



Department of Toxic Substances Control

Hazardous Waste Management Program
Permitting Division

RCRA EQUIVALENT HAZARDOUS WASTE FACILITY PERMIT

FACILITY NAME / ADDRESS:

Pacific Scientific Energetic Materials Company

3601 Union Road
Hollister, California 95023

OWNER NAME:

Pacific Scientific Energetic Materials Company

OPERATOR NAME:

Pacific Scientific Energetic Materials Company

PERMIT NUMBER: 2021/22-HWM-01

EPA ID NUMBER: CAD 009 220 898

FIRST ISSUE DATE: August 9, 2021

EFFECTIVE DATE: August 9, 2021

EXPIRATION DATE: August 9, 2031

The Department of Toxic Substances Control (DTSC) hereby issues this Resource Conservation and Recovery Act (RCRA) equivalent Hazardous Waste Facility Permit (hereafter referred to as "Permit") pursuant to the authority provided by California Health and Safety Code section 25200. As of the effective date, this Permit modifies and replaces any prior Permit with the same permit number.

This Permit, and Attachment "A" to the Permit dated August 9, 2021, are 3 and 34 pages in length, respectively. This Permit incorporates, by reference, the Part "A" and Part "B" Permit Application dated May 19, 2021, and May 19, 2021, respectively.

In the event of conflicts between this Permit and the Application, this Permit takes precedence.

August 9, 2021

Muzhda Ferouz, P.E.
Branch Chief
Permitting Division
Hazardous Waste Management Program

Date

RCRA Equivalent - Hazardous Waste Facility Permit		
Pacific Scientific Energetic Materials Company		
EPA ID.: CAD 009 220 898	Permit No.: 2020/21-HWM-01	August 9, 2021

PERMIT MODIFICATION SUMMARY

The following table summarizes the modification history of this Permit. Each time the Permit is modified, a new row is added to the table. A description of the contents of each column of the table is found below the table.

Rev.	Attachment "A"	Part A Application	Part B Application	Modification Requested	Modification Class	Permit Signed	Permit Effective
0	08/09/2021	05/19/2021	05/19/2021	NA	NA	08/09/2021	08/09/2021

Column Header

Rev.
Attachment "A"
Part A Application
Part B Application
Modification Requested
Modification Class

Permit Signed
Permit Effective

Description

The permit revision number (beginning at zero for a new permit).
The date of Attachment "A" to the permit.
The date of the Part A permit application.
The date of the Part B permit application.
The date that a permit modification was requested.
The classification of the permit modification (i.e. Class 1, Class 1*, Class 2, Class 3, or Other).
The date that the modified permit was signed.
The date that the terms and conditions of the permit, as modified, take effect.

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PERMIT MODIFICATION DESCRIPTION

The following section provides a brief narrative description of the revision history of this Permit.

Permit Modification 1 Description:

Reserved.



Department of Toxic Substances Control

Hazardous Waste Management Program
Permitting Division



ATTACHMENT "A" **to the** **RCRA EQUIVALENT** **HAZARDOUS WASTE FACILITY PERMIT**

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Pacific Scientific Energetic Materials Company

FACILITY ADDRESS:

3601 Union Road
Hollister, California 95023

PERMIT NUMBER: 2021/22-HWM-01

EPA ID NUMBER: CAD 009 220 898

DOCUMENT DATE: August 9, 2021

The Department of Toxic Substances Control (DTSC) prepared this document as an attachment to the Hazardous Waste Facility Permit (hereafter, referred to as "Permit") with the indicated permit number. Prior to relying on this document, the reader should confirm that it is the current version of Attachment "A" that is identified by date in the current Permit. A copy of the current Permit can be obtained by contacting DTSC or may be accessed directly from DTSC's EnviroStor database (www.envirostor.dtsc.ca.gov).

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PART I. DEFINITIONS

All terms used in the Permit shall have the same meaning as those terms have in the California Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, unless expressly provided otherwise by this Permit.

1. **“BATF”** as used in this Permit means the United States Bureau of Alcohol, Tobacco, and Firearms.
2. **“DTSC”** as used in this Permit means the California Department of Toxic Substances Control.
3. **“DoD”** as used in this Permit means the United States Department of Defense.
4. **“EHW”** as used in this Permit means Explosive Hazardous Waste.
5. **“EHWS”** as used in this Permit means Explosive Hazardous Waste Solvent.
6. **“Facility”** as used in this Permit means all contiguous land and structures, other appurtenances, and improvements on the land used for the treatment, transfer, storage, resource recovery, disposal, or recycling of hazardous waste. A hazardous waste facility may consist of one or more treatment, transfer, storage, resource recovery, disposal, or recycling operational units or combinations of these units.

For the purpose of implementing corrective action under California Code of Regulations, title 22, division 4.5, a hazardous waste facility includes all contiguous property under the control of the owner or operator required to implement corrective action.

7. **“NEW”** as used in this Permit means Net Explosive Weight, which is a measure of the weight of the reactive component of a hazardous waste and does not include the weight of the non-reactive component parts such as the casing.
8. **“Open Burning” (OB)** means the combustion of any material without the following characteristics:
 - a. control of combustion air to maintain adequate temperature for efficient combustion;
 - b. containment of the combustion-reaction in an enclosed device to provide sufficient residence time and mixing for complete combustion; and
 - c. control of emission of the gaseous combustion products.
9. **“Open Detonation” (OD)** as used in this Permit means the treatment of ignitable or reactive hazardous waste accomplished by the detonation of hazardous waste using a counter charge to initiate the explosion. Open detonation is not formally defined in Title 22 of California Code of Regulations. OD does not include ignition systems designed to ignite the excelsior.

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10. **“Permittee”** as used in this Permit means the Facility Owner and Operator.
11. **“Permit Application”** as used in this Permit means the Part A Permit Application and the Part B Permit Application (operation plan), submitted by the Permittee and identified by title and date on the cover page of the Permit.
12. **“RCRA”** as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

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PART II. DESCRIPTION OF FACILITY AND OWNERSHIP

1. OWNER OF FACILITY

Pacific Scientific Energetic Materials Company
3601 Union Road
Hollister, California 95023

2. OWNER OF REAL PROPERTY

Pacific Scientific Energetic Materials Company
3601 Union Road
Hollister, California 95023

3. OPERATOR OF FACILITY

Pacific Scientific Energetic Materials Company
3601 Union Road
Hollister, California 95023

4. LOCATION

The Facility address is 3601 Union Road, Hollister, California 95023, at latitude 36° 50' 00" N and longitude 121° 27' 05" W. The Facility is located approximately 3 miles southwest of the center of Hollister, CA near the intersection of Union Road and State Highway 156 (See Part IX, Figures for the Assessor's Parcel Map). The San Benito County Assessor's parcel numbers for the Facility property are: 021-140-001 and 021-140-048.

5. DESCRIPTION OF FACILITY ACTIVITY

The Facility occupies approximately 270 acres. Twenty (20) acres were added adjacent and to the south of the original 250-acre facility in 1992 to provide additional buffer area. The Facility has historically been in a sparsely developed area bounded by agricultural and grazing lands. The Permittee and its predecessor companies have manufactured explosives and explosive devices for aerospace, military, and commercial applications, and have produced specialty chemicals on a contract basis at the Facility since 1971. Hazardous wastes generated from these activities include explosives (reactive waste), solvents, toxic chemicals, and metal powders.

6. FACILITY PERMITTING HISTORY

The Facility was built in 1971 by Teledyne, Incorporated (Inc.), which purchased McCormick Selph Associates in 1964. The original Part "A" application was submitted November 19, 1980. An Interim Status Document (ISD) was issued on April 6, 1981. A permit to store hazardous waste in tanks and

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containers was issued to Teledyne, Inc., on November 7, 1983. Other hazardous waste activities (such as treatment in tanks, storage and treatment in surface impoundments, and thermal treatment of explosive wastes) continued under the ISD until a new permit was issued on July 28, 1993. As a result of internal reorganization, the corporate name for the July 31, 1993 permit was Teledyne Ryan Aeronautical/McCormick Selph Ordnance (Teledyne Ryan). In July 1999, McCormick Selph was sold and became McCormick Selph, Incorporated (MSI). In July 2003, MSI was acquired by Pacific Scientific Energetic Materials Company. The 1993 permit expired on July 31, 2003, but it continued to be in effect while DTSC processed MSI's permit renewal application pursuant to California Code of Regulations, title 22, section 66270.51. DTSC issued the permit renewal on May 12, 2006, with an expiration date of May 11, 2016.

7. FACILITY SIZE AND TYPE FOR FEE PURPOSES

The Facility is categorized as a small treatment facility pursuant to Health and Safety Code section 25205.1 and for purposes of Health and Safety Code sections 25205.2 and 25205.19.

8. CLOSURE COST ESTIMATE

The closure cost estimate (in 2020 Dollars), as approved by DTSC on August 10, 2020, is \$1,295,425.

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PART III. GENERAL CONDITIONS

1. EFFECT OF PERMIT

- (a) The Permittee shall comply with the terms and conditions of this Permit and the provisions of the Health and Safety Code and California Code of Regulations, title 22, division 4.5. The issuance of this Permit by DTSC does not release the Permittee from any liability or duty imposed by federal or state statutes, regulations, or local ordinances, except the obligation to obtain this Permit. The Permittee shall obtain the permits required by other governmental agencies, including but not limited to, those required by the applicable land use planning, zoning, hazardous waste, air quality, water quality, and solid waste management laws for the construction and/or operation of the Facility.
- (b) The Permittee is permitted to manage hazardous waste in accordance with the terms and conditions of this Permit. Any management or accumulation of hazardous waste that is not specifically authorized in this Permit, or otherwise authorized by law, is strictly prohibited.
- (c) This Permit incorporates by reference the conditions applicable to all permits found in California Code of Regulations, title 22, section 66270.30.
- (d) Compliance with the terms and conditions of this Permit does not constitute a defense to any action brought under any other law governing protection of public health or the environment, including, but not limited to, one brought for any imminent and substantial endangerment to human health or the environment.
- (e) DTSC's issuance of this Permit does not prevent DTSC from adopting or amending regulations that impose additional or more stringent requirements than those in existence at the time this Permit is issued and does not prevent the enforcement of these requirements against the Permittee.
- (f) Failure to comply with any term or condition set forth in the Permit in the time or manner specified herein will subject the Permittee to possible enforcement action including, but not limited to, penalties pursuant to Health and Safety Code section 25187.
- (g) Pursuant to Health and Safety Code, division 20, chapter 6.5, article 8, California Code of Regulations, title 22, section 66270.43, and California Code of Regulations, title 22, division 4.5, chapter 21, article 3, DTSC may revoke or suspend this Permit or suspend the facility operation for various grounds, including, but not limited to: activities of the Permittee (or any trustee, officer, director, partner, or any person holding 5% of the equity in, or debt liability of, the Permittee's business concern) resulting in any violation of, or non-compliance with, various environmental statutes and regulations, or federal or state conviction significantly related to the fitness of the permit applicant or the Permittee; any

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misrepresentation or omission of information in the Permit Application, during the permit application process, or in information subsequently reported by the Permittee; a determination that conditions may present an imminent and substantial endangerment to the public health or safety or the environment; non-payment of any fees, penalties, or costs owed to DTSC; or if a facility is assigned an unacceptable compliance tier based on its Facility Violations Scoring Procedure (VSP) Score.

- (h) In case of conflicts between the Permit Application and the Permit, the Permit conditions take precedence.
- (i) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Permittee by the State Water Resources Control Board or any of the California Regional Water Quality Control Boards and any conditions imposed pursuant to section 13227 of the Water Code, to the extent such conditions are not less stringent than any requirements or limitations set forth in the Permit.

2. CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

DTSC prepared an Addendum to a previously adopted Negative Declaration in accordance with the requirements of the California Environmental Quality Act, Public Resources Code section 21000 et seq. and the Guidelines for the California Environmental Quality Act, California Code of Regulations, title 14, section 15000 et seq. Upon making a final permit decision, DTSC will file a Notice of Determination with the Office of Planning and Research State Clearinghouse.

3. ENVIRONMENTAL MONITORING

The Permittee shall comply with the applicable environmental monitoring and response program requirements of California Code of Regulations, title 22, division 4.5, chapter 14, articles 6 and 17 for all regulated units at the Facility.

4. ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION CERTIFICATION

The Permittee shall certify annually that it has a hazardous waste reduction and minimization program and method in place and shall keep the annual certification as part of its Operating Record in accordance with California Code of Regulations, title 22, section 66264.73(b)(9).

5. ACCESS

- (a) DTSC, its contractors, employees, agents, and/or any United States Environmental Protection Agency representatives are authorized to enter and freely move about the Facility for the purposes of: interviewing Facility personnel and contractors; inspecting records, operating logs, and contracts relating to the Facility; reviewing progress of the Permittee in carrying out the terms of Part VI of the Permit; conducting such testing

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sampling, or monitoring as DTSC deems necessary; using a camera, sound recording, or other documentary-type equipment; verifying the reports and data submitted to DTSC by the Permittee; or confirming any other aspect of compliance with this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5. The Permittee shall provide DTSC and its representatives access at all reasonable times to the Facility and any other property to which access is required for implementation of any provision of this Permit, Health and Safety Code, division 20, chapter 6.5, and California Code of Regulations, title 22, division 4.5, and shall allow such persons to inspect and copy all records, files, photographs, documents, including all sampling and monitoring data, that pertain to work undertaken pursuant to the entire Permit, or undertake any other activity necessary to determine compliance with applicable requirements.

- (b) Nothing in this Permit shall limit or otherwise affect DTSC’s right to access and entry pursuant to any applicable State or federal laws and regulations.

6. GOVERNMENT LIABILITIES

The State of California or DTSC shall not be liable for injuries or damages to persons or property resulting from acts or omissions by the Permittee or its agents in carrying out activities pursuant to this Permit, nor shall the State of California or DTSC be held as a party to any contract entered into by the Permittee or its agents in carrying out activities pursuant to this Permit.

7. SEVERABILITY

If any provision, term, or condition of this Permit is for any reason held to be invalid, illegal, or unenforceable, the validity, legality, and enforceability of the remaining provisions, terms, and conditions of this Permit shall in no way be affected, impaired or invalidated thereby and shall remain in full force and effect.

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PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation, monitoring and maintenance only of the facility units and activities described in this Part IV. The Permittee shall not perform permit required hazardous waste management activities in any unit other than those specified in this Part IV. Modifications to a unit or activity authorized by this Permit may require the written approval of DTSC in accordance with the permit modification procedures set forth by California Code of Regulations, title 22, division 4.5.

UNIT NUMBER:

UNIT 1

UNIT NAME:

Treatment / Storage Unit 1 (TSU-1), Open Burn (OB) Unit

LOCATION:

Unit 1 is located at the southern portion of the Facility (see Figure 1).

ACTIVITY TYPE:

Treatment of reactive hazardous waste by OB in miscellaneous unit

ACTIVITY DESCRIPTION:

Explosive Hazardous Waste (EHW) and waste that has been contaminated by EHW is treated by open burning at Unit 1. Treatment is completed by: (a) loading combustible material into the burn tube; (b) placing EHW on top of the combustible material; and lastly (c) igniting the combustible material using a remote ignition device. After the first treatment event, subsequent treatment events are conducted at Unit 1 as needed to ensure that the reactive component is no longer present in the waste via visual inspection of post-treatment EHW. The ash resulting from the treatment of hazardous waste at Unit 1 is placed into containers and managed as hazardous waste at Unit 3. Residual metal is separated from the ash and managed as non-hazardous scrap metal, which is then recycled. Any sludge resulting from evaporation in Unit 4 is transferred to Unit 1 for treatment.

PHYSICAL DESCRIPTION:

Unit 1 contains two 10.5 feet diameter, 8.5 feet long, reinforced concrete pipes (burn tubes) which are enclosed in a reinforced, expanded metal mesh cage (22 feet W x 28 feet D x 10 feet 10 inches H). The mesh cage is surrounded by concrete walls approximately 3 feet high. Unit 1 is recessed into the hillside and has an earthen embankment on three sides. The two burn tubes rest on a six-inch thick reinforced concrete slab. The mesh cage is bolted to the concrete slab. The sides of the mesh cage

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are reinforced with steel bars attached at 45-degree angles from the sides of the mesh cage to the concrete pad. The dimensions of the concrete slab are approximately 54 feet by 50 feet. There is a 66 feet by 62 feet corrugated metal roof structure over the mesh cage and concrete slab.

MAXIMUM CAPACITY:

The maximum treatment capacity of Unit 1 shall not exceed the following:

- Annual treatment of hazardous waste by open burning shall not exceed 4,700 pounds Net Explosive Weight (NEW) per calendar year.
- Daily treatment of hazardous waste by open burning shall not exceed 100 pounds NEW or 500 pounds gross weight.
- No more than six pounds of NEW that has the potential to detonate may be treated in each burn tube during an event (six pounds NEW in each burn tube for a maximum of 12 pounds per treatment event).
- Daily treatment of ammonium perchlorate shall not exceed 16 pounds, in order to maintain a hazard index of less than 1.

WASTE SOURCES:

The sources of waste that are treated at Unit 1 include: post treatment residue from Unit 2; post-treatment residue from Unit 4 (TSU-8); off-specification energetics; and materials contaminated with explosive residue. Post-treatment waste from UNIT 2 is transported directly to Unit 1. Post-treatment waste from Unit 4 (TSU-8) is either temporarily stored at Unit 3 prior to treatment at Unit 1 or is transported directly to Unit 1. Allowable waste types categorized by treatment units are listed in Chapter 3, Table III-1 of the approved Permit Application.

WASTE TYPES:

The waste types treated at Unit 1 are reactive (explosive) hazardous waste generated onsite during the manufacture of explosive materials, metal casings containing explosives, raw explosives, explosive contaminated debris (predominantly paper), post-treatment waste and troughs from Unit 2, and post-treatment waste from Unit 4 (TSU-8). Only waste that is reactive is authorized for treatment at Unit 1. The Permittee shall only manage hazardous waste streams identified in Chapter 3, Table III-1 of the Permit Application.

RCRA HAZARDOUS WASTE CODES:

D001, D003, D005, D007, D008, D011, F003, F005, U002, U003, U154, U160, and U234

CALIFORNIA HAZARDOUS WASTE CODES:

132, 172, 181, 212, 213, 214, 343, 352, and 791

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UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not initiate any treatment activity at Unit 1 as an open detonation.
2. The Permittee shall not initiate treatment at Unit 1 outside of daylight hours. For purposes of this condition, daylight hours are from one hour after sunrise to three hours prior to sunset.
3. The Permittee shall not initiate treatment activities at Unit 1 if the wind speed during the prior 30-minutes has exceeded 15 miles per hour. The wind speed at Unit 1 shall be determined by a hand-held anemometer.
4. The Permittee shall not conduct hazardous waste treatment at Unit 1, including loading of waste for treatment, when electrical storms are occurring, or are forecasted to occur in 24-hours, within three miles of the Facility boundary.
5. The Permittee shall not operate Unit 1 during precipitation events or if precipitation events are forecasted to occur during the four hours after treatment is initiated.
6. The Permittee shall clear combustible material a minimum distance of 50-feet from the outside edge of the chain-link fence surrounding Unit 1 as a fire prevention measure.
7. The Permittee shall only place reactive hazardous waste in Unit 1 during daylight hours and when treatment of the reactive hazardous waste is planned during the same day. Furthermore, the Permittee shall initiate the treatment as soon as is practicable after loading reactive hazardous waste into Unit 1. For purposes of this condition, daylight hours are from one hour after sunrise to three hours prior to sunset.
8. The Permittee shall ensure that no cattle or other livestock are present within 500 feet of Unit 1 before initiating, and during, a treatment event.
9. The Permittee shall maintain the roof at Unit 1 to prevent precipitation from entering Unit 1. For purposes of this condition, any hole that is one inch or greater in any dimension requires repair, and any sheet metal panel with three or more visible holes requires repair. The repair shall be completed within 30 days of discovering the damage, and the Permittee shall document, in the operating record, the efforts to promptly complete the repair.
10. The Permittee shall retain all operational data at the Facility from Unit 1 for the duration of the Permit and in the operating record, pursuant to California Code of Regulations, title 22, section 66264.73. The Permittee shall provide access to the operating record upon request. For the purposes of this condition, "operational data" includes, but is not limited to, environmental monitoring data, records of hazardous waste treated at Unit 1, and inspection and maintenance logs.

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11. Alternative treatment technology

- a. Within 90-days of the effective date of this Permit, the Permittee shall submit to DTSC for review and approval a Feasibility Report for the implementation of an alternative treatment technology that does not involve open burning of hazardous waste. The Feasibility Report shall evaluate options to treat each type and/or category of energetic hazardous waste presently treated at Unit 1. The Feasibility Report shall be prepared by an independent contractor and/or vendor with knowledge and experience evaluating hazardous waste treatment technologies. The Permittee shall revise the Feasibility Report to address any DTSC comments and shall resubmit the report by the due date specified by DTSC.
- b. The Permittee shall ensure that the scope of the analysis contained in the Feasibility Report includes, but is not limited to, the following factors (compared with the status quo of open burning):
 - i. Operator safety
 - ii. Technical feasibility
 - iii. Operational considerations (e.g., labor requirements, consumables, maintenance)
 - iv. Emissions and risk reduction
 - v. Capital and operating cost (e.g., facility installation, maintenance, labor, and consumable costs)
- c. The Permittee shall undertake one of the following actions and, within 60 days, notify DTSC of the chosen action. If, following review of the Feasibility Report, DTSC issues a written feasibility determination that the implementation of an alternative treatment technology to open burning at Unit 1 is feasible, Permittee shall:
 - i. Stop treating hazardous waste by open burning at Unit 1 within one (1) year of DTSC's determination.
 - ii. Submit, within 60-days of DTSC's feasibility determination, a permit modification request to modify this condition to allow continued operations at the unit. The permit modification request shall include a justification for continued operation considering DTSC's feasibility determination. If the Permittee submits a permit modification request, then the Permittee may continue to perform open burns at Unit 1 until DTSC makes a final determination on the permit modification request, and during the pendency of any appeal proceedings; or

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- iii. Submit, within six-months of DTSC’s feasibility determination, a permit modification request to implement the alternative treatment technology. If the Permittee submits a permit modification request, then the Permittee may continue to perform open burns at the unit until DTSC makes a final determination on the permit modification request, and while the Permittee is actively working towards implementing the permit modification.
 - d. The Permittee shall implement the alternative technology within two (2) years of the date of approval of the permit modification request. The Permittee may submit a written request for an extension to DTSC regarding the implementation timeline due to factors outside the control of the Permittee. Upon determining that an extension will be needed, Permittee must notify DTSC of its intent to submit a written request for an extension. Permittee must notify DTSC of its intent to submit a written request for an extension no later than three (3) months prior to the end of the two-year period.
 - e. The provisions of this permit condition apply only to the types and/or categories of energetic hazardous waste that are deemed feasible to treat with an alternative technology. If some (or all) types/categories of hazardous waste presently treated in Unit 1 are deemed infeasible by DTSC to treat by alternative means, then the conditions outlined in 11.c. above do not apply, and the Permittee may continue to treat that hazardous waste stream in Unit 1 for the duration of the Permit’s term.
12. The Permittee shall proceed to implement the closure plan for Unit 1 when the authorization to treat all types and/or categories of hazardous waste ends.
13. Five years after the effective date of this permit, and every five years thereafter, the Permittee shall submit a report for DTSC's approval on the Permittee’s efforts to identify, evaluate, and test methods for air emission sampling from open burn (OB) events. The report shall include a certification that the information is the best and most current information available to the Permittee.
14. The Permittee shall not conduct open burning of non-hazardous solid wastes or hazardous wastes that are not energetic and/or not contaminated with energetics, and do not carry a D003 waste code, at Unit 1 in accordance with Table III-1 of the approved Permit Application.
15. The Permittee shall not treat more than 16 pounds NEW of ammonium perchlorate per day.
16. The Permittee shall not enter Unit 1 for at least 48 hours after a treatment event was initiated. Furthermore, the Permittee shall remove the resultant ash and residuals, or perform additional treatment within 72 hours of the initiation of the final treatment event.
17. The Permittee shall perform an analysis of ash (excluding scrap metal) samples from Unit 1 annually and update the waste profile accordingly.

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18. The Permittee shall record the number of distinct percussive sounds observed during the treatment event and use this information as an additional line of evidence to verify that complete treatment has occurred.

19. The Permittee shall not conduct open burning of solvents at Unit 1.

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UNIT NUMBER:

UNIT 2

UNIT NAME:

TSU-2, Solvent Burn Unit

LOCATION:

Unit 2 is located at the central portion of the Facility, south of Lake Teledyne and west of Unit 4 (TSU-8) (see Figure 1).

ACTIVITY TYPE:

Treatment of reactive solvent waste by open burning in miscellaneous unit

ACTIVITY DESCRIPTION:

Explosive Hazardous Waste Solvent (EHWS) is loaded into single use fifty-five-gallon drums that have been cut along their horizontal axis (hereafter, referred to as “troughs”). The two troughs are placed on each metal rack, one above the other. The metal racks are placed inside steel secondary containment pans. Temporary secondary containment pans are placed on the ground while EHWS is loaded into the troughs prior to treatment. The bottom trough in each metal rack is then ignited using a remote ignition device. The troughs and all post-treatment residue inside the troughs are transported directly to Unit 1 for additional treatment.

PHYSICAL DESCRIPTION:

Unit 2 consists of the following components: (a) up to eight single use 55-gallon steel drums split horizontally (troughs); (b) two metal racks, whereby each rack has the capacity for two troughs that are designed to hold the troughs during open burning treatment; (c) one stainless steel secondary containment pan that is approximately 4 feet wide by 10 feet long and is 0.5 feet deep; (d) one stainless steel secondary containment pan that is approximately 5 feet wide by 10 feet and 0.5 feet deep; and (e) a concrete pad 27 feet long by 20 feet wide.

MAXIMUM CAPACITY:

The maximum treatment capacity of Unit 2 shall adhere to the following:

- Annual treatment of EHWS shall not exceed 2,000 gallons per calendar year.
- Daily treatment of EHWS shall not exceed 240 gallons per day.

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- In addition, each trough shall not contain more than 30-gallons of EHWS and there must be a minimum freeboard of six inches.

WASTE SOURCES:

Unit 2 treats EHWS generated onsite during manufacturing processes.

WASTE TYPES:

Unit 2 is used to treat the following reactive EHWS: acetone; butyl acetate; dimethylformamide; ethanol; isopropyl alcohol; methanol mixed with high melting explosives (HMX); hexanitrostilbene (HNS); research department explosives (RDX) such as cyclonite or hexogen; or pentaerythritol tetranitrate (PETN). Waste types are listed in Table III-1 and Table 4-3 of the approved permit application.

RCRA HAZARDOUS WASTE CODES:

D001, D003, D005, D007, D008, F003, F005, U002, U003, U154, and U213

CALIFORNIA HAZARDOUS WASTE CODES:

212, 213, 214, and 343

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not initiate any treatment activity at Unit 2 as an open detonation.
2. The Permittee shall not initiate treatment at Unit 2 outside of daylight hours. For purposes of this condition, daylight hours are from one hour after sunrise to three hours prior to sunset.
3. The Permittee shall not initiate treatment activities at Unit 2 if the wind speed during the prior 30-minutes has exceeded 15 miles per hour. The wind speed at Unit 2 shall be determined by a hand-held anemometer.
4. The Permittee shall not conduct hazardous waste treatment at Unit 2, including loading of waste for treatment, when electrical storms are occurring, or are forecasted to occur in 24-hours, within three miles of the Facility boundary.
5. The Permittee shall not operate Unit 2 during precipitation events or if precipitation events are forecasted to occur during the four hours after treatment is initiated.
6. The Permittee shall clear combustible material from the interior of Unit 2 to the crest of the berm that surrounds Unit 2 as a fire prevention measure.

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7. The Permittee shall only place EHWS in Unit 2 during daylight hours and when treatment of the EHWS is planned during the same day. Furthermore, the Permittee shall initiate the treatment as soon as is practicable after loading EHWS in Unit 2. For purposes of this condition, daylight hours are from one hour after sunrise to three hours prior to sunset.
8. The Permittee shall only perform treatment (open burning) of solvent wastes that exhibit the hazardous waste characteristic of reactivity. Prior to initiating each burn event, the Permittee shall document in the operating record the basis for concluding that each waste stream subject to treatment by open burning is reactive.
9. The Permittee shall retain all operational data at the Facility from Unit 2 for the duration of the Permit and in the operating record, pursuant to California Code of Regulations, title 22, section 66264.73. The Permittee shall provide access to the operating record upon request. For the purposes of this condition, “operational data” includes, but is not limited to, environmental monitoring data, records of hazardous waste treated at Unit 2, and inspection and maintenance logs.

10. Alternative Treatment Technology

- a. Within 90-days of the effective date of this permit, the Permittee shall submit to DTSC a Feasibility Report for the implementation of an alternative treatment technology that does not involve open burning of hazardous waste. The Feasibility Report shall evaluate options to treat each type and/or category of energetic hazardous waste presently treated at the unit. The Feasibility Report shall be prepared by an independent contractor and/or vendor with knowledge and experience evaluating hazardous waste treatment technologies. The Permittee shall revise the Feasibility Report to address any DTSC comments and shall resubmit the report by the due date specified by DTSC.
- b. The Permittee shall ensure that the scope of the analysis contained in the Feasibility Report includes, but is not limited to, the following factors (compared with the status quo of open burning):
 - i. Operator safety
 - ii. Technical feasibility
 - iii. Operational considerations (e.g., labor requirements, consumables, maintenance)
 - iv. Emissions and risk reduction
 - v. Capital and operating cost (e.g., facility installation, maintenance, labor, and consumable costs)

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- c. The Permittee shall undertake one of the following actions and, within 60 days, notify DTSC of the chosen action. If, following review of the Feasibility Report, DTSC issues a written feasibility determination that the implementation of an alternative treatment technology to open burning at Unit 2 is feasible, Permittee shall:
 - i. Stop treating hazardous waste by open burning at Unit 2 within one year of DTSC’s determination.
 - ii. Submit, within 60 days of DTSC’s feasibility determination, a permit modification request to modify this condition to allow continued operations at Unit 2. The permit modification request shall include a justification for continued operation considering DTSC’s feasibility determination. If the Permittee submits a permit modification request, then the Permittee may continue to perform open burns at Unit 2 until DTSC makes a final determination on the permit modification request, and during the pendency of any appeal proceedings.
 - iii. Submit, within six months of DTSC’s feasibility determination, a permit modification request to implement the alternative treatment technology. If the Permittee submits a permit modification request, then the Permittee may continue to perform open burns at Unit 2 until DTSC makes a final determination on the permit modification request, and while the Permittee is actively working towards implementing the permit modification.
 - d. The Permittee shall implement the alternative treatment technology within two years of the date of approval of the permit modification request. DTSC may grant an extension to the implementation timeline due to factors outside the control of the Permittee.
 - e. The Permittee shall proceed to implement the closure plan for Unit 2 when the authorization to treat all types and/or categories of hazardous waste ends.
11. The Permittee shall not conduct open burning of hazardous wastes that are not energetic and do not carry a D003 waste code at Unit 2 in accordance with Table III-1 of the approved Permit Application.
12. The Permittee shall not enter Unit 2 for at least 48 hours after a treatment event was initiated. Furthermore, the Permittee shall transfer the residuals to Unit 1 or perform additional treatment within 72 hours of the start of the treatment event at Unit 2.

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UNIT NUMBER:

UNIT 3

UNIT NAME:

TSU-3, Container Storage

LOCATION:

Unit 3 is located at the central portion of the Facility, southeast of Lake Teledyne (see Figure 1).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

The container storage area is used to hold United States Department of Transportation approved containers of hazardous waste generated onsite and compatible stock chemicals. The containers are only authorized to be handled by trained employees. Unit 3 consists of four bays, each with independent secondary containment systems.

PHYSICAL DESCRIPTION:

The secondary containment area for Unit 3 is divided into four bays to keep incompatible chemicals separated. Each bay is separated by a reinforced concrete dike that is bolted and epoxy bonded to the coated concrete floor. Bay A is 17 feet 3 inches wide by 59 feet 3 inches long, with a 1,077-gallon sump that brings the total liquid capacity to 3,060 gallons. Bay B is 16 feet 6 inches wide by 59 feet 3 inches long, with a 1,025-gallon sump that brings the total liquid capacity to 2,810 gallons. Bay C is 16 feet 6 inches wide by 59 feet 3 inches long, with a 1,025-gallon sump that brings the total liquid capacity to 2,810 gallons. Bay D is 17 feet 3 inches wide by 59 feet 3 inches long, with a 1,077-gallon sump that brings the total liquid capacity to 2,590 gallons. The storage area for Bays A, B, C, and D has a roof that prevents precipitation from entering Unit 3. The roof does not cover the sump area, which is susceptible to collecting rainfall.

MAXIMUM CAPACITY:

The maximum combined capacity of Unit 3 is 11,270 gallons, as follows:

Bay A: 3,060 gallons

Bay B: 2,810 gallons

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Bay C: 2,810 gallons

Bay D: 2,590 gallons

WASTE SOURCES:

Hazardous waste generated onsite from manufacturing operations and waste residual from onsite treatment.

WASTE TYPES:

Bay A: caustics (pH >7), cyanides, sulfides, and aqueous solutions with pH of 5 to 9

Bay B: halogenated hydrocarbons, non-flammable liquids, oxidizers, and aqueous solutions with pH 5 to 9

Bay C: acids

Bay D: ignitable liquids, reducing agents, metal catalysts, carbon, fuels, and combustible liquids

Additional information on the appropriate storage bay for each waste stream is found in Chapter 3, Table III-1 of the Permit Application.

RCRA HAZARDOUS WASTE CODES:

Bay A: D002, D005, D006, D007, D008, D011, D035

Bay B: D001, D006, D007, D008, D011, D022, D035, D039, F001, F002, U044

Bay C: D002, D007, D008, D009

Bay D: D001, D003, D005, D006, D007, D008, D035, D038, F001, F002, F003, F005, U002, U003, U031, U056, U154, U160, U161, U213

CALIFORNIA HAZARDOUS WASTE CODES:

Bay A: 121, 122, 132, 135, 172, 181, 343, 352, 512, 541, 722, 723, 791

Bay B: 121, 172, 181, 211, 213, 214, 223, 331, 343, 352, 512, 513, 741

Bay C: 135, 141, 181, 343, 512, 513, 725, 791, 792

Bay D: 141, 212, 213, 214, 331, 343, 352, 461, 491, 512, 513

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UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall inspect Unit 3 each business day for evidence of spills or leaks. If the Permittee identifies a spill(s), the Permittee must take immediate action to clean up the spilled material. If the Permittee identifies a leak(s), the Permittee must take immediate action to stop the leak(s), clean up any and all leaked liquids, and transfer the remainder of the hazardous waste from the leaking container into a compatible container. The Permittee shall document any spills or leaks in the operating record.
2. The Permittee shall inspect containers in Unit 3 weekly for evidence of corrosion or deterioration. If the Permittee determines that there is evidence of deterioration or corrosion of a container that could impact its integrity, the Permittee must transfer the waste into a compatible container and remove the deteriorated container from service as soon as practicable, but not more than 24 hours.
3. The Permittee shall measure the depth of liquid in the sump on a weekly basis when there has not been a rain event, and daily when there has been a rain event exceeding one-tenth of an inch measured on property with a rain gauge. This measurement is in addition to the daily visual check of the sumps. If any quantity of liquid is observed in the sumps that cannot be attributed to storm water from a rain event, the Permittee shall remove the liquid within one day. The Permittee shall make a waste classification determination on the removed liquids and dispose of the liquid accordingly. Any liquids in the sumps that are attributable to storm water from a rain event can remain, provided the depth does not exceed six inches. The Permittee shall remove storm water from the sumps within one day when the depth exceeds six inches. Sump depth measurements, rain gauge readings, and occurrences where the sump depth exceeds six inches will be documented in the operating record.
4. Permittee shall maintain a minimum aisle space of 30 inches between rows of containers to provide unobstructed movement of firefighting equipment or container handling equipment.
5. The Permittee shall ensure that containers of hazardous waste at the Facility are closed except when adding or removing waste or conducting an inspection of the contents.
6. The Permittee shall not stack containers holding ignitable or reactive waste. Containers holding non-ignitable hazardous wastes shall not be stacked more than two containers high.

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UNIT NUMBER:

UNIT 4

UNIT NAME:

TSU-8, Evaporation Tanks

LOCATION:

Unit 4 is located at the central portion of the Facility, south of Lake Teledyne and east of UNIT 2 (see Figure 1).

ACTIVITY TYPE:

Treatment in tanks (volume reduction by evaporation)

ACTIVITY DESCRIPTION:

Safety Bucket Water (i.e., water contaminated with EHW) is placed into open top tanks and is treated via evaporation. Once the Safety Bucket Water has evaporated, the resultant sludge is removed and transported to Unit 1 for treatment.

PHYSICAL DESCRIPTION:

Unit 4 consists of two evaporation tanks constructed of 3/16-inch-thick stainless steel. The tanks are half cylinders with domed ends that are 4.3 feet wide and 11.3 feet long. The tanks are located on a concrete secondary containment pad designed to hold at least the volume of one tank along with precipitation from a 25-year, 24-hour rain event.

MAXIMUM CAPACITY:

The capacity of each tank is 505 gallons, and the total unit capacity is 1,010 gallons. In addition, each tank must be operated with a minimum of six inches of freeboard.

WASTE SOURCES:

The Permittee generates EHW residuals during manufacturing processes. The EHW is placed into Safety Buckets to prevent explosive reactions. The spent Safety Buckets yield a liquid and a solid waste stream. The Safety Bucket liquids, defined as Safety Bucket Water, are transferred to the two tanks at Unit 4 for treatment. The remaining Safety Bucket solids are stored in containers, on a concrete pad within the fenced area, for up to 90 days, as allowed by hazardous waste generator regulations.

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WASTE TYPES:

Unit 4 is used to treat Safety Bucket Water, which is an aqueous liquid waste containing energetics. Safety Bucket solids are also stored in containers inside the fenced area surrounding Unit 4, in accordance with hazardous waste generator regulations.

RCRA HAZARDOUS WASTE CODES:

D003

CALIFORNIA HAZARDOUS WASTE CODES:

343

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall maintain a minimum freeboard of six inches in the tanks at all times.
2. The Permittee shall ensure that the tanks are covered with portable rain covers during periods of rain or when rain is forecasted. The rain covers shall be designed to fit the outer dimensions of the tanks.
3. The Permittee shall not treat waste in Unit 4 that contains an average volatile organic (VO) concentration at the point of waste origination of more than 500 parts per million by weight (ppmw). The Permittee shall establish the average VO concentration annually using the procedures outlined in California Code of Regulations, title 22, section 66264.1083(a).
4. The Permittee shall inspect Unit 4 each business day for minimum freeboard requirements, presence of spills or leaks, tank condition, and secondary containment condition. If the Permittee identifies a leak(s), the Permittee must take immediate action to stop the leak, clean up any and all leaked liquids, and transfer the remainder of the hazardous waste from the leaking container into a compatible container. Permittee shall document any spills or leaks in the operating log.

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PART V. SPECIAL CONDITIONS

The following conditions for corrective action are included in the Draft Permit in accordance with Health and Safety Code sections 25187 and 25200.10.

1. The Permittee shall retain all meteorological data (e.g., wind speed and direction, precipitation) and other data collected to comply with this Permit for the duration of the Permit.
2. The Permittee shall notify DTSC, in writing, within ten business days of receiving a complaint attributable to a treatment event at Unit 1 or Unit 2. The notification shall include the following information:
 - a. Copy of the complaint if received in writing or a description of the complaint if received verbally;
 - b. Complainants name and contact information;
 - c. Date the complaint was received;
 - d. Date and time that the event leading to the complaint occurred;
 - e. Description of the event(s) that occurred on the date in question, including waste type, and quantity treated;
 - f. Meteorological and other data collected immediately prior to, during, or immediately following the event; and
 - g. Description of any unplanned or unexpected occurrences during treatment.
3. The Permittee is prohibited from receiving any hazardous waste generated from off-site.
4. The Permittee shall only manage the hazardous waste streams identified in Chapter 3, Table III-1 of the Permit Application.
5. Except as specifically authorized in this Permit, Permittee shall not dispose of hazardous waste at the Facility. In accordance with California Code of Regulations, title 22, section 66260.10, “disposal” means: (a) the discharge, deposit, injection, dumping, spilling, leaking or placing of any waste or hazardous waste into or on any land or water so that such waste or hazardous waste or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including groundwaters; (b) the abandonment of any waste.
6. The Permittee shall not store any hazardous waste beyond one year unless the Permittee notifies DTSC in advance and provides evidence demonstrating that such storage is solely for the purpose of accumulating certain quantities as are necessary to facilitate proper recovery, treatment, or disposal pursuant to California Code of Regulations, title 22, section 66268.50(c).

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7. Any non-hazardous waste that is stored or treated in a unit authorized by this Permit for management of hazardous waste shall be subject to the conditions of this Permit, including volume calculations, compatibility, and inspections.

8. The Permittee shall collect all rainwater and washwater accumulated within the authorized units and characterize the rainwater and washwater for appropriate disposal.

9. For the purpose of California Code of Regulations, title 22,
 - (a) Section 66264.91(b), the specific elements of the water quality monitoring and response program for the Facility are those described in Appendix 12 of the Permit Application.
 - (b) Section 66264.92, the water quality protection standard is described in Section 4.4.5 of the monitoring and response plan found in Appendix 12 of the Permit Application.
 - (c) Section 66264.93, the constituents of concern are described in Section 7.3 of the monitoring and response plan found in Appendix 12 of the Permit Application.
 - (d) Section 66264.95, the monitoring points and points of compliance are described in Figure 5 and Figure 6 of the monitoring and response plan found in Appendix 12 of the Permit Application.
 - (e) Section 66270.31, the requirements for recording and reporting of monitoring results are described in Section 8.0 of the monitoring and response plan found in Appendix 12 of the Permit Application.

10. For the purpose of California Code of Regulations, title 22,
 - (a) Section 66264.701(b), the specific elements of the environmental monitoring and response programs for air, soil, and soil-pore gas for the Facility are those described in Appendix 12 of the Permit Application.
 - (b) Section 66264.703, the hazardous constituents are described in Section 6.4 of the monitoring and response plan found in Appendix 12 of the Permit Application.
 - (c) Section 66264.705, the monitoring points are described in Figure 5 and Figure 6 of the monitoring and response plan found in Appendix 12 of the Permit Application.
 - (d) Section 66270.31, the requirements for recording and reporting of monitoring results are described in Section 8.0 of the monitoring and response plan found in Appendix 12 of the Permit Application.

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11. The Permittee shall notify DTSC within 24 hours of the discovery of any cracks, gaps, or tears in a hazardous waste management unit or a secondary containment system or device. Repairs shall be initiated as soon as possible and completed within one week. Within seven days of discovery, the Permittee shall notify DTSC in writing of the corrective measures that have been taken.
12. Any non-hazardous waste that is stored in a unit authorized by this Permit for management of hazardous waste shall be subject to the compatibility, inspection, and labelling conditions of this Permit, and will be counted against the permitted capacity of the unit.
13. The Facility shall not be a designated Treatment, Storage, or Disposal Facility on the manifests for any exempt transfer activities conducted pursuant to California Code of Regulations, title 22, section 66263.18.
14. For the purpose of calculating the permitted maximum capacity limitations for storage and for secondary containment, all containers in the authorized units are assumed to be full, and all hazardous and nonhazardous waste or other material that is stored or located in an authorized unit shall be counted against the permitted capacity for that unit, including any hazardous waste that is covered by the transfer facility exemptions pursuant to California Code of Regulations, title 22, section 66263.18.
15. The Permittee shall submit an annual report, covering the prior calendar year, to DTSC by March 1 of each year that includes the following information:
 - Dates that treatment events occurred at Unit 1 and the total mass and NEW per event;
 - Dates that treatment events occurred at Unit 2 and the total mass, volume, and NEW per event;
 - Dates of addition and removal of waste from Unit 4 (TSU-8) and the associated mass or volume;
 - Dates and volume of liquid and classification of liquid removed from Unit 3;
 - Results of annual recharacterization of the volatile organic content of the Safety Bucket water treated at Unit 4 (TSU-8);
 - Results of annual recharacterization of ash resulting from treatment activities of Unit 1, in accordance with condition 17 of Unit 1;
 - Summary of active and/or completed permit modifications from any agency relating to the hazardous waste management units;
 - Summary of any complaints received from the public concerning the hazardous waste management units;
 - Summary of any violations received from any agency relating to the hazardous waste management units;
 - Describes any Occupational Safety and Health Administration (OSHA) reportable events relating to operations at the hazardous waste management units;
 - Attaches documentation that OSHA-reportable events were filed with OSHA.

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- Describes any instance when the Contingency Plan for the hazardous waste management units was implemented;
- Changes in key facility personnel related to the management of hazardous waste.

This permit condition is in addition to, and separate from, the requirement to submit an annual report to DTSC pursuant to California Code of Regulations, title 22, section 66264.75.

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PART VI. CORRECTIVE ACTION

1. The Permittee shall conduct corrective action at the Facility pursuant to Health and Safety Code sections 25187 and 25200.10. Environmental remediation is being conducted at the site by the former facility owner, TDY Industries, LLC, in accordance with Cleanup and Abatement Order RB3-2013-0019, issued by the Regional Water Quality Control Board, Central Coast Region (RWQCB-CCR), dated June 24, 2013.
2. In the event the Permittee identifies an immediate or potential threat to human health and/or the environment, discovers new releases of hazardous waste and/or hazardous constituents, or discovers new Solid Waste Management Units (SWMUs) not previously identified, the Permittee shall notify DTSC orally within 24 hours of discovery and notify DTSC in writing within 10 days of such discovery, summarizing the findings, including the immediacy and magnitude of any potential threat to human health and/or the environment.
3. DTSC 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 and newly identified SWMUs or releases of hazardous waste and/or hazardous constituents. If and when corrective action is required at the Facility, the Permittee shall conduct corrective action under either a corrective action consent agreement or an enforcement order for corrective action issued by DTSC pursuant to Health and Safety Code sections 25187 and 25200.10.
4. To the extent that work being performed pursuant to Part VI of the Permit must be done on property not owned or controlled by the Permittee, the Permittee shall use its best efforts to obtain access agreements necessary to complete work required by this Part of the Permit from the present owner(s) of such property within 30 days of approval of any workplan for which access is required. "Best efforts," as used in this paragraph, shall include, at a minimum, a certified letter from the Permittee to the present owner(s) of such property requesting access agreement(s) to allow the Permittee and DTSC and its authorized representatives access to such property and the payment of reasonable sums of money in consideration of granting access. The Permittee shall provide DTSC with a copy of any access agreement(s). In the event that agreements for the access are not obtained within 30 days of approval of any workplan for which access is required, or of the date that the need for access becomes known to the Permittee, the Permittee shall notify DTSC in writing within 14 days thereafter regarding both efforts undertaken to obtain access and its failure to obtain such agreements. In the event DTSC obtains access, the Permittee shall undertake approved work on such property. If there is any conflict between this permit condition on access and the access requirements in any agreement entered into between DTSC and the Permittee, this permit condition on access shall govern.
5. Nothing in Part VI of the Permit shall be construed to limit or otherwise affect the Permittee's liability and obligation to perform corrective action, including corrective action beyond the facility boundary, notwithstanding the lack of access. DTSC may determine that additional on-site

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measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

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PART VII. SUBMITTAL SCHEDULE

1. REQUIRED SUBMITTALS

The Permittee shall submit reports and other information to DTSC in accordance with the following schedule. All submittals to DTSC must be signed and certified in accordance with California Code of Regulations, title 22, division 4.5, chapter 20, article 2.

Frequency	Definition
Monthly	Twelve times per calendar year by the 15 th day of the following month (unless otherwise indicated).
Quarterly	Four times per calendar year by the 15 th day of the month following the close of the three-month period (unless otherwise indicated).
Semi-annual	Two times per calendar year by the end of the month following the close of the six-month period (unless otherwise indicated).
Annual	Once per calendar year, by March 1 st of the following year (unless otherwise indicated).
As necessary	Submit within 15 calendar days of the triggering event (unless otherwise indicated).

Frequency	Submittal
Monthly	Reserved
Quarterly	Reserved
Semi-annual	Facility fees are paid in two installments of 50% each (due date as directed by the invoice).
	Soil and groundwater monitoring report (semi-annually for the first two years following the effective date of this Permit).
Annual	Waste minimization and toxicity reduction certification [Cal. Code Regs., tit. 22, § 66264.75(h) and (i)].
	Annual report [Cal. Code Regs., tit. 22, § 66264.75].
	Annual report [per special condition 15].
	Annual training certification [Cal. Code Regs., tit. 22, § 66264.16(f)]
	Soil and groundwater monitoring report (annually beginning the third year following the effective date of this Permit).
As necessary	Report of incident that requires implementation of the contingency plan [Cal. Code Regs., tit. 22, § 66264.56(j)].
	Permit modifications [Cal. Code Regs., tit. 22, § 66270.42] (due dates will vary by modification type).

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Frequency	Submittal
	Manifests for waste accepted [Health & Saf. Code, § 25160(e)(1)] (within 30 days of receipt).
	24 hours reporting of noncompliance which may endanger health or the environment [Cal. Code Regs., tit. 22, § 66270.30(l)(6)] (orally within 24 hours and in writing within five days).
	Notification of receipt of a public complaint [refer to special condition 2] (within 10 business days of receipt of the complaint).
	Manifest discrepancy report [Cal. Code Regs., tit. 22, § 66270.30(l)(7)].
	Unmanifested hazardous waste report [Cal. Code Regs., tit. 22, § 66270.30(l)(8)].

The submittals identified in the above table may not be a complete list and the Permittee shall be responsible for determining if additional submittals are required by law.

2. EXTENSIONS

The Permittee may request an extension to the submittal date for any given deliverable by making a written request to DTSC. The request must state why the extension is necessary, must propose an alternate due date, and must be submitted at least seven calendar days prior to the scheduled submittal date. DTSC will respond to the extension request in writing. DTSC is under no obligation to approve the extension request and the absence of a response to an extension request does not constitute approval of the request. The approval of an extension request shall not impact the scheduled submittal date for future deliverables.

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PART VIII. FIGURES

FIGURE 1 – FACILITY MAP

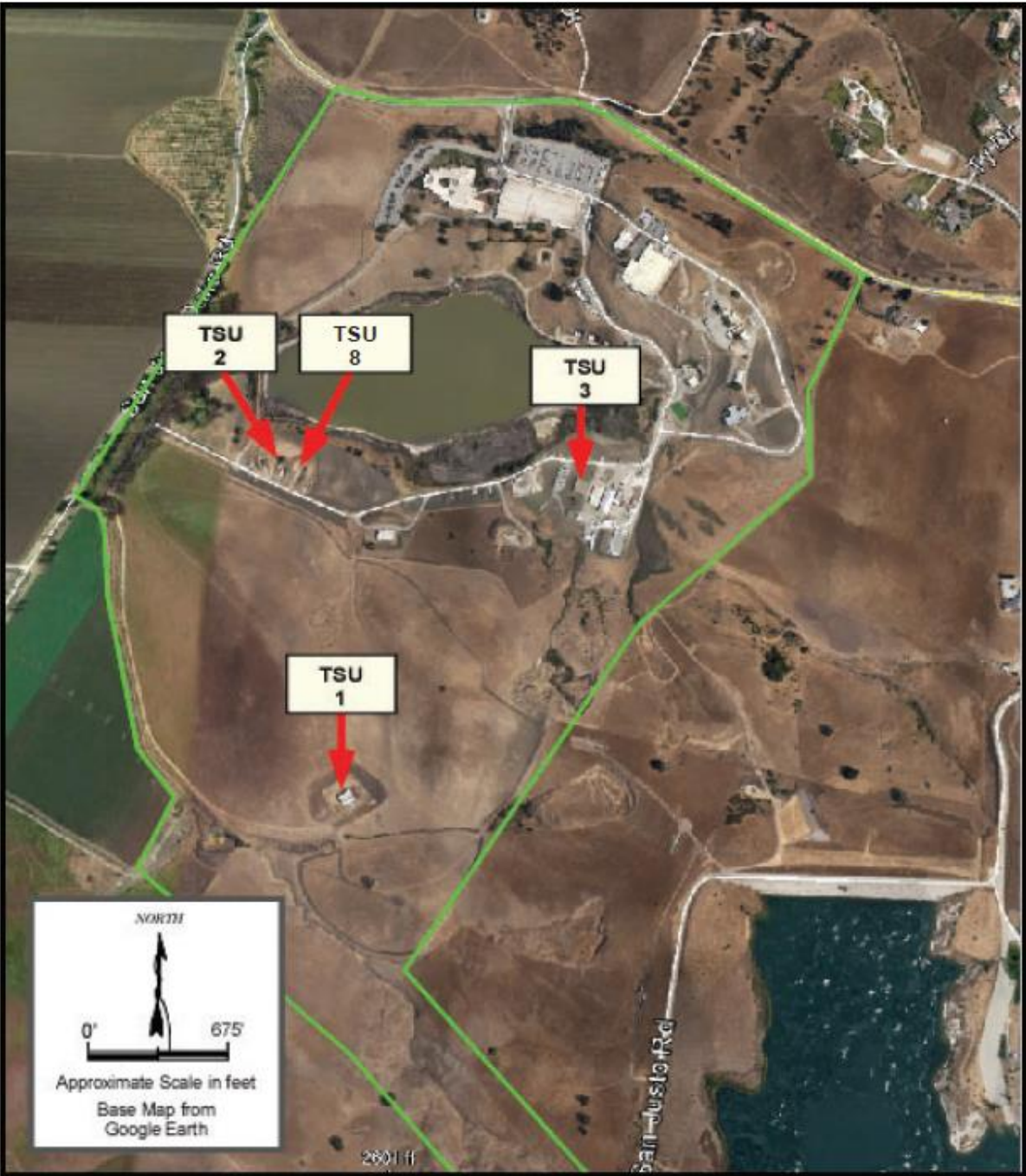


FIGURE 2 – WASTE MOVEMENT FLOW DIAGRAM

