



South Coast Air Quality Management District

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SENT VIA E-MAIL:

June 15, 2021

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Class 2 Permit Modification for DeMenno-Kerdoon dba World Oil Recycling

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to provide comments on the above-mentioned document. According to the Public Notice of Class 2 Permit Modification, DeMenno-Kerdoon dba World Oil Recycling (WOREC and also referred to as facility) owns and operates a hazardous waste facility that treats, stores, recycles, and transfers used oil, used anti-freeze, oily water and contaminated oil, and petroleum products. The activities are regulated under an existing Hazardous Waste Facility Part B Permit issued by the Department of Toxic Substances Control (DTSC). The facility is located at 2000 North Alameda Street on the southeast corner of North Alameda Street and East Pine Street in the City of Compton.

According to the Public Notice, the proposed Class 2 Permit Modification will replace a naphtha splitter column, add an oily water filter press, eight 42,000-gallon tanks (14 feet in diameter and 38 feet in height), a new glycol recovery still, an ethylene glycol filter press, and make minor modifications of the vacuum used oily dehydration column (C-203). The proposed Class 2 Permit Modification will also remove seven existing tanks (e.g., Tank C-206, Tanks D-353 through D-356, Tank C-120, and Tank T-55001).

Because the proposed modifications to the existing hazardous waste facility permit consist of replacement of existing equipment, removal of existing tanks, and installation of new equipment, requirements of South Coast AQMD Rule 201 – Permit to Construct¹ and South Coast AQMD Rule 203 – Permit to Operate² will apply. Questions on permits should be directed to the South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. Additionally, the existing equipment and tanks that would be replaced and removed are facility components subject to the requirements of South Coast AQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities³ and U.S. Code of Federal Regulations Title 40 Chapter 61 Subpart M National Emission Standard for Asbestos⁴. Therefore, it is recommended that an asbestos survey be conducted prior to the commencement of replacement and removal activities.

¹ South Coast AQMD. Rule 201. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-201.pdf>.

² South Coast AQMD. Rule 203. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-203.pdf>.

³ South Coast AQMD. Rule 1403. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xiv/rule-1403.pdf>.

⁴ 40 CFR, Chapter 61, Subpart M. Accessed at: http://www.swcleanair.org/docs/misc/NES_Asbestos.pdf.

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June 15, 2021

If you have any questions or wish to discuss the comments, please contact Mr. Steve Tsumura, Air Quality Specialist, at stsumura@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS/JA/RR:ST
LAC210415-06
Control Number