. Response to Leaks or Spills

1. In the event of a leak or spill from a tank system or a secondary containment system, or if a system becomes unfit for continued use, the permittee shall remove the system from service immediately and comply with the applicable requirements of 22 CCR 66264.196(b)(1) through (7). If the tank system has been repaired, the permittee shall submit a certification of tank repairs as specified in 22 CCR 66264.196(b)(7) to the Department within seven (7) calendar days after returning the tank system to use.
2. Spilled or leaked waste and accumulated precipitation must be removed within twenty-four (24) hours after its discovery.
3. The collected material from a leak, a spill or accumulated precipitation shall be managed as hazardous waste unless the permittee has established that the collected material is not a hazardous waste in accordance with the requirements of 22 CCR 66261.3(d). The permittee shall comply with the applicable requirements of 22 CCR 66261.4(c), 66264.175(b)(5), 66264.178 and 66264.193(c)(4) concerning the collected material.
4. **Air Emission**

The permittee shall comply with all applicable air emission standards required by Federal, State or local agencies.

I. Special Reporting Requirements

1. If the Facility has had a release, fire, explosion or any incident of noncompliance, the permittee shall comply with the requirements of 22

CCR 66264.56(d) and 66270.30(l)(6) as follows:

- a. Comply with the 24-hour reporting requirements of Permit Condition H.K.
 - b. Notify the appropriate local authorities immediately if evacuation of local areas is deemed advisable.
 - c. Note the time, date and details of any incident in the Facility operating record and submit a written report of the incident to the Department within fifteen (15) calendar days after the incident. The report shall include the information as specified in 22 CCR 66264.56(j) and 66270.30(l)(6)(C).
 - d. Notify the Department and appropriate state and local authorities in writing that the Facility is in compliance with 22 CCR 66264.56(h) before operations are resumed in the affected area(s) of the Facility.
2. If there has been any release to the environment from a tank system or its secondary containment system, the permittee shall comply with the requirements of 22 CCR 66264.196(b)(5) as follows:
- a. Report the release within 24 hours of its detection to the Department, except as provided in 22 CCR 66264.196(b)(5)(B).
 - b. Submit a written report containing the information specified in 22 CCR 66264.196(b)(5)(C) to the Department within thirty (30) calendar days after detection of the release.

J. Manifest Requirements

1. The Owner and/or Operator shall comply with the manifest requirements of 22 CCR 66264.71, 66264.72 and 66264.76.

K. Generator Requirements

The permittee shall comply with the applicable requirements of 22 CCR Chapters 12 through 18 and the Health and Safety Code for those wastes generated on-site from normal operations, maintenance, construction and/or closure activities. Whenever a shipment of hazardous waste is initiated from the Facility, the permittee shall comply with the requirements of 22 CCR Chapter 12.

PART IV

CORRECTIVE ACTION SCHEDULE OF COMPLIANCE FOR SOLID WASTE MANAGEMENT UNITS

A. Background

A RCRA Facility Assessment (RFA) was conducted jointly by the United States Environmental Protection (EPA) agency, Region IX and the California State Department of Toxic Substances Control (formerly the California State Department of Health Services, Toxic Substances Control Program) in August 1990. The RFA summarizing the findings was prepared in July 1991. The RFA identified several Solid Waste Management Units (SWMU) and Areas of Concern at the Santa Susana Field Laboratory. The two buildings, T029 and T133, were identified as SWMUs.

These 2 SWMUs are described in Sections 7.2 and 7.11 of the RFA report titled "RCRA Facility Assessment, Rockwell International, Santa Susana Field Laboratory, Simi Hills, CA." prepared by Science Application International Corporation For EPA, July 10, 1991.

B. ENFORCEMENT ORDER

The Department issued Rockwell International Corporation a Stipulated Enforcement Order (Order) regarding its SSFL on November 11, 1992 and filed with the court on December 2, 1992. This Order include: preparation of a Current Condition Report, RCRA Facility Investigation (RFI) Workplan, RFI Report, Corrective Measure Studies and clean up of the areas identified in the final Corrective Measure Studies. The Order is attached to this permit as Appendix I

C. Newly Identified Releases/Newly Identified SWMUs

1. In the event the permittee discovers new releases of hazardous waste and/or hazardous constituents, or discovers new SWMUs not previously identified, the permittee shall notify the Department in writing within 30 days of such discovery summarizing the findings including the immediacy and magnitude of any potential threats to human health and the environment.

- 2. The Department may require the permittee to investigate, mitigate and/or take other applicable action to address any immediate or potential threats to human health and/or the environment, newly identified releases of hazardous waste and/or hazardous constituents, or newly identified SWMUs. Upon written request by the Department, the permittee shall submit to the Department any required documents which may include, but are not limited to, IM Workplans and/or RCRA Facility Investigation Workplans. The required documents shall be developed in a manner consistent with the workplans approved by the Department and/or EPA, applicable state and federal laws and regulations and all applicable guidance documents developed by the Department and/or EPA.**

- 3. Upon receipt of the Department's written approval, the permittee shall implement the approved workplans according to the schedules and provisions contained therein."**



FIGURE 1
General Location Map of the Santa Susana Field Laboratory

NOTE: MAP NOT TO SCALE

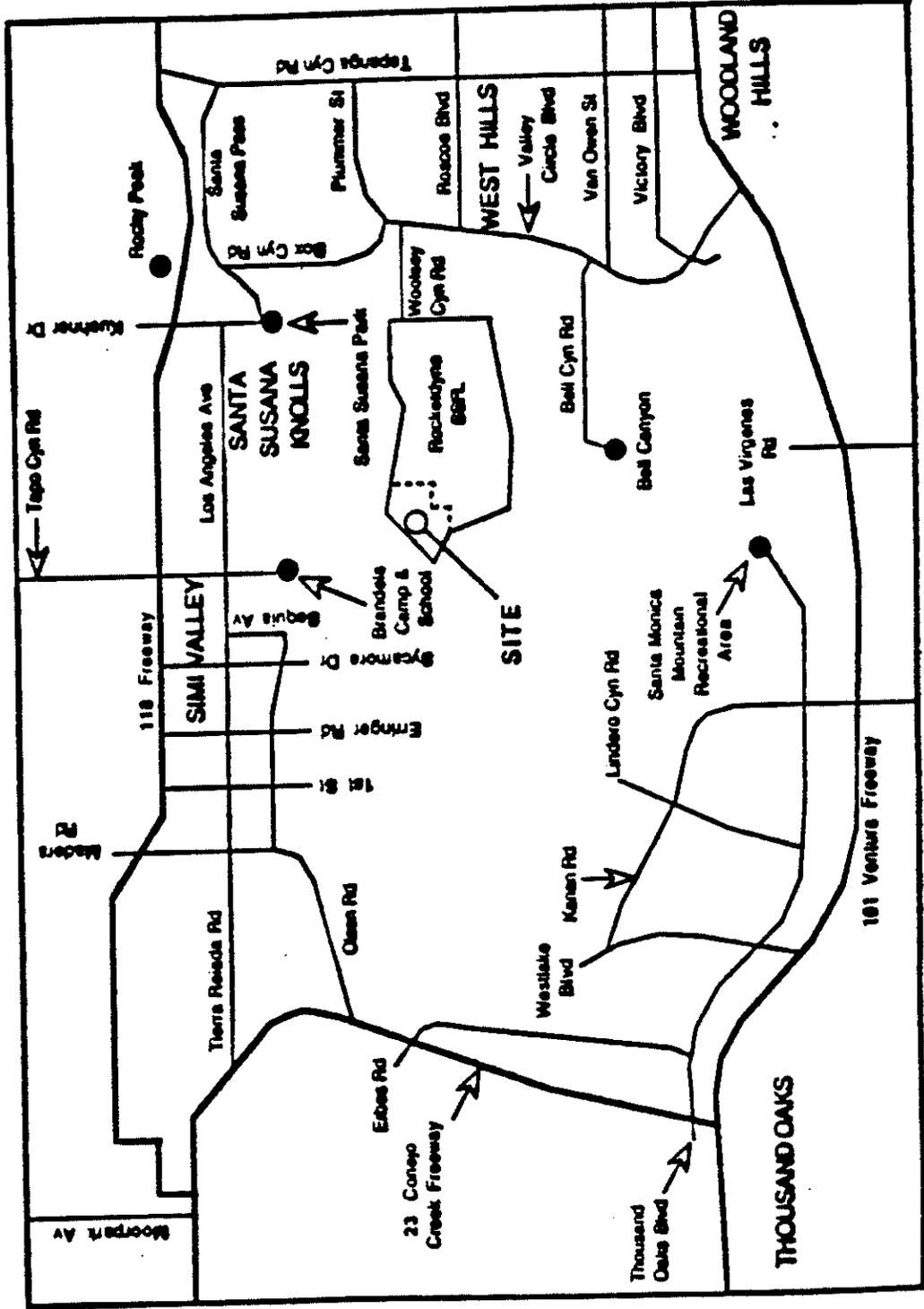


FIGURE 2
Area IV Property Layout

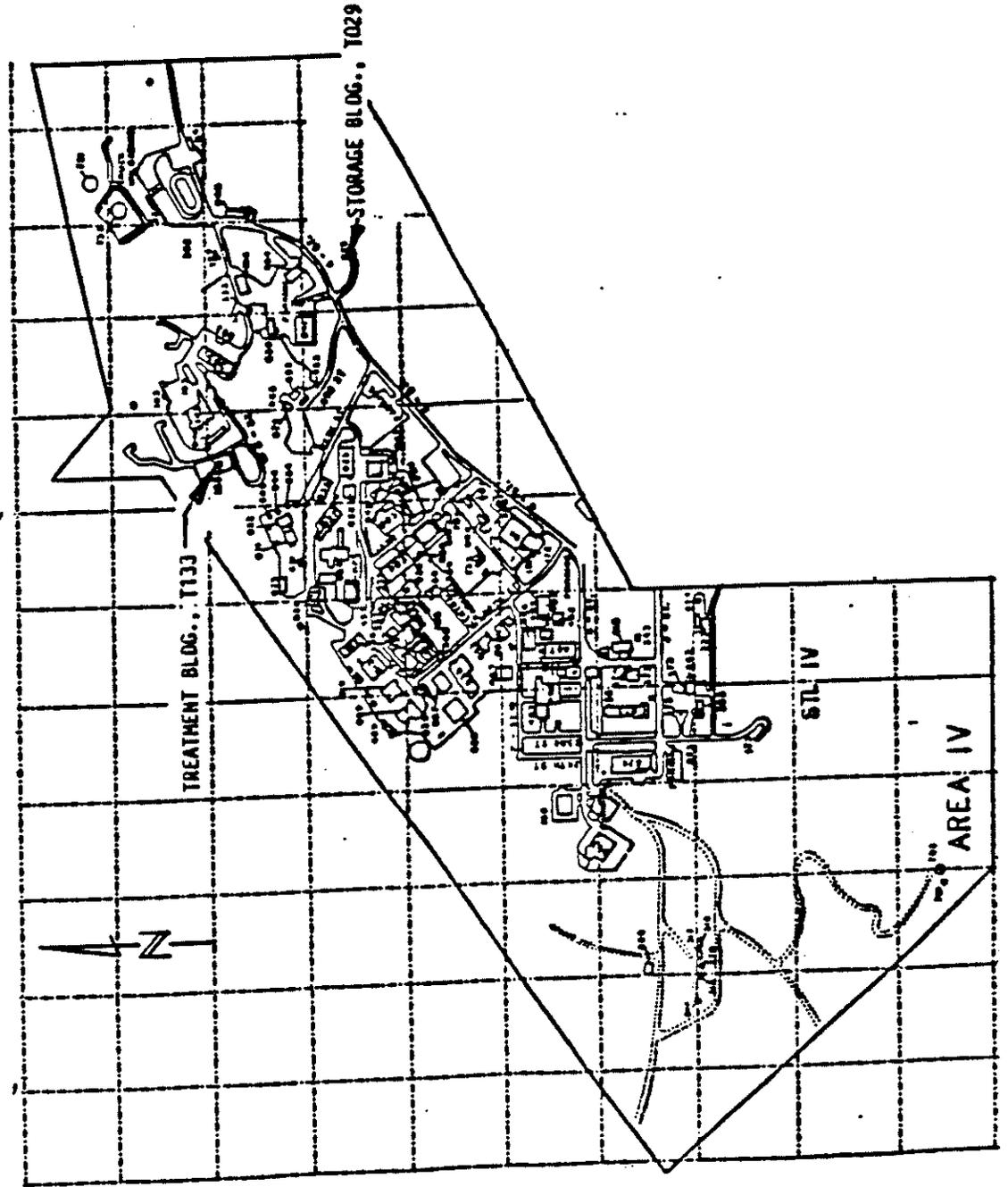
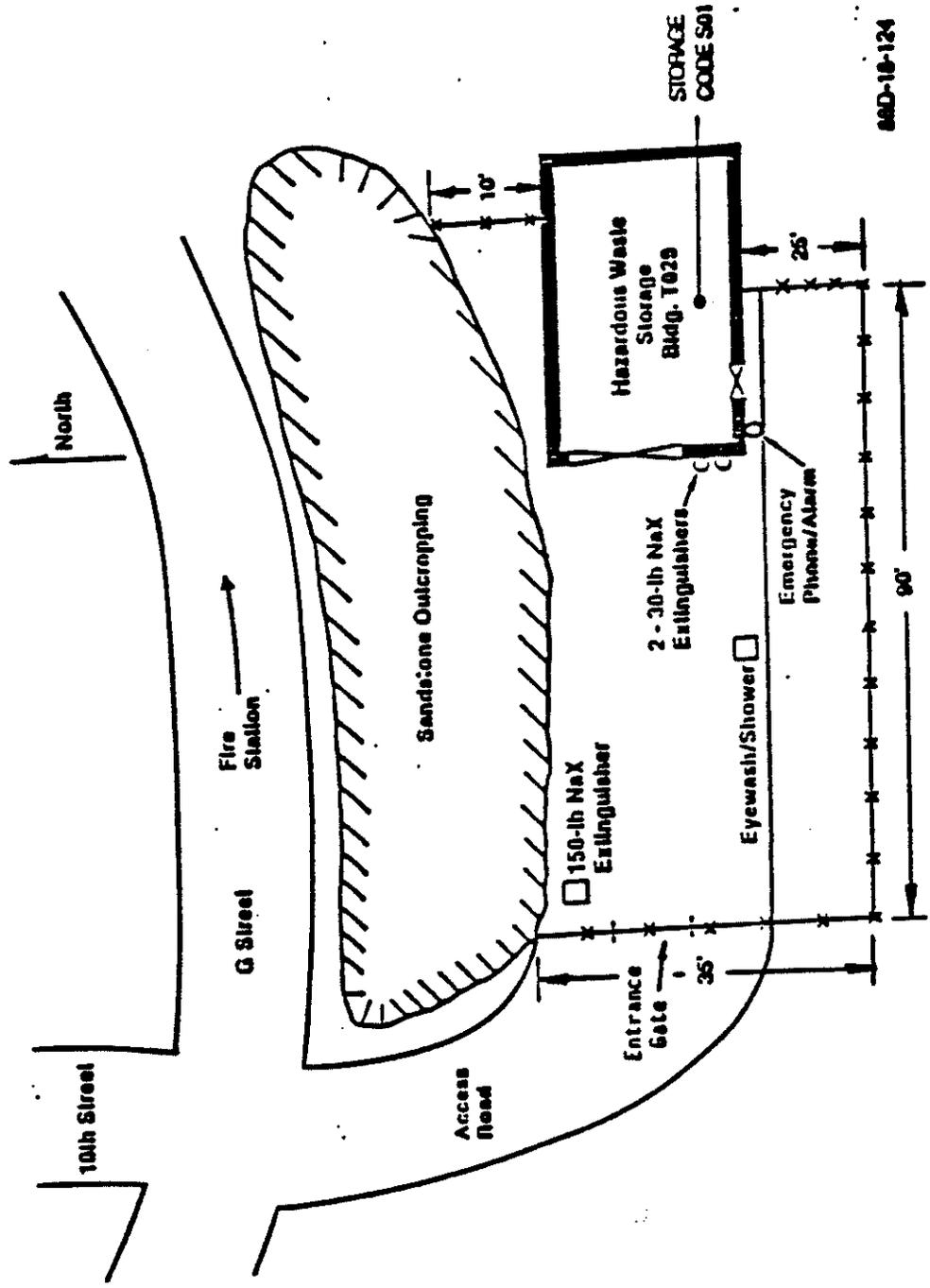
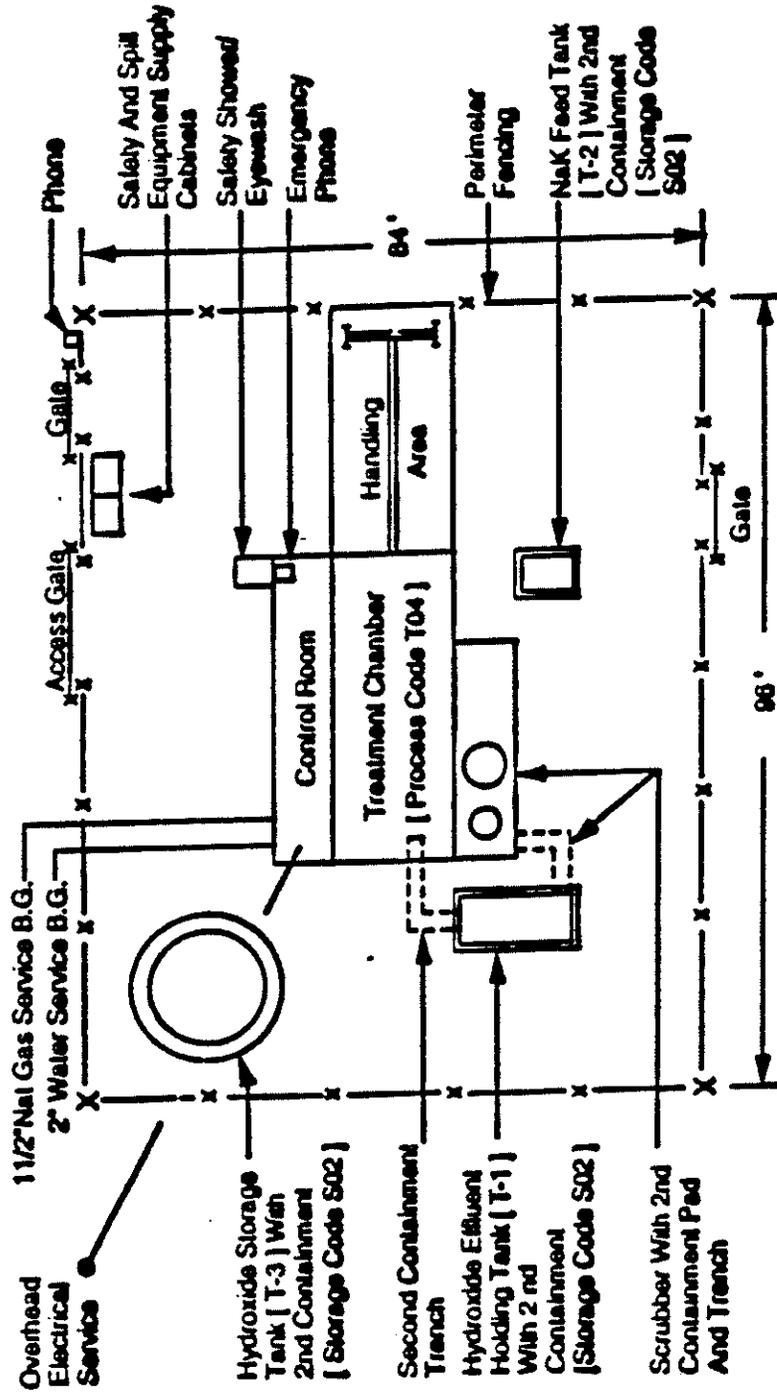


FIGURE 3
Storage Building T029 Plot Plan



06D-10-124

FIGURE 4
Treatment Building T133 Plot Plan



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Appendix I

STIPULATED ENFORCEMENT ORDER

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Appendix I

STIPULATED ENFORCEMENT ORDER

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
DEPARTMENT OF TOXIC SUBSTANCES CONTROL

In Matter of:)
)
Rockwell International Corporation)
Rocketdyne Division)
6633 Canoga Avenue)
Canoga Park, CA 91303)
)
Respondent.)
_____)

Docket HWCA
STIPULATED
ENFORCEMENT ORDER
(Calif. H & S Code §25187)

1. Introduction

The State of California Environmental Protection Agency, Department of Toxic Substances Control, Region 3 (the "Department") issues this Stipulated Enforcement Order ("Stipulated Order") to Rockwell International Corporation ("Rockwell") regarding its Santa Susana Field Laboratory ("SSFL") located in the unincorporated area of Ventura County known as Simi Hills pursuant to Health and Safety Code section 25187.

2. Areas To Be Reviewed

A preliminary RCRA Facility Assessment (RFA) was jointly conducted by the EPA Region IX and the Department, and a report was issued on July 10, 1991. This RFA preliminarily identified areas of the SSFL for designation as Solid Waste Management Units (SWMU) and Areas of Concern (AOC). Those identified areas are now the subject of this Stipulated Order.

3. Assessment Actions: Current Conditions Report

Within 7 months of the date of this Stipulated Order, Rockwell shall submit to the Department a Current Conditions Report analyzing each area identified in the RFA referenced in Paragraph 2 above. The Current Conditions Report shall contain an in-depth investigation of waste generation and release at each area. Review shall include interviews with relevant past and present Rockwell employees, historical record review, and visual inspections. The Current Conditions Report shall state for each area, Rockwell's determination of necessary further actions and the basis for each conclusion.

4. Assessment Actions: Draft RFI Workplan

Within three months of Rockwell's submission of the Current Conditions Report, Rockwell shall submit to the Department a Draft RCRA Facility Investigation Workplan (RFI Workplan) including plans for each area identified in the Current Conditions Report as areas appropriate for RFI.

5. Site Cleanup

The parties contemplate that the approval of the RFI Workplan will result, ultimately, in an RFI Report, Corrective Measure Studies, and final cleanup of the areas identified in the final approved Corrective Measure Studies.

6. Public Review

At the time Rockwell submits the Draft RFI Workplan to the Department, it shall make the Current Conditions Report and the Draft RFI Workplan available for public review and comment.

7. NASA/DOE

Because the parties anticipate that some of the work that may be required pursuant to any final RFI Workplan will take place on NASA or DOE owned property, during the next ten months, Rockwell shall seek DOE's and NASA's approval for RFI and related actions. This Stipulated Order does not preclude Rockwell from contending in the future that NASA or DOE approval and funding may be required to conduct characterization or cleanup actions on property owned or leased by NASA or DOE.

8. Authority Under Law

Nothing in this Stipulated Order is intended nor shall it be construed to preclude the Department from exercising its authority under any law, statute or regulation. Furthermore, nothing in this Agreement is intended nor shall it be construed to preclude any state agency, department, board or entity from exercising its authority under any law, statute, or regulation.

9. Modification of Agreement

This Stipulated Order may be modified by written agreement of the parties. Consent to modification of submission dates in

this Stipulated Order shall not be unreasonably withheld.

10. Effective Date

The effective date of this Stipulated Order shall be the later of the dates on which it is signed by the Department and the Rockwell.

IT IS AGREED:

BY: Florence Pearson
FLORENCE PEARSON, Chief
Facilities Management Branch
Department of Toxic Substances Control
Region 3

11/12/92
Date

BY: J.R. Stocker
JOHN R. STOCKER,
Vice President and Associate
General Counsel, Attorney
for Rockwell International

9-8-92
Date

IT IS ORDERED:

BY: Florence Pearson
FLORENCE PEARSON, Chief
Facilities Management Branch
Department of Toxic Substances Control
Region 3

11/12/92
Date