

**CALIFORNIA ENVIRONMENTAL QUALITY ACT**

**NOTICE OF EXEMPTION**

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

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

**Project Title:** Emergency Permit for Management of Hazardous Waste, Nanosyn Inc., Santa Clara, California

**Project Location:** 3100 Central Expressway, Santa Clara, California 95051

**County:** Santa Clara

**Project Applicant:** Maria Desagun, Safety, Health, Environment Director Life Sciences

**Approval Action Under Consideration by DTSC:** Emergency Permit

**Statutory Authority:** California Health and Safety Code, Chapter 6.5

**Project Description:** The California Department of Toxic Substances Control (DTSC), pursuant to authority granted under California Code of Regulations (CCR), Title 22, Division 4.5, Chapter 20, Sec. 66270.61, has issued an Emergency Permit to Nanosyn Inc., (EPA ID# CAR000017152) to treat hazardous wastes through a controlled reaction with chemical solutions. The following chemicals must be stabilized prior to transport to an authorized hazardous waste treatment, storage, and disposal facility: one (1) 500-gram, one (1) 100-gram, two (2) 25-gram, and one (1) 5-gram container of 1-Hydroxy-7-azabenzotriazole; three (3) 25-gram containers of 98% Benzoyl peroxide; two (2) 100-gram and three (3) 25-gram containers of Diazald; one (1) 1100-gram; five (5) 100-gram, and six (6) 25-gram containers of 97% Diethyl azadicarboxylate; one (1) 500-gram, one (1) 1-kilogram, three (3) 25-gram, and one (1) 50-gram container of anhydrous 1-Hydroxybenzotriazole; one (1) 25-gram container of 1H-Tetrazole; five (5) 100-gram containers of 2,2-Azobisisobutyric acid dimethyl ester; one (1) 5-gram container of 2,4-Dinitrophenol; one (1) 25-gram container of N-methyl-n-nitrosourea; one (1) 5-gram container of N-methyl-n-nitrosoguanidine and one (1) 1-kilogram container of 3,8 Dinitro-6-phenyl phenanthridine.

These chemicals are currently being stored at Nanosyn Inc. located at 3100 Central Expressway, Santa Clara, California 95051. 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 prior to storage and eventual transportation off-site by Triumvirate Environmental Inc. (TEI).

State of California – California Environmental Protection Agency  
Department of Toxic Substances Control

**Background:** The containers have peroxide formation present on either the inside, outside, or the bottom of the chemicals' containers, as well as the thread container caps. The presence of peroxide formation may be unstable at relatively low concentrations, resulting in fire and/or explosion if improperly handled. Due to the presence of peroxide formation, DTSC considers these chemicals to be an imminent and substantial endangerment to human health and the environment. Chemical stabilization is recommended prior to transport to a permitted treatment, storage, and disposal facility.

**Project Activities:** The treatment of these hazardous wastes involves the addition of solutions 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 High Hazard Technicians from TEI will be allowed in the exclusion zone. Movement, preparation, and treatment of the containers will be in accordance with established standards.

Within 10 business days of the expiration of this permit, Nanosyn Inc. will submit a final report, signed in accordance with Title 22, CCR Sec. 66270.11(d). The report shall include certification that the treatment area has been cleared of all residual hazardous waste generated from this emergency treatment and all generated waste has been properly managed. The Emergency Permit is effective beginning July 2, 2024 and shall expire on August 2, 2024.

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

**Name of Person or Agency Carrying Out Project:** Triumvirate Environmental Inc.

**Exempt Status:** Emergency Project Public Resources Code (PRC), Sec. 21080(b)(4); 14 CCR, Sec.15269(b)(c)

**Reasons Why Project is Exempt:** This action is necessary to prevent an emergency. Chemical stabilization of the chemicals is necessary prior to transportation to an authorized hazardous waste treatment, storage, and disposal facility to prevent accidental fire and/or explosion during transport.

The administrative record for this project is available to the public by appointment at the following location:

Department of Toxic Substances Control  
Permitting Division  
File Room  
8800 Cal Center Drive  
Sacramento, CA 95826

State of California – California Environmental Protection Agency  
Department of Toxic Substances Control

Approver's Name

Michelle Snapp

Approver's Title

Hazardous Substances  
Engineer

Approver's Phone Number

(916) 255-3647

Approver's Signature:

Date:

Michelle Snapp

Digitally signed by Michelle  
Snapp  
Date: 2024.06.26 10:32:13 -07'00'

June 26, 2024

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