

California Environmental Protection Agency Department of Toxic Substances Control

DRAFT HAZARDOUS WASTE FACILITY PERMIT

Facility Name:	Lawrence Livermore Laboratory – Site 300 Corral Hollow Road Tracy, California		EPA ID Number: CA2 890 090 002 Effective Date: Draft
N <i>H</i> L F	United States Department National Nuclear Security Administration Livermore Site Office P.O. Box 808, L-293 Livermore, California 945	у	Expiration Date:
Operator Name	e: Lawrence Livermore Security, LLC. P.O. Box 808, L-001 Livermore, California		
and Recovery A Lawrence Liver United States I The Issuance of	Act (RCRA)-equivalent In The Mational Security, Department of Energy. Of this Permit is subject the subject the Material Inc.	Hazardous Waste LLC/Lawrence L o the terms and o	25200, this Resource Conservation e Facility Permit is hereby issued to: livermore National Laboratory and the conditions set forth in Attachment A uary 2015. Attachment A consists of
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Lawrence Livermore National Laboratory - Site 300 Corral Hollow Road Tracy, California

DRAFT HAZARDOUS WASTE FACILITY PERMIT

ATTACHMENT "A"

TABLE OF CONTENTS

PART I.	DEFINITIONS	4
PART II.	. DESCRIPTION OF THE FACILITY AND OWNERSHIP	5
	 OWNER OF FACILITY OWNER OF REAL PROPERTY OPERATOR OF FACILITY LOCATION DESCRIPTION OF FACILITY OPERATIONS FACILITY HISTORY FACILITY SIZE AND TYPE FOR FEE PURPOSES CLOSURE COST ESTIMATE 	5 5 5 6 6
PART III	I. GENERAL CONDITIONS	7
	 PERMIT APPLICATION DOCUMENTS	7 8 8
PART IV	/. PERMITTED UNITS AND ACTIVITIES1	0
PART V	SPECIAL CONDITIONS2	6
PART V	I. CORRECTIVE ACTION2	9
FIGURE	1 - Facility Location and Regional Map3	0
FIGURE	2 - Location of Hazardous Waste Management Units3	1
FIGURE	3 - Explosives Waste Treatment Units Map3	2

FIGURE 4 - Explosives Waste Storage Units	. 33
FIGURE 5 - Building B833 Container Storage Area	. 33
TABLE 1 - Waste Streams Permitted for Treatment at the Explosive Waste Treatment Facility	
TABLE 2 - Waste Streams Permitted for Storage at the Explosive Waste Storage Facility	. 35
TABLE 3 - Storage Compatibility for the Explosive Waste Storage Facility	. 36
TABLE 4 - Waste Streams Permitted for Storage at the Building 883 (B883) Contained Storage Area	
TABLE 5 - RCRA Hazardous Waste Codes Permitted for Storage at the Building 883 (B883) Container Storage Area	
TABLE 6 – California Hazardous Waste Codes Permitted for Storage at the Building 883 (B883) Container Storage Area	. 39

PART I. <u>DEFINITIONS</u>

All terms used in this 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. "DTSC" as used in this Permit means the California Department of Toxic Substances Control.
- 2. **"Explosives waste"** as used in this permit means reactive hazardous waste as defined in California Code of Regulations, title 22, section 66261.23(a) (6) and (7), including explosives-containing process waste sludge, explosives-contaminated packaging, and explosives-contaminated laboratory waste.
- 3. "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.

- 4. "Permittee" as used in this Permit means the Owner and Operator.
- 5. "RCRA" as used in this Permit means the Resource Conservation and Recovery Act (42 U.S.C. §6901 et seq.).

PART II. DESCRIPTION OF THE FACILITY AND OWNERSHIP

1. Owner of Facility:

United States Department of Energy, National Nuclear Security Administration Livermore Site Office P.O. Box 808, L-293 Livermore, California 94551-0808.

2. Owner of Real Property:

United States Department of Energy, National Nuclear Security Administration Livermore Site Office P.O. Box 808, L-293 Livermore, California 94551-0808.

3. Operator of Facility:

Lawrence Livermore National Security, LLC, Lawrence Livermore National Laboratory (LLNL) and the United States Department of Energy, National Nuclear Security Administration Livermore Site Office P.O. Box 808, L-293 Livermore, California 94551-0808.

4. Location:

The Facility (Site 300) is located 15 miles southeast of the Lawrence Livermore National Laboratory (LLNL) Main Site in Livermore and two miles northeast of the City of Tracy, California (Figure 1) at Latitude: 37° 39' 30", Longitude 121° 32' 30". The Facility comprises approximately 6,800 acres. About one-sixth of the Facility lies in Alameda County; the remainder, including all units covered by this Permit is located in San Joaquin County. The nearest urban area is the City of Tracy, California. The Facility is located outside the Tracy city limits.

The legal description can be found in page II-4 of the operations plan.

5. <u>Description of Facility Operations:</u>

The Facility is primarily an explosives test facility that supports the LLNL weapons program in research, development, and testing associated with non-nuclear weapons components. The Facility's operations include chemical formulation of explosives, machining explosive charges, and assembling machined charges before they are sent to the on-site test firing facilities.

Hazardous waste generated from these activities is sent to the on-site waste management facilities for treatment, packaging, or storage, and eventual shipment to an off-site disposal facility. In addition to accepting on-site generated hazardous waste, the Facility also accepts explosives waste from the LLNL Main Site (EPA Identification Number CA2890012584) for storage and treatment.

6. <u>Facility History:</u>

The Facility was established by the Department of Energy and the University of California in 1955 as an experimental test site for explosives testing. Prior to 1992, the Facility operated the B829 High Explosives Burn Pits (B829) and B883 Container Storage Area (B883) under Interim Status granted by the United States Environmental Protection Agency (US EPA). In 1993, DTSC issued an order requiring the closure of B829 and the submittal of a Part B Permit Application for the Explosives Waste Treatment Facility (EWTF). DTSC issued a Hazardous Waste Facility Permit (Permit) for the operation of the Explosives Waste Storage Facility (EWSF) and B883 in 1996 (1996 EWSF Permit). In 1997, DTSC issued a second Permit for the operation of the EWTF (1997 EWTF Permit). In 2005, the Facility submitted a consolidated permit renewal application for B883, EWSF and EWTF.

7. Facility Size and Type for Fee Purposes:

The Facility is categorized as a small treatment facility and a small storage 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. <u>Closure Cost Estimate:</u>

LLNL – Site 300 is owned by the United States Department of Energy and is exempt from the requirements to provide a closure cost estimate and financial assurance mechanisms for closure in accordance with California Code of Regulations, title 22, section 66264.140(c).

PART III. GENERAL CONDITIONS

1. PERMIT APPLICATION DOCUMENTS

The Part "A" Application dated January 2015 and the Part "B" Application dated January 2015 (Operation Plan), including, but not limited to all attachments and exhibits therein, are hereby made a part of this Permit by reference.

2. 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 (Cal. Code Regs.), 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 or 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 treat and store hazardous wastes in accordance with the terms and conditions of this Permit. Any management of hazardous wastes not specifically authorized in this Permit is strictly prohibited.
- (c) 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.
- (d) 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.
- (e) 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.
- (f) Failure to submit any information required in connection with the Permit, or falsification and/or misrepresentation of any submitted information, is grounds for revocation of this Permit (Cal. Code Regs., tit. 22, §66270.43).

- (g) In case of conflicts between the Operation Plan and the Permit, the Permit conditions take precedence.
- (h) This Permit includes and incorporates by reference any conditions of waste discharge requirements issued to the Facility 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.

3. COMPLIANCE WITH CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

In accordance with the requirements of Public Resources Code section 21000 et seq. and the CEQA Guidelines sections 15162, 15163, and 15164, DTSC determined that Negative Declarations that it prepared as lead agency for issuance of the 1996 EWSF Permit and the 1997 EWTF Permit provided an accurate description of proposed project activities, and that the conditions requiring preparation of a subsequent environmental impact report are not present. To document its determination, DTSC prepared an Addendum to the previous Negative Declarations.

4. <u>ENVIRONMENTAL MONITORING</u>

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.

5. <u>ANNUAL HAZARDOUS WASTE REDUCTION AND MINIMIZATION</u> <u>CERTIFICATION</u>

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).

6. 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, 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 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.

PART IV. PERMITTED UNITS AND ACTIVITIES

This Permit authorizes operation only of the facility units and activities listed below. The Permittee shall not treat, store or otherwise manage hazardous waste in any unit other than those specified in this Part IV. Any modifications to a unit or activity authorized by this Permit require the written approval of DTSC in accordance with the permit modification procedures set forth in California Code of Regulations, title 22, division 4.5.

UNIT #1

UNIT NAME:

Open Burn Cage

LOCATION:

The Open Burn Cage is located within the Explosives Waste Treatment Facility in the southern portion of the Facility (Figures 2 and 3).

ACTIVITY TYPE:

Open burning of explosives waste in Miscellaneous Unit (X01)

ACTIVITY DESCRIPTION:

Explosives-contaminated debris (e.g., explosives-containing process waste sludge, explosives-contaminated packaging, and explosives-contaminated laboratory waste including personal protective equipment) are placed inside the Open Burn Cage. When ready for treatment, the unit operator closes the access door in order to secure the waste inside the cage, and then starts the burning process by igniting the propane burners from a remote location (Building 845A). Upon completion of the treatment and after 24 hours of cooling time, the treatment residue (ash) is collected and removed for storage prior to disposal at an authorized off-site Treatment Storage and Disposal Facility (TSDF). If any explosives residual is left, a re-burn will be done before any collection of treatment residue.

PHYSICAL DESCRIPTION:

This unit consists of a ventilated metal enclosure that is eight feet in diameter and eight feet high, with a refractory liner. This unit is installed on an elevated metal base on a concrete pad. Propane fuel from a protected supply tank is piped to the unit and is used to aid in the combustion process.

MAXIMUM CAPACITY:

The maximum permitted treatment capacity for this unit is 260 pounds (118 kilogram (kg)) of total waste or 50 pounds (23 kg) of net explosive waste per day/event.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and from the LLNL Main Site.

WASTE TYPES:

Explosives Waste identified as Form 3 and Form 4 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, F002, F003, F005, K044, K045, K046, K047

CALIFORNIA HAZARDOUS WASTE CODES:

352, 491

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall not store hazardous waste in this Unit.
- 2. The Permittee shall not conduct more than 100 open burn events in this Unit per calendar year.
- 3. Open burning in this Unit shall be conducted in accordance with all the requirements of the San Joaquin Valley Air Pollution Control District.
- 4. Open burning in this Unit shall not commence before sunrise or after sunset.
- 5. The Permittee shall wait at least 24-hours following a burn event to remove the treatment residue from this Unit.

UNIT #2

UNIT NAME:

Open Burn Pan

LOCATION:

The Open Burn Pan is located within the Explosives Waste Treatment Facility adjacent to the Open Burn Cage in the southern portion of the Facility (Figures 2 and 3).

ACTIVITY TYPE:

Open burning of explosives waste in Miscellaneous Unit (X01)

ACTIVITY DESCRIPTION:

Pieces, powders, pastes, absorbed liquids, and small assemblies of explosives waste derived from pure materials or formulated products (generally containing 80 to 100% explosive material) that will not detonate during the open burning in the Open Burn Cage are placed on the pan on a layer of straw or paper to facilitate burning of the waste. Combustible material (e.g., Kerosene) may be used to facilitate the ignition and burning of the explosives waste. When ready for treatment, the unit operator starts the burning process by remotely igniting the waste from Building 845A. The pan cover is then placed over the burn pan after the treatment has been completed. Upon completion of the treatment and after 24 hours of cooling time, the treatment residue is collected and removed for storage prior to disposal at an authorized off-site TSDF. If any explosives residue is left, a re-burn will be completed before any residue is collected. In addition to treatment of explosives waste, an area between the Open Burn Pan and Open Burn Cage has been set up for decontaminating process equipment that may contain some explosives residue. The area is equipped with a steel plate foundation upon which process equipment is placed. The decontamination is accomplished by flashing the equipment with a torch.

PHYSICAL DESCRIPTION:

This unit consists of a rectangular welded steel, water tight metal burn pan measuring four feet by eight feet and six inches deep, mounted on steel legs. The pan is equipped with a remotely controlled steel cover.

MAXIMUM CAPACITY:

The maximum permitted treatment capacity for this unit is 100 pounds (45 kg) of explosives waste per day/event.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and from the LLNL Main Site.

WASTE TYPES:

Explosives Waste identified as Form 2 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

331, 352, 551

UNIT-SPECIFIC SPECIAL CONDITIONS:

1. The Permittee shall not store hazardous waste in this Unit.

Lawrence Livermore National Laboratory – Site 300 EPA ID Number: CA2890090002

- 2. The Permittee shall not conduct more than 100 open burn events in this Unit per calendar year.
- 3. Open burning in this Unit shall be conducted in accordance with all the requirements of the San Joaquin Valley Air Pollution Control District.
- 4. Open burning in this Unit shall not commence before sunrise or after sunset.
- 5. The Permittee shall wait at least 24 hours following a burn event to remove the treatment residue from this Unit.

UNIT #3

UNIT NAME:

Open Detonation Unit

LOCATION:

The Open Detonation Unit is located within the Explosives Waste Treatment Facility in the southern portion of the Facility (Figures 2 and 3).

ACTIVITY TYPE:

Open detonation of explosives waste in Miscellaneous Unit (X01)

ACTIVITY DESCRIPTION:

This unit is used for treatment of explosives waste that generally contains 90 to 100% explosive material which cannot be safely treated by open burning. Small amounts of explosives waste are staged on the Open Detonation Unit, and then remotely detonated from Building 845A bunker, using detonators or other initiating devices.

PHYSICAL DESCRIPTION:

This unit consists of a level gravel pad, measuring 30 feet by 30 feet by eight feet deep.

MAXIMUM CAPACITY:

The maximum permitted treatment capacity is 100 pounds of explosives waste per day/event and 1000 pounds of explosives waste per year.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and the LLNL Main Site.

WASTE TYPES:

Explosives Waste identified as Form 1 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, P081, P112, U117

CALIFORNIA HAZARDOUS WASTE CODES:

331, 352

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall not store hazardous waste in this Unit.
- 2. The Permittee shall not detonate more than 100 pounds of explosives waste per day/event and 1000 pounds of explosives waste per year.
- 3. Open detonation in this Unit shall be conducted in accordance with all the requirements of the San Joaquin Valley Air Pollution Control District.
- 4. Open detonation in this Unit shall not commence before sunrise or after sunset.
- 5. The Permittee shall wait at least 24-hours following a detonation event to remove the treatment residue from this Unit.

UNIT #4

UNIT NAME:

Explosives Waste Treatment Residue Storage Unit 1 – near Open Burn.

LOCATION:

This unit is located adjacent to the Open Burn Cage and Open Burn Pan in the southern portion of the Facility (Figures 2 and 3).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

This Unit is used for storage of treatment residue from the Open Burn Cage and Open Burn Pan.

PHYSICAL DESCRIPTION:

This Unit is a prefabricated metal chemical storage cabinet with integrated secondary

containment.

MAXIMUM CAPACITY:

The maximum permitted storage capacity is 275 gallons.

WASTE SOURCES:

Treatment residue from the Open Burn Cage and Open Burn Pan.

WASTE TYPES:

Residue ash from treated explosives waste identified as Form 2, Form 3 and Form 4 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

571

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. This Unit shall be kept closed and locked except when in use.
- 2. The Permittee shall maintain a hazardous waste sign on the front of this Unit. The sign shall have the emergency contact name and phone number on it and shall be visible from a distance of at least 10 feet.
- 3. The Permittee shall not store any containers larger than 55 gallons in this Unit.
- 4. This Unit shall only store treatment residue generated from the Open Burn Cage (Unit #1) and Open Burn Pan (Unit #2).

UNIT #5

UNIT NAME:

Explosives Waste Treatment Residue Storage Unit 2 – near Open Detonation.

LOCATION:

This Unit is located adjacent to the Open Detonation Unit in the southern portion of the Facility (Figures 2 and 3).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

This Unit is used for storage treatment residue from the Open Detonation Unit.

PHYSICAL DESCRIPTION:

This Unit is a prefabricated plastic cabinet with integrated secondary containment.

MAXIMUM CAPACITY:

The maximum permitted storage capacity is 110 gallons.

WASTE SOURCES:

Treatment residue from the Open Detonation Unit.

WASTE TYPES:

Residue ash from treated explosives waste identified as Form 1 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

571

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. This Unit shall be kept closed and locked except when in use.
- 2. The Permittee shall maintain a hazardous waste sign on the front of this Unit. The sign shall have the emergency contact name and phone number on it and shall be visible from a distance of at least 10 feet.
- 3. The Permittee shall not store any containers larger than 55 gallons in this Unit.
- 4. This Unit shall only store treatment residue generated from the Open Detonation Unit (Unit #3).

UNIT #6

UNIT NAME:

Magazine 2 (M2)

LOCATION:

This Unit is located within the Explosives Waste Storage Facility (EWSF) in the southern portion of the Facility (Figures 2 and 4).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of explosives waste such as damp fines from machining and processing operations, wet filters, cased explosives, fabricated parts, pastes, powders, explosive liquids and explosive liquids absorbed onto sawdust. The explosives waste is contained in plastic bags and stored in rigid plastic containers, tubs, or United States Department of Transportation (US DOT)-compliant packaging.

PHYSICAL DESCRIPTION:

Magazine 2 is a semi-cylindrical, corrugated metal structure overlain with two feet and six inches of earth. The floor is one foot and 10 inch thick reinforced concrete and is covered with a non-conducting, non-sparking membrane. The inside floor measures 21 feet and 10 inches by 15 feet and five inches. The ceilings at the highest point measures nine feet and two inches. The storage area has a vault door constructed of two ¼ inch steel plates with four inches of fiberglass insulation between them. Inside, the magazine has two rows of steel frame plywood shelving. This magazine also has a row of freestanding plywood shelves in the center of the room. Wastes are stored on the shelves or elevated on pallets or skids. There are no floor drains.

MAXIMUM CAPACITY:

The maximum permitted storage capacity is 3209 pounds.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and from the LLNL Main Site.

WASTE TYPES:

Explosives waste identified as Form 1, Form 2 and Form 3 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, K044, K045, K046, K047, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

331, 352, 491, 551

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

<u>UNIT-SPECIFIC SPECIAL CONDITIONS:</u>

- 1. The Permittee shall not store any containers larger than 55 gallons in this Unit.
- 2. At all times, the Permittee shall display the total weight currently stored within the Unit on the outer side of the Unit's door.

UNIT #7

<u>UNIT NAME:</u>

Magazine 3 (M3)

LOCATION:

This Unit is located within the Explosives Waste Storage Facility in the southern portion of the Facility (Figures 2 and 4).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of explosives waste such as damp fines from machining and processing operations, wet filters, cased explosives, fabricated parts, pastes, powders, explosive liquids and explosive liquids absorbed onto sawdust. The explosives waste is contained in plastic bags and stored in rigid plastic containers, tubs, or US DOT-compliant packaging.

PHYSICAL DESCRIPTION:

Magazine 3 is a rectangular steel reinforced concrete building. The floor is 10 inch thick reinforced concrete covered with a non-conducting, non-sparking membrane. The inside floors measure 12 feet and 4 inches by 11 feet and 2 inches. The inside ceiling measures nine feet and nine inches above the floor. The front wall is constructed of one foot thick reinforced concrete. The remaining reinforced concrete walls and roof are 10 inch thick and are covered with three feet of earth. The door is constructed of two ¼ inch steel plates with four inches of fiberglass insulation between them. Two screened metal louvers in front and a 12-inch pipe at the rear provide ventilation for the magazine. Inside, the magazine has two rows of steel frame plywood shelving. Wastes are stored on the shelves or elevated on pallets or skids. This unit has no floor drain.

MAXIMUM CAPACITY:

The maximum permitted storage capacity is 5592 pounds.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and from the LLNL Main Site.

WASTE TYPES:

Explosive Waste identified as Form 1, Form 2 and Form 3 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, K044, K045, K046, K047, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

331, 352, 491, 551

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

<u>UNIT-SPECIFIC SPECIAL CONDITIONS:</u>

1. The Permittee shall not store any containers larger than 55 gallons in this Unit.

2. At all times, the Permittee shall display the total weight currently stored within the Unit on the outer side of the Unit's door

Unit #8

UNIT NAME:

Magazine 4 (M4)

LOCATION:

This Unit is located within the Explosives Waste Storage Facility in the southern portion of the Facility (Figures 2 and 4).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of explosives waste such as damp fines from machining and processing operations, wet filters, cased explosives, fabricated parts, pastes, powders, explosive liquids and explosive liquids absorbed onto sawdust. The explosives waste is contained in plastic bags and stored in rigid plastic containers and tubs or in US DOT-compliant packaging.

PHYSICAL DESCRIPTION:

Magazine 4 is a rectangular steel reinforced concrete building. The floor is 10" thick reinforced concrete covered with a non-conducting, non-sparking membrane. The inside floor measures 12 feet and 4 inches by 11 feet and 2 inches. The inside ceiling measures nine feet and nine inches above the floor. The front wall is constructed of one foot thick reinforced concrete. The remaining reinforced concrete walls and roof are 10 inch thick and are covered with three feet of earth. The door is constructed of two ¼ inch steel plates with four inches of fiberglass insulation between them. Two screened metal louvers in front and a 12-inch pipe at the rear provide ventilation for the magazine. Inside, the magazines have two rows of steel frame plywood shelving. Wastes are stored on the shelves or elevated on pallets or skids. This unit has no floor drain.

MAXIMUM CAPACITY:

The maximum permitted storage capacity for this unit is 4291 pounds.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and from the LLNL Main Site.

WASTE TYPES:

Explosives Waste identified in Form 1, Form 2 and Form 3 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, K044, K045, K046, K047, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

331, 352, 491, 551

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall not store any containers larger than 55 gallons in this Unit.
- 2. At all times, the Permittee shall display the total weight currently stored within the Unit on the outer side of the Unit's door.

Unit #9

UNIT NAME:

Magazine 5 (M5)

LOCATION:

This unit is located within the Explosives Waste Storage Facility in the southern portion of the Facility (Figures 2 and 4).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of explosives waste such as damp fines from machining and processing operations, wet filters, cased explosives, fabricated parts, pastes, powders, explosive liquids and explosive liquids absorbed onto sawdust. The explosives waste is contained in plastic bags and stored in rigid plastic containers and tubs or in US DOT-compliant packaging.

PHYSICAL DESCRIPTION:

Magazine 5 is a semi-cylindrical, corrugated metal structure overlain with two feet and six inches of earth. The floor is one foot and 10 inch thick reinforced concrete and is covered with a non-conducting, non-sparking membrane. The floor measures 15 feet by 10 feet. The

ceiling measures seven feet and eight inches at the highest point. The storage area has vault doors constructed of two ¼ inch steel plates with four inches of fiberglass insulation between them. Inside, the magazine has two rows of steel frame plywood shelving. Wastes are stored on the shelves or elevated on pallets or skids. There are no floor drains.

MAXIMUM CAPACITY:

The maximum permitted storage capacity for this unit is 2744 pounds.

WASTE SOURCES:

Explosives waste from waste generator areas at the Facility and from the LLNL Main Site.

WASTE TYPES:

Explosives waste identified as Form 1, Form 2 and Form 3 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, K044, K045, K046, K047, P081, P112, U117, U234

CALIFORNIA HAZARDOUS WASTE CODES:

331, 352, 491, 551

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall not store any containers larger than 55 gallons in this Unit.
- 2. At all times, the Permittee shall display the total weight currently stored within the Unit on the outer side of the Unit's door.

UNIT #10

UNIT NAME:

Magazine 816 (M816)

LOCATION:

This Unit is located with the Explosives Waste Storage Facility in the southern portion of the Facility (Figures 2 and 4).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

Storage of explosives-contaminated paper, wipes, filters, plastic, rubber, wood, cotton, tubing, personal protective equipment, wet wipes and laboratory trash. The explosives waste is contained in plastic bags and stored in 55-gallon drums.

PHYSICAL DESCRIPTION:

Magazine 816 is a prefabricated metal building measuring 27 feet by 38 feet. The floor is six inches of reinforced concrete with spread type footings around the perimeter. The ceiling ranges from seven feet to 12 feet. Two roof vents provide ventilation. Containers are elevated on pallets or skids to prevent contact with potential surface liquids. This unit has no floor drain.

MAXIMUM CAPACITY:

The maximum permitted storage capacity for this unit is 9240 gallons.

WASTE SOURCES:

Explosives waste from waste generator areas at this Facility and the LLNL Main Site.

WASTE TYPES:

Explosives waste identified as Form 4 in Table 1 of this Permit.

RCRA HAZARDOUS WASTE CODES:

D003, F002, F003, F005

CALIFORNIA HAZARDOUS WASTE CODES:

352

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall not store any containers larger than 55 gallons in this Unit.
- 2. The Permittee shall not store liquid wastes in this Unit.

UNIT #11

UNIT NAME:

Building 883 (B883) Container Storage Area (CSA).

LOCATION:

The Unit is located on the southeast corner of the Facility (Figures 2 and 5).

ACTIVITY TYPE:

Storage in containers

ACTIVITY DESCRIPTION:

This Unit is used for storage of hazardous waste. Ignitable waste is stored in the designated chemical storage locker.

PHYSICAL DESCRIPTION:

This Unit consists of a concrete pad surrounded by a slat fence and covered by a galvanized tin roof. The floor measures 48 feet 11 inches by 33 feet 11 inches. The floor consists of two 6-inch thick slabs. The base slab is continuously poured. The top slab is poured in sections with a polyvinyl water stop between the sections. The concrete pad is covered with an impermeable coating. A curb with a minimum height of 5.75 inches surrounds the pad to form secondary containment. The floor is sloped towards a sump that measures 25.75 inches by 36 inches by 10 inches deep, and is located in the southwest corner of the storage area.

MAXIMUM CAPACITY:

The maximum permitted storage capacity for this Unit is 5500 gallons, inclusive of the maximum capacity for the chemical storage locker. The maximum capacity of the chemical storage locker is 330 gallons.

WASTE SOURCES:

Hazardous waste from waste generator areas at this Facility

WASTE TYPES:

See Table 4

RCRA HAZARDOUS WASTE CODES:

See Table 5

CALIFORNIA HAZARDOUS WASTE CODES:

See Table 6

AIR EMISSION STANDARDS

This Unit is subject to the applicable requirements of California Code of Regulations, title 22, division 4.5, chapter 14, article 28.5.

UNIT-SPECIFIC SPECIAL CONDITIONS:

- 1. The Permittee shall not store any containers larger than 1110 gallons in this Unit.
- 2. The Permittee shall not stack 55-gallon or larger containers more than two containers high.
- 3. The Permittee shall segregate and store incompatible hazardous wastes in separate secondary containment systems.
- 4. The Permittee shall not store any explosives waste in this Unit.

PART V. SPECIAL CONDITIONS

- 1. The Permittee shall not store, treat or manage radioactive wastes or hazardous wastes containing radioactive waste or constituents (mixed waste).
- 2. The Permittee shall not receive any hazardous waste from off-site facilities or locations, with the exception noted in Special Condition 3 below.
- 3. The Permittee may receive only explosives waste from LLNL Main Site (EPA ID No. CA2890012584) for the purpose of storage and treatment as authorized by this Permit and only in an amount not to exceed 22 pounds (10 kg) per shipment by ground transportation.
- 4. The Permittee is prohibited from conducting any hazardous waste transfer, storage, treatment or other management activity unless it is specifically described in this Permit or otherwise authorized by DTSC.
- 5. The Permittee shall label all hazardous waste containers in accordance with California Code of Regulations, title 22, section 66262.34(f). The label shall clearly indicate the name and address of the waste generator, including the LLNL Main Site as applicable.
- 6. The Permittee shall clearly mark containers of explosives waste with the compatibility group designation letter as specified in Table 2 of this Permit and shall keep the containers segregated and stored in accordance with Table 3 of this Permit.
- 7. The Permittee shall keep Group L waste comprising of ammunition waste as described in Table 2 of this Permit segregated and stored separately from other explosives wastes.
- 8. The Permittee shall maintain a minimum of 30 inches of aisle space between rows of containers at all times.
- 9. The Permittee shall not stack any containers holding explosives waste on top of any other container.
- 10. In the event any cracks, gaps or tears are detected in any hazardous waste management unit, the Permittee shall initiate repair as soon as possible and complete repair within one week of discovery of the problem. The Permittee shall notify DTSC within 24 hours whenever a containment crack, gap or tear is found. Within seven days of discovery of the problem, the Permittee shall notify DTSC in writing of corrective measures that have been taken.
- 11. Containers holding hazardous wastes shall be stored only in the authorized areas designated in Part IV of this Permit. Any non-hazardous waste that is stored in a designated hazardous waste storage area as provided by this Permit shall be subject to the conditions of this Permit, including volume calculations, compatibility and inspections.

- 12. 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 waste that is stored or located in an authorized unit shall be included in the calculation for that unit.
- 13. Only employees of the Permittee who are fully trained in the Facility's operations and procedures are allowed to handle the treatment, transfer, and storage operations at the Facility.
- 14. Within three (3) years from the effective date of this Permit, the Permittee shall submit for approval, a Soil Sampling Plan (Soil Sampling Plan) to implement the recommendations of the September 2012 Soil Sample Report (LLNL-TR-588454). The Soil Sampling Plan shall include at a minimum:
 - a. The laboratory Method Detection Limit and Reporting Limit for each chemical listed in Table 1 of the Soil Sample Report, LLNL-TR-588454;
 - A plan to sample metals, furans, explosives, perchlorate and semi-volatile compounds from one location closest to Units #1 and #2 (Burn Units) and #3 (Open Detonation Unit);
 - c. A plan to sample metals from each downwind sampling location using the same methodology employed during the 2009 sampling effort, as described in the Soil Sampling Plan, October 2007, LLNL-TR-400074 (2007 Soil Sampling Plan);
 - d. A plan to sample two additional locations (one to the northeast and the other to the southwest) in addition to pre-existing sampling locations designated as EWTF Downwind #1, #2, #3 and #4 as specified in LLNL-TR-588454 Soil Sample Report. The two additional locations shall be located at the same distance from the Burn Units (Units #1 and #2) as the EWTF Downwind #1 sample location and sampled for metals only.
 - e. A plan to sample two additional locations (one to the northwest and one to the southeast) in addition to pre-existing sample locations designated as Detonation Pad Downwind #1 and #2 as specified in LLNL-TR-588454 Soil Sample Report. The two additional locations shall be located at the same distance from the Open Detonation Unit (Unit #3) as the Detonation Pad Downwind #1 sample location and sampled for metals only.
 - f. A plan to sample for perchlorate at all locations.
- 15. The Permittee shall fully implement the approved Soil Sampling Plan no later than one (1) year after receiving approval from DTSC.
- 16. The Permittee shall submit to DTSC, no later than eight (8) months after full implementation of the approved Soil Sampling Plan, a summary report of the soil sampling effort. At a minimum, the report shall include:
 - a. Executive summary, including objectives and conclusions;

Draft Hazardous Waste Facility Permit Page 28

Lawrence Livermore National Laboratory – Site 300 EPA ID Number: CA2890090002

- b. Supporting laboratory report of analytical data;
- c. Discussion of any changes in soil chemical concentrations relative to the September 2012 Soil Sample Report (LLNL-TR-588454);
- d. Statistical analysis by mean, standard deviation and UCL 95% methods (applied the same as the 2012 Soil Sample Report, LLNL-TR-588454);
- e. Identification and analysis of any individual result whose variability is greater than 20% of the mean value for each constituent; and
- f. Comparison of results to the CERCLA Site 300 background levels identified in the 2012 Soil Sample Report, LLNL-TR-588454.

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. Corrective action shall be carried out pursuant to the Federal Facility Agreement (FFA) entered into by USEPA, United States Department of Energy (DOE)/LLNL, DTSC and the California Regional Water Quality Control Board on or about June 29, 1992 under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), Section 120, and most recently amended on August 9, 2011. Section VII of the current FFA provides that the parties intend to integrate the Permittee's CERCLA response obligations and RCRA corrective action obligations which relate to the releases of hazardous substances and hazardous wastes; and the parties further intend that remedial action satisfactorily implemented under the current FFA, or any future amendments to the FFA, shall obviate the need for further corrective action under RCRA with respect to those releases. However, DTSC reserves its right to require the Permittee to comply with additional corrective action requirements should the remedial action implemented under the FFA be deemed insufficient or inadequate for the protection of the environment or human health.
- 2. 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.
- 3. 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 measures must be taken to address releases beyond the Facility boundary if access to off-site areas cannot be obtained.

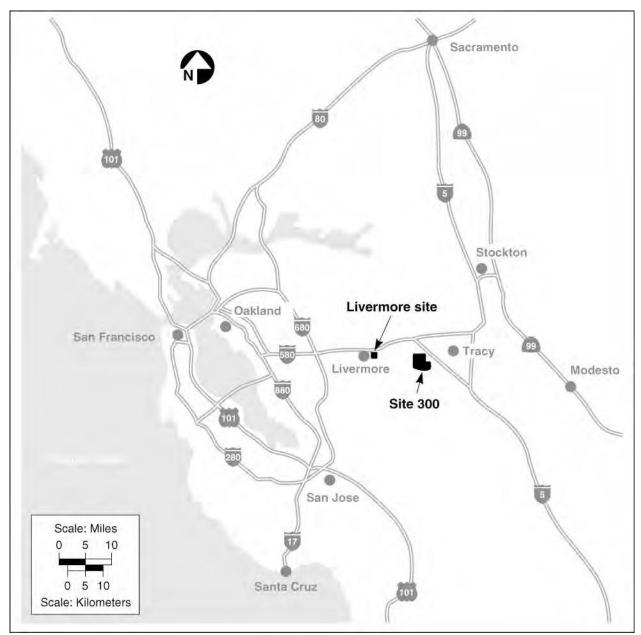


Figure 1 - Facility Location and Regional Map

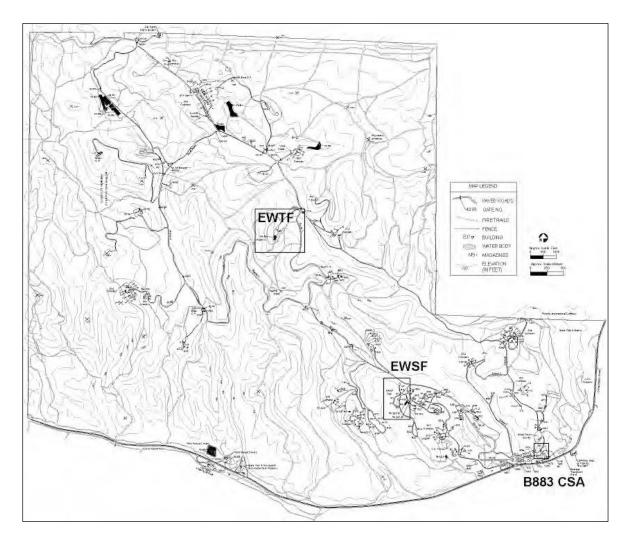


Figure 2 – Location of Hazardous Waste Management Units

B883 CSA – Building 883 Container Storage Area EWSF – Explosives Waste Storage Facility EWTF – Explosives Waste Treatment Facility

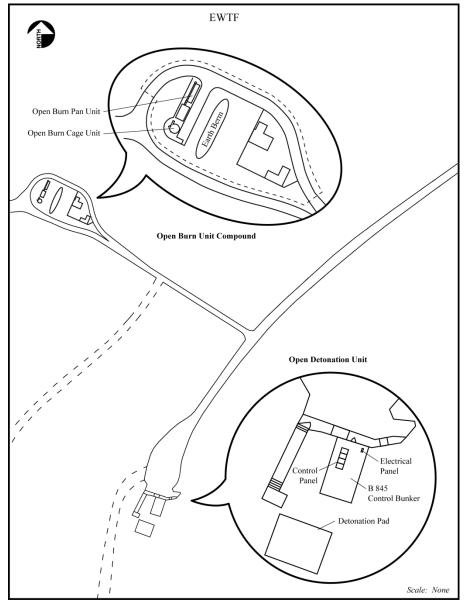


Figure 3 - Explosives Waste Treatment Units
Open-Burn Pan
Open-Burn Cage
Open-Detonation Pad

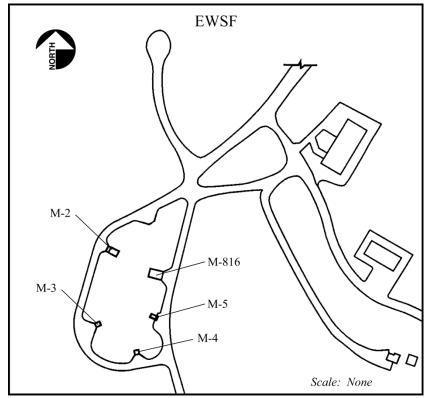


Figure 4 – Explosives Waste Storage Units M-2, M-3, M-4, M-5, M-816

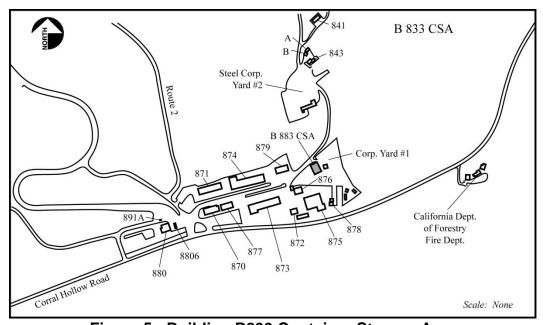


Figure 5 - Building B833 Container Storage Area

TABLE 1

WASTE STREAMS PERMITTED FOR
TREATMENT AT THE EXPLOSIVES WASTE TREATMENT FACILITY

Explosives Waste Stream Number	Waste Stream Description and Examples	U.S. EPA Waste Codes	CA Waste Codes	Treatment Method/Unit
Form 1	Cased explosives or other explosives that have the potential to detonate during treatment operations.	D003, P081, P112, U117	331, 352	Open Detonation Open Detonation Unit
Form 2	Explosives pieces, powders, pastes, absorbed liquids and small assemblies that will not detonate during open burning.	D003, P081, P112, U117, U234	331, 352, 551	Open Burning/ Burn Pan
Form 3	Wet explosives machine fines, sludge from weirs and settling basins, wet waste filters.	D003, K044, K045, K046, K047	352, 491	Open Burning/ Burn Cage
Form 4	Explosives- contaminated personal protective equipment, paper, rags, packaging, plastic tubing, laboratory waste, dry waste filters.	D003, F002, F003, F005	352	Open Burning/ Burn Cage

From Part III, Table 3, Part B Permit Application for Hazardous Waste Treatment and Storage Facilities Site 300, October 2007.

WASTE STREAMS PERMITTED FOR

STORAGE AT THE EXPLOSIVES WASTE STORAGE FACILITY

TABLE 2

UNO STORAGE ² COMPATIBILITY GROUP	DESCRIPTION
Group A	Initiating explosives
Group B	Detonators and similar initiating devices not containing two or more independent safety features
Group C	Bulk propellants, propellants propelling charges, and devices containing propellant with or without their means of ignition.
Group D	Black powder, high explosives (HE), ammunition/devices containing HE without its own means of initiation and without propelling charge, or a device containing an initiating explosive and containing two or more independent safety features.
Group E	Ammunition/explosives devices containing HE without its own means of initiation and with propelling charge (other than one containing a flammable or hypergolic liquid)
Group F	Ammunition containing HE with its own means of initiation and with propelling charge (other than one containing a flammable or hypergolic liquid or without propelling charge)
Group G	Fireworks, illuminating, incendiary and smoke, including hexachlorethane or tear producing munitions other than those munitions that are water activated or which contain white phosphorus (WP) or flammable liquid or gel.
Group H	Ammunition containing both explosives and WP or other pyrophoric material.
Group J	Ammunition containing both explosives and flammable liquids or gels.
Group K	Ammunition containing both explosives and toxic chemical agents.
Group L	Ammunition not included in other compatibility groups. Ammunition having characteristics that do not permit storage with other types of ammunition, or kinds of explosives, or dissimilar ammunition of this group.
Group N	Ammunition containing only extremely insensitive detonating substance.
Group S	Ammunition presenting no significant hazard.

From Part III, Table 9, Part B Permit Application for Hazardous Waste Treatment and Storage Facilities Site 300, October 2007.

TABLE 3

STORAGE COMPATIBILITY MATRIX FOR THE EXPLOSIVES WASTE STORAGE FACILITY

Groups ⁴	Α	В	С	D	Е	F	G	н	J	K	L	N	s
Α	Χ	Z											
В	Z	Χ	Z	Z	Z	Z	Z						Χ
С		Z	Χ	Χ	Χ	Z	Z						Χ
D		Z	Χ	Χ	Χ	Z	Z						Χ
E		Z	Χ	Χ	Χ	Z	Z						Χ
F		Z	Z	Z	Z	Χ	Z						Χ
G		Z	Z	Z	Z	Z	Χ						Χ
Н								Х					Χ
J									Х				Χ
K										Z			
L											(d)		
N			Z	Z	Z							Х	Χ
S		Χ	Χ	Χ	Χ	Χ	Х	Χ	Χ			Х	Х

Corresponds to Table 2 of this permit.

Matrix Restrictions:

- a. An ""X" in the above matrix indicates that these groups may be stored in the same magazines. Otherwise, storage of these groups is prohibited or restricted according to Restriction b, below.
- b. A "Z" in the above matrix indicates that when warranted by operational considerations or magazine unavailability, and when safety is not sacrificed, limited quantities (not to exceed 1,000 pounds) of these groups may be stored in the same magazine.
- c. No mark in a block indicates that storage of these groups in the same magazine is prohibited.
- d. Group L is "ammunition not included in other groups, requiring separate storage requirements, and therefore are not compatible with other groups. Group L can be damaged or suspect ammunition of any group and will be stored separately. Types presenting similar hazards may be stored together but not mixed with other groups.

TABLE 4

WASTE STREAMS PERMITTED FOR STORAGE
AT THE BUILDING 883 (B883) CONTAINER STORAGE AREA

Waste ¹ Stream Number/ Form Code	Waste Name	Waste ¹ Stream Number/ Form Code	Waste Name
W001	Lab packs from any source not containing acute hazardous waste	W206	Waste oil
W002	Contaminated debris (lab packed or bulk debris)	W209	Paint, ink, lacquer, or varnish
W004	Lab packs containing acute hazardous wastes	W210	Reactive or polymerizable organic liquids and adhesives
W101	Very dilute aqueous waste with low concentration (<1%) of solvents	W211	Paint thinner or petroleum distillates
W103	Spent concentrated acid (≥ 5%) with metals	W219	Other organic liquid
W105	Acidic aqueous waste < 5% acid	W301	Contaminated soil (usually from spill cleanup, demolition, or remediation); see also W512
W107	Caustic solution with metals and cyanide	W303	Ash (from any type of burning of hazardous waste)
W110	Caustic aqueous waste without cyanides	W304	Slags, drosses, and other solid thermal residues
W113	Other aqueous waste or wastewaters (fluid but not sludge)	W307	Metal scale, filings and scrap
W117	Waste liquid mercury	W312	Cyanide or metal cyanide bearing solids, salts or chemicals
W119	Other inorganic liquids	W316	Metal salts or chemicals not containing cyanides
W200	Still bottoms in liquid form	W319	Other waste inorganic solids
W202	Concentrated Halogenated solvent	W401	Pesticide solids
W203	Concentrated non-halogenated solvent	W403	Solid resins, plastics, or polymerized organics
W204	Concentrated halogenated/non- halogenated solvent mixture	W405	Explosives or reactive organic solids
W205	Oil-water emulsion or mixture	W406	Dried paint

From Part III, Table 1, Part B Permit Application for Hazardous Waste Treatment and Storage Facilities Site 300, January 2015.

TABLE 4 (Continued)

WASTE STREAMS PERMITTED FOR STORAGE AT THE BUILDING 883 (B883) CONTAINER STORAGE AREA

Waste ¹ Stream Number/ Form Code	Waste Name
W409	Other organic solids
W501	Lime and/or metal hydroxide sludges and soils with no cyanides (not contaminated muds-W512)
W503	Gypsum sludges from wastewater treatment or air pollution control
W504	Other sludges from wastewater treatment or air pollution control
W505	Metal bearing sludges (including plating sludge) not containing cyanides
W506	Cyanide-bearing sludges (not contaminated soils –W512)
W512	Sediment or lagoon dragout, drilling or other muds; see also W301
W519	Other inorganic sludges (not contaminated muds – W512)
W603	Oily sludge (not contaminated muds – W512)
W604	Paint or ink sludges, still bottoms in sludge form (not contaminated muds – W512)
W606	Resins, tars, polymer or tarry sludge (not contaminated muds – W512)
W609	Other organic sludge
W801	Compressed gases of any type

From Part III, Table 1, Part B Permit Application for Hazardous Waste Treatment and Storage Facilities Site 300, January 2015.

TABLE 5

RCRA HAZARDOUS WASTE CODES PERMITTED FOR STORAGE AT THE BUILDING 883
(B883) CONTAINER STORAGE AREA

D001	D015	D039	F010	P105
D002	D016	D040	F025	P106
D003	D018	F001	F028	P112
D004	D019	F002	F039	U007
D005	D022	F003	K044	U025
D006	D028	F004	K045	U117
D007	D029	F005	K046	U144
D008	D030	F006	K047	U196
D009	D031	F007	P002	U234
D010	D035	F008	P015	
D011	D038	F009	P081	

TABLE 6

CALIFORNIA HAZARDOUS WASTE CODES PERMITTED FOR STORAGE AT THE BUILDING 883 (B883) CONTAINER STORAGE AREA

121	141	213	251	321	411	491	561	723	751
122	151	214	252	322	421	511	571	724	791
123	162	221	261	331	431	512	581	725	792
131	171	222	271	341	441	513	591	726	801
132	172	223	272	342	451	521	611	727	
133	181	231	281	343	461	531	711	728	
134	211	232	291	351	471	541	721	731	
135	212	241	311	352	481	551	722	741	