



Office of the City Manager

May 24, 2024

To: Honorable Mayor and Members of the City Council
From:  Dee Williams-Ridley, City Manager
Subject: Update on Environmental Testing at former City landfill

Summary

This memo provides an update on a regulatory inquiry from the San Francisco Bay Regional Water Quality Control Board, which is looking to test industrial waste delivered more than a half century ago from a Richmond business then known as Stauffer Chemical Company to five former Bay Area landfills: Albany, Benicia, Berkeley and two in Richmond. The City has met all regulatory requirements and is working closely with regulators throughout this process.

The Water Board believes that from 1960 to 1971, Berkeley's landfill *may* have accepted waste that *could* present a health or environmental risk. Given the ambiguity, the Water Board is asking the City to test for chemicals as well as radiation, the latter of which can occur naturally but also may be in unnatural levels in the industrial waste in question. The testing will examine whether these elements are at unnatural levels.

The Water Board, in an attached letter, has stated that the hypothesis for the presence of these toxic elements is based on historic documents suggesting that Stauffer sent industrial waste materials to the Berkeley Landfill and testing done at one of the five affected landfills, the Blair Landfill in Richmond. The California Department of Toxic Substances Control, which is working closely with the Water Board, has provided this statement about the levels of radiation at the Blair Landfill:

The levels of radioactivity present in the Blair Landfill wastes are low enough that it is uncertain as to whether the results detected are from natural background levels or waste disposal.

In the six months since the Water Board first contacted the City about this issue, regulators have not asked for any restrictions on activity at the former landfill, which was closed in 1983, sealed with a clay cap, and later converted into a public park. The Water Board has confirmed this public statement about health and safety concerns at the former Albany and Berkeley landfills:

Currently the board has no information to suggest that the sites pose a risk to water quality or human health.

The precautionary testing guided by the Water Board over the next few months will help determine next steps. We are mindful that we inherit the legacy of our predecessors, regardless of their benefit or harm. Landfills on the Bay were common a half century ago. Generations later, we now benefit from laws like the Resource Conservation and Recovery Act (1976), the Comprehensive Environmental Response, Compensation, and Liability Act (1980), and their state counterparts, which require generators and others to notify landfills and the public of hazardous waste disposal and releases to the environment.

The City has met all regulatory requirements, including the following timeline:

- December 2023, Water Board contacts City to set a meeting.
- January 18, 2024, Water Board sends letter, Requirement for Technical Reports Pursuant to Water Code Section 13267
- April 1, 2024, City submitted draft testing workplan
- May 16, 2024, Water Board informs City to provide revised work plan by July 1, 2024.
- July 1, 2024, Deadline for City to submit revised work plan to Water Board.
- Completion report due 90 days after workplan is approved

In close coordination with regulators, we are committed to addressing the issues that emerge.

Summary of Testing

The California Department of Toxic Substances Control contacted the Water Board in 2023 to let them know about the five landfills that received waste from Stauffer Chemical Company, which later was known as Zeneca. The suspicion is that the waste includes certain radionuclides and pesticides found at one of the five landfills used by Stauffer Chemical, the Blair Landfill in Richmond.

The Water Board is requiring the City to perform an initial, one-time representative sampling of the closed landfill site to investigate the presence of the following:

- Radionuclides. Thorium-232, uranium-238, and uranium-235
- Pesticides. 4-4'-DDT, and dieldrin

The suspected source of the radionuclides is from the processing of alum mud (bauxite) that typically contain certain naturally occurring radionuclides. Please see the Water Boards January 18, 2024 letter to the City, which is attached.

The City Manager's Office will provide another memo to Council once the results have been provided to the regulators.

Attachment:

January 18, 2024 letter from San Francisco Bay Regional Water Quality Control Board Letter: Berkeley Landfill, Berkeley, Alameda County – Requirement for Technical Reports Pursuant to Water Code Section 13267, dated

cc: LaTanya Bellow, Deputy City Manager
Anne Cardwell, Deputy City Manager
Terrance Davis, Director, Public Works Department
Wahid Amiri, Deputy Director, Public Works Department
Farimah Brown, City Attorney
Scott Ferris, Director, Parks, Recreation, & Waterfront
Matthai Chakko, Communications Director/Assistant to the City Manager
Mark Numainville, City Clerk
Jenny Wong, City Auditor

San Francisco Bay Regional Water Quality Control Board

January 18, 2024

GeoTracker ID: [L10006224883](#) (FY)

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

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

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 may also be present at the Berkeley Landfill.

Table 1. Wastes Generated at Zeneca Plant in Richmond

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

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 [Electronic Submittal of Information](#) 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 [GeoTracker Guidance Letter on Reporting of Estimated Results in EDF](#).

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

Sincerely,

Eileen M. White

Eileen M. White, P.E.
Executive Officer

Attachments:

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

AGRICULTURAL
CHEMICAL DIVISION



4-9-80 FB
Stauffer Chemical Company

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

March 28, 1980

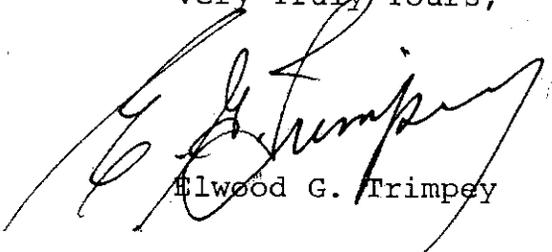
Department of Health Services
Hazardous Materials Management Section
714/744 "P" Street
Sacramento CA 95814



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.

Very Truly Yours,



Elwood G. Trimpey

Enclosure as stated

EGT:st

FORM A: GENERAL FACILITY INFORMATION

Company Name: Stauffer Chemical Company

Facility Name: Richmond Ag

Address: 1415 South 47th Street
 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 00 (10-11)
2. Primary SIC Code 2879 (12-15)
3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
 - thousand gallons (16-24)
 - hundred tons 19 (25-32)
 - thousand cubic yards (33-41)
4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:
 - in landfill 05 (42-44)
 - in pit/pond/lagoon 15 (45-47)
 - in deep well 10 (48-50)
 - incinerated 10 (51-53)
 - reprocessed/recycled 10 (54-56)
 - evaporated 80 (57-59)
 - unknown 10 (60-62)
 - other (Specify _____) 10 (63-65)
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? 11 (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

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)

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) 1 (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO 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 1956 (71-72)
9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms 1941 (73-74)

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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Ag.
 Name of Site: Albany Landfill Co.
 Address of Site: Foot of Buchanan Street
 no. street
 Albany CA
 city state zip code

Name of Owner (while used by facility): Santa Fe Land & Improvement Co.
 Address: 114 Sansome St.
 no. street
 San Francisco CA
 city state zip code

Current Owner (if different from above):
 Address: _____
 no. street
 _____ city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) (11)
3. Current status (1= closed; 2= still in use; 9=don't know) (12)
 IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 19 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons (19-26)
 hundred tons (27-35)
 thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono-industrial waste (42)
 landfill, mixed industrial waste (43)
 landfill, drummed waste (44)
 landfill, municipal refuse co-disposed ... (45)
 pits/ponds/lagoons (46)
 deep well injection (47)
 land farming (48)
 incineration (49)
 treatment (eg, neutralizing)..... (50)
 reprocessing/recycling (51)
 other (specify) (52)
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) (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: Stauffer Chemical Co.

Facility Name: Richmond Aq 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

Acid solutions, with pH < 3.....	[9]	(10)
pickling liquor	[2]	(11)
metal plating waste	[2]	(12)
circuit etchings	[2]	(13)
inorganic acid manufacture	[2]	(14)
organic acid manufacture	[2]	(15)
Base solutions, with pH > 12.....	[2]	(16)
caustic soda manufacture	[2]	(17)
nylon and similar polymer generation	[2]	(18)
scrubber residual	[2]	(19)
Heavy metals & trace metals (bonded organically & inorganically)	[1]	(20) *
arsenic, selenium, antimony	[2]	(21)
mercury	[2]	(22)
iron, manganese, magnesium	[1]	(23) *
zinc, cadmium, copper, chromium (trivalent)	[1]	(24) *
chromium (hexavalent)	[2]	(25) *
lead	[1]	(26) *
Radioactive residues, > 3 pico curies/liter	[2]	(27)
uranium residuals & residuals for U ₆ recycling	[2]	(28)
lathanide series elements and rare earth salts	[2]	(29)
phosphate slag	[2]	(30)
thorium	[2]	(31)
radium	[2]	(32)
other alpha, beta & gamma emitters	[2]	(33)
Organics.....	[2]	(34)
insecticides & intermediates	[2]	(35)
herbicides & intermediates	[2]	(36)
fungicides & intermediates	[2]	(37)
rodenticides & intermediates	[2]	(38)
halogenated aliphatics	[2]	(39)
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)
elastomers	[2]	(46)
solvents polar (except water)	[2]	(47)
carbon tetrachloride	[2]	(48)
trichloroethylene	[2]	(49)
other solvents nonpolar	[2]	(50)
solvents halogenated aliphatic	[2]	(51)
solvents halogenated aromatic	[2]	(52)
oils and oil sludges	[2]	(53)
esters and others	[2]	(54)
alcohols	[2]	(55)
ketones & aldehydes	[2]	(56)
dioxins	[2]	(57)
Inorganics	[1]	(58)
salts	[1]	(59)
mercaptans	[2]	(60)
Misc.....	[2]	(61)
pharmaceutical wastes	[2]	(62)
paints & pigments	[2]	(63)
catalysts (eg. vanadium, platinum, palladium)	[2]	(64)
asbestos	[1]	(65) *
shock sensitive wastes (eg. nitrated toluenes)	[2]	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	[2]	(67)
wastes with flash point below 100° F.....	[2]	(68)

Dry Alum Mud, Insolubles

Iron	1%	Manganese	200 ppm
Copper	30 ppm	Chromium +6	< 0.1 ppm
Lead	100-200 ppm	Chromium +3	14.5 ppm
Asbestos	40 ppm		

02724 00095 AA 11787 STARBAR DELNAV EXTRA LIVESTOCK SPRAY AND DIP
 02021 00310 ZB 11787 STARBAR FEEDLOT FOG
 02724 00201 AA 11787 STARBAR FOGSECT 2-HOUR FOGGER
 02724 00082 ZA 11787 STARBAR GOLDEN MALRIN FLY SPRAY
 02724 00140 AA 11787 STARBAR GOLDEN MALRIN LIQUID EMULSIFIABLE CONCENTR
 ATE
 02724 00162 AA 11787 STARBAR GOLDEN MALRIN SUGAR BAIT
 00476 02043 AA 11787 STARBAR 6X-118
 CATTIE INSECTICIDE POUR ON

*Taken from:
 State of California
 Dept. of Food & Agriculture
 Pesticide Legis. # Book
 1978*

38659 STATE SURGICAL SUPPLY CO.
 00283 00004 AA 38659 GERMICIDAL SOLUTION
 33402 STAUFFER CHEMICAL COMPANY ATTN M. S. O'CONNOR
 00052 00219 AA 33402 CLENESCO NOVADINE +

STAUFFER CHEMICAL COMPANY LABELING & REGISTRATION DEPT.

00476 00254 AA ALEX-BRAND BETTABLE SULFUR
 00476 02106 AA BETASAN TECHNICAL
 00476 01956 AA BETASAN 12.5 G
 00476 01817 ZA BETASAN 4-E
 00476 02122 AA BIO-STAT
 00476 01867 AA CAPTAN 5P 4 FLOWABLE SEED PROTECTANT
 00476 00655 AA CAPTAN 10 DUST
 00476 01839 AA CAPTAN 4 FLOWABLE
 00476 00581 AA CAPTAN 50 WP
 00476 00676 AA CAPTAN 75 SEED PROTECTANT
 00476 02041 AA CAPTAN 80 SEED PROTECTANT
 00476 50020 AA CAPTAN-SIGNAL SULFUR 15-35 DUST
 00476 50021 AA CAPTAN-SIGNAL SULFUR 15-50 DUST
 00476 01286 AA CAPTAN-SULFUR 10-50 DUST
 00476 00001 AA CARBON DISULPHIDE REFINED
 00476 02128 AA CLENESCO A-Q
 00476 02145 AA CLENESCO CHLORINATED CLEANER
 00476 02149 AA CLENESCO CLEAR
 00476 02126 AA CLENESCO DAIRYMAN'S CHLORINE
 00476 02129 AA CLENESCO SANIDINE
 00476 02124 AA CLENESCO SANITIZER
 00476 50194 AA DEVRINOL 10G
 00476 50196 AA DEVRINOL 2-E ORNAMENTAL
 00476 02150 AA DEVRINOL 2E
 00476 02108 AA DEVRINOL 50-WP
 00476 50195 AA DEVRINOL 50-WP ORNAMENTAL
 00476 01995 ZA DYEONATE 10.G
 00476 02056 ZA DYEONATE 4-E
 00476 01307 AA EPTAM 5.G
 00476 01188 AA EPTAM 6-E
 00476 02154 AA EPTAM 7-E
 00476 02165 AA EPTAM 8.7.8 / MANUFACTURING CONCENTRATE
 00476 02157 AA ERADICANE 6.7-E
 00476 01609 AA FOLPET PHALTAN 50-WP
 00476 02153 AA FYBRFLUF GT
 00476 01917 AA IMIDAN 50-WP
 00476 01054 AA MAGNETIC 6 FLOWABLE SULFUR
 00476 02127 AA MILDUPROF
 00476 01932 AA ORDRAM 10.G
 00476 02107 AA ORDRAM 6-E
 00476 02004 AA PREFAR 4-E
 00476 01979 AA RO-NHEET 6-E
 00476 00199 AA SIGNAL BRAND DUSTING SULFUR
 00476 00197 AA SPECIAL ELECTRIC BRAND REFINED SUPER-ADHESIVE DUST
 00476 02156 AA SUTAN + 6.7-E
 00476 01615 AA TILLAM 6-E
 00476 02162 AA TRITHION TECHNICAL
 00476 01633 AA TRITHION 8-E
 00476 00859 AA VAPAM
 00476 02155 AA VERNAM 7-E

01685 STATE CHEMICAL MFG. COMPANY, THE
 01685 00043 AA FORMULA 190-NON SELECTIVE WEED AND BRUSH KILLER
 01685 00049 AA FORMULA 238 SYS-TEM - SYSTEMIC GRANULAR INSECTICID
 E
 01685 00045 AA FORMULA 271 SE-LECT
 01685 00075 AA FORMULA 300 SWIMMING POOL ALGAECIDE
 01685 00080 AA RMK-308 RODENTICIDE
 01685 00063 AA SOK MULTI-PURPOSE INSECT KILLER
 01685 00073 AA STATE BRAND FORMULA 267-B PARCH NON-SELECTIVE HERB
 ICIDE
 01685 00040 AA STATE FIX
 01685 00052 AA STATE FORMULA 236 TERG-O-CIOE
 01685 00072 AA STATE FORMULA 254 IRS - INSECT REPELLENT SPRAY
 01685 00069 AA STATE FORMULA 296 STATE ROACH AND ANT KILLER
 01685 00071 AA STATE FORMULA 298 RAS
 10900 00019 AA STATE FORMULA 319 WAS WASP KILLER
 01685 00065 AA STATEBRAND FORMULA 289 KURE FUNGICIDE
 00655 00476 AA STATEBRAND FORMULA 324 DZ-125
 04704 STATE COLLEGE LABORATORIES
 04704 00003 AA MAGIC CIRCLE DEER REPELLENT
 04704 00002 AA MAGIC CIRCLE RABBIT REPELLENT

Stauffer

FORM B: DISPOSAL SITE INFORMATION

(1-S)
(DO NOT USE)

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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Ag Plant
 Name of Site: CS₂ Retort and Slag Disposal
 Address of Site: 1415 South 47th Street
 no. street

Richmond CA 94804
 city state zip code

Name of Owner (while used by facility): Stauffer Chemical Co.
 Address: 1415 South 47th
 no. street

Richmond CA 94804
 city state zip code

Current Owner (if different from above): _____
 Address: _____
 no. street

_____ _____ _____
 city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 1 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 1 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
 IF CLOSED, specify year closed 1959 (13-14)
4. Year first used for process waste from this facility 1951 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1959 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons 1 (19-26)
 hundred tons 14 (27-33)
 thousand cubic yards 1 (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste 3 (42)
 landfill, mixed industrial waste 2 (45)
 landfill, drummed waste 3 (44)
 landfill, municipal refuse co-disposed ... 3 (45)
 pits/ponds/lagoons 3 (46)
 deep well injection 3 (47)
 land farming 3 (48)
 incineration 3 (49)
 treatment (eg. neutralizing) 3 (50)
 reprocessing/recycling 3 (51)
 other (specify) 3 (52)
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) 1 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: Stauffer Chemical Co.Facility Name: Richmond Ag PlantSite Name: CS₂ Retort and Slag Disposal

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 pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Basic solutions, with pH > 12.....	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	9	(21)
mercury	9	(22)
iron, manganese, magnesium	1	(23)
zinc, cadmium, copper, chromium (trivalent)	9	(24)
chromium (hexavalent)	9	(25)
lead	9	(26)
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UFG recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
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)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbon tetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.....	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	2	(68)

Company Name: Stauffer Chemical Company
 Facility Name: Richmond Ag Plant
 Site Name: Filled Settling Ponds

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 pH < 3.....	2	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	1	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12.....	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation.....	2	(18)
scrubber residual	1	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	1	(23)
zinc, cadmium, copper, chromium (trivalent)	9	(24)
chromium (hexavalent)	9	(25)
lead	9	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
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)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.....	2	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

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.

Company Name: Stauffer Chemical Company
 Facility Name: Richmond Aq Plant
 Name of Site: South End of Plant at San Francisco Bay Edge
 Address of Site: 1415 South 47th Street
 no. street

Richmond CA 94804
 city state zip code

Name of Owner (while used by facility): Stauffer Chemical Co.
 Address: 1415 South 47th Street
 no. street

Richmond CA 94804
 city state zip code

Current Owner (if different from above):
 Address: _____
 no. street

_____ _____ _____
 city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... 1 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 1 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 1 (12)
 IF CLOSED, specify year closed 1958 (13-14)
4. Year first used for process waste from this facility 1950 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1958 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons | | | | | | | | | | (19-26)
 hundred tons | | | | | | | | | | (27-33)
 thousand cubic yards | | | | | | | | | | (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste 3 (42)
 landfill, mixed industrial waste 2 (43)
 landfill, drummed waste 3 (44)
 landfill, municipal refuse co-disposed ... 3 (45)
 pits/ponds/lagoons 3 (46)
 deep well injection 3 (47)
 land farming 3 (48)
 incineration 3 (49)
 treatment (eg. neutralizing)..... 3 (50)
 reprocessing/recycling 3 (51)
 other (specify) 9 (52)
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) 1 (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

Company Name: Stauffer Chemical Co.

Facility Name: Richmond Aq Plant

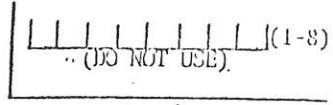
Site Name: South End of Plant at San Francisco Bay Edge

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)

FILE IN EVERY BLOCK SPACE

Acid solutions, with pH < 3	1	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	1	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	1	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20) *
arsenic, selenium, antimony	1	(21) *
mercury	2	(22)
iron, manganese, magnesium	1	(23) *
zinc, cadmium, copper, chromium (trivalent)	1	(24) *
chromium (hexavalent)	2	(25) *
lead	1	(26) *
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
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)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.	1	(61) *
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65) *
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	2	(68)

* Cinders and Insoluble Dry Alum Mud Mixture	Alum Mud 98.5%
Iron	1% - 2%
Copper	30 ppm
Arsenic	5 - 10 ppm
Manganese	200ppm
Zinc	170 ppm
Asbestos	40 ppm
	Cinders 1.5%



Company Name: Stauffer Chemical Co.

Facility Name: Richmond Ag Plant

Site Name: Blair Southern Pacific Landfill

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 pH < 3.....	9	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12.....	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20) *
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	1	(23) *
zinc, cadmium, copper, chromium (trivalent)	1	(24) *
chromium (hexavalent)	2	(25) *
lead	1	(26) *
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
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)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbon tetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65) *
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

* Dry Alum Mud Insolubles

Iron	1%	Manganese	200 ppm
Copper	30 ppm	Chromium +3	14.5 ppm
Lead	100-200 ppm	Chromium +6	< 0.1 ppm
Asbestos (prior to 8/76)	40 ppm		

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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Ag Plant
 Name of Site: I.T. Environmental of Contra Costa County
 Address of Site: East End Arthur Road
 no. street

Martinez CA 94553
 city state zip code

Name of Owner (while used by facility): I.T. Corporation
 Address: 4575 Pacheco Blvd.
 no. street

Martinez CA 94553
 city state zip code

Current Owner (if different from above):
 Address: _____
 no. street

_____ _____ _____

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) [2] (12)
 IF CLOSED, specify year closed 19[] [] (13-14)
4. Year first used for process waste from this facility 19[7] [6] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19[7] [9] (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons [] [] [] [] [] [] [] [] [] [] (19-26)
 hundred tons [] [] [] [] [] [] [] [] [] [] (27-33)
 thousand cubic yards [] [] [] [] [] [] [] [] [] [] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste [9] (42)
 landfill, mixed industrial waste [1] (43)
 landfill, drummed waste [9] (44)
 landfill, municipal refuse co-disposed ... [9] (45)
 pits/ponds/lagoons [1] (46)
 deep well injection [9] (47)
 land farming [9] (48)
 incineration [9] (49)
 treatment (eg. neutralizing)..... [1] (50)
 reprocessing/recycling [9] (51)
 other (specify) [9] (52)
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: DISPOSAL SITE INFORMATION

1 1 1 1 1 1 1 1 1 1 (1-8)
(DO NOT USE)

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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Aq Plant
 Name of Site: I.T. Environmental, Solano County
 Address of Site: Lake Herman Road
 no. street
 Benicia CA 94510
 city state zip code

Name of Owner (while used by facility): I.T. Corporation
 Address: 4575 Pacheco Blvd.
 no. street
 Martinez CA 94553
 city state zip code

Current Owner (if different from above): _____
 Address: _____
 no. street
 _____ _____ _____

1. Location (1= the property on which facility is located; 2= off-site)..... 2 (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) 2 (11)
3. Current status (1= closed; 2= still in use; 9=don't know) 2 (12)
 IF CLOSED, specify year closed 19 (13-14)
4. Year first used for process waste from this facility 1975 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 1979 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons (19-26)
 hundred tons 37 (27-33)
 thousand cubic yards (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste 9 (42)
 landfill, mixed industrial waste 1 (43)
 landfill, drummed waste 9 (44)
 landfill, municipal refuse co-disposed ... 9 (45)
 pits/ponds/lagoons 1 (46)
 deep well injection 9 (47)
 land farming 9 (48)
 incineration 9 (49)
 treatment (eg. neutralizing)..... 9 (50)
 reprocessing/recycling 9 (51)
 other (specify) 9 (52)
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

Company Name: Stauffer Chemical Co.

Facility Name: Richmond Ag Plant

Site Name: I.T. Environmental, Solano County

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 pH < 3	1	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(15)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20) *
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	1	(25) *
zinc, cadmium, copper, chromium (trivalent)	1	(24) *
chromium (hexavalent)	2	(25) *
lead	1	(26) *
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(35)
Organics	1	(34)
insectides & intermediates	2	(35)
herbicides & intermediates	1	(35)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
halogenated aromatics	2	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbon tetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	1	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65) *
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.	1	(68)

Dry Alum Mud Insoluble

Iron	18	Manganese	200 ppm
Copper	30 ppm	Chromium +3	14.5 ppm
Lead	100-200 ppm	Chromium +6	< 0.1 ppm
Asbestos (prior to 8/76)	40 ppm		

FORM 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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Ag Plant
 Name of Site: Berkeley Landfill Co.
 Address of Site: 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

Current Owner (if different from above):
 Address: _____
 no. street
 _____ _____ _____

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) [2] (12)
 IF CLOSED, specify year closed 19[] (13-14)
4. Year first used for process waste from this facility 19[6]0 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19[7]1 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons [] [] [] [] [] [] [] [] [] [] (19-26)
 hundred tons [] [] [] [] [] [] [] [] [] [] (27-33)
 thousand cubic yards [] [] [] [] [] [] [] [] [] [] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	[9]	(42)
landfill, mixed industrial waste	[2]	(43)
landfill, drummed waste	[9]	(44)
landfill, municipal refuse co-disposed	[9]	(45)
pits/ponds/lagoons	[9]	(46)
deep well injection	[9]	(47)
land farming	[9]	(48)
incineration	[9]	(49)
treatment (eg. neutralizing)	[9]	(50)
reprocessing/recycling	[9]	(51)
other (specify) <u>Class 2 Landfill</u>	[2]	(52)
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



Company Name: Stauffer Chemical Co.
 Facility Name: 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)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	9	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	2	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12	2	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	2	(19)
Heavy metals & trace metals (bonded organically & inorganically)	1	(20) *
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	1	(23) *
zinc, cadmium, copper, chromium (trivalent)	1	(24) *
chromium (hexavalent)	2	(25) *
lead	1	(26) *
Radioactive residues, > 3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	2	(34)
insecticides & intermediates	2	(35)
herbicides & intermediates	2	(36)
fungicides & intermediates	2	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	2	(39)
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)
elastomers	2	(46)
solvents polar (except water)	2	(47)
carbontetrachloride	2	(48)
trichloroethylene	2	(49)
other solvents nonpolar	2	(50)
solvents halogenated aliphatic	2	(51)
solvents halogenated aromatic	2	(52)
oils and oil sludges	2	(53)
esters and ethers	2	(54)
alcohols	2	(55)
ketones & aldehydes	2	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	2	(60)
Misc.....	1	(61) *
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	2	(64)
asbestos	1	(65) *
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	2	(67)
wastes with flash point below 100° F.....	2	(68)

Dry Alum Mud Insolubles

Iron	1%	Manganese	200 ppm
Copper	30 ppm	Chromium +6	< 0.1 ppm
Lead	100-200 ppm	Chromium +3	14.5 ppm
Asbestos	40 ppm		

FORM 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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Ag Plant
 Name of Site: Environmental Disposal Services
 Address of Site:

no. street
Kettleman City CA
 city state zip code

Name of Owner (while used by facility): Waste Management, Inc.
 Address: 900 Jorie Blvd.
 no. street

Oakbrook IL 60521
 city state zip code

Current Owner (if different from above):
 Address: no. street
 city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) [2] (12)
 IF CLOSED, specify year closed 19[] (13-14)
4. Year first used for process waste from this facility 19[7] [8] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19[7] [9] (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons [] [] [] [] [] [] [] [] [] [] (19-26)
 hundred tons [] [] [] [] [] [] [] [] [] [] (27-33)
 thousand cubic yards [] [] [] [] [] [] [] [] [] [] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste [9] (42)
 landfill, mixed industrial waste [1] (43)
 landfill, drummed waste [9] (44)
 landfill, municipal refuse co-disposed ... [9] (45)
 pits/ponds/lagoons [9] (46)
 deep well injection [9] (47)
 land farming [9] (48)
 incineration [9] (49)
 treatment (eg. neutralizing)..... [9] (50)
 reprocessing/recycling [9] (51)
 other (specify) [9] (52)
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

* 9 Tons

Company Name: Stauffer Chemical Co.

Facility Name: Richmond Aq 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 pH < 3.....	<u>1</u>	(10)
pickling liquor	<u>2</u>	(11)
metal plating waste	<u>2</u>	(12)
circuit etchings	<u>2</u>	(13)
inorganic acid manufacture	<u>2</u>	(14)
organic acid manufacture	<u>1</u>	(15)
Base solutions, with pH > 12.....	<u>1</u>	(16)
caustic soda manufacture	<u>2</u>	(17)
nylon and similar polymer generation	<u>2</u>	(18)
scrubber residual	<u>1</u>	(19)
Heavy metals & trace metals (bonded organically & inorganically)	<u>2</u>	(20)
arsenic, selenium, antimony	<u>2</u>	(21)
mercury	<u>2</u>	(22)
iron, manganese, magnesium	<u>2</u>	(23)
zinc, cadmium, copper, chromium (trivalent)	<u>2</u>	(24)
chromium (hexavalent)	<u>2</u>	(25)
lead	<u>2</u>	(26)
Radioactive residues, > 3 pico curies/liter	<u>2</u>	(27)
uranium residuals & residuals for UF ₆ recycling	<u>2</u>	(28)
lathanide series elements and rare earth salts	<u>2</u>	(29)
phosphate slag	<u>2</u>	(30)
thorium	<u>2</u>	(31)
radium	<u>2</u>	(32)
other alpha, beta & gamma emitters	<u>2</u>	(33)
Organics.....	<u>1</u>	(34)
insecticides & intermediates	<u>2</u>	(35)
herbicides & intermediates	<u>1</u>	(36)
fungicides & intermediates	<u>2</u>	(37)
rodenticides & intermediates	<u>2</u>	(38)
halogenated aliphatics	<u>2</u>	(39)
halogenated aromatics	<u>2</u>	(40)
acrylates & latex emulsions	<u>2</u>	(41)
PCB/PBB's	<u>2</u>	(42)
amides, amines, imides	<u>1</u>	(43)
plastizers	<u>2</u>	(44)
resins	<u>2</u>	(45)
elastomers	<u>2</u>	(46)
solvents polar (except water)	<u>2</u>	(47)
carbontetrachloride	<u>2</u>	(48)
trichloroethylene	<u>2</u>	(49)
other solvents nonpolar	<u>1</u>	(50)
solvents halogenated aliphatic	<u>2</u>	(51)
solvents halogenated aromatic	<u>2</u>	(52)
oils and oil sludges	<u>2</u>	(53)
esters and ethers	<u>2</u>	(54)
alcohols	<u>2</u>	(55)
ketones & aldehydes	<u>2</u>	(56)
dioxins	<u>2</u>	(57)
Inorganics	<u>1</u>	(58)
salts	<u>1</u>	(59)
mercaptans	<u>2</u>	(60)
Misc.....	<u>1</u>	(61)
pharmaceutical wastes	<u>2</u>	(62)
paints & pigments	<u>2</u>	(63)
catalysts (eg. vanadium, platinum, palladium)	<u>2</u>	(64)
asbestos	<u>2</u>	(65)
shock sensitive wastes (eg. nitrated toluenes)	<u>2</u>	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	<u>2</u>	(67)
wastes with flash point below 100° F.....	<u>1</u>	(68)

Form B: DISPOSAL SITE INFORMATION

(1-8)
(DO NOT USE)

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.

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Aq Plant
 Name of Site: Western Contra Costa County Sanitary Landfill
 Address of Site: Foot of Paar Blvd.
 no. street

Richmond CA 94805
 city state zip code

Name of Owner (while used by facility): Richmond Sanitary Service
 Address: 205 41st Street
 no. street

Richmond CA 94805
 city state zip code

Current Owner (if different from above): _____

Address: _____
 no. street

 city state zip code

1. Location (1= the property on which facility is located; 2= off-site)..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership) [2] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) [2] (12)
 IF CLOSED, specify year closed 19[] (13-14)
4. Year first used for process waste from this facility 19[6]0 (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) 19[7]9 (17-18)
6. Total amount of process waste from this facility disposed at site:
 thousand gallons [] [] [] [] [] [] [] [] [] [] (19-26)
 hundred tons [] [] [] [] [] [] [] [] [] [] (27-33)
 thousand cubic yards [] [] [] [] [] [] [] [] [] [] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)
 landfill, mono industrial waste [9] (42)
 landfill, mixed industrial waste [1] (43)
 landfill, drummed waste [1] (44)
 landfill, municipal refuse co-disposed ... [9] (45)
 pits/ponds/lagoons [9] (46)
 deep well injection [9] (47)
 land farming [9] (48)
 incineration [9] (49)
 treatment (eg. neutralizing)..... [9] (50)
 reprocessing/recycling [9] (51)
 other (specify) [9] (52)
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

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: (1=present in waste; 2=not present in waste; 9=don't know)

FILL IN EVERY BLOCK SPACE

Acid solutions, with pH < 3.....	1	(10)
pickling liquor	2	(11)
metal plating waste	2	(12)
circuit etchings	2	(13)
inorganic acid manufacture	1	(14)
organic acid manufacture	2	(15)
Base solutions, with pH > 12.....	1	(16)
caustic soda manufacture	2	(17)
nylon and similar polymer generation	2	(18)
scrubber residual	1	(19)
Heavy metals & trace metals (bonded organically & inorganically)	2	(20)
arsenic, selenium, antimony	2	(21)
mercury	2	(22)
iron, manganese, magnesium	2	(23)
zinc, cadmium, copper, chromium (trivalent)	2	(24)
chromium (hexavalent)	2	(25)
lead	2	(26)
Radioactive residues, >3 pico curies/liter	2	(27)
uranium residuals & residuals for UF ₆ recycling	2	(28)
lathanide series elements and rare earth salts	2	(29)
phosphate slag	2	(30)
thorium	2	(31)
radium	2	(32)
other alpha, beta & gamma emitters	2	(33)
Organics.....	1	(34)
insecticides & intermediates	1	(35)
herbicides & intermediates	1	(36)
fungicides & intermediates	1	(37)
rodenticides & intermediates	2	(38)
halogenated aliphatics	9	(39)
halogenated aromatics	9	(40)
acrylates & latex emulsions	2	(41)
PCB/PBB's	2	(42)
amides, amines, imides	1	(43)
plastizers	2	(44)
resins	2	(45)
elastomers	2	(46)
solvents polar (except water)	1	(47)
carbontetrachloride	9	(48)
trichloroethylene	2	(49)
other solvents nonpolar	9	(50)
solvents halogenated aliphatic	9	(51)
solvents halogenated aromatic	9	(52)
oils and oil sludges	1	(53)
esters and ethers	9	(54)
alcohols	9	(55)
ketones & aldehydes	9	(56)
dioxins	2	(57)
Inorganics	1	(58)
salts	1	(59)
mercaptans	9	(60)
Misc.....	1	(61)
pharmaceutical wastes	2	(62)
paints & pigments	2	(63)
catalysts (eg. vanadium, platinum, palladium)	1	(64)
asbestos	2	(65)
shock sensitive wastes (eg. nitrated toluenes)	2	(66)
air water reactive wastes (eg. P ₄ , aluminum chloride)	9	(67)
wastes with flash point below 100° F.....	1	(68)

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.

Company Name: Stauffer Chemical Co.

Facility Name: Richmond Ag Plant

<u>Name of Firm or Contractor</u>	<u>Address</u>	<u>ICC # (If Known)</u>	<u>Years Used</u>
1. E. L. Bibb, Inc. General Contractor	4030 Wesley Way El Sobrante, CA 94803		3
2. Blair Excavators, Inc.	1360 So. 51st St. Richmond CA 94804		29
3. Erickson Trucking, Inc. State Liquid Waste Hauler's Registration No. 19	249 Tewksbury Ave. Richmond CA 94801		3
4. I.T. Transportation, Inc. State Liquid Waste Hauler's Reg. # 88	4501 Pacheco Blvd. Martinez, CA 94553		4
5. Knapp Excavators, Inc. State License No. 188777	63 Parr Blvd. Richmond CA		29
6. Richmond Sanitary Service State Liquid Waste Hauler's Reg. #92	205 41st St. Richmond CA 94805		29

FORM D: SUPPLEMENTAL HAULER INFORMATION

NOTE THIS FORM FOR EACH FIRM OR INDIVIDUAL CONTRACTOR (INCLUDING YOUR OWN COMPANY, ITS AFFILIATES & SUBSIDIARIES) WHO REMOVED PROCESS WASTE FROM THIS FACILITY SINCE 1950 AND TOOK IT TO AN UNKNOWN LOCATION

(1-
(DO NOT USE)

Company Name: Stauffer Chemical Co.
 Facility Name: Richmond Ag Plant
 Name of Hauling Firm/Contractor: _____
 Address: (no.) _____ (street) _____
 (city) _____ (state) _____ (zip code) _____

**NOT APPLICABLE*

1. Year first used 19 (10-11)
2. Year last used (enter "79" if still in use) 19 (12-13)
3. Total amount of process waste hauled from this facility:
 thousand gallons (14-21)
 hundred tons (22-28)
 thousand cubic yards (29-36)
4. 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 pH < 3 (37)
 - pickling liquor (38)
 - metal plating waste (39)
 - circuit etchings (40)
 - inorganic acid manufacture (41)
 - organic acid manufacture (42)
- Base solutions, with pH > 10 (43)
 - caustic soda manufacture (44)
 - nylon and similar polymer generation (45)
 - scrubber residual (46)
- Heavy metals & trace metals (bonded organically & inorganically) (47)
 - arsenic, selenium, antimony (48)
 - mercury (49)
 - iron, manganese, magnesium (50)
 - zinc, cadmium, copper, chromium (trivalent) (51)
 - chromium (hexavalent) (52)
 - lead (53)
- Radioactive residues, > 5 pico curies/liter (54)
 - uranium residuals & residuals for UF₆ recycling (55)
 - lanthanide series elements and rare earth salts (56)
 - phosphate slag (57)
 - thorium (58)
 - radium (59)
 - other alpha, beta & gamma emitters (60)
- Organics (61)
 - pesticides & intermediates (62)
 - herbicides & intermediates (63)
 - fungicides & intermediates (64)
 - rodenticides & intermediates (65)
 - halogenated aliphatics (66)
 - halogenated aromatics (67)
 - acrylates & latex emulsions (68)
 - PCB/PBB's (69)
 - amides, amines, imides (70)
 - plastizers (71)
 - resins (72)
 - elastomers (73)
 - solvents polar (except water) (74)
 - carbontetrachloride (75)
 - trichloroethylene (76)
 - other solvents nonpolar (77)
 - solvents halogenated aliphatic (78)
 - solvents halogenated aromatic (79)
 - oils and oil sludges (10) (80)
 - esters and ethers (11)
 - alcohols (12)
 - ketones & aldehydes (13)
 - dioxins (14)
- Inorganics (15)
 - salts (16)
 - mercaptans (17)
- Misc. (18)
 - pharmaceutical wastes (19)
 - paints & pigments (20)
 - catalysts (eg. vanadium, platinum, palladium) (21)
 - asbestos (22)
 - shock sensitive wastes (eg. nitrated toluenes) (23)
 - air water reactive wastes (eg. P₄, aluminum chloride) (24)
 - wastes with flash point below 100° F (25) (80)

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 13267¹ 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.

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

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