

Office of the City Manager

# April 18, 2024

- To: Honorable Mayor and Members of the City Council
- From: Dee Williams-Ridley, City Manager
- Re: History and update on former Berkeley landfill environmental compliance

#### **History**

From the mid-1950's to 1983, the City of Berkeley ("City") operated an approximately 90-acre landfill ("Berkeley Landfill") in the area that is now Cesar Chavez Park. The landfill was sealed with a clay cap. Six years after the closure in 1989, the City installed an underground gas collection and control system (GCCS) to manage gases emanating from natural biodegradation of landfill matter. As that landfill matter has continued to biodegrade over the past 41 years, the gasses have continued to diminish. This reduction in gasses has, with regulatory approval, allowed for periodic shutdowns of the flare as well permission to use a flare that's smaller in size to burn off excess gas.

The gas control system – which complies with landfill closure regulations and allowed redevelopment of the area into Cesar Chavez Park – is comprised of underground wells that extract landfill gas generated from the decomposition of organic material in the refuse buried at the Berkeley Landfill, lateral lines that deliver the gas to a flare station, and a flare that burns the landfill gas to control methane emissions. Since 1999, the GCCS has been maintained and operated by SCS Engineers ("SCS") on behalf of and under contract with the City, pursuant to a permit issued by the Bay Area Air Quality Management District ("BAAQMD"). We are working closely with regulators to ensure that any errors in operations do not recur. This includes regular testing, sampling, and stringent safety protocols to ensure the system's integrity.

Cesar Chavez Park continues to be a thriving, safe area for dog walkers, kite fliers, and those bringing family for walks. City staff also use the area regularly, reflecting regulator guidance as well as the City's engineering expertise that there are no additional limits that need to be placed on activity in the park.

### **Current Situation**

City staff is working with SCS to comply with recent orders and requests from BAAQMD, the California Department of Resources, Recycling, and Recovery ("CalRecycle"), and the San Francisco Regional Water Quality Control Board ("RWQCB"). The City is on track to substantially comply with the requirements and

requests, except as otherwise agreed to between the City and the three regulatory agencies.

Inspections of the landfill occur on a regular basis by the three regulatory agencies. The RWQCB inspects generally once per year based on staff availability. The BAAQMD inspects once per year, also based on staff availability. The agency has increased inspectors in recent years, and due to the Notice of Violations (NOVs), they have been inspecting the landfill more frequently. CalRecycle inspects the landfill on a quarterly basis.

The City, its contractors, and the regulatory agencies periodically measure surface emissions of methane and have found levels consistently far below the regulatory maximums deeming the area secure from health or safety threats. The City will perform additional monitoring for methane as set forth in the abatement order.

To ensure compliance with all environmental regulations in the future, the City has taken the following steps:

- Reviewed the organizational structure and staffing levels of the Environmental Compliance unit within the Engineering and Transportation Division of the Public Works Department and is proposing additional City staff positions for this unit;
- Engaged consultants to support City staff in complying with the Berkeley Landfillrelated requirements;
- Engaged a consultant to assess whether the City's current arrangement for management of the Berkeley Landfill, including the GCCS and division of responsibilities between City staff and contractors, is appropriate or should be revised; and
- Created new procedures through which environmental compliance matters that involve potential noncompliance or noncompliance be elevated in the organization to staff with appropriate authority and resources to successfully resolve the compliance issues and new procedures through which the City Attorney's Office will be involved in resolving all matters that involve potential noncompliance or noncompliance.
- Started an ongoing process of trenching and repair work guided by the abatement order.

City staff will update the City Council and community on the status of compliance issues with another off-agenda memo in the next few months.

### Landfill and Compliance History

GCCSs require regular monitoring and maintenance and have a limited lifespan. The City made numerous repairs to the GCCS in 2015, 2016, and 2017. In early 2000, the City addressed system challenges with air intrusion and vacuum. In 2011, the

GCCS experienced challenges related to liquid and from that point, SCS recommended that the City evaluate the replacement of the GCCS.

As noted above, the closed Berkeley Landfill is regulated by the BAAQMD, CalRecycle, and the RWQCB. BAAQMD regulates the emission of landfill gases and the byproduct of the GCCS. BAAQMD standards regarding the operation of the GCCS include permissible downtime and temperature of the GCCS's flare. BAAQMD allows 240 hours per year of downtime for inspection and maintenance.

The amount of landfill gas naturally diminishes over time as more landfill matter decomposes. From 2009 to 2016 the BAAQMD approved intermittent operation of the GCCS flare. This allowed the flare to have a longer downtime than the allotted 240 hours per year.

As a result, the City, with BAAQMD's authorization, installed a new, smaller flare in 2016 as part of upgrades to the GCCS. BAAQMD then rescinded the intermittent operation of the flare once the smaller flare was installed.

In 2017, the flare was out of operation for 24 straight days due to a lack of power from the normal Pacific Gas and Electric (PG&E) connection. The flare did not have a backup power supply at that time.

In 2018, SCS provided the City with an evaluation of various potential upgrades to the GCCS that included a complete replacement estimated to cost \$2M. SCS advised that a replacement would not be cost effective: naturally declining amounts of gas meant that a new gas collection and control system would have a relatively short lifespan.

In 2019, a significant buildup of liquid in the GCCS impeded the flow of gases to the flare. The consensus between the City and SCS was that the liquid buildup was a result of particularly wet weather during the winter of 2019-2020. The liquid caused the longest non-continuous flare operation since the PG&E power disruption in 2017 and exceeded the allowable downtime hours allotted by the BAAQMD.

Between August 2019 and June 2022, BAAQMD issued the City seven notices of violation ("NOVs") for non-continuous flare operations. Since June 2022, BAAQMD has issued the City 16 additional NOVs, largely for non-continuous flare operations. These NOVs are accusations, not findings of non-compliance, and the City has requested that BAAQMD reconsider or rescind two that are not related to non-continuous flare operations.

In May 2022, SCS and City staff engaged with BAAQMD to address operational challenges, particularly the inability to operate the methane flare continuously. SCS and BAAQMD have different theories related to the non-continuous operation of the flare. SCS contends that the Berkeley Landfill's gas production is decreasing as the landfill

ages. As a result, if underground gas is not generated in sufficient quantities, it cannot be pumped to the surface in sufficient concentrations to operate the flare. Alternatively, BAAQMD believes that high oxygen content measured in the wells is proof that portions of the gas collection system are not effectively collecting the landfill gas that is present underground.

SCS applied for another approval of intermittent operation in May 2022. After months of information exchange with BAAQMD, SCS rescinded the application in March 2023 because BAAQMD stated it would not approve the intermittent operation unless the GCCS met certain oxygen content criteria. SCS believed those levels were not achievable. At that point, the only viable option for compliance was to file an application for permit variance with the BAAQMD Hearing Board since SCS predicted the 240-hour downtown allotment for 2023 would be utilized before year-end. This quasi-judicial proceeding was initiated on behalf of the City without City Attorney's Office consultation or approval. In addition to opposing the variance application, BAAQMD also subsequently filed an "Accusation" alleging permit violations and seeking an Abatement Order requiring the City to perform a number of steps to remediate them.

In January and February 2024, the BAAQMD Hearing Board rejected the City's request for a permit variance for downtime and entered an Abatement Order substantially along the lines requested by BAAQMD. Abatement Order that was issued (Attachment 1) directs the City to take 11 steps to remediate the inability to operate the flare continuously.

The City and BAAQMD separately reached a negotiated agreement to resolve the 7 NOVs issued between August 2019 and June 2022 in the amount of \$130,000. The more recently issued NOVs remain pending, as BAAQMD has not yet taken any action to enforce them. The remaining alleged violations are subject to a three-year statute of limitations for enforcement by BAAQMD.

As a result of the dialog between the City and BAAQMD, CalRecycle and the RWQCB also reviewed their monitoring and compliance records regarding the Berkeley Landfill. In July 2023, CalRecycle issued a letter requesting that the City conduct a subsurface combustible gas speciation assessment of the landfill and near the DoubleTree Hotel (Attachment 2). The Waterfront, including the Double Tree Hotel and Cesar Chavez Park, is on State Tidelands granted in trust to the City in 1913. The property where the DoubleTree Hotel exists, is beyond the boundaries of the Berkeley Landfill. There are indications that refuse exists below the hotel from possible illegal dumping that was combined with fill soil when the hotel was constructed. The City has submitted a workplan regarding methane assessment in the area of the hotel and CalRecycle has indicated that they will respond to the workplan by the end of March 2024. Staff are coordinating with DoubleTree Hotel.

In January 2024, the RWQCB issued a letter (Attachment 3) requiring the City to submit a workplan to conduct testing of hazardous waste that may have been deposited at the Berkeley Landfill. Specifically, the RWQCB is seeking information regarding the landfill receiving waste containing heavy metals and radionuclides in the 1960's, and the City is performing an investigation into this matter. There is no allegation of non-compliance by the RWQCB.

We will continue to diligently manage our relationships with regulators as we maintain the breadth of safe, activities throughout Cesar Chavez Park and adjacent areas of the Marina.

Attachments:

- 1. BAAQMD Finding and Decision for Order of Abatement
- 2. CalRecycle Letter Regarding Landfill Gas Monitoring and Control at Berkeley Landfill, Virginia St and Marina Blvd, Berkeley, Alameda County (SWIS #01-AC-0001)
- 3. RWQCB Letter Regarding Berkeley Landfill, Berkeley, Alameda County Requirement for Technical Reports Pursuant to Water Code Section 13267
- cc: LaTanya Bellow, Deputy City Manager Anne Cardwell, Deputy City Manager Terrance Davis, Public Works Director Wahid Amiri, Deputy Director Public Works, Engineering and Transportation Farimah Brown, City Attorney Scott Ferris, Parks, Recreation, and Waterfront Director Matthai Chakko, Communications Director/Assistant to the City Manager Mark Numainville, City Clerk Jenny Wong, City Auditor

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2	BEFORE THE HEARING BOARD OF THE				
3	BAY AREA AIR QUALITY		FILED		
4	STATE OF C	CALIFORNIA	FEB 16 2024		
5		D. 1. ()1. 2747	HEARING BOARD		
6	In the Matter of the	Docket No. 3747	MUNAGEMENT DISTRICT		
7	AIR POLLUTION CONTROL OFFICER of the BAY AREA AIR QUALITY MANAGEMENT DISTRICT	FINDINGS AND DE ORDER OF ABATE	CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR CONTRACTOR		
8	MANAOEMENT DISTRICT	DISTRICT REGUL	ATION 8-34-301.1		
9	Complainant,	Hearing Date: January	v 23, 2024 and		
10	vs.		ry 6, 2024		
11	BERKELEY LANDFILL	Place: Hearin	g Board		
12	Respondent.	375 Be	rea Air Quality Mgt Dist cale Street		
13		San Fr	ancisco, CA 94105		
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15	The Request of Complainant the Air Pol	llution Control Officer	(hereinafter, the		
16	"APCO") of the Bay Area Air Quality Manager	ment District (the "Air l	District") for an Order of		
17	Abatement was heard on January 23 and Februa	ary 6, 2024, in accordan	ice with the provisions of		
18	California Health and Safety Code ("HSC") § 4	0823 and Air District F	learing Board Rule §		
19	6.2. The following Members of the Hearing Boa	ard were present: Chair	Valerie Armento and		
20	Members Amelia Timbers, Danny Cullenward,	and Rajiv Dabir. Respo	ondent Berkeley Landfill		
21	was represented by Marc Shapp, Deputy City A	ttorney, City of Berkel	ey. Complainant APCO		
22	of the Air District was represented by Joel Freid	l, Assistant Counsel II,	Air District. The public		
23	was given the opportunity to testify, evidence w	vas received, and the ma	atter was submitted.		
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Testimony from the hearing on Respondent's application for a regular variance, Case No. 3741, was incorporated, without objection, into the record.

The Hearing Board finds and decides as follows:

#### **FINDINGS OF FACT**

1. The Air District is the governmental agency charged with the primary responsibility in the San Francisco Bay Area for controlling air pollution from all sources other than motor vehicles, for enforcing laws relating to air pollution, and for maintaining healthy air quality. The Air District is organized pursuant to the HSC Division 26, Part 3, Chapter 11.

9 2. The Complainant Air Pollution Control Officer ("APCO") is appointed by the
Bay Area Air Quality Management District Board of Directors to enforce all orders, rules and
regulations prescribed by the Air District Board. (HSC § 40750 *et seq.*) The APCO is
authorized to request that the Hearing Board issue an Order of Abatement in accordance with
HSC Section 42451(a).

3. Respondent Berkeley Landfill ("Landfill" or "Facility") is owned by the City of
Berkeley (the "City"), operated by SCS Engineers ("SCS"), and subject to the jurisdiction of
the Air District. Respondent owns the Landfill located at Cesar Chavez Park, at 11 Spinnaker
Way, Berkeley, Alameda County, California.

4. Air District Regulation ("Reg.") 8-34-301.1, California Code of Regulations
 ("CCR") Title 17, Section 95464(b)(1)(A), a part of 17 CCR Sections 95460-94476, the State
 Landfill Methane Rule ("State LMR"), and the Landfill's Permit Condition ("P/C") 1826, Part
 3, each require continuous operation of the Landfill's landfill Gas Collection and Control
 System ("GCCS").

23 5. The Facility is located within the Air District's jurisdiction and subject to the
24 Air District's regulations. The Landfill is a closed landfill owned by the City and currently

developed as Cesar Chavez Park. The City also owns the land in the Berkeley Marina adjacent to Cesar Chavez Park, including the site of an operating hotel, collects gases including Methane offsite, meaning off of Cesar Chavez Park, and feeds those gases to the City's flare in the Park for abatement.

6. The Landfill has been closed, i.e. not accepting any new solid waste, since 1983. As part of required post-closure operations, the Landfill operates a GCCS, which collects landfill gas from the decomposing material in the Landfill and combusts it in an enclosed flare. The Landfill has contracted with SCS for the operation and maintenance of the Landfill and its GCCS and for compliance monitoring and measures necessary to comply with Air District and CA State Regulations.

7. Landfill Gas ("LFG") is comprised of Methane which is a potent greenhouse gas, Carbon Dioxide ("CO2"), Carbon Monoxide ("CO"), Non-methane Organic Compounds ("NMOCs"), Toxic Air Contaminants ("TACs"), and other compounds which can be emitted when the Gas Collection System ("GCS") and flare are not operated continuously and when there are leaks of landfill gas from the landfill surface and/or from GCCS components.

8. Methane is a potent greenhouse gas more effective than CO2 at trapping heat in the atmosphere.

9. LFG is extracted from the Landfill using a series of vertical landfill gas collection wells, lateral piping, and a vacuum system that comprise the GCS which feeds the collected LFG to a flare where the landfill gas is burned and thereby abated, as required by Regulation 8, Rule 34 ("Reg. 8-34") and the State LMR. The Landfill is required by its Air District permit to operate a GCS consisting of 42 vertical wells, 2 horizontal collectors, and 14 trench collectors.

10. A landfill subject to Reg. 8-34 is required to continuously operate a Gas Collection System and flare (or other abatement or control system) unless Less Than Continuous Operation ("LTCO") is approved by the Air District. The state LMR also requires continuous operation of the GCS unless the Air District approves an alternative compliance option. Landfills that are granted approval for LTCO are required to request approval of the LTCO allowance from the Air District every 3 years, and the Air District has the authority to approve, reject, or modify terms of LTCO.

8 11. The Air District has issued 15 Notices of Violation ("NOVs") to the Landfill
9 since November 22, 2021 for noncontinuous operation of its GCCS, in violation of Reg. 8-340 301.1, the State Landfill Methane Rule CCR Title 17 Section 95464(b)(1)(A), and the
1 Landfill's P/C 1826, Part 3, among 5 other violations. Berkeley Landfill is not operating its
2 GCCS continuously.

12. The Air District issued 14 NOVs to the Landfill over the past year, and 21
14 NOVs since 2019, including the 10 NOVs issued for noncontinuous operation of the GCCS in
2023. The cited violations include not operating required landfill gas collection wells, leaks of
16 landfill gas in violation of applicable regulations, improper maintenance of the flare, the flare
17 exceeding its 57.6 MMBTU/day limit in violation of Reg. 2-1-307 and P/C 1826, Part 2, late
18 source test report submittal, and noncontinuous operation of its GCCS.

13. As part of its application for a Regular Variance, Respondent acknowledged and
presented evidence to support a finding that the Landfill is operating in violation of Reg. 8-34301.1 and P/C 1826, Part 3.

14. Because the Landfill closed before 1987 it is exempt under Reg. 8-34-119 from
the 5% oxygen content limit of Reg. 8-34-305.4. Whether or not this limit applies, high oxygen
readings indicate ambient air is being drawn into the GCS. In this case, oxygen readings of 20%

have been recorded, indicating that ambient air is being drawn into the GCS. The Air District believes that this oxygen intrusion is due to poor maintenance and disrepair of the Landfill's GCS.

When LFG is not collected adequately, it builds up pressure within the Landfill
and can move offsite, outside the Landfill boundary, where the LFG can become a safety
hazard, as well as eventually being emitted to the atmosphere. Monitoring probes offsite
near Cesar Chavez Park now situated upon the former the Landfill have detected methane. The
Air District and CalRecycle, the Landfill's Local Enforcement Agency ("LEA") have met to
discuss and develop the chemical fingerprinting methodology in Sections 4, 4.1, and 4.2 of the
Order of Abatement below aimed to determine whether the methane measured offsite of Cesar
Chavez Park is originating from the Landfill.

16. On May 18, 2022, the Landfill petitioned the Air District for approval of an
LTCO allowance for the Landfill's new smaller flare under Reg. 8-34-404. The Landfill
claimed that it was not producing enough LFG to operate even the new smaller flare on a
continuous basis.

16 17. At the end of 2022, Air District Engineering Staff met with CalRecycle,
17 Berkeley LEA, SCS, and the City staff to discuss investigation into the offsite methane
18 detections, and SCS/the City agreed to investigate. The City has been requested by CalRecycle
19 to submit a work plan to conduct the investigation into the offsite methane detections by
20 February 23, 2024.

18. On March 21, 2023, the City's Landfill and its consultant, SCS, withdrew the
application seeking LTCO for the new flare after the Air District expressed concerns about
poor landfill gas collection, ambient levels of oxygen being captured by the GCS, and possible
offsite landfill gas migration, and stated that if system adjustments and repairs could not be

completed within 60 days to ensure that all vertical extraction wells reported oxygen				
concentrations below 5% then the LTCO petition would be denied				
19. The Landfill is in a well-populated area. Cesar Chavez Park, which is used by				
the public, is located on top of the Landfill and with an adjacent hotel. Accordingly, there is a				
strong public interest in bringing the Landfill into compliance with continuous operation				
requirements and in determining whether or not landfill gas is migrating off of the Landfill site.				
CONCLUSION				
20. The Landfill is in violation of Reg.8-34-301.1, 2-1-307, State LMR Section				
95464(b)(1)(A), and its P/C 1826, Part 3.				
21. It is reasonable to require the Landfill to comply with District rules and its				
permit. Reg. 8-34 that applies in this case is a federally enforceable requirement.				
22. The issuance of this Order of Abatement upon a noticed hearing does not				
constitute a taking of property without due process of law.				
23. The Order of Abatement is not intended to act as a variance.				
ORDER OF ABATEMENT				
Based on the aforesaid statements and good cause appearing, the Hearing Board hereby				
orders Respondent to immediately cease and desist from operating Respondent's closed				
Landfill in a manner that violates Air District Reg. 8-34-301.1 or that violates the Landfill's				
P/C 1826, which require both the continuous operation of its landfill gas (LFG) collection				
system, consisting of 42 vertical wells, 2 horizontal collectors, 14 trench collectors, and the				
proper maintenance of and continuous operation of Flare A-4 combusting the collected LFG at				
a temperature of at least 1,400 degrees Fahrenheit, unless and until the Air District determines				
that all of the following compliance action conditions and increments of progress 1 through 11				
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have been met.

### **COMPLIANCE ACTION CONDITIONS AND INCREMENTS OF PROGRESS:**

1. Subject to Section 2 of this Abatement Order, locate all required vertical LFG collection wells pursuant to the BAAQMD Permit to Operate, Permit Condition 1826, Part 4 and on the attached Landfill Gas System Plan topographical site map. (Reg. 8-34-301). Complete within 30 business days of issuance of this Abatement Order.

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2. Once Wells 14, 29, 33, 34, and 35 are located, immediately monitor each located well to confirm operation, measure well gas in accordance with Regulation 8-34-604, and measure pressure in accordance with Regulation 8-34-608. Adjust each well as needed to collect LFG. Submit the monitoring results and description of adjustments to the Air District within 5 business days. If any of these wells cannot be located, repaired, or brought into compliance with section 3, then submit an application to the Air District proposing an alteration to the LFG collection system to address the missing, unrepairable, or non-compliant wells. (Reg. 8-34-301, Permit Condition 1826). Complete within 30 business days of completion of the requirements of Section 1.

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3. To the extent necessary to achieve the performance criteria herein, repair the 11 LFG collection system such that, subsequent to inspection, repairs, or modifications as described in subsections 3.1, 3.2, 3.3, 3.4, and 3.5, all vertical LFG extraction wells, horizontal 12 collectors, and trench collectors are optimally collecting LFG and limiting air intrusion to 5 percent oxygen by volume, except as otherwise provided in subsections 3.4 and 3.5, and ensure 13 that each wellhead operates under a vacuum/negative pressure and LFG in each wellhead less than 55° C (131° F), and ensure all system components comply with all applicable 14 requirements in Reg. 8-34-301.2, and ensure the gas collection system and landfill gas flare operate continuously as specified in Reg. 8-34-301.1 and meet the destruction efficiency 15 requirement in Reg. 8-34-301.3. Complete the actions set forth in subsections 3.3, 3.4, and 3.5 on an as-needed basis. (Reg. 8-34-301, Permit Condition 1826). 16

3.1 Within 90 business days of issuance of this Abatement Order, complete 17 an inspection of the integrity of each vertical LFG extraction well, LFG horizontal collector. LFG trench collector, LFG collection system lateral, and piping, including physical inspection, 18 total depth and liquid level sounding, video camera inspection, and any other method(s) necessary to demonstrate that there are no blockages due to damage or from liquid. Submit 19 inspection results to the Air District within 30 business days of the completion of the inspection, including a timeline for any repairs that are necessary based on the inspection. If 20 LFG collection system component replacements are needed, an application to the Air District proposing an alteration to the LFG collection system to replace unrepairable LFG collection 21 system components shall also be submitted with the inspection results. (Reg. 8-34-301, Permit Condition 1826). 22

3.2 Within 90 business days of issuance of this Abatement Order, at all vertical LFG extraction wells, replace existing near surface bentonite well bore seal and install additional well bore HDPE liner boot seals. (Reg. 8-34-301, Permit Condition 1826).

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 3.3 As needed, install additional supplemental LFG collection system below grade pipelines to maintain vacuum distribution in the wellfield. Submit an application to the Air District if the installation(s) are not allowed by the current permit to operate. If any additional supplemental LFG collection system below grade pipelines are needed under this subsection 3.3, the City of Berkeley shall install those pipelines within 120 business days of issuance of this Abatement Order or any approvals required from the District, whichever is later. (Reg. 8-34-301, Permit Condition 1826).

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3.4 After measures set forth in subsections 3.1, 3.2, and 3.3 have been completed, if any well gas data from vertical wells, horizontal collectors, and trench wells (collectively and individually, the Well Gas Data) show oxygen concentrations greater than 5 percent by volume, submit to the Air District for approval a proposed Work Plan (WP) within 60 business days of the last GCS repair done under subsections 3.2 or 3.3 for a site-wide drone survey across the landfill and nearby areas that could be pathways of LFG migration to the offsite probes with methane detections per EPA approved Other Test Method 51 (OTM-51) – Unmanned Aerial Systems (UAS) Application for Surface Emissions Monitoring of Landfills. City of Berkeley staff shall seek approval from the Berkeley City Council for any drone survey under this subsection 3.4, if Council approval be needed under the Acquisition and Use of Surveillance Technology Ordinance, Berkeley Municipal Code Ch. 2.99. Upon the Air District's approval of the drone survey WP, which shall not be unreasonably withheld, within

30 business days complete the drone survey. At any identified location(s) of landfill gas leak(s), locate the GCS damage causing the leak(s) and identify new GCS component(s) needed to eliminate the leak(s). Submit an application to the Air District proposing an alteration to the

- LFG collection system to replace piping, replace landfill gas wells, horizontal collectors, trench wells, and/or install new landfill gas collection system components within 60 business days of completing the survey. (Reg. 8-34-301, Permit Condition 1826).
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3.5 If, after repairs of the GCS, the Well Gas Data at any well or collector 15 continue to show an oxygen concentration greater than 5 percent by volume, develop a probe monitoring plan to measure LFG content in the area surrounding such well(s) or collector(s). 16 Submit the probe monitoring plan, which shall include notice to the Air District to allow Air District personnel to attend the probe monitoring activity, to the Air District within 60 business 17 days of the last GCS repair done under subsections 3.2, 3.3, or 3.4, for review, comment, and approval by the Air District. Complete the probe monitoring survey within 30business days of 18 Air District approval of the probe monitoring plan, which shall not be unreasonably withheld, and submit the probe monitoring survey results report to the Air District within 7 business days 19 of Berkeley Landfill's receipt of the report and no later than 60 business days of District approval of the probe monitoring plan. If any such well(s) or collector(s) are determined by the 20 Air District to be collecting gas that is not representative of the LFG in the surrounding waste mass, locate the GCS damage causing the leak(s) and identify new GCS component(s) needed 21 to eliminate the leak(s). Submit an application to the Air District proposing an alteration to the LFG collection system to replace piping, replace landfill gas wells, replace collectors, and/or 22 install new landfill gas components, in accordance with direction by the Air District, within 60 business days of receiving such direction by the Air District. (Reg. 8-34-301, Permit Condition

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1826).

4. Within 60 business days of issuance of this Abatement Order submit to the Air District for approval, which shall not be unreasonably withheld, a proposed Work Plan (WP) for the collection of gas and laboratory analysis meeting all requirements of, and containing all, the information specified in subsections 4.1 and 4.2 below. (Reg. 8-34-301, Permit Condition 1826). The WP will include details for:

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4.1 Screening, collection, and testing gas at all existing permanent monitoring probes offsite of Cesar Chavez Park: Screening method to determine if methane is 5 present and measure methane content. For locations at which methane is detected, a collection and test plan, including the number and size of representative gas samples collected and test 6 methods to establish the source of the methane. The WP shall include at a minimum: collection protocols, advance notice to Air District of sampling to allow for Air District staff being 7 present, type of approved-container, chain of custody, and deadlines for laboratory submittal; analysis of gas content, including methane, other gas fractions, and specific volatile organic 8 compound (VOC) and toxic air contaminant (TAC) compounds by Methods ASTM D1946 and TO-15, and any other methods necessary to identify indicators of the source of methane gas. 9 For locations at which methane is not detected, a follow up monitoring schedule, including frequency and duration; methane-containing gas from follow up monitoring shall be collected 10 and submitted for testing. Deadlines for submittal of the initial field investigation report, results of ongoing monitoring, and laboratory analysis to the Air District. (Reg. 8-34-301, Permit 11 Condition 1826). 12 4.2 Collection and testing of LFG from the Berkeley Landfill: Collection and

4.2 Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of LFG from the Berkeley Landfill: Collection and testing of testing of representation and testing of representative LFG samples collected and well
14 locations in proximity to each offsite probe. The plan shall include at a minimum: collection protocols, advance notice to the Air District of sampling to allow for Air District staff to be present, type of approved container, chain of custody, and deadlines for laboratory submittal; analysis of gas content, including methane, other gas fractions, and specific VOC and TAC compounds by Methods ASTM D1946 and TO-15, and any other methods necessary to establish a fingerprint of the landfill gas. Deadlines for submittal of the field investigation report and laboratory analysis to the Air District. (Reg. 8-34-301, Permit Condition 1826).

17 5. Perform the sampling and collection of gas and initiate laboratory analysis in accordance with the approved WP. (Reg. 8-34-301, Permit Condition 1826). Complete within 60 business days of receiving Air District approval of the WP.

6. Submit laboratory analyses and field investigation report(s) to the Air District for the gases collected from the offsite monitoring probes and from the Berkeley Landfill by the deadlines specified within the approved WP. The field investigation report(s) shall contain all the information required in the approved WP. (Reg. 8-34-301, Permit Condition 1826).

Schedule a full inspection and servicing of the onsite flare by the flare manufacturer. (Reg. 8-34-301, Permit Condition 1826). Complete within 60 business days of issuance of this Abatement Order.

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8. Submit results of flare inspection and details of the servicing to the Air District
 within 30 business days of the inspection and servicing, including all details of the flare's

compliance and/or non-compliance with regulatory requirements. (Reg. 8-34-301, Permit Condition 1826). Complete within 90 business days of issuance of this Abatement Order.

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9. For a period of at least 3 months following any repair or replacement of any 3 component of the LFG collection system required under subsections 2, 3, 3.1, 3.2, and 3.3 and until the Well Gas Data oxygen content at every well and collector has remained no more than 4 5 percent by volume for at least 3 months, and for a period of at least 3 months following installation of all GCS components required by subsections 3.4 and 3.5, perform weekly 5 monitoring of well gas at all vertical wells, horizontal collectors, and trench wells in accordance with Regulation 8-34-604, determine wellhead pressure in accordance with 6 Regulation 8-34-608, and adjust or repair the wells and collectors as necessary to optimize gas recovery and minimize air intrusion. For a period of at least 6 months after weekly monitoring 7 has ceased, perform monthly wellhead monitoring and continue to adjust wells and collectors to optimize gas recovery and minimize air intrusion. If the oxygen content exceeds 5 percent by 8 volume at any well or collector, perform repairs and maintenance at those components to reduce oxygen content and revert to the weekly monitoring schedule. When all of Berkeley 9 Landfill's Well Gas Data demonstrate 6 months of continuous oxygen concentrations that do not exceed 5 percent by volume, Berkeley Landfill may revert to the monitoring requirements 10 in Regulation 8-34. Submit the monitoring results to the Air District within 5 business days following each monitoring event. (Regs. 8-34-301 and 8-34-303). 11 10. For the duration of the activities required under Section 9, perform monthly 12 monitoring for landfill gas leaks at all components containing landfill gas and for landfill surface leaks in accordance with the procedures in Regulation 8-34-602 and 8-34-607. 13 Immediately address and repair any leaks in excess of 8-34-301.2 and 8-34-303 standards and submit the results of the monitoring and repairs to the Air District within 2 weeks of the 14 monitoring event. (Regs. 8-34-301 and 8-34-303). 15 11. Any downtime of the LFG collection and control system that is reasonable in the determination of the Air District and required to conduct the actions specified under this 16 Abatement Order shall not constitute a violation of Reg. 8-34-301.1, provided the City of Berkeley provides documentation, if feasible in advance of the downtime events, including start 17 and stop time, reason, and actions taken. Submit such documentation to the Air District, in compliance with Regulation 8-34-118 and no later than 5 business days following each 18 downtime event if advance notice is not feasible. Nothing in this Section 11 exempts Permittee Berkeley Landfill from the requirements of Regs. 2-1-301 and 2-1-302. 19 A. The Hearing Board shall retain jurisdiction over this matter until February 5, 20 2025 or until Respondent Berkeley Landfill has met all the Compliance Action Conditions and 21 Increments of Progress set forth in Sections 1 through 11, whichever occurs first, unless this 22

Order is amended or modified.

23 24

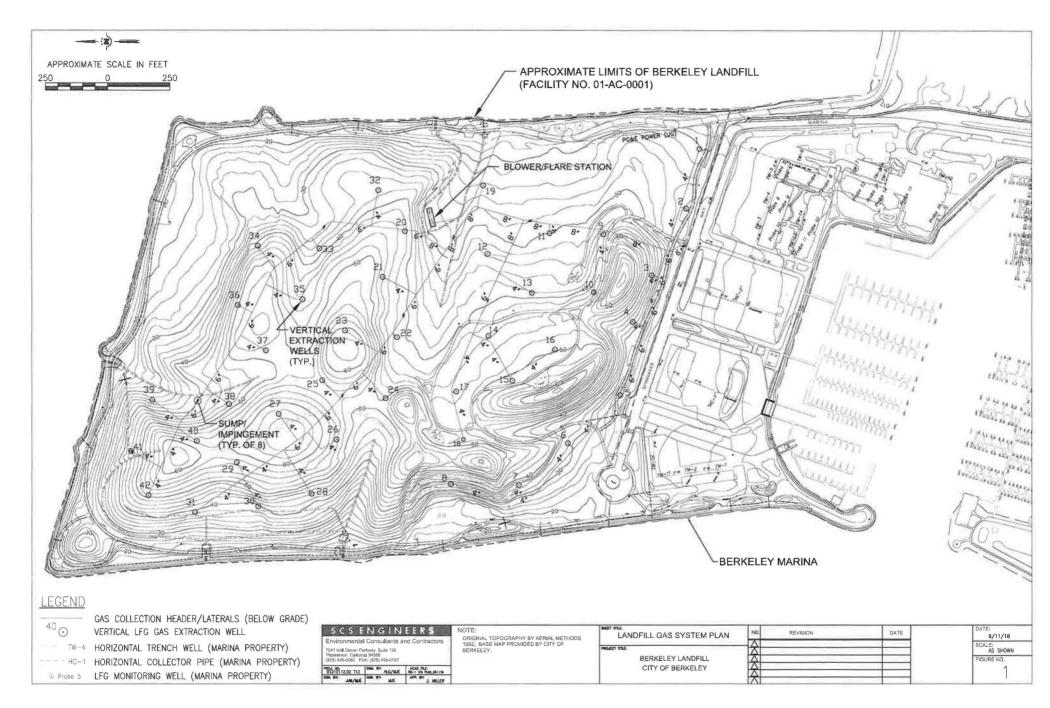
Β. The Hearing Board may modify this Order without the stipulation of the parties upon a showing of good cause, and upon making the findings required by HSC § 42451(a) and Hearing Board Rule § 4.13.

C. This Order is not and does not act as a variance. Respondent Berkeley Landfill is subject to all applicable rules and regulations of the Air District, and to all applicable California law. Nothing herein shall be deemed or construed to limit the authority of the Air District to issue Notices of Violation nor to seek civil or criminal penalties, or injunctive relief, or to seek further orders of abatement or other administrative or legal relief.

Dated: February <u>16</u>, 2024

amento By: Calerie Q.

Valerie J. Armento, Esq. Hearing Board Chair Bay Area Air Quality Management District



1	BEFORE THE HEARING BOARD					
2	OF THE					
3	BAY AREA AIR QUALITY MANAGEMENT DISTRICT STATE OF CALIFORNIA					
4	In the Matter of the Docket No: 3747					
5	AIR POLLUTION CONTROL OFFICER of) CERTIFICATE OF SERVICE					
6	the BAY AREA AIR QUALITY) MANAGEMENT DISTRICT					
7	vs. FILED					
8	BERKELEY LANDFILL ) FEB 16 2024					
9	STATE OF CALIFORNIA )					
10	City and County of San Francisco ) ss.					
11	I, Marcy Hiratzka, do hereby certify under penalty of perjury as follows: That I am a citizen of the United States, over the age of 18 years and not a party to the above-					
12	entitled action; that I served a true copy of the attached <b>Findings and Decision for Order of</b> <b>Abatement</b> on:					
13						
14	Marc Shapp, Deputy City Attorney City of Berkeley					
15	2180 Milvia St., Ste. 4					
16	Berkeley, CA, 94704 <u>mshapp@berkeleyca.gov</u>					
17	via email and USPS Certified Mail on February 16, 2024, and on:					
18	Joel Freid, Esq., Assistant Counsel					
19	Bay Area Air Quality Management District 375 Beale Street, 6 <sup>th</sup> Floor					
20	San Francisco, California 94105 jfreid@baaqmd.gov					
21						
22	Λ					
23	via email on February 16, 2024					
24	DATED: February 16, 2024					
25	Marcy Hiratzka Clerk of the Boards					
26						
27						
28						
	CERTIFICATE OF SERVICE Page 1					

**California Environmental Protection Agency** 

Gavin Newsom California Governor



Jared Blumenfeld Secretary for Environmental Protection Rachel Machi Wagoner CalRecycle Director

Via Email

December 22, 2023

Ms. Mary Skramstad MSkramstad@berkeleyca.gov City of Berkeley Engineering Division Department of Public Works 1947 Center Street, 4th Floor Berkeley, California 94704

### SUBJECT: Landfill Gas Monitoring and Control at Berkeley Landfill, Virginia St and Marina Blvd, Berkeley, Alameda County (SWIS #01-AC-0001)

Dear Ms. Skramstad:

CalRecycle is in receipt of your consultant SCS Engineers' letter dated October 12, 2023, in response to our letter dated July 14, 2023. In the letter we requested four action items from the City of Berkeley (City). Our current understanding of each action item is presented below:

1) **Gas Speciation** - The City agreed to perform additional sample collection and analysis to evaluate the source of the gas. The City reported that the details of this testing would be provided to CalRecycle and the City proposed to submit a work plan to CalRecycle by November 21, 2023.

CalRecycle expected to receive the proposed work plan from the City by November 21, 2023. On December 8, 2023, CalRecycle emailed the City requesting a status update of the work plan because it had not been received. In a December 13, 2023 email, the City stated they were waiting for a response from CalRecycle prior to initiating the work plan and proposed a new submittal date of February 23, 2024. **Submit a work plan to CalRecycle by February 23, 2024 to evaluate the source of the combustible gas.** 

2) Additional Gas Monitoring Probes - The City stated that the current network of probes sufficiently monitors the subsurface around the Double Tree for potential combustible gas. CalRecycle will consider the results of the gas speciation project prior to making a determination of probe adequacy. Berkeley LFG Monitoring December 22, 2023 Page 2 of 2

3) **Boring Logs & As-Built Diagrams** - Provide all available boring logs and as-built diagrams of landfill gas (LFG) monitoring probes.

The City indicated that to the best of their knowledge, they do not have boring logs. The City stated that the 1989 engineering drawing in Appendix B of SCS Engineers' October 12, 2023 letter is the as-built diagram. California Water Code section 13751 requires well completion logs to be filed with the Department of Water Resources within 60 days of completion of the work. While these probes may not be subject to that requirement, it is still a common business practice for drillers and environmental consultants to file well completion logs with the Department of Water Resources. **The City may wish to check with the Department of Water Resources or the local city or county office responsible for drilling permits to determine if well completion logs for this site are on file.** 

4) **Trench Collector Gas Data** - Provide all trench collector gas data consistent with the 2009 approved LFG monitoring and reporting procedures.

The City agreed to add the monthly trench data to the monitoring reports submitted quarterly to CalRecycle. **CalRecycle concurs with this approach.** 

If you have questions, please do not hesitate to contact me at (916) 341-6804 or catherine.blair@calrecycle.ca.gov.

Sincerely,

Catherine Blair, Manager Solid Waste Enforcement Section CalRecycle

CC:

Joel Freid, Bay Area Air Quality Management District: JFreid@baaqmd.gov

Tamiko Endow, BAAQMD: TEndow@baaqmd.gov

Daniel Oliver, BAAQMD: DOliver@baaqmd.gov

Rebecca Lucero, SCS Engineers: <u>RLucero@scsengineers.com</u>

Stephen Harquail, SCS Engineers: <u>SHarquail@scsengineers.com</u>

Srinivas Muktevi, City of Berkeley: <u>SMuktevi@berkeleyca.gov</u>

Marc Shapp, City of Berkeley: <u>MShapp@berkeleyca.gov</u>

1001 I Street, Sacramento, CA 95814 | P.O. Box 4025, Sacramento, CA 95812 www.CalRecycle.ca.gov | (916) 322-4027





# San Francisco Bay Regional Water Quality Control Board

January 18, 2024 GeoTracker ID: <u>L10006224883</u> (FY)

City of Berkeley Department of Public Works, Engineering Division Attn: Mary Skramstad 1947 Center St., 4<sup>th</sup> Floor Berkeley, CA 94704 Sent via email only: <u>mskramstad@berkeleyca.gov</u>

# Subject: Berkeley Landfill, Berkeley, Alameda County – Requirement for Technical Reports Pursuant to Water Code Section 13267

Dear Mary Skramstad:

This letter requires the City of Berkeley to submit technical reports regarding the Berkeley Landfill (Landfill) due to our recent discovery of information suggesting the Landfill may have accepted industrial waste materials that could present a risk to human health and/or the environment. **Pursuant to Water Code section 13267, this letter requires the City of Berkeley to submit a Work Plan by April 1, 2024, and a Completion Report within 90 days of implementation of an approved Work Plan**. The requirements and basis for them are explained below.

# Background

The Landfill is an approximately 90-acre site located in the City of Berkeley, California. The Landfill began accepting non-hazardous municipal solid waste in 1961 and continued operations until 1983. The Landfill was closed in phases between 1981 and 1990. The Landfill is regulated by the Regional Water Board under Waste Discharge Requirements Order R2-2010-0064.

Recently, the Department of Toxic Substances Control (DTSC) provided us information indicating that industrial waste materials were deposited at the Berkeley Landfill (see attached letter from Stauffer Chemical Company). Table 1 contains a summary of industrial wastes generated by the Stauffer Chemical Company at its plant in Richmond (later known as Zeneca) and disposed at nearby landfills, including the Berkeley Landfill. This summary indicates that 11,100 tons of industrial waste from the Zeneca Richmond plant were disposed of at the Berkeley Landfill.

The letter from Stauffer Chemical indicates that this waste from the Zeneca Richmond plant contained a substantial amount of "alum mud," which is a sludge left over from the

JAYNE BATTEY, CHAIR | EILEEN M. WHITE, EXECUTIVE OFFICER

processing of aluminum from bauxite ore. The primary waste constituents in alum mud include heavy metals and trace metals including iron, manganese, magnesium, zinc, cadmium, copper, trivalent chromium, and lead.

Alum mud also typically contains certain radionuclides that are naturally present in bauxite. During aluminum processing, these radionuclides become concentrated and are known as "technologically enhanced naturally occurring radioactive material" or TENORM. Some of these radionuclides, especially thorium-232, uranium-238, and uranium-235, and their breakdown products, have been detected at the Blair Southern Pacific Landfill in Richmond, which also received alum mud from the Zeneca plant in Richmond. Pesticides were also produced at the Zeneca Richmond plant and have been detected at the Blair Landfill. As shown in Table 1, the Berkeley Landfill also accepted a significant volume of wastes from the Zeneca plant, so it is reasonable to suspect that the chemicals that have been detected at the Blair Landfill.

Locations of Alum Mud Disposal	Total Waste Disposal Timeframe	Total Waste Disposal Weight
South End of Richmond Plant (Richmond, CA)	1900 to 1958	18,700 tons
Albany Landfill Co. (Albany, CA)	1960 to 1971	11,100 tons
Berkeley Landfill Co. (Berkeley, CA)	1960 to 1971	11,100 tons
Blair Southern Pacific Landfill (Richmond, CA)	1971	6,200 tons (all alum mud)
IT Environmental (Benicia, CA)	1975 to 1979	3,700 tons

Table 1. Wastes Generated at Zene	eca Plant in Richmond
-----------------------------------	-----------------------

The documented disposal of 11,100 tons of industrial waste (presumably including alum mud) from the Zeneca Richmond plant was not known at the time the WDRs were adopted for the Berkeley Landfill. Nor was the presence of radionuclides in alum mud understood by the Water Board at that time. The documentation of alum mud disposal at the Landfill, and the confirmation of radionuclides and pesticides present at the Blair

Southern Pacific Landfill, suggest that the wastes contained within the Berkeley Landfill have not been thoroughly characterized for all potential contaminants that may be present.

### **Requirement for Work Plan and Completion Report**

By April 1, 2024, the City of Berkeley is required to submit a Work Plan that proposes to perform an initial, one-time representative sampling of soil and water from within the Landfill. The collected samples should be analyzed for the following because these are chemicals present in the alum mud disposed at the Blair Landfill: radionuclides (including, but not limited to, thorium-232, uranium-238, and uranium-235); and pesticides (including, but not limited to, 4-4'-DDT and dieldrin). Metals analysis is not necessary due to the minimal concentrations of metals in groundwater and the absence of an increasing trend in metals concentrations. This conclusion is based on a multi-year trend analysis of metals the City of Berkeley completed in 2018.

Within 90 days of implementation of an approved Work Plan, the City of Berkeley is required to submit a Completion Report that summarizes the results of the sampling and analysis. Depending upon the results of the soil and groundwater characterization, additional work may be required.

### **Basis for Requirement**

This requirement for reports is made pursuant to Water Code section 13267, which allows the Water Board to require technical or monitoring program reports from any person who has discharged, discharges, proposes to discharge, or is suspected of discharging waste that could affect water quality. The attachment provides additional information about Section 13267 requirements.

The reports required by this letter are necessary to assess the presence of suspected contaminants at the Landfill and to assess any immediate threats to water quality, human health, and the environment. The City of Berkeley is required to submit the reports because information recently received indicates that it may have accepted hazardous or toxic materials at the Landfill that could discharge into waters of the state. The burden, including costs, of the reports bears a reasonable relationship to the need for the reports and the benefits to be obtained from the reports. The estimated cost of preparing the reports is from \$100,000 to \$200,000. Given the potential threats to waters of the state, human health, and the environment, the need for these reports is high. The benefits to be obtained from the reports include understanding the potential threats to human health, water quality, and the environment so that any unacceptable threats can be appropriately addressed. The evidence that supports requiring the reports is contained in the file for this matter.

### **Electronic Reporting**

The City of Berkeley is required to submit all reports and data in electronic format to the State Water Resources Control Board's GeoTracker database, pursuant to California

Code of Regulations, title 23, sections 3890–3895. See <u>Electronic Submittal of</u> <u>Information</u> for guidance on submitting documents to GeoTracker. This requirement includes all analytical data, monitoring well information (latitudes, longitudes, elevations, depth and length of screened interval, and water depth), site maps, and boring logs. Analytical data must be submitted in Electronic Deliverable Format (EDF) and be in accordance with the <u>GeoTracker Guidance Letter on Reporting of Estimated Results in</u> <u>EDF</u>.

If you have any questions, please contact Fangli Yin of my staff at (510) 622-2406 or <u>fangli.vin@waterboards.ca.gov</u>.

Sincerely,

Eleen M. White

Eileen M. White, P.E. Executive Officer

Attachments: Stauffer Chemical Company letter dated March 20, 1980 Water Code Section 13267 Fact Sheet

4-9-80 FB Stauffer Chemical Company

AGRICULTURAL CHEMICAL DIVISION



1415 South 47th Street / Richmond, California 94804 / Tel. (415) 233-9361

March 28, 1980

Department of Health Services Hazardous Materials Management Section 714/744 "P" Street Sacramento CA 95814

APR 0 1 1980 California 🕫 38.5 of Health Services CAMEN

Gentlemen:

This is in response to your March 4 request for information on hazardous waste disposals. We are enclosing the information supplied to the House Subcommittee on Oversight and Investigations for the Stauffer Chemical Company plant located at 1415 South 47th Street, Richmond California.

Verv Truly Yours, rimpe

Enclosure as stated

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$\sim 10^{-1}$	(IN NOT USE)
	FORM A: GENERAL FACILITY INFORMATION
	Company Name: Stauffer Chemical Company
	Facility Name: Richmond Ag
	Address: 1415 South 47th Street
4	No. Street Richmond CA 94804
	City State Zip Code
	Name of Person Completing Form: Lee E. Erickson
	Position:Plant Manager
	Phone Number: (415) 231-1392
	1. Year Facility Opened 19 [0] 0] (10-11)
	2. Primary SIC Code ,
	3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
	thousand gallons
	hundred tons
	thousand cubic yards
	4. Estimate (in whole percents) how these process wastes
	generated in 1978 were disposed of:
	in landfill[0]5](42-44)
	in pit/pond/lagoon [1]5] (45-47)
	in deep well [ [ 10] (48-50)
	incinerated
	evaporated
	(57-53)
	other (Specify )
	5. What is the total number of known sites (including disposal on the
	property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since
	1950?
	6. Have any of the process wastes generated at this facility been
•	hauled (removed) from this facility for disposal? (Yes=1; no=2) [1] (69)
χ <del>α</del> .	IF YES, COMPLETE FORM "C"
	7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2)
	IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR MIC TOOK WASTE TO AN UNKNOWN LOCATION
	8. Specify the earliest year represented by information from company
	or facility records supplied on this and other forms
	knowledge supplied on this and other forms

· **1** 

IV.M B:	DI SPOSAL	SETE	INFORMATION

· • "

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

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Current Owner (if Address:	different fr	om above):	<u> </u>	<del></del>	e References and	
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· · · · · · · · · · · · · · · · · · ·	city	·	+0+0			
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2. Ownership at	time of use (	1= company own	nership; 2=priv	vate but not	•	
3. Current statu	snip) s=public s (l= closed)	c ownersnip) 2= ctill in y	$\cdots$	· · · · · · · · · · · · · · · · · · ·	* * * * * * * *	2 (11)
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4. Year first us	ed for process	s waste from 1	this facility .		1916	10(15-16)
5. Year last use	d for process	waste from the	nis facility (e	enter "79" i	f	
• still in use)					19 <u>i 7</u>	<u>11 (</u> 17-18)
6. Total amount	or process was	ste from this	facility dispo	used at site	: 	· • • • • • • •
		bundred to	gallons ms			(19-26)
	•	thousand c	ubic yards	<u></u>		(27-53)
7. Specify type(	s) of disposal	l method(s) us	sed at site and	l whether me	thod	
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	$\underline{\mathbf{B}} - \underline{\mathbf{Pape 2}} \qquad ( \underline{\mathbf{L}} - \underline{\mathbf{L}} + \underline{\mathbf{L}}$
Version of the former	Company Name:Stauffer Chemical Co
	Facility Nume: Richmond Ag Plant
	Site Name: Albany City Dump
	9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)
	FILL IN EVERY BLOCK SPACE
	<pre>Acid solutions, with pll&lt;3</pre>
	zinc, cadmium, copper, chromium (trivalent)
	uranium residuals & residuals for UF <sub>6</sub> recycling
	insectides & intermediates
	halogenated aromatics       [2] (40)         acrylates & latex emulsions       [2] (41)         PCB/PBB's       [2] (42)         amides, amines, imides       [2] (43)         plastizers       [2] (44)         resins       [2] (45)
	elastomors
	solvents halogenated aliphatic
	aloxins       [2] (57)         Inorganics       [1] (58)         salts       [1] (59)         mercaptans       [2] (60)         Misc       [2] (61)
	pharmaceutical wastes paints & pignents catalysts (eg. vandium, platinum, palladium) asbestos bock sensitive wastes (eg. nitrated tolumnes)
	air water reactive wastes (eg. P <sub>1</sub> , aluminum chloridc)
	* . Dry Alum Mud. Insolubles
	Copper30 ppmChromium +6200 ppmLead100-200 ppmChromium +314.5 ppm
-	Asbestos 40 ppm

SIGNAL BRAND DUSTING SULFUR SPECIAL ELECTRIC BRAND REFINED SUPER-ADHESIVE DUST STAUFFER CHEMICAL COMPANY LABELING & REGISTRATION DEPT. MANUFACTURING CONCENTRATE M . S. D.CONNOR CAPTAN SP 4 FLOWABLE SEED PROTECTANT Captan 10 dust CAPTAN-SIGNAL SULFUR 15-35 DUST CAPTAN-SIGNAL SULFUR 15-50 DUST CAPTAN-SULFUR 10-50 DUST CARBON DISULPHIDE REFINED CLENESCO A-O CLENESCO A-O CLENESCO CHLORINATED CLEANER CLENESCO CLEAR CLENESCO CALAR CLENESCO SANITIZER CLENESCO SANITIZER DEVRINGL 10G DEVRINGL 2-E ORNAMENTAL MAUNETIC & FLOWABLE SULFUR CAPTAN 4 FLOWABLE Captan 50 WP Captan 75 Seed Protectant Captan 86 Seed Protectant ÚEVRINOL 50-4P DEVRINOL 50-4P DEVRINDL 50-4P ORNAMENTAL DYFONATE 10.6 DYFONATE 4-E EPTAM 5 G 33402 STAUFFER LHEMICAL COMPANY ATTN G0052 G0219 AA 33402 CLENESCO NOVADINE + 50-WP 38659 STATE SURGICAL SUPPLY CD. 00283 00004 4A 38659 |GERMICIDAL SULUTION TRITHION TECHNICAL TRITHION 8-E BETASAN TECHNICAL BETASAN 12.5 G EPTAM 87.8 / MU FOLPET PHALTAN SUTAN + 6.7-E IMIDAN 50-WP ORDAAM 10.6 CRDRAM 6-E BETASAN 4-E FYBRFLUF GT RO.NEET 6-E PREFAR 4-E ING SULFUR TILLAM 6-E VERNAM 7-E ц Г Ф 1--MILDUPRUF BIO-STAT EPTAH EPTAM VAPAN ¥ ¥ ¥ 2 ¥ 3 4 ≯ \$ ¥ A. AA ¥ ۷V ¥٨ ٩v 4 4 4 4 5 00476 00254 00476 00254 00476 02106 001997 00197 01956 01817 02122 01867 00655 01839 50020 01198 00676 01286 02056 01609 62156 02155 00581 02041 02149 02126 02129 02124 50196 02150 02108 50195 01995 C13 C7 02165 02157 02153 01917 02004 61979 01615 02162 C1633 66859 02128 02145 50194 02154 01054 02127 01932 50021 02107 0000 00475 00475 00475 00476 00476 00476 00476 00476 30476 30476 30476 30476 30476 30476 50476 00476 00476 30476 91400 00476 0047.6 00476 C0476 00476 00476 C0476 00476 60476 00476 0676 97400 00476 0476 0476 00476 0476 00476 0476 0476 0476 00476 0476 004-76 00476 9446 03476 0476 00476 00476 -67-FURNULA 300 SMIMMING POOL ALGAECIDZ FURNULA 300 SMIMMING POOL ALGAECIDZ RMK-308 RODENTICIDE 50K MULTI-PURPOSE INSECT KILLER STATE BRAND FORMULA 267-9 PARCH NON-SELECTIVE HERB VEGETATION KILL STATE CHEMICAL MFG. COMPANY, THE STATE CHEMICAL MFG. COMPANY, THE WEED AND BRUSH KILLER FORMULA 190.NON SELECTIVE WEED AND BRUSH KILLER FORMULA 238 SYS-TEM - SYSTEMIC GRANULAR INSECTICID JTAAEAR DELNAV EXTRA LIVESTOCK SPRAY AND DIP STANBAR FEEDLOT FOG STANBAR FOEDCT FOG STANBAR FOGGER STARBAR GOLDEN MALRIN FLY SPRAY STARBAR GOLDEN MALRIN LIQUID EMULSIFIABLE CONCENTR WITH MUSCAMON STATE FORMULA 236 TERG-O-CIDE STATE FORMULA 236 TERG-O-CIDE STATE FORMULA 256 IKS - INSECT REPELLENT SPRAY STATE FORMULA 296 STATE ROACH AND ANT KILLER STATE FORMULA 299 KASS STATEBRAND FORMULA 289 KURE FUNGICIDE STATEBRAND FORMULA 324 DZ-I25 ED FORMULA) NG ACTING REFILL 01P Itate of California Det 3 7000 : Aquiculture Retreide Cegio. # Book. COLLEGE LABDRATORIES MAGIC CIRCLE DEER RÉPELLENT MAGIC CIRCLE RABBIT REPELLENT FORMULA 271 SE-LECT Ϋ́Ξ ICIDE STATE Taken from: ATE 1978 02724 00095 AA 11787 00201 00310 2B 11787 02724 00201 AA 11787 02724 06082 2A 11787 02724 06140 AA 11787 STATE 02724 06162 AA 11787 01476 02043 AA 11787 AA 01645 AA Ulta5 04704 00003 AA 04764 00003 AA 04764 06002 AA 44 ¥¥ Å A A A A 4 4 4 4 ٨A \*\* Ş 4 ¥ 01685 01685 00043 A 01685 00049 A 01685 00045 1 01685 00075 1 01685 00040 1 01685 00040 1 01685 00063 1 01685 00073 1 10900 00019 . 01685 00065 / 00655 00476 / 01685 00040 01685 00040 01685 00072 01685 00069 01685 00071

I JAM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950. . 2

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(1-8)

					. ,	٠	
C	ompany Name:	Stauffer C	hemical Co	<b>.</b> .	· .		
Fa	acility Name	Richmond A	lg Plant				-
	ame of Site:		and Slag	Disposal	· · · ·	`	`
240	ddress of Si	<u> </u>	47th Stre street	et	· · · · · · · · · · · · · · · · · · ·	·	
	,	no	Stidet		•	,	
		Richmond		CA	94804		
		city		state	zip code		
Na	ame of Owner	(while used by f	facility):	Stauffor (	Chemical Co		
, Ad	dress:	1415_South	47th	, caurier ,	CHEMICAL CO	<u> </u>	
		no.	street			<u>_</u>	
		Richmond		CA	94804		
	• <u> </u>	city		state	zip code		
. Cu	rrent Owner.	(if different fr	om above);			1	a san ta san sa
	dress:			· · · · · · · · · · · · · · · · · · ·		<u> </u>	
	÷ 1,	no.	street	•			
						÷ *	
		city		state	zip code		,
	•			•			
1.	Location (	I= the property	on which fac	ility is 1	ocated: 2= of	ff-site)	171(10)
2.	Ownership	at time of use (	l= company c	wnership:	2=private but	t not	
7	company ow	nership) 3=publi	c ownership)		•••••••••••••••••••••••••••••••••••••••		[1] (11)
5.	current st	atus (1= closed; IF CLOSED, speci	Z≕ SELLL IN fy year clos	iuse; 9=do ed	n't know}		(12)
4.	lear first	used for proces:	s waste from	i this faci	lity	70	$\frac{15}{19}$ (15-14)
5.	iear last	used for process	waste from	this facil	ity (enter "7	79" if	<u>D;0</u> ;(~~ ~0)
6.	Still in u	se) nt of process was	to from the	· · · · · · · · · · · · · · · · · · ·			5191 (17-18)
۰.	Total amou	it of process was	thousand	s facility	disposed at	site:	(19-26)
		•	hundred	tons		11111	11 141 (27 - 33)
.,	. C		thousand	cubic var	ds	1 1 1 1 1	(34-41)
1.	is still in	pe(s) of disposal use (l=current]	l method(s)	used at si	te and whothe	rimethod	
	9=don't kno	v use (i−current; ow)	ty in use, z	-no ionger	in use; s=ne	ever usea;	
		•	landfill	, mono indu	ustrial waste		[3] (42)
			landfill	, mixed ind	dustrial wast	е	(45)
		. <i>•</i>	landfill	, drummed w	waste 1 refuse co-d	· · · · · · · · · · · · · · · · · · ·	3 (44)
			pits/pon	ds/lagoons	·····	rsposed	3 (45) 3 (46)
	•		deep wel	1 injection	1		131 (47)
			land fam	ming			[3] (48)
			treatmen	tion	ralizing)	• • • • • • • • • • • • •	<b>3</b> (49)
			reprocess	sing/recyc]	ling	***********	3 (50) 3 (51)
•			orner (s	300111111			3 (52)
8.	USCIS OF the	is site (l=this only; 3=this com	facility; 2:	this facil	lity and othe	r company	
		·				• • • • • • • • • • • •	11 (53)
	LIST NAMES	AND ADDRESSES O	F OTHER KNOW	IN USERS BE	LOW		
	Ŧ	· .		-	• •	· •	
					:		1. A.
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	., .	• •				2	
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с <sup>1</sup> .		1			а 	•	و منصفه
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		. '					
FOIÑ	TH CONTINUE	) ON SECOND PAGE				2	111 /001
				-			<b>{ 1 1</b> (80)

B - Page 2

Company Ramo: Stauffer Chemical Co.

Facility Name: \_\_\_\_\_\_ Richmond Ag Plant\_\_\_\_

Site Name: CS<sub>2</sub> Retort and Slag Disposal

 Components (or characteristics) of process waste from this facility disposed at site: (1<sup>spresent</sup> in waste; 2=not present in waste; 9=don't know)

#### FILL IN EVERY BLOCK SPACE

And Share and a factor of the statements of the	11101
Acid solutions, with pll<3 12	L (Tru)
pickling liquor	[ [11] -
metal plating waste	i (12)-
circuit etchings	113
	동꽃
inorganic acid munufacture	U.U.
organic acid manufacture t2	(35)
Base solutions, with $pli > 12$	(16)
caustic soda manufacture	(17)
mylon and similar polymer generation	
ny ion and spattar borough generation surface and surface to the first state and the state of th	GSI.
scrubber residual 2	(J.9) -
Heavy metals & trace metals (bonded organically & inorganically) 11	(20)
arsenic, selenium, antimony [9]	(21)
mercury	(22)
	201
iron, manganese, magnesium 1	(23)
zinc, cadmium, copper, chromium (trivalent)	(24)
chromium (hexavalent)	(25)
lead	(265)
Radioactive residues, >3 pico curies/liter	(22)
Kaulonchive restaues, 25 pico carles, inter	(47)
uranium residuals & residuals for UF6 recycling	(ZS)
lathanide series elements and rare earth salts	·(2 <u>9</u> ) -
phosphate slag	.Č305 -
thorizon	22:5
Modium	(22)
rodium	(.)_j
other alpha, beta & gamma emitters	(33)
Organics	(34)
insectides & intermediates [2]	(35)
herbicides & intermediates [2]	(35)
function of an example of a	17-15
fungicides & intermediates [2]	(37)
rodenticides & intermediates	(38)
halogenated aliphatics [2]	(39)
halogenated aromatics	(40)
acrylates & latex emulsions [2]	24.5
PCB/PBB's	(12)
$1 \text{ Cm}^{-1}$	(9-)
amides, amines, imides	(45)
plastizers	(44)
resins	(45)
clastomers	1465
solvents polar (except water)	27
Solvenes $\mu$ and $\mu$ (except where $\mu$ , $\mu$ ) $\mu$ (2)	(47)
carbontetrachloride [2]	(40)
trichloroothyleng	(49) -
other solvents nonpolar	(50)
solvents halogenated aliphatic	7515
solvents halogenated aromatic 121	(0.)
solutions with definition of the first state of the second state o	(34)
oils and oil sludges [2]	(5.5)
esters and others	(54)
alcohols	(55)
ketones & aldelydes	1565
dioxins	7571
Thore is a second sec	
Inorganics 1	(5)
salts	(59)
morcaptans	(60)
Misc	(61)
pharmacentical wastes	16.55
wainte $\ell$ niamate	(0.5)
paints & pigments [2]	(0.5)
catalysts (eg. vonadium, platinum, palladium)	(64)
asbestos	(65)
shock sensitive wastes (eg. nitrated toluenes)	(66)
air water reactive wastes (eg. P4, aluminum chlorid	ass
wastes with flash point below 100° B	160
manda actal and point born ave free contraction of the second state 2	$T_{03}$ )

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1 5 1		14 ° 7 ° .		•	7			, thereas
<b>1</b>	1.	1		. ,	V.			[ ] (1-8)
		TORM B: DISPOS	AL SITE INFORM	NTION		ŕ	(DO NOT USI	
		COMPLETE THE	FORM FOR EVER	Y STTE (INC	LUDING THE	LOCATION OF	· · · ·	
		WASTES GENERA	( AS ONE SETE) (TED BY THIS FA	CTLITY SINCE	3 1950,	UP PROCESS		
÷,		· · · · · · · · · · · · · · · · · · ·		,	· · · · · · · · · · · · · · · · · · ·		*	
	-	Company Name:	Stauffer (	<u>Chemical C</u>	o	· · · · · · · · · · · · · · · · · · ·		
· · ·		Facility Name: Name of Site:	Richmond / Evaporatio		·		,	· ,
4-		Address of Site	: 1415 South	1 47th St.				, .
		• •	no.	street	<b>61</b>	94804		•
			Richmond city		<u>CA</u> state			
• -,		Name of Owner (	while used by	facilitvì:	Stauffer	Chemical Co.	•	
. 1		Address:	1415 South	47th Str			_ _	
· · ·	-	•	no.	street		,		
		<del></del>	Richmond city		<u>CA</u> state	94804 zip code	-	
taan oo faan oo san si S	n: 1. 2011, 75, 7	Current Owner (	and the second	rom above):_		ng hutang Dingta din- ang-ang-ang tangga ding-	er en an andre en sele 🛥 💿 e	an
	-	Address:	no.	street	•		<b></b>	
						•	•	· ·
· · · · ·		· · · · · · · ·	city		state	zip code		
							ال مناهم)	1. j. (10)
		1. Location (1 2. Ownership a	t time of use	on which ra (1= company	ownership;	located; 2= of 2=private but	not	
		company owne 3. Current star	ership) 3-publ:	ic ownership	)			1 (11) 121(12)
-		: I	F CLOSED, speci	fy year clo	sed			5:6:(13-14)*
		<ol> <li>Year first i</li> <li>Year last us</li> </ol>	used for proces sed for process	s waste iro waste from	m this faci. this faci.	lity (enter "7	19 <u>65</u> 9" if	0 (15-10)
• `		<b>5.</b> Total amount	c)	ste from th	is facilit	y disposed at	19 <u>6</u> site:	<u> 6[(17-18)</u>
·			C OF Process we	thousan	d gallons			(19-26)
		۰ ۲۰۰۰ ۲۰۰۰ ۲۰۰۰	. 1 3	• <b>t</b> housan	d cubic ya:			(34-41)
		7. Specify type				ite and whethe r in use; 3=ne		· ************************************
, 'ı		9=don't know			, ,			( ) ( ( ) )
						dustrial waste idustrial wast		(42) (45)
			· .			waste al refuso co-d		3 (44) 3 (45)
		•	<i>.</i> .	pits/po	nds/lagoon:	5		2 (46)
			. ·	land fa	ming	on	• • • • • • • • • • • • • • • • • • •	3 (47) 3 (48)
			-			stralizing)		3 (49) 3 (50)
	:	•		reproce	ssing/recy	cling	• • • • • • • • • • • • •	3 (5)
	,	8. Users of thi	is site (l=this	facility;	specify) 2=this fac:	ility incothe	r, company	3 (52)
		facilities of	mly; 3=this co	apany and o	thers; 9=de	on't know)	• • • • • • • • • • • •	L1 (53)
		LIST NAMES	AND ADDRESSES	OF OTHER KN	OWN USERS I	MELOW		
				÷				
		* Used a	s evaporati	on ponds c	nly since	1966.		
	•		<b>S - -</b> -		· · · · · · · · · · · · · · · · · · ·	• •		
		• 4			*		• _	,
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		•		•			· * •	

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	- 6 -	Page.	-2
- · · ·			_

Company	Namo:	Stauffer	Chemical	Co.

Facility Name:	Richmond Ag Plant	•

(1-8)

Site Name: Evaporation Ponds

9. Components (or characteristics) of process waste from this facility disposed at site: (l=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

•	•	1			
	Acid solutions, with pH<3			2	(10)
	pickling liquor			12	i (11)
	metal plating waste			12	1(12)
	circuit etchings				(13)
	inorganic acid manufacture				i $(14)$
	organic acid manufacture			(2	
	Base solutions, with pH> 12,		* * * * * * * * * * * * *	12	(16)
	caustic soda manufacture				
	nylon and similar polymer generation			•••••	$\int \left( \frac{1}{2} \frac{1}{2} \right)$
	scrubber residual	analla C incorrent	• • • · · • • • • • • • • • • • • • • •	•••• [1	J (20)
	Heavy metals & trace metals (bonded organi	scally 4 inorgan	rcertty,	···· [i	(20)
	arsenic, selenium, antimony		• • • • • • • • • • • • • • • • • • •	12	(21)
	mercury				
٠	iron, manganese, magnesium			···· [ <u>]</u>	(23)
	zinc, cadmium, copper, chromium (triva	lent)	• • • • • • • • • • • • •	[9]	[ (Z4')
•	chromium (hexavalent)				
	lead			19	(26) -
	Radioactive residues, >3 pico curies/liter	• • • • • • • • • • • • • • • • • • • •		[2]	(27)
	uranium residuals & residuals for UP6	recycling		2	j (28)
	lathanide series clements and rare car	th salts		2	J (29)
	phosphate slag				
•	thorium				
÷	radium				
	other alpha, beta & gamma emitters				
	Organics			[2]	(34)
	insectides & intermediates				
	herbicides & intermediates				
	fungicides & intermediates			12	(37)
	rodenticides & intermediates			12	(38)
	<ul> <li>halogenated aliphatics</li> </ul>			12	(39)
	halogenated aromatics				
	acrylates & latex emulsions				
	PCB/PEB's				
	amides, amines, imides				(43)
	plastizers				(44)
	resins				
	elastomers				
	solvents polar (except water)				(47)
	carbontetrachloride				(48)
	trichloroothyleno			12	(49)
	other solvents nonpolar			12 1	1501
	solvents halogenated aliphatic			121	
	solvents halogenated aromatic			12	(52)
	oils and oil sludges		• • • • • • • • • • • • • •	12	(53)
	esters and others				
	alcohols				
	ketones & aldehydes				
	dioxins			🖾	(57)
	Inorganics				
	solts			· · · · [ <u>L</u> ]	(30)
		• • • • • • • • • • • • • • • • •	• • • • • • • • • • • • • •	· · · · <u>i</u>	(60)
	mercaptans	*************	*****		
	Misc.	*************	*********	[2.]	
	pharmacoutical wastes	• • • • • • • • • • • • • • • • • • •	******	12	(04)
	paints 4 pigments	· · · · · · · · · · · · · · · · · · ·	*********	12	103)
	catalysts (eg. vanadium, platinum, pal			<u>p</u>	j (04)
	asbestos		• • • • • • • • • • • • • • •		(05)
	shock sensitive wastes (eg. nitrated to	DIUCHOSJ:	••••••	· • • • <u>P_ ·  </u>	l (00)
	air water reactive wastes (eg. P4, alu	niuum chloride)		· · · · <u>p</u>	<b>j (</b> 67) –
	wastes with flash point below 1000 P.,			<u>p</u>	<b>[ (</b> 68)-

	1		*	• • • • • • • • • • • • • • • • • • • •	,, .	•	·	
			• •	(	.'	t		(1-8)
$\sum_{i=1}^{l}$	<u>, n</u>	DRM B: DYSPOSA	L SITE INFORMATI	ON			(IN NOT USE)	
	1	THIS FACILITY .	FORM FOR EVERY S AS ONE SITE) USH ED BY THIS FACTL	id for the l	DISPOSAL OF F		ہ ب ب	
X ]			•.			4	•	. *
	Га	mpany Name: cility Name: me of Site:	Stauffer Cher Richmond Ag	Plant	- <u></u>	·- · · ·	_	•
• 1. •			Filled Settl1415 South 4no.s	<u>ing Ponds</u> 7th Stree treet	t		 	
÷			Richmond city		CA	94804 zip code		
×		me of Owner (wh dress:	nile used by fac. 1415 South 4 no. s			nical Co.		•
	•		Richmond		CA	94804		
			city	c	tato	zin code		· · ·
	Cu Ad	rrent Owner (if dress:	different from			n na har in r	• • • • • • • • • • • • • • • • • • •	
			no. si	treet	•			
	• .	·	city	s	tate	zip code	-	· · · ·
						÷		. 1
		Ownership at company owner Current statu IF Year first us Year last use still in use) Total amount Specify type(	the property on time of use (1= ship) 3=public of s (1= closed; 2= CLOSED, specify ed for process wa d for process was of process waste s) of disposal m se (1=currently	company ow ownership) = still in year close raste from t = from this thousand hundred t thousand wethod(s) u	nership; 2=pn use; 9=don't d this facility his facility facility dis gallons ons cubic yards sed at site a	rivate but know) (enter "79 sposed at s	not 19[7] 19[6] 19[6] 19[7] 5ite: 1.1.1.1.1.51 1.1.1.1.51 1.1.1.1.51 1.1.1.1.51 1.1.1.1.51 1.1.1.1.51 1.1.1.1.51 1.1.1.51	$ \begin{array}{c} 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\ 1 \\$
				landfill, landfill, landfill, pits/ponds deep well land farm	mono industr mixed indust drummed wast municipal re s/lagoons injection	riel waste cfuse co-di	sposed [	2 (43) 3 (44) 3 (45) 2 (46) 3 (47) 3 (48)
		•		treatment reprocess: other (spi	lon (eg. neutral ing/recycling ecify)	izing)	····· [	3 (49) 2 (50) 3 (51) 3 (52)
service and	8.	Users of this facilities on	site (l≐this fa ly; 3≒this compa	cility; 2= ny and othe	this facility ers; 9=don't	nd other know)	company	Ц (53)
		LIST NAMES AN	D ADDRESSES OF	OTHER KNOW	V USERS BELOW		•	
•				,		<u>.</u> 14	· •	• •
			,	•	· .		·	
	•						. ·	

FORM B CONFINED ON SECOND PAGE

[<u>]</u> (80)

1	and the second	
	$\frac{1 B - Pago 2}{2}$	
	Company Namo:Stauffer Chemical Company	
	Facility Nume: Richmond Ag Plant	
A A A	Site Name: Filled Settling Ponds	د به در المعاد . مراجع المعاد . مراجع المعاد .
	<ol> <li>Components (or characteristics) of process waste from t disposed at site: (1-present in waste; 2-not present in 9-don't know)</li> </ol>	this facility n waste;
	FILL IN EVERY BLOCK SPACE	÷.
	<pre>Acid solutions, with pll≤3. pickling liquor metal plating waste circuit etchings inorganic acid manufacture Base solutions, with pll&gt; 12. caustic soda manufacture mylon and similar polymer generation scrubber residual Heavy metals &amp; trace metals (bonded organically &amp; inorg arsenic, selenium, antimony mercury</pre>	(2) (11) (2) (12) (12) (13) (14) (14) (14) (14) (15) (15) (16) (16) (16) (17) (16) (17) (16) (17) (18) (19) (18) (19) (19) (20) (21) (21) (21) (21) (21) (21) (21) (21
	iron, manganesc, magnesium iron, cadmium, copper, chromium (trivalent) chromium (hexavalent) lead Radioactive residues, >3 pico curies/liter uranium residuals & residuals for UF6 recycling	$\begin{array}{c} & (1) \\ (23) \\ (24) \\ (24) \\ (25) \\ (25) \\ (26) \\ (26) \\ (27) \end{array}$
	lathanide sories elements and rare earth salts phosphate slag thorium radium other alpha, beta & gamma emitters Organics.	
	insectides & intermediates herbicides & intermediates fungicides & intermediates rodenticides & intermediates halogenated aliphatics halogenated aromatics acrylates & latex emulsions	(35) (36) (2) (36) (2) (37) (2) (38) (2) (39) (2) (40)
	PCB/PBB's amides, amines, imides plastizers resins elastomers solvents polar (except water)	2] (42)         2] (43)         2] (44)         2] (44)         2] (45)         2] (46)
	carbontetrachloride trichloroethylene other solvents nonpolar solvents halogenated aliphatic	
	oils and oil sludges esters and ethers alcohols ketones & aldehydes dioxins Inorganics	2 (54) 2 (55) 
	morcaptans	(59)
	Misc. phirmaceutical wastes paints & pignents catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloride) wastes with flash point below 100° F.	(62) $(63)$ $(63)$ $(64)$ $(65)$ $(66)$ $(66)$

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PORM R	DISPOSAL SITE I	NEORIARI				[] (1-8)
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COMPL	FIT THIS FORM FOR	EVERY SITE (IN	CLUDING THE	LOCATION OF	-	• -
	FACILITY AS ONE S 5. GENERATED BY 711			OP PROCESS		
	2 (1094030731212) 121 111	TO INCTUTI OTH	1010.	J		· •
,		•				
Company		er Chemical C	ompany			
Facility Name of		nd Ag Plant				
	of Site: <u>1415</u> Sc	and of Plant	<u>at San Fra</u> Get	<u>incisco Bay</u>	<u>Edg</u> e	
	no.	street			·····	
	<u>Rich</u> m	ond	CA	94804		
	city		state	zip code		
	•		,			
Name of Address:	Owner (while used	l by facility):	Stauffer	Chemical Co	) <u>.</u>	
nuar 035 ,	<u>1415 So</u> no.	uth 47th Stri street	eet			•
•	- 1 .					
	Richmon	<u>d</u>	CA state	94804 zip code	·····	•
Current	Owner (if differe	nt from obaine)		· ·		
Address:	wher (if differe				<b></b>	an Alina a sh
	no.	street	•			· ·
				r		
	city		state	zip code	'	· ·
	•			· •		
2. Owner comp 3. Curre	tion (1= the prop rship at time of any ownership) 3= ent status (1= cl IF CLOSED,	use (1= company public ownershi osed; 2= still specify year cl	y ownership; ip) in use; 9=do .osed	2=private bu on't know)	t not	. [1] (11) . [1] (12) 5 [8] (13-14
2. Owne comp 3. Curr 4. Year 5. Year	rship at time of any ownership) 3= ent status (1= cl IF CLOSED, first used for p Tast used for pr	use (1= company public ownershi osed; 2= still specify year cl rocess waste fr ocess waste fro	y ownership; ip) in use; 9=do osed om this faci om this faci	2=private bu on't know) ility	t not 	. [] (11) . [] (12) 5 8 (13-14 9 0 (15-16
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2. Owne comp 3. Curr 4. Year 5. Year stil	rship at time of any ownership) 3= ent status (1= cl IF CLOSED, first used for p Tast used for pr l in use)	use (1= company public ownershi osed; 2= still specify year cl rocess waste fr ocess waste fro ss waste from t thousa	y ownership; ip) in use; 9=dc osed om this faci m this facility his facility nd gallons .	2=private bu on't know) ility Lity (enter " disposed at	t not 19 19 79" if 19 site: 1	. 1 (11) . 1 (12) 5 8 (13-14 0 0 (15-16 5 8 (17-18
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<ol> <li>Owne comp.</li> <li>Curra</li> <li>Year</li> <li>Year still</li> <li>Tota</li> </ol> 7. Specifies st 9=dor 8. Users facil	<pre>rship at time of any ownership) 3= ent status (l= cl IF CLOSED, first used for pr l in use) l amount of proce ify type(s) of dis cill in use (l=cur of this site (l= itics only; 3=thi </pre>	use (1= company public ownershi osed; 2= still specify year cl rocess waste fro cess waste fro ss waste from t thousa sposal method(s rrently in use; landfi landfi landfi landfi landfi landfi landfi ep w land fi incine: treatm reproce other	y ownership; in use; 9=dc osed om this facil in this facility mom this facility nd gallons nd cubic yar ) used at si 2=no longer 11, mono ind 11, mixed in 11, mono ind 11, mixed in 11, mono ind 11, mixed in 11, municipa onds/lagoons ell injectio arming ration ent (eg, neu essing/recyce (specify) 2=this faci others; 9=do	2=private bu on't know) ility Lity (enter " disposed at te and whether in use; 3=ne lustrial waste dustrial waste ustrial waste ustrial vaste ustrial vaste il refuse co-con tralizing) ling lity and other n't know)	t not 19 19 19 19 19 19 19 19 19 19	<ul> <li>1 (11)</li> <li>1 (12)</li> <li>5 8 (13-14)</li> <li>0 (15-16)</li> <li>5 8 (17-18)</li> <li>(19-26)</li> <li>8 7 (27-33)</li> <li>(34-41)</li> <li>(42)</li> <li>(42)</li> <li>(43)</li> <li>(44)</li> <li>(45)</li> <li>(44)</li> <li>(45)</li> <li>(44)</li> <li>(45)</li> <li>(46)</li> <li>(47)</li> <li>(48)</li> <li>(49)</li> <li>(50)</li> <li>(51)</li> <li>(52)</li> </ul>
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<ol> <li>Owne comp.</li> <li>Curra</li> <li>Year</li> <li>Year still</li> <li>Tota</li> </ol> 7. Specifies st 9=dor 8. Users facil	<pre>rship at time of any ownership) 3= ent status (l= cl IF CLOSED, first used for pr l in use) l amount of proce ify type(s) of dis cill in use (l=cur of this site (l= itics only; 3=thi </pre>	use (1= company public ownershi osed; 2= still specify year cl rocess waste fro cess waste fro ss waste from t thousa sposal method(s rrently in use; landfi landfi landfi landfi landfi landfi landfi ep w land fi incine: treatm reproce other	y ownership; in use; 9=dc osed om this facil in this facility mom this facility nd gallons nd cubic yar ) used at si 2=no longer 11, mono ind 11, mixed in 11, mono ind 11, mixed in 11, mono ind 11, mixed in 11, municipa onds/lagoons ell injectio arming ration ent (eg, neu essing/recyce (specify) 2=this faci others; 9=do	2=private bu on't know) ility Lity (enter " disposed at te and whether in use; 3=ne lustrial waste dustrial waste ustrial waste ustrial vaste ustrial vaste il refuse co-con tralizing) ling lity and other n't know)	t not 19 19 19 19 19 19 19 19 19 19	<ul> <li>1 (11)</li> <li>1 (12)</li> <li>5 8 (13-14)</li> <li>0 (15-16)</li> <li>5 8 (17-18)</li> <li>(19-26)</li> <li>8 7 (27-33)</li> <li>(34-41)</li> <li>(42)</li> <li>(42)</li> <li>(43)</li> <li>(44)</li> <li>(45)</li> <li>(44)</li> <li>(45)</li> <li>(44)</li> <li>(45)</li> <li>(46)</li> <li>(47)</li> <li>(48)</li> <li>(49)</li> <li>(50)</li> <li>(51)</li> <li>(52)</li> </ul>

FORM B CONFINUED ON SUCOND PAGE

[<u>1]</u> (80)

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Company Name: \_\_\_\_\_Stauffer Chemical Co.\_\_\_\_

Facility Name	Richmond Ag Plant	
	South End of Plant at Jan Francisco Bay Edge	,

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

](1-8)

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ROT

### FILL IN EVERY BLOCK SPACE

		•	1			
Λα	cid solutions, with pH≺3		21	111	(10)	
	pickling liquor	* * * *	• • • • •	Ľ	$(\pi\pi)$	
•	metal plating waste			121	(12)	
	circuit otchings			2	C1 7.5	
		****		Ę		
	inorganic acid manufacture		* * * * *	Ш	- (1+)	
•	organic acid manufacture			121	(15)	
Re	ise solutions, with plf> 12			1	1765	
100	Se bolutions, with phase as the transformer of the	• • • •		4	frei	
	caustic soda manufacture			121	(17)	
	nylon and similar polymer generation	٠.		121	right	
	emilian and dual		* * * * * *	Ę.		····
	scrubber residual			[±]	-(uΩ)-	
He	avy metals & trace metals (bonded organically & inorganically)			111	(20)	*
	arsenic, selenium, antimony	•••		등 1	2215	*
	arsonic, setenical, anethony		* * * * *		(21)	*
	mercury			121	(22)	
	. iron, manganese, magnesium			<u> </u>	12:55	*
· .		****	• • • • •		(43)	~
	zinc, cadmium, copper, chromium (trivalent)			111	(24)	*
,	chromium (hexavalent)			121	(25)	×
	lead	••••		<u>لگ ا</u>	200	
~				ш	<u>(</u> 40)	. *
Ra	dioactive residues, >3 pico curies/liter			121	(27)	
	uranium residuals & residuals for UF6 recycling				1201	
	Tothenido operation of a boundary and the beginst the second state of the second state		* • • • •	4	1401	
	lathanide series elements and rare earth salts			[2]	- (29) -	
	phosphate slag			121	(30)	
	thorium			الشر	2755	
	needa alaan ahaa ahaa ahaa ahaa ahaa ahaa ah	* • • • •		12	1517	
	radium			121	(32)	
· .	other alpha, beta & gamma emitters				Č335	
<b>•••</b>	anias	• • • • •	••••	4	(33)	
Urj	ganics			121	(34)	
•	insectides & intermediates			121	(35)	
٠	herbicides & intermediates			5	1765	-
•	nerotendes q intermediates	• • • • •		[2]	(20)	
	fungicides & intermediates			121	(37)	
•	rodenticides & intermediates				aver.	
		• • • • •		2	(30)	
•	halogenated aliphatics			21	(39)	
	halogenated aromatics			( )	(40)	
	acrylates & latex emulsions			41	2.5	
· · ·	aciy facts () filled Caulisions		••••	2	(41)	
	PCB/PBB's			121	(42)	
	amides, amines, imides				(43).	
				4	S.S	•
	plastizers			21	(44)	
	resins			21	(45)	•
	elastomers		••••	<u> </u>	222	
				21	(ao)	
	solvents polar (except water)		1	21	(47)	
	carbontetrachloride				(12)	
	find and a start and			<u> </u>		
	trichloroethylene			21	(49) -	-
	other columnic neuroles				1000	
	Utilet sourceits nonpotar		1	21	[50]	
	other solvents nonpolar		••••	21	(50) (51)	
	solvents halogenated alighttic		-	21	(51)	
	solvents halogenated aliphatic	• • • •	•••• į	2	(51) (52)	
	solvents halogenated aliphatic solvents halogenated aromatic oils and oil sludges	••••	••••	2	(51) (52) (53)	
	solvents halogenated aliphatic solvents halogenated aromatic oils and oil sludges	••••	••••	2	(51) (52) (53)	
•	solvents halogenated aliphatic solvents halogenated aromatic oils and oil sludges esters and ethers	• • • • • •	••••	2	(51) (52) (53) (54)	
•	solvents halogenated aliphatic solvents halogenated aromatic oils and oil sludges esters and ethers	· · · · · ·	· · · · ·   · · · · ·   · · · · ·	2222	(51) (52) (53) (54) (55)	
	solvents halogenated aliphatic solvents halogenated aromatic oils and oil sludges esters and ethers	· · · · · ·	· · · · ·   · · · · ·   · · · · ·	2222	(51) (52) (53) (54) (55)	
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Mise	solvents halogenated aliphatic. solvents halogenated aromatic oils and oil sludges esters and others alcohols ketones & aldehydes dioxins rganics salts mercaptans catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastes (eg. nitrated foluenes) air water reactive wastes (eg. PA, aluminum chloride)				(51) (52) (53) (53) (55) (55) (56) (57) (56) (57) (62) (62) (63) (65)	
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Mise	solvents halogenated aliphatic. solvents halogenated aromatic oils and oil sludges esters and ethers alcohols ketones & aldehydos dioxins rganics salts wercaptans catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastos (eg. nitrated toluenes) air water reactive wastos (eg. P4, aluminum chloride) wastes with flash point below 100° P.	Alur	· · · · · · · · · · · · · · · · · · ·		(51) (52) (55) (55) (55) (57) (57) (59) (61) (65)	
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Mise	solvents halogenated aliphatic. solvents halogenated aromatic oils and oil sludges esters and others alcohols ketones & aldehydes dioxins rganics salts mercaptans pharmaceutical wastes paints & pigments catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloridc) wastes with flash point below 100° F. <u>Cinders and Insoluble Dry Alum Mud Mixture</u> Iron 1% - 2% Manganese Copper 30 ppm Zinc	Alur Zinc 2001			(51) (52) (55) (55) (55) (57) (57) (59) (61) (65)	
Mise	solvents halogenated aliphatic. solvents halogenated aromatic oils and oil sludges esters and ethers alcohols ketones & aldehydes dioxins rganics salts mercaptans catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloride) wastes with flash point below 100° P. <u>Cinders and Insoluble Dry Alum Mud Mixture</u> Iron 1% - 2% Manganese	Aluu 200p 170			(51) (52) (55) (55) (55) (57) (57) (59) (61) (65)	
Mise	solvents halogenated aliphatic. solvents halogenated aromatic oils and oil sludges esters and others alcohols ketones & aldehydes dioxins rganics salts mercaptans pharmaceutical wastes paints & pigments catalysts (eg. vanadium, platinum, palladium) asbestos shock sensitive wastes (eg. nitrated toluenes) air water reactive wastes (eg. P4, aluminum chloridc) wastes with flash point below 100° F. <u>Cinders and Insoluble Dry Alum Mud Mixture</u> Iron 1% - 2% Manganese Copper 30 ppm Zinc	Aluu 200p 170			(51) (52) (55) (55) (55) (57) (57) (59) (61) (65)	

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	<u>Polit B: DISPOSAL SITE INFORMATION</u> (DO NOT USE)
	COMPLIENT THUS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF
	THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.
	WISHES GEREIGTED BT HITS INCLETETT SINCE 1950.
	Company Name:Stauffer Chemical Co.
	Facility Nume: Richmond Ag Plant
	Name of Site: <u>Blair Southern Pacific Landfill</u> Address of Site: <u>Foot of South 51st Street</u>
	no, street
	RichmondCA94804Citystatezip code
	Southern Pacific Land
4.	Name of Owner (while used by facility): <u>&amp; Improvement Co.</u> Address: <u>1</u> Market Street
	no. street
	San Francisco CA City State zip code
141 (11) (14) (14) (14) (14) (14) (14) (	City state zip code Current Owner (if different from above);
	Address:
	no. street .
	city state zip code
·. · [	<ol> <li>Location (1= the property on which facility is located; 2= off-site) [2] (10)</li> <li>Ownership at time of use (1= company ownership; 2=private but not</li> </ol>
	<b>COMPANY</b> ownership) 3=public ownership)
	3. Current status (1= closed; 2= still in use; 9=don't know)
	<ol> <li>Year first used for process waste from this facility</li></ol>
	<ul> <li>still in use)</li></ul>
	thousand gallons
	hundred tons $1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 + 1 $
	<ol> <li>Specify type(s) of disposal method(s) used at site and whother method is still in use (l=currently in use; 2=no longer in use; 3=never used;</li> </ol>
	9=don't know
	landfill, mono industrial waste
	landrill, drummed waste [3] (44)
	pits/ponds/lagoons
	deep well injection
	incineration
	reprocessing/recycling
	8. Users of this site (1=this facility; 2=this facility and other company
	facilities only; 3=this company and others; $9=don't know$ ) [3] (53)
	LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW
· · ·	
-	

FORM B CONTINUED ON SECOND PAGE

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**[1]** (80)

MB - Page 2

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	· · ·		

Company Name: Stauffer Chemical Co.

Facility Nume: \_\_\_\_\_ Richmond Ag Plant

Site Nume: Blair Southern Pacific Landfill

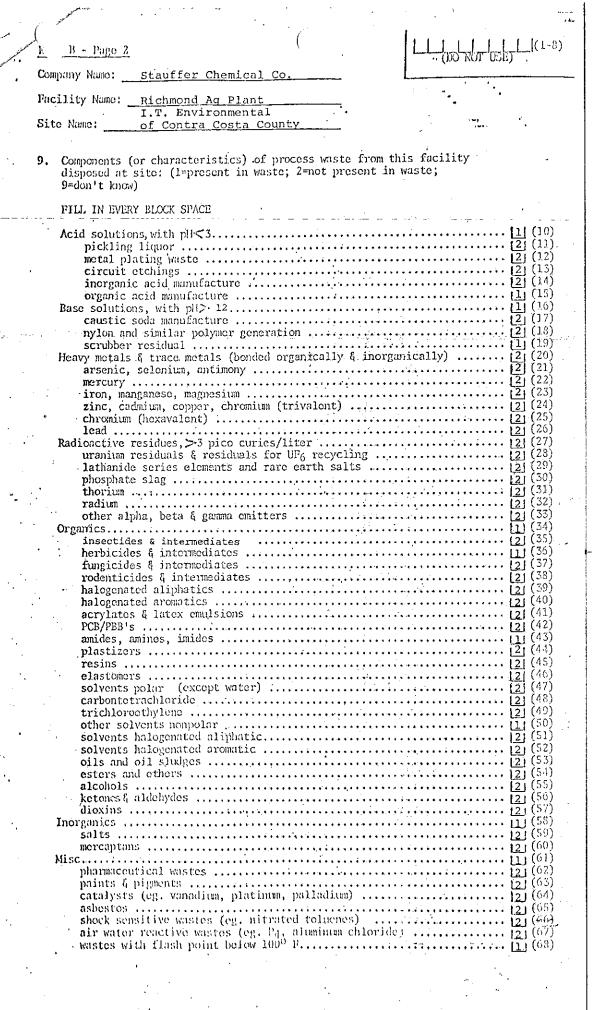
 Components (or characteristics) of process waste from this facility disposed at site: (l=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid	solutions, with pH<3		. 19	(10	)
p p				(11)	)
111	CLAI DIALING WASEC		10	. /1 2'	1
L	ILUIL CLEATINGS			1	N
<b>4</b> .	norganic acid manufacture.		80	(14)	1
0				(10)	× .
Dasc.	SOLUCIONS, WITH DIA 12		101	(1()	<b>`</b>
				(17)	N
11	Find and Shullar bolymer generation			(10)	÷
50				(20)	
ncory.	metals & trace metals (bonded organically & inorganically)			(20)	
	screen screen and money		601	(21)	
III			10.	(22)	
· 11	on, manganese, magnesiim			(nen	
CI	(ICXavalent)			(25)	
Radios	ad		11	(26)	*
Maditon	ctive residues, >3 pico curies/liter		121	(27)	
nh	thanide series elements and rare carth salts		121	(29)	
Organio	her alpha, beta & gamma cmitters cs		21	(33)	
in	Sectides & internalist	• • • • • • • • •	[2]	(34)	
ber	sectides & intermediates rbicides & intermediates	• • • • • • • • •	[2]	(35)	-
fim	peicides & intermediates		121	(36)	
1.00	ngicides & intermediates	• • • • • • • • •	2	(37)	
ha]	lenticides & intermediates logenated aliphatics		21	(38)	28
1101	LOPERALCO ALOBETTICS			1.03	
acr	ylates & latex emulsions	•••••	[2]	(40)	
PCB	PBB's	•••••	[2]	(41)	
100				(15)	
sol	s and oil sludges	•••••	21	51)	
		14	(	1 1)	
					ł
Shoc	k sensitive wastes (eg. nitrated toluenes)		211	66)	
	The state show from the second for the second		24 (	63)	i, m
*	. Dry Alum Mud Insolubles		=1 (	,	
Iro					
Cop	per 30 ppm Chromium +3 14 5 ppm				
Lead	d = 100-200  ppm Chromium +6 /0.1 ppm	·			
Asbo	estos (prior to 8/76) 40 ppm				
		-			
	and the second		211.	(0)	

	( ) . B: DISPOSAL SITE INFORMATION (	(DO NOT USE) (1-8)
	COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS PACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS PACILITY SINCE 1950.	· · · · · ·
	Company Nume:       Stauffer Chemical Co.         Facility Name:       Richmond Ag Plant         Name of Site:       I.T. Environmental of Contra Costa Cour         Address of Site:       East End Arthur Road         no.       street	<u></u>
1	<u>Martinez CA 94553</u> city state zip code	
	Name of Owner (while used by facility): <u>I.T. Corporation</u> Address: <u>4575 Pacheco Blvd.</u> no. street	
	<u>Martinez CA 94553</u> city state zip code	
<b>as</b> Standard <u>and an </u>	Current Owner (if different from above):	——
	no. street	
	city state zip code	— .
	<ul> <li>3. Current status (1= closed; 2= still in use; 9=don't know) IF CLOSED, specify year closed</li></ul>	t not 2 (11) 2 (12) 12 (12) 12 (12) 13 (13-14) 19 (13-14) 19 (13-14) 19 (13-14) 19 (15-16) 79" if 19 (17-18) site: 1 (19-26) 1 (1
	LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS DELOW	•
		••••
	DORAT B CONTINUED ON SECOND PAGE	[ <u>1]</u> (80)
	алан ал	

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2 (00)

#### 1 ... B: DESPOSAL STIT INFORMATION

COMPLETE THIS FORM FOR EVERY SETE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SFIE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950. ۰.

11

USD) - (1-8)

	• •		· · · ·	
Composer Munos	a) 55 a)	· · · · ·		
Company Name: Facility Name:	Stauffer Cher	nical Co.		
Name of Site: -	Richmond Ag J	Plant		
Address of Site:		mental, Solano Com	unty	
Multips of block		<u>Herman Road</u>	<u> </u>	·
. *	no. st	reet	•	•
,	Benicia	CA	94510	1 m
	city	state	zip code	+ ·
	•	,	-	
Name of Owner (wh	ile used by faci	lity): I.T. Corpor	ration	
Address:	4575 Pacheco	BÍVd.		
	no, st	reet .		
		·.	•	4
	<u>Martinez</u>	CA	94553	•
	city	state	zip code	1
Current Owner (if	different from	above):		المرت المالي من الوجار
Address:			······································	na dalente internetationen Alexandre
	no, st	rcet .		
	• •	•		•
·				
	city	state	zip code	
. ,				
1. Location (1=	the property on a	which facility is lo	catad: 2- off-	
2. Ownership at	time of use (3= )	company ownership; 2:	-privata but m	[2](10)
COMPORT OWNER	cime of use (i⊸ ( chin) %=mublic o	wership)	-private but n	
3. Ourrent statu	$s (1 = c \log c d \cdot 2 =$	still in use; 9=don	• • • • • • • • • • • • • • • • • • •	$\cdots \cdots \underbrace{[2]}_{[1]}$
IF (	CLASED specify y	loar closed	C MIOW)	19[1] (1.3-14)
4. Year first use	ed for process wa	oute from this facili	• • • • • • • • • • • • • • • • • • •	$19_{75}$ (15-16)
5. Year last used	for process was	te from this facilit	ty (optor 1701	····· 19//5 (15-10)
still in use)	2 101 process dae		ty (enter 79	
6. Total amount of	of process waste	from this facility d	isneed of eit	19 719 (17-18)
	- process hable	thousand gallons	ATSDOSOU AU STI	1 1 1 (19-26)
• *	•	hundred tons	•••••••••••••••••••••••••••••••••••••••	1 37 (27-33)
,	•	thousand cubic varies	4 <b>1</b> 1	+ $+$ $+$ $+$ $+$ $+$ $+$ $+$ $+$ $+$
7. Specify type(s	s) of disposal me	thod(s) used at site	and whether n	<u>        (</u> 34-41)
is still in us	e (l=currently i	n u:; 2=no longer i	n use: 3≡never	i i conte
9=don't know)			ar aboy o novor	usee j.
		landfill, mono indus	trial waste	
		landfill, mixed indu	strial waste	1 (43)
		landfill, drummed wa	isto	
· · · · · · · · · · · · · · · · · · ·		landfill, municipal	refusa co-disr	osed 9 (45)
		pits/ponds/lagoons .		1 (46)
		deep well injection		
1	· · · ·	land farming		<b>19</b> (48)
		incineration		(49)
		treatment (eg. neutr	aliziuo)	
•		reprocessing/recycli	ng	
	1	OTHER (Specify)		In 1 (52)
8. Users of this	site (l=this fac	ility: 2=this facili	ty and other c	ompany
facilities only	y; 3≃this compan	y and others; 9=don'	t know)	······ [2] (53)
LIST NAMES AN	D ADDRESSES OF O	THER KNOWN USERS BEL	OW ]	
· · · · · · · · · · · · · · · · · · ·			·	
		•		
	•			· .
· .		7		
		• *		· · ·
				-
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	· .	•	•	
	· · · · · · · · · · · · · · · · · · ·	•	• •	

FORM IN CONTINUED ON SECOND PAGE

[1] (80)

J	÷	 <u>B -</u>	Page	2

Company Namo: Stauffer Chemical Co.

Facility Name: \_\_\_\_\_\_ Richmond Ag Plant

Site Nume: I.T. Environmental, Solano County

Components (or characteristics) of process waste from this facility disposed at site: (l=present in waste; 2=not present in waste; 9=don't know) 9,

(1-8)

FILL IN EVERY BLOCK SPACE

	•				
	Acid solutions with ply 3			Fat (10)	
	pickling liquor	****	• • • • • • • • • • • •		
	motal plating waste	*****		(2) $(12)$	
	Gircuit etchings	* * * * * * * * * * * * * * * * * * * *	• • • • • • • • • • • •	(2)(12)	
	increanic acid wanufac	ture	• • • • • • • • • • • •	2 (1.3)	
	organic acid www.foctu	uulu , , , , , , , , , , , , , , , , , ,		[2] $(1.1)$	
ĩ	lase solutions with with	re		<b>[2]</b> (15)	
^	caustic code wards	12		<b>[2]</b> (16)	
	i i internet sour manufactu	re	• • • • • • • • • • • •	<u>[2]</u> (17)	
	and the sublation of th	ner generation		- <u>[2]</u> (18) -	
L:	Scrubber Feshdual			[2] (19)	
11	ways motars a trace metal	S (DODded organically & inorganically	7]	111(20) -4	t
	arsenic, scienium, ant	mony	• • • • • • • • • • • •	2 (21)	
				101 (22)	
•	<b>IION, MUDEABCSC, MEDDO</b>	י אין ראין די אין אין אין אין אין אין אין אין אין אי			ł
	ATHC, CRUMINE, CODDET.	Chromitan Irrivalenti		1 1 1 ( 2 1 )	•
	Chromium (hexavalent)			12. (25)	
~				( ) < )	
, к	autouctive residues. >3 p	co curies/lifer		101 (22)	
	Tatuantoe series element	ts and rare earth salts		121 (20)	
	phosphate star			10. (70)	
		****		101 (31)	
•••				101 (32)	
÷ .	ouner alpha, bela 6 gan	ma emitters		Ear (37)	
.0	. gamres	· · · · · · · · · · · · · · · · · · ·		5-1 (21)	
	insectides & intermedia	tes		· · · · · · · · · · · · · · · · · · ·	
• • •	nerbicides 6 intermedia	tes		175	
	<b>IUNGICIDES</b> & Internetia	103		101 (77)	
•.	IUGUHLICIDES 6 INTERNED	18105	4	1 . (70)	
•	natueunaten aramantes			1-1 (70)	
	nalueenalee aromataes .				
	acrylates & latex emils	ions	••••••	[2] (40)	
	PCB/PBB's		*********	$\begin{bmatrix} 2 \end{bmatrix} \begin{pmatrix} 41 \end{pmatrix}$	
	amides, amines, imides		• • • • • • • • • • •	[2] (42)	
	plastizers	· · · · · · · · · · · · · · · · · · ·	••••••••	<u>[]</u> (43) .	
	resins	· · · · · · · · · · · · · · · · · · ·	• • • • • • • • • • •	<b>[2] (</b> 44) - ,	
	elastomore	**************	• • • • • • • • • • • •	21 (45)	
•	solvent's polar (except	water)	• • • • • • • • • • •	2 (46)	
	carboutetrachlorido	Madely	••••••	[2] (47)	
	trichloreothyleno	*****	•••••••	2 (48)	
	other solvents neurolas	****	• • • • • • • • • • • • •	2 (49)	
	solvents helogonated al-	······································		<u>1</u> (50)	
	solvents halogenatad ar	phatic		<b>2 (</b> 5])	
	oils and oil slylans	matic		2 (52)	
· • .	offere and otherwises	*****	••••	2 (55)	
. •		A A A A A A A A A A A A A A A A A A A		- (F 1)	
	kotono Faldaliulaa	****	••••	2 (55)	
	dioxing diamonyales	*****		2 (56)	
Tno	wornice	· · · · · · · · · · · · · · · · · · ·		2 (57)	
TH					
	- 201102	***************************************		(50)	
M: -	nercaptans			~ (60)·	
141.5			********	1 (61)	
	phanmaceutical Wastes			5. (62)	
1					
•	- current ara, (clt+ vanadafall)	DIATINAL DALIAGINES		01 (6.1)	
5	THEY IS OVERALLEYS RECEIVES 1	MY, HIEFTFOG FOLGONOSI		- (	
		5 IUTE 21. ILLUDIIUDU COLZMPIZATI			
•	wastes with flash point	below 1000 1		1 (68)	
				<u>+</u> ↓ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \	
*	•	Dry Alum Mud Insoluble		-	
	Iron 18	Mangapogo	0		
·	Copper 30 ppm		0 ppm		
	Lead 100-200 ppm	Chromium +3 14.	5 ppm		
	Acherter (		1 ppm		

121 (80)

< 0.1 ppm

Chromium +3 · Chromium +6

40 ppm

Asbestos (prior to 8/76)

	1. 4 B: DISPOSAL SITE INFORMATION (DO NOT USE)
	COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILLITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS
	WASTES GENERATED BY THIS FACILITY SINCE 1950.
V	Company Namo:Stauffer_Chemical_Co,
	Facility Name:         Richmond Ag Plant           Name of Site:         Berkeley Landfill Co.
	Address of Sitc: Foot of University Avenue no. street
	Berkeley CA
	city state zip code
	Name of Owner (while used by facility): City of Berkeley Address: 2180 Milvia Street
	no. street
	Berkeley CA city state zip code
۱۹۹۹ - ۲۰۰۵ - ۲۰۰۹ <u>۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹</u> ۱۹۹۹ - ۲۰۰۵ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹ - ۲۰۰۹	Current Owner (if different from above):
	no. street
· · · · ·	city state zip code
	<ol> <li>Location (1= the property on which facility is located; 2= off-site) [2] (10)</li> <li>Ownership at time of use (1= company ownership; 2=private but not</li> </ol>
· · ·	<pre>company ownership) 3=public ownership)</pre>
	4. Year first used for process waste from this facility
:	5. Year last used for process waste from this facility (enter "79" if still in use)
	6. Total amount of process waste from this facility disposed at site: thousand gallons
	hundred tons 111111 (27-33)
	<ul> <li>7. Specify type(s) of disposal method(s) used at site and whether method</li> <li>is still in use (l=currently in use; 2=no longer in use; 3=never used;</li> </ul>
	9≈don't know)
	landfill, mixed industrial waste 2 (43)
	landfill, municipal refuse co-disposed 9 (45)
	pits/ponds/lagoons
	land farming
	treatment (eg. neutralizin;)
	other (specify)       Class 2 Landfill       2 (52)         8. Users of this site (l=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know)
	LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW
	Liter werde rede rederedede of Official Adoma OSEAS DILOW
18	
	FORM B CONFINUED ON SECOND PAGE
'.	
· · · ·	

М	B	÷	Pa	ge	2

Company Namo: \_\_\_\_\_Stauffer Chemical Co.

Facility Nume: \_\_\_\_\_\_ Richmond Ag Plant

Site Name: \_\_\_\_\_ Berkeley City Dump

9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)

[(1-8]

TID)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3				fa l	(10)	
proximg liquor		-		10.1	(11)	
metal plating waste				12.1	(12)	
LINCOLL CICULDOS					1	
inorganic acid manufacture				151	(14)	
organic acid manufacture		•••••	******	<u>4</u>		
Base solutions, with pli> 12		• • • • • • •	•••••	121	(12)	
. Causele soda manuracture				10	1171	
nylon and similar polymor generation		*****	* * * * * * *	121	(17)	
scrubber residual		e regens	• * • • • • •	2		-
Heavy metals & trace metals (bonded orga	Aicolly R Anomanian	*****	• • • • • • • •	2	(10)	
arsenic, sclenium, antimony	nicariy, q morganica	11y) .	•••••	Ш	(20)	7
mercury	*******************	• • • • • •	• • • • • • •	2	(21)	
iron manganese magnacium	******************	• • • • • • •	• • • • • • •	2	(22)	
iron, manganèse, magnesium	***************************************	• • • • • •	*****	1	(23)	1
zinc, cadmium, copper, chromium (tri	valent)	• • • • • • •		1	(24)	*
chronium (hexavalent)		• • • • • • •		2	(25)	*
lead	• • • • • • • • • • • • • • • • • • • •			11	(26)	*
Radioactive residues, >3 pico curies/lita	er		*****	2	(27)	
uranium residuals & residuals for UF	s recycling			2	(28)	•
Lauraniae series elements and rare er	with salts	•		121.	(20)	
mostrate stag				12	(70)	
				10.1	7713	
				10.4	1791	
other alpha, beta g gamma cmitters	. <b></b>			In i	(22)	
VI gantes				10.5	1731	
insectides & intermediator		•			イクロシー	
nerbicides a incerneurates					12/2	1
ingities q intermediates	• • • • • • • • • • • • • • • • • • •			10.1	1271	
	• • • • • • • • • • • • • • • •			10.1	(20)	
				10.	/703	
nalogenated aromatics			•		(10)	
acrylates a fatex emilisions	· · · · · · · · · · · · · · · · · · ·				(11)	
					(10)	
and an annes, innes, in					イメジン	
plastizers	* * * * * * * * * * * * * * * * * * * *	•••••	• • • • • •	121	(43)	
resins	******	• • • • • •	• • • • • •	21	(44)	
elastomere	* * * * * * * * * * * * * * * * * * * *	• • • • • •	• • • • • •	2	(45)	
elastomers	••••••••	* * * * * *		211	(46)	
solvents polar (except water)	* * * * * * * * * * * * * * * * * * * *	•••••	• • • • • •	2 (	(47)	
				~ * /		
other solvents nonpolar	• • • • • • • • • • • • • • • • • • • •	• • • • • • •		21(	(50)	
solvents halogenated aliphatic		• • • • • • •		2   (	(51)	
sorvenus naregenated aromarie				<u> </u>	(FO) -	
	and the second		•	<u> </u>	(r * )	
				<u> </u>	- F	
				_ (		
				n . (	ርግነ	
anorganities and a second s				<u> </u>	6.03	
				/	<b>r</b> ())	
		A		- /	( ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) ) )	
procession and a web cost of a second second second				~ . (	6.22.	
	2.57714.54981			/	2 <b>.</b> .	
air water reactive wastes (eg. PA. alu	minum chloride)		• • • • • •	41 (	00J 693	
air water reactive wastes (eg. $P_4$ , alt wastes with flash point below $100^{\circ}$ P.				211	075 603	
		* • • • • •	••••• ];	210	08)	
Dry Alum Mud	Insolubles					•
Iron 18	Manganose	200	ppm	· '		
Copper 30 ppm		< 0.1	5. Full			
Lead 100-200 ppm	Chromium +3	14 5	ЪЪШ ЪЪЩ			
Asbestos 40 ppm		14.5	Ъħш		·	

TORM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

	1					
Company Name:	Stauffer Che			<u> </u>	-	. *
Facility Name: Name of Site:	Richmond Ag		Saruicas		-	-
Address of Site	Environmenta	I DISPOSAL	Dervrees		-	
	ло. 5	treet	· ·	,		
	<u>Kettleman Ci</u>			zip code	_	
	city	sta	ite	Zip cole	· •	-
Name of Owner (	while used by fac	ility): <u>Was</u>	te Manage	ement, In	c.	
Address: 900	<u>Jorie Blvd.</u>		<u> </u>		<u> </u>	
	no. s	treet	,			
_Oakb	rook	<u> </u>		60521 zip code	<b></b> .	
	city	sta	ile .	zip code.		• .
Current Owner ( Address:	if different from	[above]:			<del>-</del> Andres - Argan	
Au01055	no. s	treet	· · · ·		-	
,	·					• .
·	city	sta	ite	zip code	-	. · ·
1. Location (1	= the property on	which facili	ty is loca	ted; $2 = of$	f-site)	[2] (10)
2. Ownership a	t time of use (1=	company owne	rship; 2≠p	rivate but	not	
company own	ership) 3=public tus (1= closed; 2	ownership)	o. 0=donlt	1		$\frac{2}{12}$ (11)
ĩ	F CLOSED, specify	vear closed				1 1 (13-14)
4. Year first	used for process	waste from th	his facilit	y		718 (15-16)
5. Year last u	sed for process w e)	aste from thi	is facility	(ent or "A	9'' 1T 	719 ( (17-18)
6. Total amoun	t of process wast	e from this f	Eacility di	sposed at :	site:	
	, ,	thousand ga	llons			(19-26)
•••	•	. hundred ton thousand cu				(27-33)
7. Specify typ	e(s) of disposal :	method(s) use	d at site	and whethe	r method	
is still in	use (1=currently	in use; 2=no	longer in	use; 3=ne	ver used;	· · ·
9=don't kno	w)	landfill m	ono indust	rial waste		(9) (42)
· ,	•	landfill, m	nixed indus	trial wast	e	(43)
		landfill, d	brummed was	to		
	·	nits/ponds/	unicipal r lagoous	eruse co-a	isposed	9 (45) 9 (46)
	•					191 (47)
-						9 (48)
	•					9 (49) 9 (50)
		' reprocessir	ng/recyclin	Ig		<u>19</u> (51)
0	is site (1=this f	• other (spec	rify) Ne focilit	v and atha	Vulcingon a	<u>19</u> (52)
8. Users of th facilities	only; S=this comp	any and other	s; 9=don't	know	*********	13 (53)
	• • • •					· .
LIST NAMES	AND ADDRESSES OF	OTHER KNOWN	USERS BELC	217		· .
				· ·		
•	•	•			i.	· · ·
* 9 т	ons	·!				
· ·		•	· ·		•	
			•			
	· .		• :	•		
,	. <b>.</b> .		۰.			ا منوعها.
•		•	r			
				• -	1997 - 199 <b>9</b> - 1997 -	

FORM B COMPLETIED ON SECOND PAGE

1 (80)

語言語言

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(1-8)

and the second	Vem B - Page 2
	apany Namo:Stauffer Chemical Co.
	Facility Name: Richmond Ag Plant
	Site Name: Environmental Disposal Services
	9. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know)
	FILL IN EVERY BLOCK SPACE
	Acid solutions, with pll<3.
e naerza cererato o caro o contro da como contro	Heavy metals & trace metals (bonded organically & inorganically)
	mercury $(21)$
	zinc, cadmium, copper, chromium (trivalent)
	lead
	phosphate slag
	thorium
	other alpha, beta & gamma emitters
	herbicides & intermediates
	rodenticides & intermediates
,	halogenated aromatics
· · · · ·	PCB/PBB's $(21)$ (41)
,	plastizers $(1)$ (43)
	resins
	SUIVENUS DOLAT (EXCEPT WALET)
	carbontetrachloride [2] (47) trichloroethylene [2] (48) [2] (49)
	other solvents nonpolar       [1] (50)         solvents halogenated aliphatic.       [2] (51)         solvents halogenated aromatic       [2] (52)
	<b>oils</b> and <b>oil</b> sludges
	alcehols
	Inorganics
	mercaptans
	paints & pigments [2] (62) catalysts (eg. vanadiew platinum palladiew)
	asbestos

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### FOLM B: DISPOSAL SITE INFORMATION

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Communica Manual					•	
Company Name: Facility Name:	<u>Stauffer Ch</u> Richmond Aq				•	· ~
Name of Site:	Western Con	tra Costa C	ounty San	itary Land	fill	
Address of Site	Foot of Paa no.	<u>r Blvd.</u> street				
			·	0 4 0 0 5		
	<u>Richmond</u>		ate	<u>94805</u> zip code		
			•	•		
Name of Owner (			hmond San:	itary Serv	ice	
Address:	205 41st	<u>_Street</u>				
				94805		•
<del></del>	<u>Richmond</u> city	C St	ate	zip code		7
Current_Owner_(i	•	m above):	• •	-		9
Address:					na galazzi ferran (	i tulu e no concluir in
¢.	no.	street	•	· · ·	14 Å.	
·				·	,	
	city	St	äte	zip code		
					• • • •	
1. Location (1=	the property o time of use (1	n which facil	ity is loca	ted; 2= off	-site)	. [2] (10)
2. Ownership at company owne	ership) 3=public	ownership) .	p. 2-p	· · · · · · · · · · · · · · · · · ·		. 21(11)
company owne 3. Current stat	us (l= closed;	2= still in u	se; 9=don't	know)		$\cdot [2] (12)$
4. Year first u	CLOSED, specif sed for process	y year closed waste from t	his facilit	•••••••••••••	19	(13-14)
5. Year last us	ed for process	waste from th	is facility	(enter "79	'if	
still in use	) of process was					79 (17-18)
6. Total amount		• thousand g				(19-26)
•		hundred to	ns			16 (27-33)
7. Specify type	(s) of disposal	thousand c	ubic yards	and whether	method	(34-41)
	use (l=currenth					
9≃don't know			-			(0) (10)
•			mono indust: mixed indus			
		landfill,	drummed was	te		<u>1</u> (44)
		landfill,	municipal ro /lagoons	efuse co-di.	sposed	9 (45) 9 (46)
		deep well	injection .	• • • • • • • • • • • • • •	• • • • • • • • • • • • • •	<b>9</b> (47)
·	;	1and farmi	ng			9 (48)
			on (eg. neutral			
		. reprocessi	ng/recyclin	g		
9 Marson of Alid	s site (1=this	other (spe	cify)			9 (52)
8. Users of thi facilities of	nly; 3=this com	pany and othe	nis racilic rs: 9≃don't	kinosi)	сощрану .	3 (53)
	· · ·	<u>.</u>		- 1		••••••
LIST NAMES	AND ADDRESSES O	F OTHER KNOWN				
· .	•		•			
		• •			· .	<b>.</b>
			·			
٠			· ,		•	
	•		. •	• ,		
	."	•		• • •		و جنهور
		•				5
•				, <b>.</b> .		
						· .
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FORT B CONTINUED	ON SECOND PAGE					[1] <b>(</b> 80)
						•

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	· · · · · · · · · · · · · · · · · · ·
and a	$\frac{(B - Page 2)}{(DO NOT USE)} $
•	Company Name: Stauffer Chemical Co.
	Facility Name: Richmond Ag Plant
	Western Contra Costa County           Site Name:         Sanitary Landfill
	9. Components (or characteristics) of process waste from this facility disposed at site: (l=present in waste; 2=not present in waste; 9=don't know)
	FILL IN EVERY BLOCK SPACE
	Acid solutions, with pll<3
	Heavy metals & trace metals (bonded organically & inorganically)
	arsenic, sclenium, antimony
	iron, manganese, magnesium
	chromium (hexavalent)
• •	lead
	uranium residuals $\xi$ residuals for UF <sub>6</sub> recycling
	lathanide series elements and rare earth salts
<b>۔</b> , '	thorium
•	radium
• ;	Organics
	insectides & intermediates
	fungicides & intermediates
	rodenticides & intermediates
. •	halogenated aromatics
	acrylates & latex emulsions
•	amides, amines, imides
	plostizers
	elastomers $121$ (46)
	solvents polar (except water)
	trichloroethylene
•	other solvents nonpolar
	solvents halogenated aromatic
	oils and oil sludges
	alcohols
	ketones & aldehydes
•	Inorganics $(1)$ (58)
	solts
	$\operatorname{Misc}_{1}$ (61)
	pharmaceutical wastes
·	catalysts (eg. vanadium, platinum, palladium)
	asbestos
	air water reactive wastes (eg. Pd. aluminum chloride)
	wastes with flash point below $100^{\circ}$ P

[2] (80)

頭目

· FORM C: HAULER INFORMATION

#### PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Address

4030 Wesley Way

1360 So, 51st St.

Richmond CA 94804

249 Tewksbury Ave.

Richmond CA .94801

El Sobrante, CA 94803

J (1-5)

Years Used

3

29

29

29

(DO NOT USE)

ICC # (If Known)

Company Name: \_Stauffer Chemical Co.

Facility Name: Richmond Ag Plant

Name of Firm or Contractor

E. L. Bibb, Inc. General Contractor Blair Excavators, Inc.

2.

-3:

6.

Erickson Trucking, Inc. State Liquid Waste Hauler's Registration No. 19

 I.T. Transportation, Inc.
 State Liquid Waste Hauler's Reg. # 88

 Knapp Excavators, Inc. State License No. 188777

Richmond Sanitary Service State Liquid Waste

Hauler's Reg. #92

4501 Pacheco Blvd. Martinez, CA 94553

63 Parr Blvd. Richmond CA

205 41st St. Richmond CA 94805

nd CA 94805

e iteres	"	and De Cittuisting may are have	1 <u>2.1.</u>
		( M D: SUPPLIMENTAL HAULER INFORMATION	
		THE THIS FURN FOR EACH FIRM OR THDEPEN CONTRACTOR (IN-)	(DO NOT USE)
		C ING YOUR OWN COMPANY, ITS AFFILIATES & SULOLARIES) WHO REMOVED PROCESS WASTE FROM THIS FACILITY SINCE 1950 AND TOOK IT	(De Her Bob)
1		TO AN UNKNOWN LOCATION	
		Company Name:" Stauffer Chemical Co	•
1		Company Name: Stauffer Chemical Co. Facility Name: Richmond Ag Plant	**NOT APPLICABLE
1.		Name of Hauling Finn/Contractor:	
		Address: (no.) (street)	-
ł :		(city) (state) (zip code)	
i -		· · · · · · · · · · · · · · · · · · ·	• •
		<ol> <li>Year first used</li></ol>	19 (10-71)
l			19 + (12-13)
Ì		thousand gallons	(14-21)
		4. Components (or characteristics) of process in the state of the stat	
		at site: (1=present in waste; 2=not present in waste; 9=don't known FILL IN EVERY BLOCK SPACE	(wo
1			
1		Acid solutions, with pH<3	
]		picking liquor	(38)
   -:		metal plating waste circuit etchings	······································
1		inorganic acto manufactore	1 1 1 (All 1
1	;	organic acio manufacture	- (42) = 1
1.		Base solutions, with pH>10	- (17)
1		caustic soua manuracture	
	•	nylon and similar polymer generation	$\cdots \cdots \sqcup (45)$
	•	neavy metals & trace metals (bonded organically & inorganically)	(47)
	÷	arsenic, selenium, antimony	· · · · · · · · · · · · · · · · · · ·
		mercury	
		iron, manganese, magnesium	······ (50)
		zinc, cadmium, copper, chromium (trivalent) chromium (hexavalent)	$\cdots \cdots \square \binom{51}{52}$
•.	-	1690 ************************************	535
		Radioactive residues, >3 pico curies/liter	545
		uranium residuais & residuals for life recycling	in the second
	·	laurance series elements and rare earth salts	<b>1</b> (16)
	•	phosphate slag	······ ( <u>57</u> )
		radium	
	•	other alpha, beta e gamma emitters	· · · · · · · · · · · · · · · · · · ·
· '		Organics pesticides ξ intermediates	······ 🔂 (61 )
	· .	herbicides & intermediates	$\cdots \cdots \square \begin{pmatrix} 62 \\ 62 \end{pmatrix}$
		fungicides & intermediates	(63)
		rodenticides & intermediates	-1 &si
		halogenated aliphatics	- 665
		halogenated aromatics	
-		acrylates & latex emulsions PCB/PBB's	(68)
		amides, amines, imides	
· •		plastizers	
		resins	72
	•	elastomers solvents polar (except water)	
	•	- Carbontetrachloride	
		trichloroethylene	1761
	•	other solvents nonpolar	
		Solvenus halogenated alighatic	2705
		solvents halogenated aromatic oils and oil sludges	······ [] (79) [1] (80
		esters and ethers	
		alconois	- 2125
	•	Ketones g aldenydes	- (17)
		dioxins	······ (14)
		saits	
• •		mercaptans	- C17-5
		MISC	- 205
		phaimacoutical wastes	
		<ul> <li>paints &amp; pigments</li> <li>catalysts (eg. vanadium, platinum, palladium)</li> </ul>	$\cdots \cdots \square (20)$
۰.		aspestos	(21)
		shock sensitive wastes (eg. nitrated toluenes)	2275
		air water reactive wastes (eq. PA aliminim chlorida)	
	<b>'</b>	wastes with flash point below 100° F	, [ (25) 2 [ 80]

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## San Francisco Bay Regional Water Quality Control Board

### Fact Sheet – Requirements for Submitting Technical Reports Under Section 13267 of the California Water Code

# What does it mean when the Regional Water Board requires a technical report?

Section 13267<sup>1</sup> of the California Water Code provides that "...the regional board may require that any person who has discharged, discharges, or who is suspected of having discharged or discharging, or who proposes to discharge waste...that could affect the quality of waters...shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires."

#### This requirement for a technical report seems to mean that I am guilty of something, or at least responsible for cleaning something up. What if that is not so?

The requirement for a technical report is a tool the Regional Water Board uses to investigate water quality issues or problems. The information provided can be used by the Regional Water Board to clarify whether a given party has responsibility.

# Are there limits to what the Regional Water Board can ask for?

Yes. The information required must relate to an actual or suspected or proposed discharge of waste (including discharges of waste where the initial discharge occurred many years ago), and the burden of compliance must bear a reasonable relationship to the need for the report and the benefits obtained. The Regional Water Board is required to explain the reasons for its requirement.

# What if I can provide the information, but not by the date specified?

A time extension may be given for good cause. Your request should be promptly submitted in writing, giving reasons.

Are there penalties if I don't comply? Depending on the situation, the Regional Water Board can impose a fine of up to \$5,000 per day, and a court can impose fines of up to \$25,000 per day as well as criminal penalties. A person who submits false information or fails to comply with a requirement to submit a technical report may be found guilty of a misdemeanor. For some reports, submission of false information may be a felony.

# Do I have to use a consultant or attorney to comply?

There is no legal requirement for this, but as a practical matter, in most cases the specialized nature of the information required makes use of a consultant and/or attorney advisable.

#### What if I disagree with the 13267 requirements and the Regional Water Board staff will not change the requirement and/or date to comply?

You may ask that the Regional Water Board reconsider the requirement, and/or submit a petition to the State Water Resources Control Board. See California Water Code sections 13320 and 13321 for details. A request for reconsideration to the Regional Water Board does not affect the 30-day deadline within which to file a petition to the State Water Resources Control Board.

**If I have more questions, whom do I ask?** Requirements for technical reports include the name, telephone number, and email address of the Regional Water Board staff contact.

<sup>1</sup> Code sections can be found by searching the California Legislative Code Section search at <u>http://leginfo.legislature.ca.gov/faces/codes.xhtml</u>

rev: March 2014

JAYNE BATTEY, CHAIR | EILEEN M. WHITE, EXECUTIVE OFFICER