

## NOTICE OF EXEMPTION

2020010395

**To:** Office of Planning and Research  
State Clearinghouse  
P.O. Box 3044, 1400 Tenth Street, Room 212  
Sacramento, CA 95812-3044

**From:** Department of Toxic Substances Control  
Permitting Division  
8800 Cal Center Drive  
Sacramento, CA 95826

<b>Project Title:</b> EMERGENCY PERMIT FOR TREATMENT OF HAZARDOUS WASTE, SANTA MONICA COLLEGE, SANTA MONICA, CALIFORNIA		
<b>Project Address:</b> 1900 Pico Boulevard	<b>City:</b> Santa Monica	<b>County:</b> Los Angeles
<b>Project Applicant:</b> Daniel Phillips, Assistant Director, Safety & Risk Management, Santa Monica College		
<b>Approval Action Under Consideration by DTSC:</b>		
<input type="checkbox"/> Removal Action Workplan	<input type="checkbox"/> Initial Permit Issuance	<input type="checkbox"/> Permit Re-Issuance
<input type="checkbox"/> Corrective Measure Study/Statement of Basis	<input type="checkbox"/> Permit Modification	<input type="checkbox"/> Closure Plan
<input type="checkbox"/> Remedial Action Plan	<input type="checkbox"/> Regulations	<input type="checkbox"/> Interim Removal
<input checked="" type="checkbox"/> Emergency Permit	<input type="checkbox"/> Other (specify):	
<b>Statutory Authority:</b>		
<input checked="" type="checkbox"/> California H&SC, Chap. 6.5 <input type="checkbox"/> California H&SC, Chap. 6.8 <input type="checkbox"/> Other (specify):		

**Project Description:**

The California Department of Toxic Substances Control (DTSC), pursuant to authority granted under California Code of Regulations, Title 22, Division 4.5, Chapter 20, Section 66270.61, has issued an Emergency Permit to Santa Monica College (EPA ID# CAD038735049) to treat hazardous wastes through a controlled reaction with chemical solutions prior to shipment off-site to a permitted treatment, storage, and disposal facility. Specifically, three 500-gram containers of 2,4 dinitrophenylhydrazine, two 1-liter containers of tetrahydrofuran, and one 500-milliliter container of cumene -must be treated. No alternative treatment to controlled chemical reactions are available.

The hazardous waste items expired and are currently being stored at Santa Monica College in Santa Monica, California. DTSC has determined as a safety precaution to prevent an accident or severe injury, an Emergency Permit should be issued to chemically stabilize the hazardous wastes on site prior to transport off-site.

**Background:**

2,4 dinitrophenylhydrazine is a high explosive chemical. When dried, 2,4 dinitrophenylhydrazine can easily be aerosolized as a dust and is also easily ignited. 2,4 dinitrophenylhydrazine is temperature and shock sensitive, potentially causing explosions. Further instability can be introduced as the chemical degrades (i.e. after the product's expiration date). Minor concussions may be enough to trigger a reaction in expired 2,4 dinitrophenylhydrazine, making transport of non-stabilized 2,4 dinitrophenylhydrazine hazardous. Chemical stabilization is recommended prior to transport to a permitted treatment, storage, and disposal facility.

Tetrahydrofuran and cumene are highly flammable chemicals. Both, in liquid state and exposed to air, can vaporize and are also easily ignited. Further instability can be introduced as the chemicals degrade (i.e. after the product's expiration date) and are temperature and shock sensitive. Minor concussions may be enough to trigger a reaction of the expired chemicals, making transport of non-stabilized tetrahydrofuran and cumene hazardous. Chemical stabilization is recommended prior to transport to a permitted treatment, storage, and disposal facility.

**Project Activities:**

The treatment of the hazardous wastes involves the addition of solution to the containers in a controlled manner to reduce the reactive or ignitable characteristics of the chemicals. Treatment will take place within a designated exclusion zone. Only technicians from Santa Monica College's contractor and Clean Harbors Environmental Services, will be allowed in the exclusion zone. Movement, preparation, and treatment of the items will be in accordance with established standards.

Within 10 business days of the expiration of this permit, Santa Monica College will submit a final report, signed in accordance with Title 22, California Code of Regulations section 66270.11(d). This report shall include treatment logs or operating record and certification that the treatment area has been cleared of all residual hazardous wastes generated from this emergency treatment and all generated wastes has been properly disposed.

The Emergency Permit is effective from January 28, 2020 through March 27, 2020.

April 2019

**Name of Public Agency Approving Project:** Department of Toxic Substances Control

**Name of Person or Agency Carrying Out Project:** Santa Monica College

**Exempt Status:** (check one)

- Ministerial [PRC, Sec. 21080(b)(1); CCR, Sec. 15268]
- Declared Emergency [PRC, Sec. 21080(b)(3); CCR, Sec. 15269(a)]
- Emergency Project [PRC, Sec. 21080(b)(4); CCR, Sec. 15269(c)]
- Categorical Exemption: [CCR Title 14, Sec. 153##]
- Statutory Exemptions: [State Code Section Number]
- Common Sense Exemption [CCR, Sec. 15061(b)(3)]

**Exemption Title:** Specific actions necessary to prevent or mitigate an emergency.

**Reasons Why Project is Exempt:** This action is necessary to prevent an emergency chemical stabilization of the 2,4 dinitrophenylhydrazine, tetrahydrofuran and cumene- is necessary prior to transportation to a permitted treatment, storage, and disposal facility to prevent accidental fire and/or explosion during transport.

The administrative record for this project is available for inspection at:

Department of Toxic Substances Control  
Sacramento Regional Office  
8800 Cal Center Drive  
Sacramento, California 95826

Matthew Mullinax  
Project Manager

Hazardous Substances Engineer  
Title

916-255-6531  
Phone No.

*Matthew Mullinax*  
Approver's Signature

1/27/2020  
Date

Matthew Mullinax  
Approver

Hazardous Substances Engineer  
Title

916-255-6531  
Phone No.

**TO BE COMPLETED BY OPR ONLY**

Governor's Office of Planning & Research

Date Received for Filing and Posting at OPR:

**JAN 27 2020**

**STATE CLEARINGHOUSE**