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GEOSCIENCE & ENGINEERING CONSULTING

August 3, 2015

Mr. Mark Detterman  
Alameda County Health Care Services  
Local Oversight Program  
1131 Harbor Bay Parkway, Suite 250  
Alameda, California 94502

Subject: Perjury Statement for the Indoor Air Survey Sampling Event 2 Letter of Findings—  
1475 and 1483 67<sup>th</sup> Street, Emeryville, California.

Dear Mr. Detterman:

Stellar Environmental Solutions, Inc. (Stellar Environmental), on behalf of the Corder Family Emeryville Properties, LP, is providing this cover to the letter report of findings on the “Indoor Air Survey Sampling Event 2 Letter of Findings—1475 and 1483 67<sup>th</sup> Street, Emeryville, California” dated July 8, 2015, to enable the report to meet the requirements to upload the report to the Geotracker site of the Responsible Party (RP) site upgradient of the impacted Corder properties. The RP site responsible for the impact to the Corder property is known as the McGrath Site (Alameda County Fuel Leak Case #RO0000063; Global ID T0600102099).

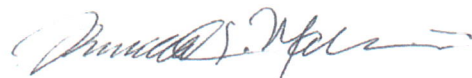
We declare, under penalty of perjury, that the information and/or recommendations contained in this report are true and correct to the best of our knowledge. Please call us at (510) 644-3123, if you have any questions.

Sincerely,



Ms. Erin M. Corder-Schaefer

Manager of Corder Family Management Company, LLC, General Partner of Corder Family Emeryville Properties, LP.



Richard S. Makdisi, P.G  
Principal Geochemist and President

December 14, 2012

Ms. Erin M. Schaefer  
Corder Family Emeryville Properties, LP  
2156 Corte Dorado Espuela  
Alpine, CA 91901

Subject: Environmental Compliance Review and Risk of Contamination Assessment,  
1475 67<sup>th</sup> Street, Emeryville, California

Dear Ms. Schaefer:

### **INTRODUCTION AND BACKGROUND**

Stellar Environmental Solutions, Inc. (Stellar Environmental) is providing this review of the current environmental compliance status for Metalco at 1475 67<sup>th</sup> Street in Emeryville, California. We understand that Metalco is a tenant at the property owned by the Corder Family Emeryville Properties, LP. The purpose of the regulatory compliance review is to ensure all permit conditions are currently being met, and that process operations at the Metalco anodizing facility comply with the permitted framework. To evaluate the regulatory compliance, file reviews were conducted with the appropriate regulatory agencies including the Alameda County Department of Environmental Health (ACDEH), the Bay Area Air Quality Management District (BAAQMD), the California Department of Toxic Substance Control (DTSC), and the East Bay Municipal Utilities District (EBMUD). In addition, a second objective beyond ascertaining if the Metalco operations have been in compliance with applicable regulations, is to more generally evaluate the closure issues in the event they leave and the risk of the operations to cause environmental contamination, based on indications of “housekeeping” and the type and volume of chemicals used. A site inspection was conducted to evaluate the process operations and to ascertain the current conditions at the site. Figure 1 shows the site location.

Appendix A contains copies of Metalco hazardous materials inventories, permits and inspection reports, Appendix B contains the 2012 Metalco Hazardous Materials Business Plan (HMBP) and Appendix C contains a Closure Plan prepared by Metalco as required by the DTSC. Appendix D contains photodocumentation of the site inspection and a facility layout diagram.

## **FACILITY DESCRIPTION**

The Metalco anodizing shop is located on the south side of 67<sup>th</sup> Street, about 250 feet west of Hollis Street in the City of Emeryville, Alameda County, California. The property is in a light industrial area on the Emeryville/Berkeley border. The site contains a 6,000 square foot building constructed circa 1940 referred to as the “Racking Room”, and an attached 8,200 square foot building constructed about 1946 which is where the anodizing process takes place and where acids and caustics used in the anodizing process are stored. Metalco has been operating on the site since 1946. Mr. Russ Gates, owner of the business, has been associated with Metalco since 1990.

Anodizing is an electrochemical process that converts a metal surface into a corrosion-resistant, anodic oxide finish and is basically an accelerated, controlled oxidation process. Metalco anodizes aluminum parts such as window frames and other building parts, and has capacity for large components such as sailboat masts. Anodizing is accomplished by immersing the aluminum part into a caustic sodium hydroxide solution for surface etching, then into a 15% sulfuric acid electrolyte bath while passing a DC electric current through the medium. A copper bar cathode is mounted to the anodizing tank and the aluminum acts as the anode so that oxygen ions are released from the electrolyte to combine with the aluminum atoms at the surface of the part being anodized. Anodized parts are then rinsed (neutralized) and then prepared for shipping.

The chemical waste stream generated by the anodizing process at Metalco consists of aluminum laden acid that is processed periodically through an ion-exchanger which precipitates the aluminum into a concentrated liquid which is then pumped to a holding tank. This low (acidic) pH liquid is then neutralized by adding an appropriate volume of caustic solution into the holding tank. The resulting aluminum laden liquids are then discharged under EBMUD permit No. 07390021 to the sanitary sewer. Each November Metalco is required to submit a sample of the waste liquid being discharged for metals analysis.

## **PERMITS AND CONDITIONS**

Metalco maintains several permits and must perform periodic tasks to remain in compliance with regulatory agencies. Table 1 on the following page is a list of the permit type, permit number, the associated regulatory agency, the expiration date, last date of inspection, and permit conditions, if any.

**Table 1**  
**Summary of Permit Requirements**  
**Metalco, 1475 67<sup>th</sup> Street Emeryville, California**

<b>PERMIT TYPE/ REQUIREMENT</b>	<b>PERMIT NUMBER</b>	<b>REGULATORY AGENCY</b>	<b>EXPIRATION DATE/FREQUENCY REQUIRED</b>	<b>LAST INSPECTION DATE</b>	<b>CONDITIONS</b>
Discharge Permit (Appendix A)	07390021	East Bay Municipal Utilities District	10/25/2014	10/25/2011	Inspections are random, bi- annually
Total Toxic Organics Compliance Report (Appendix A)	07390021	East Bay Municipal Utilities District	Each November	November 2012	Must submit samples to laboratory for metals analysis
Conditionally Authorized Permit for ion-exchanger and treatment tank (Appendix A)	CAL00100455	California Environmental Protection Agency	Forms to be completed annually	No inspection required by EPA. Ion exchanger is inspected by ACDEH	pH of discharge to sanitary sewer must be in range of 2.0 and 12.5
Hazardous Materials Business Plan (Appendix B)	Not applicable	Alameda County Department of Environmental Health	7/2/2012	HMPB is current	Must be updated yearly
Business ID and Hazardous Materials Inventory (Appendix A)	CAL000100455	Alameda County Department of Environmental Health	7/7/2013	7/7/2012	None
Inspection Report/Tiered Permit Inspection Checklist	Not Applicable	Alameda County Department of Environmental Health	Annual	12/28/2011	Comply with Correction Orders. (none noted 2011)
Air Discharge Permit	A6972	Bay Area Air Quality Management District	Expired 9/15/2008	9/15/2008	Was for IC engine used for DC generator. No longer exists.

The primary permit requirements at Metalco involve tabulating the volume and metal/pH content of the liquid that gets discharged to the sanitary sewer after processing by the ion-exchanger. To discharge this liquid, the property maintains a California Environmental Protection Agency (EPA) identification number and an EBMUD permit as mentioned above. The primary condition

of the permit is that a sample of the liquid must be collected each November and analyzed for a suite of metals. In addition, the pH is measured during discharge periods by Metalco in order to stay in compliance. Records of the most recent compliance reports and laboratory data sheets are included in Appendix A. The summary of the most recent (2011) inspection conducted by ACDEH is also included in Appendix A. No exceedence of allowable metals concentrations were found in the discharge liquid and no violations were noted in the inspection report.

### **SITE INSPECTION**

The subject property site inspection was conducted by Mr. Steve Bittman of Stellar Environmental on December 11, 2012. Mr. Bittman was accompanied by Mr. Russ Gates, of Metalco, and by Mr. Jim Bohar, the property owners real estate representative. All of the subject property areas were accessible during the site inspection, and records and permit information was made available. See Appendix D for photo-documentation of the site inspection. A facility site plan is also included in Appendix D.

The 13 anodizing tanks containing the caustic and corrosive liquids are located at the rear of the larger shop area. This area contains various sizes of tanks intended to accommodate aluminum parts of different sizes. This area also contains a washing tank that contains a solution of soap and water, and the ion-exchange unit and holding tank. The tanks all feature secondary containment. The concrete slab floor in the tank area was generally in good condition with some small areas adjacent to the tanks that appear to have been affected by acid. A concrete lined containment pit is located adjacent to the tanks should a breach or large spill occur. In general, the concrete slab floors in the areas other than the tank room were in good to excellent condition.

The ion-exchange equipment and holding tank system located by the back wall of the anodizing room appeared to be in good condition. When the holding tank contains sufficient liquid, it discharges to a floor trench that then subsequently connects to the sanitary sewer lateral that discharges to the sewer beneath 67<sup>th</sup> Street. The holding tank and trench were empty at the time of the site inspection.

The room adjacent to the anodizing area contains bulk acids and caustics in proper containers. No leaks or spill were noted in this area. This is the area that formerly contained a natural gas fueled internal combustion engine that was used until 2008 to drive a generator that provided the DC current to the anodizing cathode. Metalco formerly maintained an emissions permit with the BAAQMD for this equipment. Since 2008, the DC current has been supplied by rectifiers and the BAAMQD permit is no longer needed.

The racking area where finished parts are prepped for shipping was inspected for hazardous materials storage and signs of leaks or spills. No such conditions were noted in this area.

### **RISK OF CONTAMINATION ASSESSMENT**

The primary risk of potential contamination from the anodizing operations, assuming all permit requirements are followed as appears to be the case to date, is from a “risk of upset” due to a large enough earthquake such that caustic and acid spillage from the holding and storage tanks could occur. If this was to occur the impact would be unpermitted discharge to the trench and sanitary sewer.

### **CLOSURE PLAN**

As part of Metalco’s original DTSC permit granted in 1994, the business was required to prepare a “Closure Plan” which summarizes the process of facility closure should it occur. That closure plan is included in Appendix C. the closure plan requires the anodizing pretreatment, storage or chemical and treatment tanks to all be cleaned and removed to achieve closure. All tanks such as the acid neutralizing, desmutter, etching, anodizing and rinse water would need to be removed along with any waste or unused chemicals at the time of the closure. The containment pit and in exchanger would be required to be drained, rinsed and cleaned.

Stellar Environmental also left a voice mail message for Mr. Larry Seto of ACDEH, the designated case officer for the Metalco facility, enquiring about the compliance status and any other concerns he might have about Metalco’s operations. Mr. Seto was not available to respond in the time schedule for the completion of this report but the public records do not suggest any concern on the part of ACDEH.

### **CONCLUSIONS**

The Metalco anodizing shop, located at 1475 67<sup>th</sup> Street in Emeryville, California, according to all available records, is in compliance with local and state regulations that pertain to the activities conducted on site.

Conversations with regulatory agencies, permit inspections, and a site inspection indicate that Metalco maintains all of the necessary permits, and is in compliance with the requirements of those permits. Mr. Gates maintains records in an accessible and organized fashion, and the general housekeeping in the shop appeared good.

In the event that Metalco anodizing shop is to shut down its operations at the 1475 67<sup>th</sup> Street in Emeryville location it is required by the original permit of 1994 to submit a closure plan and implement site closure activities to the satisfaction of the reviewing regulatory agency.

There is some risk of spillage and discharge in the event of a large scale earthquake that could result in spillage from overtopping or rupture of tanks containing chemicals.

We trust this review assists you in evaluating the environmental compliance issues for the subject property site. Please call the undersigned directly at (510) 644-3123 if you have any questions regarding this report of findings.

Sincerely,



Steve Bittman  
Senior Geologist/ Environmental Scientist



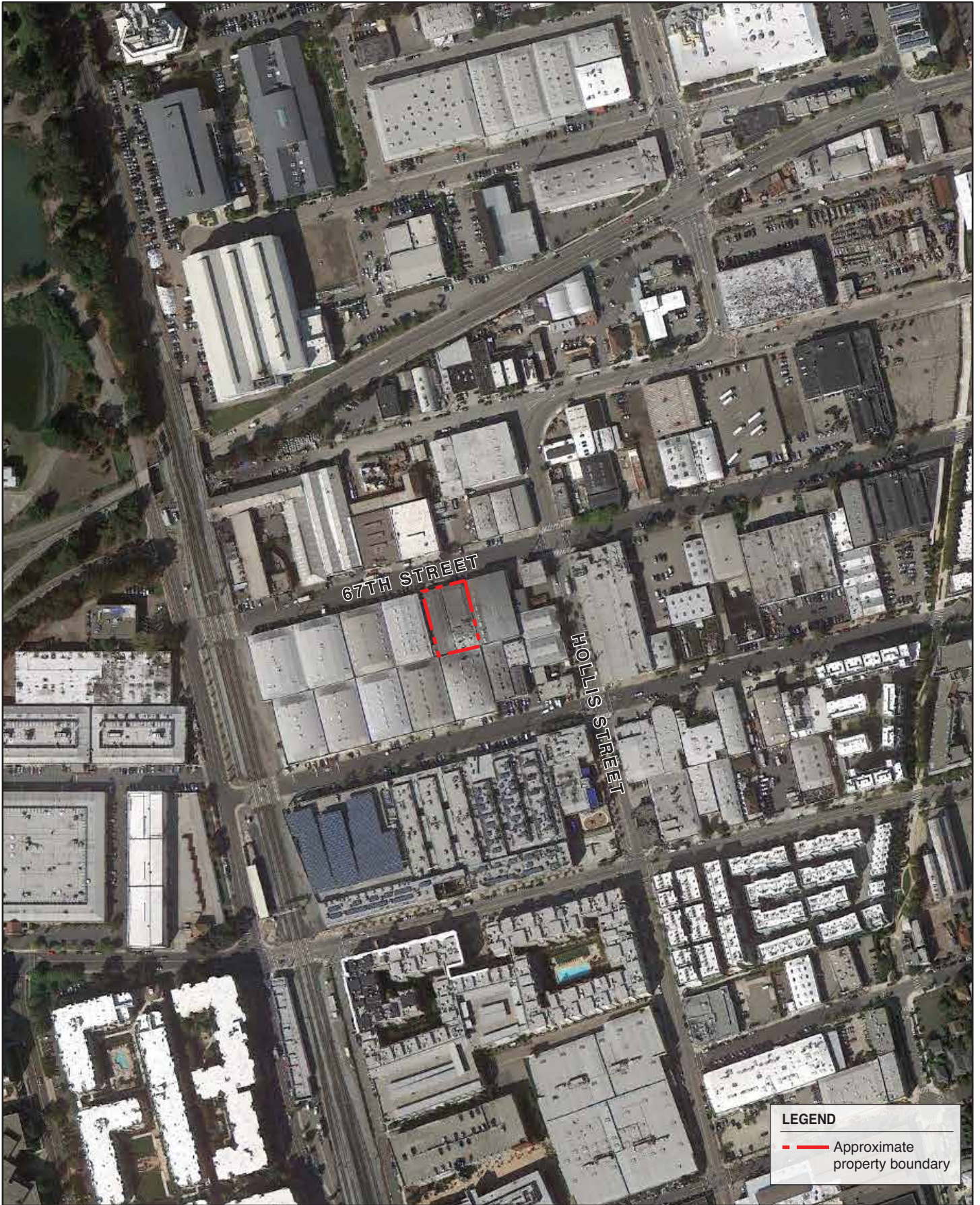
Richard S. Makdisi, R.G., R.E.A.  
Principal Geochemist/President



## **FIGURE**

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**LEGEND**

— Approximate property boundary



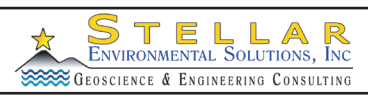
**SITE LOCATION MAP**

1475 67th St.  
Emeryville, CA

By: MJC

DECEMBER 2012

**Figure 1**



2012-44-01

## **APPENDIX A**

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## Onsite Hazardous Waste Treatment Notification – Facility

There are several treatment activities that, although they would be otherwise regulated, are exempt under the law provided certain conditions are met. Exempt treatment activities are described in Appendix A of these instructions (see below) and if your treatment activities are exempt then no notification is required for these activities.

If your treatment activities do not qualify for an exemption complete this page if your facility is a hazardous waste generator performing treatment of hazardous wastes at the site where the waste is generated, and the facility is eligible under the Conditional Exemption (CE), or Conditional Authorization (CA) tiers, or operates a Fixed Treatment Unit (FTU) under the Permit by Rule (PBR) tier. To determine which tier or tiers apply to your operations, refer to the DTSC Onsite Tiered Permitting Flow Chart, which graphically displays the eligible waste streams and treatment processes by tier. Submit one facility page (Onsite Hazardous Waste Treatment Notification - Facility) per facility, regardless of the number of treatment units located at the site. Attach a unit specific page (Onsite Hazardous Waste Treatment Notification - Unit) and a Waste and Treatment Process Combinations page for each treatment unit at this location.

For notification requirements for PBR FTUs refer to 22 CCR 67450.2, for CA refer to HSC 25200.3(e) and (k), and for CE refer to HSC 25201.5(d) and (l).

(Note: the numbering of the instructions follows the data element numbers that are on the UPCF pages. These data element numbers are used for electronic submission and are the same as the numbering used in 27 CCR, Appendix C, the Business Section of the Unified Program Data Dictionary.) Please number all pages of your submittal. This helps your CUPA or local agency identify whether the submittal is complete and if any pages are separated.

1. FACILITY ID NUMBER - Leave this blank. This number is assigned by the CUPA. This is the unique number which identifies your facility.
3. BUSINESS NAME - Enter the full legal name of the business.
600. NOTIFICATION STATUS - Check whether this notification is your initial notification under the Tiered Permitting system, an amended notification, or a renewal (for PBR only).
601. PERMIT STATUS - Check the status of the permit for State issued hazardous waste permits or grants of authorization.
602. NUMBER OF UNITS - For each of the permitting tiers or categories listed, enter the number of units you operate at this facility location. Complete a unit specific notification page and a waste and treatment process page for each unit you list here, except for CE-CL units. Verify that the total number of units (item 602g) is equal to the number of unit specific notification and waste and treatment process pages included in the submittal plus the number of CE-CL units (item 602f).
- SIGNATURE OF OWNER/OPERATOR - The business owner or officer of the company who is authorized to make decisions for the facility and who has operational control, shall sign in the space provided. In most companies, this is not the environmental compliance or technical staff. The title should indicate that an appropriately authorized person is signing for the company. Original signatures are required. You are signing the certifications and attesting to their accuracy under penalty of law for submitting false information. The certifications cover waste minimization, the eligibility of the unit(s) for the indicated tier, the fact that the unit meets all of the operating requirements for that tier, and that the information is accurate. These operating requirements are set forth in the statutes and regulations.
603. DATE CERTIFIED - Enter the date that the page was signed.
604. OWNER/ OPERATOR NAME - Enter the full printed name of the person signing the page.
605. OWNER/ OPERATOR TITLE - Enter the title of the person signing the page.

**REQUESTING A SHORTENED REVIEW PERIOD** - Generators operating under CA and CE are legally authorized 60 days after submitting a complete notification. The time period between notification and authorization may be shortened when the owner or operator shows a good cause. Check whether or not you are requesting to be authorized sooner than the standard 60-day period, and state the reason for the request. The authorization will be automatically effective on the date the completed notification page is received by the CUPA. (If necessary, use additional sheets to explain your reasons.) Generators operating under the PBR tier are not authorized until they are notified by the CUPA.

### ATTACHMENTS

*NOTE: Commercial Laundries are not required to provide attachments.*

#### ALL FACILITIES-

1. Complete a unit notification and a waste and treatment process page for EACH unit covered by this notification.
2. Provide a plot plan or map detailing the location or locations of the unit or units at this facility. This document is for use by the inspector. Clearly indicate the facility boundaries and major features. The extent or detail of the plot plan will vary depending on the size of the facility, the extent of the industrial operations, and the number of treatment units. A diagram prepared for the hazardous materials business plan (required by Title 19 CCR) may be used, as long as the unit numbers for the units covered by this notification are indicated.

#### PBR & CA ONLY

1. Complete the Certification of Financial Assurance for Closure and attach here (formerly DTSC Form 1232). Check whether you have Self-Certified (because your closure costs are less than \$10,000) or if you are submitting a financial mechanism.
2. Prior Enforcement History information is required ONLY if this facility was the subject of any convictions, judgments, settlements or final orders resulting from an action by any local, state, or federal environmental, hazardous waste, or public health enforcement agency. If applicable, attach a statement or summary that lists the cases for the last three years and provide a copy of the cover sheet from each document (conviction, settlement, etc.). The summary should include case and docket number, name and address of the agency, date, brief explanation, type of case (criminal, civil, administrative) and final resolution (including fines and penalties).

#### ADDITIONAL SUBMISSION TO DTSC:

A PHASE I ENVIRONMENTAL ASSESSMENT IS REQUIRED FROM ALL PBR AND CA FACILITIES AND MUST BE SUBMITTED TO DTSC, NOT TO YOUR CUPA. This assessment was due on January 1, 1997 or within one year from initial notification for newer facilities. Revisions are required if new releases are discovered.

The assessment checklist and instructions are available from DTSC. Call (916) 324-2423 or write to DTSC-Unified Program Section, P.O. Box 806, Sacramento, CA 95812-0806. Completed Phase I Assessments should be submitted to the same address.

#### PBR ONLY

1. Tank and/or containment system certifications are required to be submitted for only PBR units by 22 CCR 67450.2(b)(3)(G), when applicable. The specific standards are in 22 CCR 66264.175(c) for containers and 22 CCR 66265.191(a) and 66265.192(a) for tanks.
2. Notification of local agencies. Attach documentation of the other local agencies notified of your operation, i.e. sewer agency.
3. Notification of property owner. If the property owner is different than the operator, provide documentation that the facility operator has notified the property owner of the operation of this hazardous waste treatment unit under PBR.

## Appendix A - Exempt Treatment Activities

There are several treatment activities which, although they would be otherwise regulated, are exempt under the law provided certain conditions are met. No notification is required if these are the only treatment activities performed at the facility. These activities are:

### 1. Biotechnology Elementary Neutralization Activities - Refer to HSC section 25201.15

Biotechnology elementary neutralization activities are the elementary neutralization of wastes generated by biotechnology manufacturing or biotechnology process development activities. This includes activities conducted in SIC Code Subgroups 283, 2833, 2834, 2835, 2836, 8731, 8732, and 8733, including manufacturing and process development of medicinal chemicals and botanical products, pharmaceutical preparations, in vitro and in vivo diagnostic substances, and biological products, and all associated equipment and vessel cleaning and maintenance operations. These activities are exempt if ALL of the following conditions are met:

- A permit is not required to conduct elementary neutralization under federal law.
- The hazardous wastes are hazardous solely due to acidic or alkaline materials.
- Either of the following applies with regard to the biotechnology elementary neutralization activity:
  - a) The hazardous wastes in the elementary neutralization unit do not contain more than 10 percent by weight acid or alkaline constituents.
  - b) The generator determines the neutralization process will not raise the temperature of the hazardous wastes to within 10 degrees of the boiling point or cause the release of hazardous gaseous emissions.
- The hazardous wastes are not diluted for the sole purpose of meeting the criteria specified in subparagraph (a) above AND after neutralization the wastewaters do not exhibit the characteristic of corrosivity.
- The temperature of any unit 100 gallons or larger is automatically monitored, is fitted with a high temperature alarm system, and for closed systems, the unit automatically controls the adding and mixing of corrosive and neutralizing solutions.

### 2. Neutralization of Acid/ Alkaline Wastes from Regeneration of Ion Exchange Media - Refer to HSC section 25201.13(a)

NO authorization is needed to neutralize acid/alkaline wastes from regeneration of the ion exchange media used to demineralize water, if the waste contains less than or equal to 10 percent acid or base by weight.

### 3. Neutralization of Acid/ Alkaline Wastes from the Food Processing Industry - Refer to HSC section 25201.13(c)

NO authorization is needed to neutralize acid/alkaline wastes from the food processing industry.

### 4. Silver Recovery - Refer to HSC section 25143.13, amended by Senate Bill (SB) 2111, (Chapter 309, Statutes of 1998)

NO authorization is needed for the recovery of silver (provided that the solutions and wastewaters are "silver-only" hazardous wastes, and are not hazardous for any other reason or constituent) from photofinishing/photoimaging solutions and photoimaging solution wastewaters. These wastes are regulated only to the extent they are regulated under the federal Resource Conservation and Recovery Act.

### 5. Sieving or Filtering Under Limited Conditions - Refer to HSC section 25123.5(b)(2)(A), amended by Assembly Bill (AB) 966, (Chapter 506, Statutes of 1998)

NO authorization is needed for sieving or filtering liquid hazardous waste to remove solid fractions, WITHOUT added heat, chemicals, or pressure, as the waste is added to or removed from a storage or accumulation tank or container, if the activity is conducted onsite. For this exemption, sieving or filtering does not include adsorption, reverse osmosis, or ultrafiltration.

### 6. Phase Separation Under Limited Conditions - Refer to HSC section 25123.5(b)(2)(B), amended by AB 966, (Chapter 506, Statutes of 1998)

NO authorization is needed for phase separation of hazardous waste during storage or accumulation in tanks or containers, if the separation is unaided by the addition of heat or chemicals, and the activity is conducted onsite.

### 7. Combination of Wastestreams Under Limited Conditions - Refer to HSC section 25123.5(b)(2)(C), amended by AB 966, (Chapter 506, Statutes of 1998)

NO authorization is needed for combining two or more waste streams that are not incompatible into a single tank or container if the activity is conducted onsite and BOTH of the following conditions apply:

- a) The waste streams are being combined solely for the purpose of consolidated accumulation or storage or consolidated offsite shipment, and they are NOT being combined to meet a fuel specification or to otherwise be chemically or physically prepared to be treated, burned for energy value, or incinerated.
- b) The combined waste stream is managed in compliance with the most stringent of the regulatory requirements applicable to each individual waste stream.

### 8. Evaporation of Water Under Limited Conditions - Refer to HSC section 25123.5(b)(2)(D), amended by AB 966, (Chapter 506, Statutes of 1998)

NO authorization is needed for evaporation of water from hazardous wastes in tanks or containers, such as breathing and evaporation through vents and floating roofs, WITHOUT the addition of pressure, chemicals, or heat other than sunlight or ambient room lighting or heating, if the activity is conducted onsite.

**Onsite Hazardous Waste Treatment Notification – Unit**  
**[(Formerly DTSC Form 1772A,B,C,D,L)]**

Complete an Onsite Hazardous Waste Treatment Notification - Unit page and a Waste and Treatment Process Combinations page for each treatment unit operating at this facility. Commercial Laundries are not required to complete unit specific pages, provided that laundering is the only hazardous waste treatment activity conducted by the facility. Please number all pages of your submittal. (Note: Numbering of these instructions follows the UPCF data element numbers on the form.)

1. FACILITY ID NUMBER - This space is for agency use only.
3. BUSINESS NAME - Enter the complete Facility Name.
606. UNIT ID NUMBER - Enter a unique number for each unit. All unit numbers must be clearly labeled on the plot plan/map.
607. UNIT TYPE / TIER - Check the appropriate box to indicate unit type under the Tiered Permitting program.
608. NUMBER OF TANKS - Enter the number of tanks used in the unit. ["Tank" means a stationary device, designed to contain an accumulation of hazardous waste, which is constructed primarily of non-earthen materials (e.g., wood, concrete, steel, plastic) which provide structural support.]
609. NUMBER OF CONTAINERS/TREATMENT AREAS - Enter the number of containers/container treatment areas used in the unit. ["Container" means any device that is open or closed, and portable in which a material can be stored, handled, treated, transported, disposed of, or recycled.] "Treatment Area" is a location set aside and used to treat waste in containers.
610. UNIT NAME - Enter the name of the treatment unit. A treatment unit is defined as a tank, a container, or a combination of tanks or tank systems and/or containers located together that are used in sequence to treat or accumulate one or more compatible hazardous waste streams. The devices are either plumbed together or otherwise linked so as to form one system.
611. MONTHLY TREATMENT VOLUME - Enter the estimated monthly total volume of hazardous waste treated in this unit. If the volume fluctuates significantly by month, enter the maximum volume treated in any month.
612. UNIT OF MEASURE - Check a box to indicate whether the treatment volume unit of measure is pounds or gallons.
613. SPECIFIC WASTE TYPE TREATED - Describe the specific waste type(s) treated (e.g. If the waste qualifies as an aqueous waste with metals or organics, indicate the specific metals or organics).
614. TREATMENT PROCESS DESCRIPTION - Describe the treatment process(es) used. Indicate if the activities are seasonal or periodic.
615. BASIS FOR NOT NEEDING FEDERAL PERMIT - Check the reason(s) that best describe why your onsite treatment unit does not need a federal hazardous waste permit. You must indicate at least one reason to prove your eligibility for the onsite treatment tiers. If you are unsure how these exemptions apply to your operation, contact your Certified Unified Program Agency (CUPA), the DTSC Regional Office closest to you, the U.S. EPA Region IX RCRA Information Line at (415) 744-2074, or the U.S. EPA RCRA Hotline at (800) 424-9346. The eight most common reasons for not needing a federal permit are listed on this form. There is also a space to specify any other reason for exemption and a supporting regulatory citation. The following terms are defined in 40 CFR §260.10:
  - Wastewater Treatment Unit** - A device which: (1) is part of a wastewater treatment facility regulated under section 402 or 307(b) of the Clean Water Act, and (2) receives and treats or stores an influent wastewater that is a hazardous waste or that generates and accumulates a wastewater treatment sludge that is a hazardous waste or that treats or stores a wastewater treatment sludge which is a hazardous waste, and (3) meets the definition of tank or tank system.
  - Elementary Neutralization Unit** - A device which (1) is used for neutralizing wastes that are hazardous only because they exhibit the corrosivity characteristic or they are listed only for this reason, and (2) meets the definition of tank, tank system, container, transport vehicle, or vessel.
  - Totally Enclosed Treatment Facility** - A facility for the treatment of hazardous waste which is directly connected to an industrial production process and which is constructed and operated in a manner which prevents the release of any hazardous waste or any constituent thereof into the environment during treatment.
  - NPDES Permit** - A permit issued by a regional water board allowing discharge of waste to the environment under the National Pollutant Discharge Elimination System (NPDES).
616. RESIDUALS MANAGEMENT DESCRIPTION - Check the appropriate box(es) to describe how treatment residuals are managed. If box h. is checked, describe the "other" methods in the space provided.
617. SECONDARY CONTAINMENT INSTALLATION DATE - Enter the date the secondary containment was installed.

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH  
CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)

ONSITE TIERED PERMITTING  
CONDITIONALLY AUTHORIZED (CA) PAGE  
WASTE AND TREATMENT PROCESS COMBINATIONS

METALCO

(one page per treatment unit - check all that apply)

Unit ID# NT-1 606 Facility ID# 1 Page of

- 618
1. Aqueous wastes, hazardous solely due to inorganic constituents, except asbestos, listed in Title 22, CCR, Section 66261.24(a)(1)(B) or (a)(2)(A) and which contain less than 1,400 ppm total of these constituents. (There is no volume limit for this wastestream.) Treatment using:
    - a. Phase separation, including precipitation, by filtration, centrifugation, or gravity settling, including the use of demulsifiers and flocculants.
    - b. Ion exchange, including metallic replacement
    - c. Reverse osmosis
    - d. Adsorption
    - e. pH adjustment of aqueous waste with a pH of between 2.0 and 12.5
    - f. Electrowinning of solutions, unless those solutions contain hydrochloric acid
    - g. Reduction of solutions hazardous solely due to hexavalent chromium, to trivalent chromium with sodium bisulfite, sodium metabisulfite, sodium thiosulfate, ferrous chloride, ferrous sulfate, ferrous sulfide, or sulfur dioxide. The solution contains less than 750 ppm of hexavalent chromium.
  2. Aqueous wastes, hazardous solely due to organic constituents listed in Title 22, CCR, Section 66261.24(a)(1)(B) or (2)(B) and which contain less than 750 ppm total of these constituents. (There is no volume limit for this wastestream.) Treatment using:
    - a. Phase separation by filtration, centrifugation, or gravity settling, but excluding super critical fluid extraction.
    - b. Adsorption
  3. Sludges resulting from wastewater treatment, dusts, solid metal objects, and metal workings which are hazardous solely due to the presence of constituents, except asbestos, listed in Title 22, CCR, Section 66261.24(a)(1)(B) or (a)(2)(A) and which, for dusts only, contain less than 750 ppm total of these constituents. The monthly volume treated in this unit does not exceed 5,000 gallons or 45,000 pounds. Treatment using:
    - a. Physical processes which constitute treatment only because they change the physical properties of the waste, such as filtration, centrifugation, gravity settling, grinding, shredding, crushing, or compacting.
    - b. Drying to remove water.
    - c. Separation based on differences in physical properties, such as size, magnetism, or density.
  4. Alum, gypsum, lime, sulfur, or phosphate sludges. The monthly volume treated in this unit does not exceed 5,000 gallons or 45,000 pounds. Treatment using:
    - a. Drying to remove water.
    - b. Phase separation by filtration, centrifugation, or gravity settling.
  5. Special wastes listed in Title 22, CCR, Section 66261.120 that meet the criteria in Title 22, CCR, Section 66261.122 which is hazardous solely due to the constituents, except asbestos, listed in Title 22, CCR, Section 66261.24(a)(1)(B) or (a)(2)(A) and which contain less than 750 ppm total of these constituents. The monthly volume treated in this unit does not exceed 5,000 gallons or 45,000 pounds. Treatment using:
    - a. Drying to remove water.
    - b. Phase separation by filtration, centrifugation, or gravity settling.
    - c. Screening to separate components based on size.
    - d. Separation based on differences in physical properties, such as size, magnetism, or density.
  6. Special wastes classified under Title 22, CCR, Section 66261.124 as special wastes, except asbestos, which is hazardous solely due to the constituents, except asbestos, listed in Title 22, CCR, Section 66261.24(a)(1)(B) or (a)(2)(A) and which contain less than 750 ppm total of these constituents. The monthly volume treated in this unit does not exceed 5,000 gallons or 45,000 pounds. Treatment using:
    - a. Drying to remove water.
    - b. Phase separation by filtration, centrifugation, or gravity settling.
    - c. Magnetic separation
  7. Soils contaminated with metals listed in Title 22, CCR, Section 66261.24(a)(2)(A). The monthly volume treated in this unit does not exceed 5,000 gallons or 45,000 pounds. Treatment using:
    - a. Screening to separate components based on size.
    - b. Magnetic separation.
  8. Oil mixed with water and oil/water separation sludges. (There is no volume limit for this wastestream.) Treatment using: (NOTE: Some used oil/water separation is allowed under the CEL category.)
    - a. Phase separation by filtration, centrifugation, or gravity settling, but excluding super critical fluid extraction, including the use of demulsifiers and flocculants. Heat can be used, but must not exceed 160 degrees Fahrenheit.
    - b. Separation based on differences in physical properties, such as size, magnetism, or density.
    - c. Reverse osmosis.
  9. Neutralization of acidic or alkaline wastes, hazardous solely due to corrosivity, or toxic only from the acid or caustic material, in elementary neutralization units. (There is no volume limit for this wastestream.)
    - a. The waste contains less than 10 percent acid or base constituents by weight. There is no volume limit for this category.
    - b. The waste contains 10 percent or more acid or base constituents by weight and is treated in batches that do not exceed 500 gallons at one time.
  10. Not in use/exempted—formerly recovery of silver from photofinishing.
  11. Not in use/sunsetted—formerly treatment of spent cleaners and conditioners which are hazardous solely due to copper or copper compounds. Treatment of this wastestream is no longer allowed under Conditional Authorization as of January 1, 1998. Treatment of this wastestream now requires authorization under either Permit by Rule or, if the total volume treated is less than 55 gallons per month, under Conditionally Exempt Small Quantity Treatment.
  12. A wastestream technology combination certified by the Department pursuant to Section 25200.1.5 of the Health and Safety Code as appropriate for authorization under Conditional Authorization.
    - \_\_\_\_\_ Certified Technology Number

**BUSINESS OWNER/OPERATOR IDENTIFICATION**

**I. IDENTIFICATION**

FACILITY ID#										BEGINNING DATE <sup>100</sup>					ENDING DATE <sup>101</sup>				
										July 07, 2012					July 07, 2013				
BUSINESS NAME (Same as FACILITY NAME or DBA - Doing Business As) <sup>3</sup>															BUSINESS PHONE <sup>102</sup>				
METALCO															(510) 652-7470				
BUSINESS SITE ADDRESS <sup>103</sup>															BUSINESS FAX <sup>102a</sup>				
1475 - 67TH Street															(510) 652-7569				
BUSINESS SITE CITY <sup>104</sup>										CA		ZIP CODE <sup>105</sup>			COUNTY <sup>108</sup>				
Emeryville												94608			Alameda				
DUN & BRADSTREET <sup>106</sup>										PRIMARY SIC <sup>107</sup>			PRIMARY NAICS <sup>107a</sup>						
										3471			332813						
BUSINESS MAILING ADDRESS <sup>108a</sup>																			
1475 - 67TH Street																			
BUSINESS MAILING CITY <sup>108b</sup>										STATE <sup>108c</sup>		ZIP CODE <sup>108d</sup>							
Emeryville										CA		94608							
BUSINESS OPERATOR NAME <sup>109</sup>										BUSINESS OPERATOR PHONE <sup>110</sup>									
Russell Gates										(510) 652-7470									

**II. BUSINESS OWNER**

OWNER NAME <sup>111</sup>										OWNER PHONE <sup>112</sup>				
Russell Gates										(510) 652-7470				
OWNER MAILING ADDRESS <sup>113</sup>														
1475 - 67TH Street														
OWNER MAILING CITY <sup>114</sup>										STATE <sup>115</sup>		ZIP CODE <sup>116</sup>		
Emeryville										CA		94608		

**III. ENVIRONMENTAL CONTACT**

CONTACT NAME <sup>117</sup>										CONTACT PHONE <sup>118</sup>				
Russell Gates										(510) 652-7470				
CONTACT MAILING ADDRESS <sup>119</sup>										CONTACT EMAIL <sup>119a</sup>				
1475 - 67TH Street										metalco46@comcast.net				
CONTACT MAILING CITY <sup>120</sup>										STATE <sup>121</sup>		ZIP CODE <sup>122</sup>		
Emeryville										CA		94608		

**-PRIMARY-**

**IV. EMERGENCY CONTACTS**

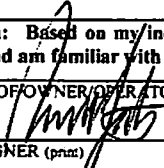
**-SECONDARY-**

NAME <sup>123</sup>					NAME <sup>128</sup>				
Russell Gates					Khalegh Modaressi				
TITLE <sup>124</sup>					TITLE <sup>129</sup>				
Secretary					Vice President				
BUSINESS PHONE <sup>125</sup>					BUSINESS PHONE <sup>130</sup>				
(510) 652-7470					(510) 652-7470				
24-HOUR PHONE <sup>126</sup>					24-HOUR PHONE <sup>131</sup>				
(510) 910-2472					(925) 858-2789				
CELL PHONE NUMBER <sup>127</sup>					CELL PHONE NUMBER <sup>132</sup>				

ADDITIONAL LOCALLY COLLECTED INFORMATION: <sup>133</sup>

Billing Address (if different from business site address): \_\_\_\_\_

Certification: Based on my inquiry of those individuals responsible for obtaining the information, I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete.

SIGNATURE OF OWNER/OPERATOR OR DESIGNATED REPRESENTATIVE										DATE <sup>134</sup>		NAME OF DOCUMENT PREPARER <sup>135</sup>		
										07/02/2012		Russell Gates		
NAME OF SIGNER (print) <sup>136</sup>										TITLE OF SIGNER <sup>137</sup>				
Russell Gates										Secretary				



**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH  
 CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)  
 1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335  
 BUSINESS ACTIVITIES**

**I. FACILITY IDENTIFICATION**

FACILITY ID # (Agency Use Only)										EPA ID # (Hazardous Waste Only)
										2 CAL 000100455
BUSINESS NAME (Same as Facility Name of DBA-Doing Business As)										
3 <b>METALCO, INC.</b>										
BUSINESS SITE ADDRESS										
103 1475 - 67 TH Street, Emeryville, CA 94608										
BUSINESS SITE CITY								104		105
Emeryville								CA		ZIP CODE 94608

**II. ACTIVITIES DECLARATION**

**NOTE: If you check YES to any part of this list,  
 please submit the Business Owner/Operator Identification page.**

Does your facility...	If Yes, please complete these forms....	
<b>A. HAZARDOUS MATERIALS</b> Have on site (for any purpose) at any one time, hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 4	SUBMIT A HAZARDOUS MATERIALS BUSINESS PLAN.
<b>B. Cal ARP REGULATED SUBSTANCES</b> Have Regulated Substances stored onsite in quantities greater than the threshold quantities established by the California Accidental Release Prevention Program (Cal ARP)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 4a	A RMP meeting State and Federal requirements shall be submitted to the ACDEH.
<b>C. UNDERGROUND STORAGE TANKS (USTs)</b> Own or operate underground storage tanks?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 5	UST FACILITY UST TANK (one page per tank)
<b>D. ABOVE GROUND PETROLEUM STORAGE</b> Store greater than 1,320 gallons of petroleum products in aboveground tanks or containers.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 8	Will require a SPCC plan.
<b>E. HAZARDOUS WASTE</b> Generate hazardous waste?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 9	EPA ID NUMBER - Provide at the top of this form.
Recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC 25143.2)?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 10	RECYCLABLE MATERIALS REPORT (one per recycler)
Treat hazardous waste on-site?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 11	ON-SITE HAZARDOUS WASTE TREATMENT - FACILITY ON-SITE HAZARDOUS WASTE TREATMENT - UNIT (one page per unit)
Perform treatment subject to financial assurance requirements (for Permit by Rule and Conditional Authorization)?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 12	CERTIFICATION OF FINANCIAL ASSURANCE
Consolidate hazardous waste generated at a remote site?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 13	REMOTE WASTE / CONSOLIDATION SITE ANNUAL NOTIFICATION
Need to report the closure/removal of a tank that was classified as hazardous waste and cleaned on-site?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 14	HAZARDOUS WASTE TANK CLOSURE CERTIFICATION
Generate in any single calendar month 1,000 kilograms (kg) (2,200 pounds) or more of federal RCRA hazardous waste, or generate in any single calendar month, or accumulate at any time, 1 kg (2.2 pounds) of RCRA acute hazardous waste; or generate or accumulate at any time more than 100 kg (220 pounds) of spill cleanup materials contaminated with RCRA acute hazardous waste.	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 14a	Obtain federal EPA ID Number, file Biennial Report (EPA Form 8700-13A/B), and satisfy requirements for RCRA Large Quantity Generator.
Serve as a Household Hazardous Waste (HHW) Collection site?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 14b	Contact ACDEH for required forms.
<b>F. LOCAL REQUIREMENTS</b> Is the property owned by an entity other than the business owner?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 15	PROPERTY OWNER IDENTIFICATION FORM

**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH  
CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)**

1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335

**PROPERTY OWNER IDENTIFICATION FORM**

(ATTACHMENT TO THE BUSINESS OWNER/OPERATOR IDENTIFICATION FORM)

**SITE IDENTIFICATION**

FACILITY ID#										FILING DATE OF THIS FORM									
0 1 0 0 0										July 02, 2012									
BUSINESS NAME (Same as FACILITY NAME or DBA - Doing Business As)															BUSINESS PHONE NUMBER				
METALCO, Inc.															(510) 652-7470				
BUSINESS SITE ADDRESS																			
1475 - 67TH Street																			
CITY										STATE					ZIP CODE				
Emeryville										CA					94608				

**PROPERTY OWNER**

OWNER NAME (USE CORPORATE NAME, IF APPLICABLE, AND COMPLETE CONTACT SECTION)										OWNER PHONE NUMBER									
Corder Family Emeryville Properties, LP										(619) 722-1823									
OWNER MAILING ADDRESS																			
PO Box 2083																			
CITY										STATE					ZIP CODE				
Alpine										CA					91903				

**PROPERTY OWNER CONTACT (FOR CORPORATIONS)**

CONTACT NAME										CONTACT PHONE NUMBER									
Erin Corder-Schaefer										(619) 722-1823									
CONTACT MAILING ADDRESS																			
PO Box 2083																			
CITY										STATE					ZIP CODE				
Alpine										CA					91903				

**PROPERTY OWNER EMERGENCY CONTACT**

NAME																			
Erin Corder-Schaefer																			
TITLE																			
Partner																			
BUSINESS PHONE NUMBER																			
(619) 722-1823																			
24-HOUR PHONE NUMBER																			
CELLULAR PHONE NUMBER																			

Please use this form to report property ownership (and property management contacts, if applicable).





**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)**  
 1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335

**HAZARDOUS MATERIALS INVENTORY – CHEMICAL DESCRIPTION**

(one page per material per building or area)

ADD       DELETE       REVISE      200      Page 10 of 41

**I. FACILITY INFORMATION**

BUSINESS NAME (Same as FACILITY NAME or DBA – Doing Business As) <span style="float:right">3</span>	
METALCO	
CHEMICAL LOCATION <span style="float:right">201</span>	CHEMICAL LOCATION CONFIDENTIAL EPCRA <span style="float:right">202</span>
TANK AREA	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
FACILITY ID # 0 1 0 0 0	MAP# (optional) <span style="float:right">203</span> GRID# (optional) <span style="float:right">204</span>
	002      2,600 gal. tank

**II. CHEMICAL INFORMATION**

CHEMICAL NAME <span style="float:right">205</span>	TRADE SECRET <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">206</span>
SULFOPHATHALIC ACID	<small>If Subject to EPCRA, refer to instructions</small>
COMMON NAME <span style="float:right">207</span>	EHS* <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">208</span>
PILOT D300	
CAS# <span style="float:right">209</span>	*If EHS is "Yes", all amounts below must be in lbs.
00089-08-07	

FIRE CODE HAZARD CLASSES (Complete if required by CUPA) 210

HAZARDOUS MATERIAL TYPE (Check one item only) <span style="float:right">211</span>	RADIOACTIVE <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">212</span>	CURIES <span style="float:right">213</span>
<input type="checkbox"/> a. PURE <input checked="" type="checkbox"/> b. MIXTURE <input type="checkbox"/> c. WASTE		

PHYSICAL STATE (Check one item only) <span style="float:right">214</span>	LARGEST CONTAINER <span style="float:right">215</span>
<input type="checkbox"/> a. SOLID <input checked="" type="checkbox"/> b. LIQUID <input type="checkbox"/> c. GAS	2,600 gallons

FED HAZARD CATEGORIES (Check all that apply) 216

a. FIRE    b. REACTIVE    c. PRESSURE RELEASE    d. ACUTE HEALTH    e. CHRONIC HEALTH

AVERAGE DAILY AMOUNT STORED ON-SITE <span style="float:right">217</span>	MAXIMUM DAILY AMOUNT STORED ON-SITE <span style="float:right">218</span>	ANNUAL WASTE AMOUNT <span style="float:right">219</span>	STATE WASTE CODE <span style="float:right">220</span>
2,600	2,600	none	

UNITS* (Check one only) <span style="float:right">221</span>	DAYS ON SITE: <span style="float:right">222</span>
<input checked="" type="checkbox"/> a. GALLONS <input type="checkbox"/> b. CUBIC FEET <input type="checkbox"/> c. POUNDS <input type="checkbox"/> d. TONS	365
<small>* If EHS, amount must be in pounds.</small>	

STORAGE CONTAINER <span style="float:right">223</span>
<input type="checkbox"/> a. ABOVE GROUND TANK <input type="checkbox"/> e. PLASTIC/NONMETALLIC DRUM <input type="checkbox"/> i. FIBER DRUM <input type="checkbox"/> m. GLASS BOTTLE <input type="checkbox"/> q. RAIL CAR <input type="checkbox"/> b. UNDERGROUND TANK <input type="checkbox"/> f. CAN <input type="checkbox"/> j. BAG <input type="checkbox"/> n. PLASTIC BOTTLE <input type="checkbox"/> r. OTHER <input checked="" type="checkbox"/> c. TANK INSIDE BUILDING <input type="checkbox"/> g. CARBOY <input type="checkbox"/> k. BOX <input type="checkbox"/> o. TOTE BIN <input type="checkbox"/> d. STEEL DRUM <input type="checkbox"/> h. SILO <input type="checkbox"/> l. CYLINDER <input type="checkbox"/> p. TANK WAGON

STORAGE PRESSURE  a. AMBIENT    b. ABOVE AMBIENT    c. BELOW AMBIENT 224

STORAGE TEMPERATURE  a. AMBIENT    b. ABOVE AMBIENT    c. BELOW AMBIENT    d. CRYOGENIC 225

%WT	HAZARDOUS COMPONENT (For mixture or waste only)	EHS	CAS #
1      12 <sup>226</sup>	SULFOPHATHALIC ACID <span style="float:right">227</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">228</span>	00089-08-7 <span style="float:right">229</span>
2      3 <sup>230</sup>	SULFURIC ACID <span style="float:right">231</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">232</span>	07664-93-9 <span style="float:right">233</span>
3      85 <sup>234</sup>	WATER <span style="float:right">235</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">236</span>	<span style="float:right">237</span>
4	<span style="float:right">239</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">240</span>	<span style="float:right">241</span>
5	<span style="float:right">243</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">244</span>	<span style="float:right">245</span>

If more hazardous components are present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, attach additional sheets of paper capturing the required information.

**ADDITIONAL LOCALLY COLLECTED INFORMATION:** If this facility is subject to Federal Emergency Planning and Community Right-To-Know Act (EPCRA) reporting requirements, a signature is required at the bottom of the form if the page lists an Extremely Hazardous Substance (EHS) handled at or above its Federal Threshold Quantity (TPQ) or 500 pounds, whichever is less. 246

If EPCRA, Please Sign Here: \_\_\_\_\_



**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)**  
 1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335

**HAZARDOUS MATERIALS INVENTORY – CHEMICAL DESCRIPTION**

(one page per material per building or area)

ADD       DELETE       REVISE      200      Page 9 of 43

**I. FACILITY INFORMATION**

BUSINESS NAME (Same as FACILITY NAME or DBA – Doing Business As) 3  
**METALCO**

CHEMICAL LOCATION 201 CHEMICAL LOCATION CONFIDENTIAL EPCRA 202  
 YES  NO

**CHEMICAL STORAGE ROOM**

FACILITY ID # 01000 MAP# (optional) 203 GRID# (optional) 204  
002

**II. CHEMICAL INFORMATION**

CHEMICAL NAME 205 TRADE SECRET  Yes  No 206  
**ETCH ADDITIVE**  
If Subject to EPCRA, refer to instructions

COMMON NAME 207 EHS\*  Yes  No 208  
**AN250L ETCH EXTENDER**

CAS# 209 \*If EHS is "Yes", all amounts below must be in lbs.  
7631-99-4

FIRE CODE HAZARD CLASSES (Complete if required by CUPA) 210

HAZARDOUS MATERIAL TYPE (Check one item only) 211 RADIOACTIVE  Yes  No 212 CURIES 213  
 a. PURE  b. MIXTURE  c. WASTE

PHYSICAL STATE (Check one item only) 214 LARGEST CONTAINER 55 gallons 215  
 a. SOLID  b. LIQUID  c. GAS

FED HAZARD CATEGORIES (Check all that apply) 216  
 a. FIRE  b. REACTIVE  c. PRESSURE RELEASE  d. ACUTE HEALTH  e. CHRONIC HEALTH

AVERAGE DAILY AMOUNT STORED ON-SITE 217 MAXIMUM DAILY AMOUNT STORED ON-SITE 218 ANNUAL WASTE AMOUNT 219 STATE WASTE CODE 220  
40 55 none

UNITS\* (Check one only) 221 DAYS ON SITE: 222  
 a. GALLONS  b. CUBIC FEET  c. POUNDS  d. TONS  
\* If EHS, amount must be in pounds. 365

STORAGE CONTAINER 223  
 a. ABOVE GROUND TANK  e. PLASTIC/NONMETALLIC DRUM  i. FIBER DRUM  m. GLASS BOTTLE  q. RAIL CAR  
 b. UNDERGROUND TANK  f. CAN  j. BAG  n. PLASTIC BOTTLE  r. OTHER  
 c. TANK INSIDE BUILDING  g. CARBOY  k. BOX  o. TOTE BIN  
 d. STEEL DRUM  h. SILO  l. CYLINDER  p. TANK WAGON

STORAGE PRESSURE  a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT 224

STORAGE TEMPERATURE  a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT  d. CRYOGENIC 225

%WT	HAZARDOUS COMPONENT (For mixture or waste only)	EHS	CAS #
1 10-30 <span style="float:right">226</span>	SODIUM NITRATE <span style="float:right">227</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">228</span>	7631-99-4 <span style="float:right">229</span>
2 1-10 <span style="float:right">230</span>	SODIUM CHLORATE <span style="float:right">231</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">232</span>	7775-09-9 <span style="float:right">233</span>
3 50 <span style="float:right">234</span>	WATER <span style="float:right">235</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">236</span>	<span style="float:right">237</span>
4 <span style="float:right">238</span>	<span style="float:right">239</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">240</span>	<span style="float:right">241</span>
5 <span style="float:right">242</span>	<span style="float:right">243</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">244</span>	<span style="float:right">245</span>

If more hazardous components are present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, attach additional sheets of paper capturing the required information.

ADDITIONAL LOCALLY COLLECTED INFORMATION: If this facility is subject to Federal Emergency Planning and Community Right-To-Know Act (EPCRA) reporting requirements, a signature is required at the bottom of the form if the page lists an Extremely Hazardous Substance (EHS) handled at or above its Federal Threshold Quantity (TPQ) or 500 pounds, whichever is less. 246

If EPCRA, Please Sign Here: \_\_\_\_\_

**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)**  
 1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335

**HAZARDOUS MATERIALS INVENTORY – CHEMICAL DESCRIPTION**

(one page per material per building or area)

ADD       DELETE       REVISE      200      Page 8 of 41

**I. FACILITY INFORMATION**

BUSINESS NAME (Same as FACILITY NAME or DBA – Doing Business As) 3

METALCO

CHEMICAL LOCATION 201 CHEMICAL LOCATION CONFIDENTIAL EPCRA 202  
 YES  NO

CHEMICAL STORAGE ROOM – ACIDS

FACILITY ID # 01000      MAP# (optional) 203 002      GRID# (optional) 204 ACIDS

**II. CHEMICAL INFORMATION**

CHEMICAL NAME 205 TRADE SECRET  Yes  No 206  
 SULFURIC ACID  
If Subject to EPCRA, refer to instructions

COMMON NAME 207 EHS\*  Yes  No 208  
 SULFURIC ACID

CAS# 209 7664939      \*If EHS is "Yes", all amounts below must be in lbs.

FIRE CODE HAZARD CLASSES (Complete if required by CUPA) 210

HAZARDOUS MATERIAL TYPE (Check one item only)  a. PURE  b. MIXTURE  c. WASTE 211 RADIOACTIVE  Yes  No 212 CURIES 213

PHYSICAL STATE (Check one item only)  a. SOLID  b. LIQUID  c. GAS 214 LARGEST CONTAINER 55 gallons 215

FED HAZARD CATEGORIES (Check all that apply)  a. FIRE  b. REACTIVE  c. PRESSURE RELEASE  d. ACUTE HEALTH  e. CHRONIC HEALTH 216

AVERAGE DAILY AMOUNT STORED ON-SITE 217 165      MAXIMUM DAILY AMOUNT STORED ON-SITE 218 330      ANNUAL WASTE AMOUNT 219 none      STATE WASTE CODE 220

UNITS\* (Check one only)  a. GALLONS  b. CUBIC FEET  c. POUNDS  d. TONS 221 DAYS ON SITE: 222  
\* If EHS, amount must be in pounds. 365

STORAGE CONTAINER  a. ABOVE GROUND TANK  e. PLASTIC/NONMETALLIC DRUM  l. FIBER DRUM  m. GLASS BOTTLE  q. RAIL CAR  
 b. UNDERGROUND TANK  f. CAN  j. BAG  n. PLASTIC BOTTLE  r. OTHER  
 c. TANK INSIDE BUILDING  g. CARBOY  k. BOX  o. TOTE BIN  
 d. STEEL DRUM  h. SILO  i. CYLINDER  p. TANK WAGON 223

STORAGE PRESSURE  a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT 224

STORAGE TEMPERATURE  a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT  d. CRYOGENIC 225

%WT	HAZARDOUS COMPONENT (For mixture or waste only)	EHS	CAS #
1    93 <span style="float:right">226</span>	SULFURIC ACID <span style="float:right">227</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">228</span>	7664939 <span style="float:right">229</span>
2 <span style="float:right">230</span>		<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">232</span>	<span style="float:right">233</span>
3 <span style="float:right">234</span>		<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">236</span>	<span style="float:right">237</span>
4 <span style="float:right">238</span>		<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">240</span>	<span style="float:right">241</span>
5 <span style="float:right">242</span>		<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">244</span>	<span style="float:right">245</span>

If more hazardous components are present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, attach additional sheets of paper capturing the required information.

ADDITIONAL LOCALLY COLLECTED INFORMATION: If this facility is subject to Federal Emergency Planning and Community Right-To-Know Act (EPCRA) reporting requirements, a signature is required at the bottom of the form if the page lists an Extremely Hazardous Substance (EHS) handled at or above its Federal Threshold Quantity (TPQ) or 500 pounds, whichever is less. 246

If EPCRA, Please Sign Here: \_\_\_\_\_



**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)**  
 1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335

**HAZARDOUS MATERIALS INVENTORY – CHEMICAL DESCRIPTION**

(one page per material per building or area)

ADD

DELETE

REVISE

200

Page 1 of 4

**I. FACILITY INFORMATION**

BUSINESS NAME (Same as FACILITY NAME or DBA – Doing Business As) 3

**METALCO**

CHEMICAL LOCATION 201

**SULFURIC ACID**

CHEMICAL LOCATION CONFIDENTIAL EPCRA 202

YES  NO

FACILITY ID #

0 1 0 0 0

MAP# (optional) 203

002

GRID# (optional) 204

5,000 gal. tank

**II. CHEMICAL INFORMATION**

CHEMICAL NAME 205

**SULFURIC ACID**

TRADE SECRET 206

Yes  No

If Subject to EPCRA, refer to instructions

COMMON NAME 207

**SULFURIC ACID**

EHS\* 208

Yes  No

CAS# 209

7664939

\*If EHS is "Yes", all amounts below must be in lbs.

FIRE CODE HAZARD CLASSES (Complete if required by CUPA) 210

HAZARDOUS MATERIAL TYPE (Check one item only) 211

a. PURE  b. MIXTURE  c. WASTE

RADIOACTIVE  Yes  No 212

CURIES 213

PHYSICAL STATE (Check one item only) 214

a. SOLID  b. LIQUID  c. GAS

LARGEST CONTAINER 5,000 gallon tank 215

FED HAZARD CATEGORIES (Check all that apply) 216

a. FIRE  b. REACTIVE  c. PRESSURE RELEASE  d. ACUTE HEALTH  e. CHRONIC HEALTH

AVERAGE DAILY AMOUNT STORED ON-SITE 217

5,000

MAXIMUM DAILY AMOUNT STORED ON-SITE 218

5,000

ANNUAL WASTE AMOUNT 219

none

STATE WASTE CODE 220

UNITS\* (Check one only) 221

a. GALLONS  b. CUBIC FEET  c. POUNDS  d. TONS

\* If EHS, amount must be in pounds.

DAYS ON SITE: 222

365

STORAGE CONTAINER 223

a. ABOVE GROUND TANK  e. PLASTIC/NONMETALLIC DRUM  i. FIBER DRUM  m. GLASS BOTTLE  q. RAIL CAR  
 b. UNDERGROUND TANK  f. CAN  j. BAG  n. PLASTIC BOTTLE  r. OTHER  
 c. TANK INSIDE BUILDING  g. CARBOY  k. BOX  o. TOTE BIN  
 d. STEEL DRUM  h. SILO  l. CYLINDER  p. TANK WAGON

STORAGE PRESSURE 224

a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT

STORAGE TEMPERATURE 225

a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT  d. CRYOGENIC

%WT	HAZARDOUS COMPONENT (For mixture or waste only)	EHS	CAS #
1 15 <span style="float:right">226</span>	SULFURIC ACID <span style="float:right">227</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">228</span>	7664939 <span style="float:right">229</span>
2 85 <span style="float:right">230</span>	WATER <span style="float:right">231</span>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <span style="float:right">232</span>	<span style="float:right">233</span>
3 <span style="float:right">234</span>	<span style="float:right">235</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">236</span>	<span style="float:right">237</span>
4 <span style="float:right">238</span>	<span style="float:right">239</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">240</span>	<span style="float:right">241</span>
5 <span style="float:right">242</span>	<span style="float:right">243</span>	<input type="checkbox"/> Yes <input type="checkbox"/> No <span style="float:right">244</span>	<span style="float:right">245</span>

If more hazardous components are present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, attach additional sheets of paper capturing the required information.

ADDITIONAL LOCALLY COLLECTED INFORMATION: If this facility is subject to Federal Emergency Planning and Community Right-To-Know Act (EPCRA) reporting requirements, a signature is required at the bottom of the form if the page lists an Extremely Hazardous Substance (EHS) handled at or above its Federal Threshold Quantity (TPQ) or 500 pounds, whichever is less. 246

If EPCRA, Please Sign Here: \_\_\_\_\_

**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
**CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)**  
 1131 Harbor Bay Parkway, Alameda, CA 94502-6577 Phone (510) 567-6700 Fax (510) 337-9335

**HAZARDOUS MATERIALS INVENTORY – CHEMICAL DESCRIPTION**

(one page per material per building or area)

ADD       DELETE       REVISE      200      Page 13 of 41

**I. FACILITY INFORMATION**

BUSINESS NAME (Same as FACILITY NAME or DBA – Doing Business As) 3

METALCO  
 CHEMICAL LOCATION 201 CHEMICAL LOCATION CONFIDENTIAL EPCRA 202  
 YES  NO

TANK AREA  
 FACILITY ID # 01000      MAP# (optional) 203 002      GRID# (optional) 204 2,600 gal. tank

**II. CHEMICAL INFORMATION**

CHEMICAL NAME 205 TRADE SECRET  Yes  No 206  
If Subject to EPCRA, refer to instructions

COMMON NAME 207 EHS\*  Yes  No 208

CAS# 209 7664939      \*If EHS is "Yes", all amounts below must be in lbs.

FIRE CODE HAZARD CLASSES (Complete if required by CUPA) 210

HAZARDOUS MATERIAL TYPE (Check one item only) 211  a. PURE  b. MIXTURE  c. WASTE      RADIOACTIVE  Yes  No 212      CURIES 213

PHYSICAL STATE (Check one item only) 214  a. SOLID  b. LIQUID  c. GAS      LARGEST CONTAINER 2,600 gallons 215

FED HAZARD CATEGORIES (Check all that apply) 216  a. FIRE  b. REACTIVE  c. PRESSURE RELEASE  d. ACUTE HEALTH  e. CHRONIC HEALTH

AVERAGE DAILY AMOUNT STORED ON-SITE 217 2,600      MAXIMUM DAILY AMOUNT STORED ON-SITE 218 2,600      ANNUAL WASTE AMOUNT 219 none      STATE WASTE CODE 220

UNITS\* (Check one only) 221  a. GALLONS  b. CUBIC FEET  c. POUNDS  d. TONS      DAYS ON SITE: 222 365  
\* If EHS, amount must be in pounds.

STORAGE CONTAINER 223  
 a. ABOVE GROUND TANK     c. PLASTIC/NONMETALLIC DRUM     i. FIBER DRUM     m. GLASS BOTTLE     q. RAIL CAR  
 b. UNDERGROUND TANK     f. CAN     j. BAG     n. PLASTIC BOTTLE     r. OTHER  
 c. TANK INSIDE BUILDING     g. CARBOY     k. BOX     o. TOTE BIN  
 d. STEEL DRUM     h. SILO     l. CYLINDER     p. TANK WAGON

STORAGE PRESSURE  a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT 224

STORAGE TEMPERATURE  a. AMBIENT  b. ABOVE AMBIENT  c. BELOW AMBIENT  d. CRYOGENIC 225

	%WT		HAZARDOUS COMPONENT (For mixture or waste only)		EHS	CAS #
1	.15	<small>226</small>	SULFURIC ACID	<small>227</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	7664939
2	85	<small>230</small>	WATER	<small>231</small>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
3		<small>234</small>		<small>235</small>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
4		<small>238</small>		<small>239</small>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
5		<small>242</small>		<small>243</small>	<input type="checkbox"/> Yes <input type="checkbox"/> No	

If more hazardous components are present at greater than 1% by weight if non-carcinogenic, or 0.1% by weight if carcinogenic, attach additional sheets of paper capturing the required information.

ADDITIONAL LOCALLY COLLECTED INFORMATION: If this facility is subject to Federal Emergency Planning and Community Right-To-Know Act (EPCRA) reporting requirements, a signature is required at the bottom of the form if the page lists an Extremely Hazardous Substance (EHS) handled at or above its Federal Threshold Quantity (TPQ) or 500 pounds, whichever is less. 246

If EPCRA, Please Sign Here: \_\_\_\_\_



# ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH

Certified Unified Program Agency (CU)

1131 Harbor Bay Parkway • Alameda, CA 94502 • 6577 • (510) 567-6700 • (510) 337-9335 FAX

<http://www.acgov.org/aceh>

## INSPECTION REPORT SUMMARY / SUMMARY OF VIOLATIONS

Facility Name <u>Metelco</u>	
Facility Address <u>1475-67th St, Emeryville</u>	
Contact Person <u>Russell Gates</u>	Telephone <u>510-652-7470</u>
Type of Business <u>Anodizing of Aluminum</u>	Inspector Signature <u>[Signature]</u>

UNIFIED PROGRAM SUMMARY	Program	Inspection	PROGRAM STATUS
Hazardous Materials Business Plan	✓	✓	
Hazardous Waste Generator	✓	✓	
Underground Storage Tank			
Aboveground Petroleum Storage Tank			
Does the facility have an SPCC Plan?			
Risk Management Plan / Cal ARP			
Universal Waste			
Tiered Permit: Permit-by-Rule			
Conditionally Authorized	✓	✓	
Conditionally Exempt, Specified Waste Stream			
Conditionally Exempt, Small Quantity Treatment			
Conditionally Exempt, Limited			
Conditionally Exempt, Commercial Laundry			

INSPECTION CHECKLISTS COMPLETED AND ATTACHED
<input checked="" type="checkbox"/> Hazardous Materials Business Plan and Aboveground Storage Tanks Inspection Checklist
<input checked="" type="checkbox"/> Hazardous Waste Generator Inspection Checklists
<input type="checkbox"/> Large Quantity Generator Inspection Checklist
<input type="checkbox"/> Tiered Permit Inspection Checklist
<input type="checkbox"/> Underground Storage Tank Checklist(s)
<input checked="" type="checkbox"/> Inspection Report Summary / Summary of Violations - Narrative

Facility representative who granted permission for this inspection:	<u>Russell Gates</u> <small>Print Name</small>	<u>[Signature]</u> <small>Signature</small>	<u>12/28/2011</u> <small>Date</small>
---	---	--	--

Submit all required documents, reports and/or plans (including Corrective Action Plan) within NA days.

All violations noted are to be corrected immediately. Compliance will be verified on or after NA.

*Failure to comply with requirements established in this inspection report and in all attachments to this report, or in subsequent correspondence may result in the issuance of a Notice of Violation. Non-compliance is punishable by criminal and/or civil penalties under applicable local, state and/or federal laws or regulations.*

<u>7/6/11 and 12/28/11</u> <small>Date of Inspection</small>	<u>[Signature]</u> <small>Signature of Facility Representative</small>	<u>Russell Gates</u> <small>Print Name</small>
---	---	---

ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH  
Certified Unified Program Agency (CUPA)

INSPECTION REPORT SUMMARY / SUMMARY OF VIOLATIONS - NARRATIVE

Facility Name: Metalco  
Facility Address: 1475-67<sup>th</sup> St., Fremont

An inspection was performed with Russell Gates, business owner. Hazardous waste is generated when the sludge from the caustic tank is removed during cleaning.

There was no hazardous waste on site (7-6-11).

Business Plan dated 12-8-10 was reviewed for accuracy. Some of the Hazardous Materials identified in this plan were non-hazardous (pH of solution in caustic tank was tested, pH 11.7, soap is non-hazardous per MSDS). A new Business Plan was completed during the 7-6-11 inspection with updated Haz Mat information.

Tiered Permit - Conditionally Authorized inspection was performed on 12-28-11. Updated Treatment Notification (facility and unit)

Certification of Financial Assurance was completed & submitted today.

No violations were observed.

Note: Records are well organized.

Date of Inspection

7/6 and 12/28/11

Inspector

Carry Seto

Signature of Facility Representative

*[Signature]*

Page \_\_\_ of \_\_\_

**Hazardous Materials Business Plan and Aboveground Petroleum Storage Tanks Inspection Checklist**

Facility ID#	Facility Name <i>Metalco</i>	Facility Address <i>1475-67th St, Emeryville</i>
Inspector <i>Larry Seto</i>	Inspection Date <i>7-6-11</i>	

Compliance status is evaluated for each item on this Checklist as follows:  
 NVO = No Violations Observed V = Violation N/A = Not Applicable  
 RV = Repeat Violation

**POST INSPECTION PROGRAM STATUS:**

NO VIOLATIONS OBSERVED MINOR MINOR-CORRECTED CLASS II CLASS I

Violation Code	Authority	Requirement	Compliance Status			
			NVO	V	N/A	RV
HM00	ALCO Title 6 6.92.050	Has a valid ACDEH Operating Permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM01	CHSC 25503.5	A business shall establish and implement a business plan for emergency response to a release or threatened release of a hazardous material in accordance with the standards prescribed in the regulations adopted pursuant to Section 25503, if the business handles a hazardous material or a mixture containing a hazardous material that has a quantity at any one time during the reporting year that is any of the following: (A) Equal to, or greater than, a total weight of 500 pounds or a total volume of 55 gallons. (B) Equal to, or greater than, 200 cubic feet at standard temperature and pressure, if the substance is compressed gas. (Note: If a HMBP has not been submitted, then code items HM02 through HM07 will be in violation).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM02	19 CCR 2729.2(a)(1)	Adequate submission/completion of Business Activities & Owner/Operator Identification forms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM03	19 CCR 2729.2(a)(2)	Adequate submission/completion of chemical inventory forms.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM04	19 CCR 2729.5c	Annual submission of the Business Activities form, Owner/Operator Identification form and chemical inventory forms when required by EPCRA (if storing > 10,000 pounds of a hazardous material or an amount ≥ the TPQ or 500 lbs [whichever is less] for an extremely hazardous material).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
HM05	19 CCR 2729.2(a)(3)	Adequate submission/completion of site map.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM06	CHSC 25504	Adequate submission/completion/retention of written Contingency Plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM07	CHSC25505(e)(2)	HMBP is maintained on-site and/or is accessible.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM08	CHSC 25504(c) & 19 CCR 2732	Initial employee training program for hazardous materials/emergency response has been implemented within 6 months of hire.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM09	CHSC 25504(c) & 19 CCR 2732	Annual hazardous materials/emergency response refresher component of the employee training program has been implemented.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM10	19 CCR 2731(c)	MSDS (Material Safety Data Sheets) are accessible.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM11	19 CCR 2731(c)	Emergency shutoffs for chemical processes or equipment are labeled.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
HM12	19 CCR 2731(c)	Emergency equipment (such as fire extinguishers, spill prevention & alarm equipment) tested & maintained as necessary (e.g. fire extinguishers assessed annually).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM13	19 CCR 2731(c)	Spill control and spill mitigation materials are available (e.g. absorbents, rags, or shop vacuum).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM14	19 CCR 2731(c)	All containers are kept closed unless in use.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM15	19 CCR 2731(c)	All containers are in good condition.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM16	19 CCR 2731(c)	Containers stored in a manner to prevent rupture, leaking or structural deterioration.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM17	19 CCR 2731(c)	Containers are compatible with contents.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM18	19 CCR 2731(c)	Containers are properly labeled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM19	22 CCR 66261.7	Containers of hazardous materials are disposed of properly when empty.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM20	19 CCR 2731(c)	All spills promptly addressed to prevent discharge to air, soil or surface water.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HM21	19 CCR 2731(c)	Storage area is maintained to separate incompatible materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
AST00	CHSC 2527.4.5(a)	Facility storing petroleum in eligible ASTs (total capacity ≥1320 gallons) has a Spill Prevention Control and Countermeasure Plan (SPCC) on site.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

*[Signature]*  
 Facility Representative Signature

*Russell Gates*  
 Printed Name

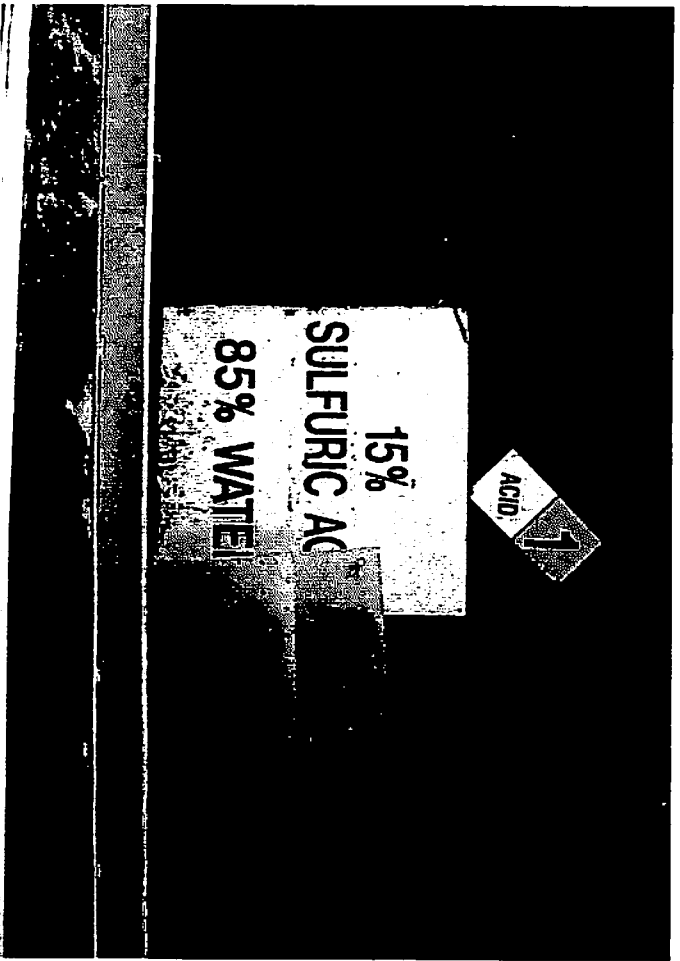
*7/6/11*  
 Date

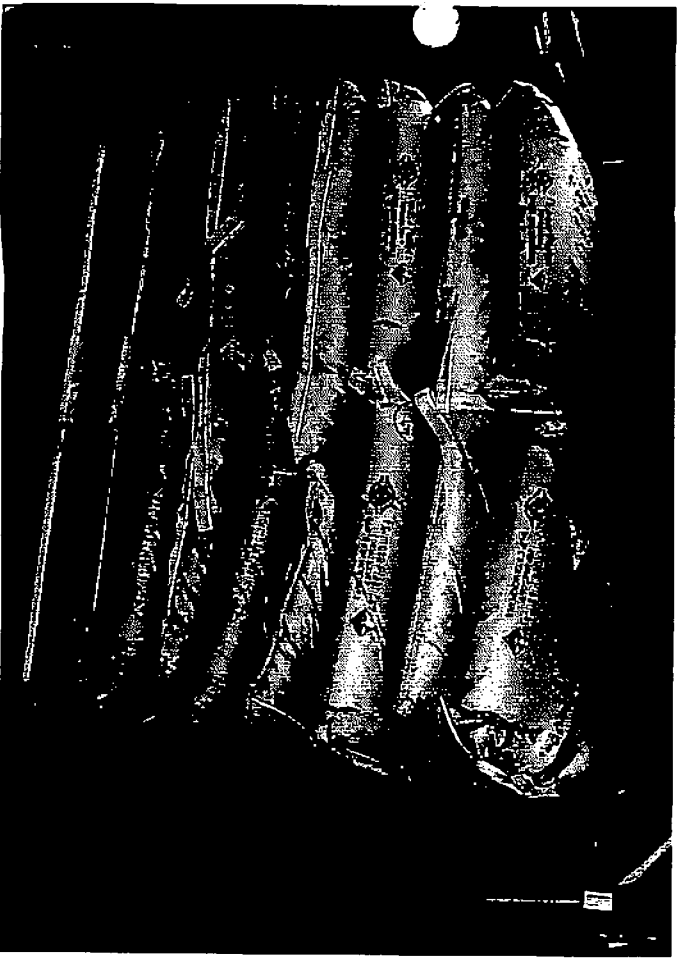


Metaco  
1475 - 64 dsh  
Deming.



7-6-11 L.S.





McKelco  
1475 - 6th St.  
Every.  
7-6-11 C.S.



**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH  
 CERTIFIED UNIFIED PROGRAM AGENCY (CUPA)  
 TIERED PERMIT INSPECTION CHECKLIST *Conditionally Authorized***

Facility Name: Metulco Date of Inspection: 12-28-11  
 Facility Address: 1475-67<sup>th</sup> St, Emeryville Inspector: Larry Seto

REQUIREMENTS	H&SC Section	COMMENTS
<b>A. NOTIFICATION</b>		
1) Maintain on site copy of most recent Notification.	25200.3(e) & (k)	✓ Ref. 22CCR66270.11
2) Maintain on site copy of most recent Authorization.		✓
3) Permit each treatment unit (TU) in proper tier.	25200.3(e)	✓
4) Identify each TU on form DTSC 1772.	25200.3(e)(3)	✓
5) Keep current the information on form DTSC 1772.	25200.3(e)	✓
6) Show location of each TU on plot plan/map.	25200.3(e)	✓
7) Complete submittal of notification documents.	25200.3(e)	✓
8) Pay all required fees.		✓
9) Comply with POTW pretreatment standards.	25200.3(c)(7)	✓
10) Submit annual waste reduction certification.	25200.3(c)(2)	Ref. H&SC25202.9
<b>B. CA OPERATIONS</b>		
1) Use only processes listed in treatment of waste.	25200.3(a)	✓ Ref. 67450.11
2) Treat only wastes listed for the process used.	25200.3(a)	✓
3) Treat only waste generated on site.	25200.3(c)(8)	✓
4) Maintain on site a written waste analysis plan.	25200.3(f)	✓
5) Address noted deficiencies in waste analysis plan.	25200.3(c)(6)	✓
6) Maintain on site a written inspection schedule.	25200.3(e)(5)	✓
7) Address noted deficiencies in inspection schedule.	25200.3(e)(5)	✓ N.A.
8) Maintain an up-to-date inspection log or summary.	25200.3(e)(5)	✓
9) Keep inspection records for three years.		✓
10) Maintain on site a current Contingency Plan.	25200.3(f)	✓
11) Address noted deficiencies in Contingency Plan.	25200.3(f)	NA
12) Maintain on site documents on investigation, cleanup, abatement or other remedial action.	25200.3(c)(3)	N.A.
13) Maintain on site documents on convictions, judgments, settlements or orders from any enforcement action.	25200.3(e)(3)	N.A.
14) Maintain on site documents on treatment, including operating instructions and record of dates, amounts, and types of wastes treated in each unit.	25200.3(c)(6)	✓
15) Limit volume of waste treated within tier limits.	25200.3(b)(1)	✓
16) Manage residual material from treatment properly.	25200.3(b)(4)	✓
17) Provide containment for treatment containers.	25200.3(c)(4)	✓ Ref. CCR66264.175
18) Certify treatment containers every 2 years.		
19) Document unauthorized or accidental releases from treatment unit in past 3 years.	Ref. 22CCR66265.31	✓ N.A.
20) Secure treatment area with 24-hr entry control.		✓
21) Maintain treatment unit in good order.		✓
22) Post "No Smoking" signs.		✓
23) Maintain on site records of tank system integrity.		✓
24) Submit Financial Assurance statement/instrument.	Ref. 22CCR67450.13	✓
25) Address deficiencies noted in Fin. Assurance checklist.		
26) SEE ATTACHED INSPECTION NARRATIVE.		

Note: Waste acid used to precipitate out aluminum from the Ion Exchange has a pH range of 1-2. At the same time acid from the Ion Exchange is pumped to the treatment tanks. Liquid caustic is manually pumped into the treatment tank to bring the pH to 5.5-12.5.

Name/Signature of Facility Representative: [Signature] Date: 12-28-11

**Hazardous Waste Generator Inspection Checklist (Page 1 of 2)**

Facility ID#	Facility Name <u>Metafco</u>	Site Address <u>1475 - 67th St, Emeryville</u>
Inspector <u>Larry Seto</u>	Inspection Date <u>7-6-11</u>	EPA ID # <u>CA1000100455</u>
HAZARDOUS WASTE GENERATOR STATUS:		# of Employees Handling Hazardous Waste <u>1-4</u>

**POST INSPECTION PROGRAM STATUS:**

	Violation Code	Authority	Requirement	Compliance Status			
				NVO	V	N/A	RV
<b>HAZARDOUS WASTE RECORDKEEPING</b>	W000	CHSC 25189.5(a)	Authorized/proper disposal of hazardous wastes.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W001	22 CCR 66262.12	Has an active EPA ID Number.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W002	ALCO Title 6 6.92.050	Has a valid ACDEH Operating Permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W003	22 CCR 66262.11	Proper characterization/testing of waste streams.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CESQS/Q TRAINING REQUIREMENTS</b>	W004	22CCR 66262.40(a)	A generator shall keep records of any test results, waste analyses, or other determinations for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W005	22 CCR 66262.34(d)(2)	At all times, there shall be at least one employee either on the facility premises or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures. This emergency coordinator shall be thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled the location of all records within the facility, and the facility layout. In addition, this person shall have the authority to commit the resources needed to carry out the contingency plan.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W006	22 CCR 66262.34(d)(2)	The generator must post the following information next to the telephone, the name and telephone number of the emergency coordinator; Location of fire extinguishers and spill control material, and, if present, fire alarm; and the telephone number of the fire department, unless the facility has a direct alarm.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>CONTAINER MANAGEMENT</b>	W007	22 CCR 66262.34(d)	Employees thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W008	22 CCR 66262.34(a)(1)(A)	Containers or tanks provided and suitable for storage of hazardous waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W009	22 CCR 66262.171	Containers not leaking.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W010	22 CCR 66265.173(a)	Containers kept closed unless removing or adding waste.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W011	22 CCR 66262.171	Containers in good condition (not rusted or defective).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W012	22 CCR 66262.173(b)	Containers handled, transferred and stored in a manner to prevent rupture and leaking.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W013	22 CCR 66262.172	Containers compatible with contents.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W014	22 CCR 66262.31-34	Containers and/or portable tanks labeled as "Hazardous Waste" and w/accumulation start date, generator name and address, contents, hazards and physical state.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>HOUSEKEEPING/SPILL PREVENTION</b>	W015	22 CCR 66261.7	Containers > 5 gallons managed properly when empty (dated when emptied, recycled, and returned to vendor within 1 year; if held EHS, must be triple-rinsed with proper disposal of rinsate).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W016	22 CCR 66265.35	Adequate aisle space is provided.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W017	22 CCR 66265.32(b)	Has access to phone, alarm or 2 way radios for emergency response.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W018	22 CCR 66265.32(c)	Has portable fire extinguishing equipment available.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W019	22 CCR 66265.32(c)	Spill control and mitigation materials available (absorbents, rags, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W020	22 CCR 66265.33	Emergency equipment (fire extinguishers, spill prevention, alarm equipment, etc.) tested and maintained as necessary (fire extinguishers assessed annually).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W021	22 CCR 66262.31	Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W022	22 CCR 66265.174	Storage area inspected weekly.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W023	22 CCR 66265.177	Separation of incompatible materials.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Compliance status is evaluated for each item on this Checklist as follows:  
 NVO= No Violations Observed    V = Violation    N/A = Not Applicable    RV = Repeat Violation

**Hazardous Waste Generator Inspection Checklist (Page 2 of 2)**

Facility ID#	Facility Name <i>Metafco</i>	Facility Address <i>1475-67th St, Emeryville</i>
Compliance status is evaluated for each item on this Checklist as follows: NVO = No Violations Observed V = Violation N/A = Not Applicable RV = Repeat Violation		<b>POST INSPECTION PROGRAM STATUS:</b> <u>NO VIOLATIONS OBSERVED</u> MINOR MINOR-CORRECTED CLASS II CLASS I

	Violation Code	Authority	Requirement	Compliance Status			
				NVO	V	N/A	RV
USED OIL	W024	22 CCR 66266.130	Proper handling, labeling, management and recycling of used oil filters (drained, labeled as "Drained Used Oil Filters" with accumulation start date and disposed of every 6 months if > 1 ton or annually if < 1 ton.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
RECYCLABLE MATERIALS	W025	22 CCR 66266.81	Proper handling, labeling, management and recycling of spent automotive lead acid batteries (must be stored on a non-reactive surface, disposed of every 6 months if > 1 ton or annually if < 1 ton; disposal records required only when more than 10 batteries are generated, stored or disposed of at one time; damaged batteries must be labeled as such with an accumulation start date).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W026	CHSC 25143.9(a)	Proper handling, labeling and management of any excluded recyclable materials.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W027	CHSC 25143.10(c)	Completion of the UPCF Recyclable Materials Report every two years if recycle on-site >100kg/27 gallons per month of recyclable material (in lieu of hazardous waste disposal for that material).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
RECORD-KEEPING	W028	22 CCR 66262.23	Hazardous waste manifests, bills of lading and/or consolidated manifests completed properly.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W029	22 CCR 66262.40	Hazardous waste manifests, bill of lading and/or consolidated manifests kept for 3 years.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
UNIV. WASTE	W030	22 CCR 66273.30-41	Universal Waste Proper handling, labeling, management and recycling of universal wastes (mercury thermostats/switches/lamps, non-auto batteries, CRT's, aerosol cans, fluorescent lights, etc.). Must label waste, document accumulation date, keep < 5000 kg (SQG's only) at any time, send to collection, disposal or recycling facility and retain receipts for 3 years.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ACCUMULATION TIME	W031	22 CCR 66262.34(e)	LQG 90 days: Hazardous waste disposed of every 90 days from the first day of accumulation (required if they generate ≥ 1000 kg/270 gallons per month).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W032	22 CCR 66262.34(d)(1)(2)(3)	SQG, 180 or 270 days A generator of less than 1,000 kilograms of hazardous waste in any calendar month may accumulate hazardous waste onsite for 180 days or less, or 270 days or less if the generator transports the generator's own waste, or offers the generator's waste for transportation, over a distance of 200 miles or more, for offsite treatment, storage, or disposal and is not a storage facility. The quantity of hazardous waste accumulated onsite never exceeds 6,000 kilograms; the generator complies with the requirements of 40 Code of Federal Regulations section 262.34(d), (e) and (f); the generator does not hold acutely hazardous waste or extremely hazardous waste in an amount greater than one kilogram for more than 90 days.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W033	22 CCR 66262.34(b)(1) and CHSC 25123.3(c)	CESQG 90 days from date 100 kg reached Hazardous waste disposed of within 90 days of accumulating 100 kg/27gallons (eligible only if they generate <100 kg/27 gallons per month)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	W034	22 CCR 66262.34(e)	Satellite Storage: Hazardous waste is disposed of at least once a year (even if <100 kg/27 gallons accumulated) OR within 90 days of accumulating 55 gallons whichever comes first (eligible for satellite rule only if waste accumulated at/near point of generation and meet labeling and storage conditions).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
HW TANKS	W035	22 CCR 66265.195	<b>HAZARDOUS WASTE ABOVEGROUND STORAGE TANKS (AST'S)</b> The owner or operator shall inspect, where present, at least once each operating day: (1) overflow/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good working order; (2) the aboveground portions of the tank system, if any, to detect corrosion or releases of waste; (3) data gathered from monitoring equipment and leak-detection equipment, (e.g., pressure and temperature gauges, monitoring wells) to ensure that the tank system is being operated according to its design; (4) the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); and (5) for uncovered tanks, the level of waste in the tank, to ensure compliance with 40 CFR 265.201(c).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	W036	22 CCR66262.31-34	Stationary tanks labeled as "Hazardous Waste" and marked with accumulation start date.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
WASTE STREAMS			<input type="checkbox"/> Used oil				
			<input type="checkbox"/> Aqueous Parts cleaner				
			<input type="checkbox"/> Ethylene glycol / antifreeze / coolant				
			<input type="checkbox"/> Oily sludge				
			<input type="checkbox"/> Paint waste				
			<input type="checkbox"/>	<input checked="" type="checkbox"/> Caustic sludge			

Facility Representative Signature 	Printed Name Russell Gates	Date 7/6/11
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Hazardous Waste Generator Inspection Checklist

Facility Name: Melco PR \_\_\_\_\_ Date of Inspection: 6-20-06  
 Facility Address: 1475 - 67th St. Emeryville Inspector: Larry Seto

CESQG  SQG  LQG  Number of Employees Handling Waste 1 EPA ID# CAL000100455

Requirement	Citation	In Compliance?		
		Yes	No	N/A
<b>1. Identification Number</b>				
(a) Obtained EPA ID Number	66262.12(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Transporter and TSD used have EPA ID #	66262.12(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2. Pre-Transport Requirements</b>				
(a) HW determination done	66262.11(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Containers labeled	66262.31	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) Labels properly filled out	66262.32	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(d) Within legal accumulation time	66262.34(e)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(e) Containers in good condition	66265.171	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Compatible with containers	66265.172	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(g) Containers closed / sealed	66265.173(a)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(h) Storage area inspected weekly	66265.174	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(i) Tanks equipment inspected daily	66265.195(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(j) Incompatible HWs separated	66265.199	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(k) Proper disposal	25189.5 (a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>3. Recordkeeping / HW Manifests</b>				
(a) LDR waste records kept 5 years	66268.7(a)(7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(b) Biennial Report submitted	66262.41(a)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(c) HW shipped with manifests/ consolidated manifests	66262.20	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Manifests/consolidated manifests kept 3 years	66262.40(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) HW analyses kept 3 years	66262.40(e)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
(f) Manifests received from TSD	66262.42	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>4. HW Personnel Training</b>				
(a) Training provided annually	66265.16	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Personnel trained and supervised	66265.16(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) New hires trained within 6 mos.	66265.16(b)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Training records kept on site	66265.16(d)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Training records kept for 3 yrs.	66265.16(e)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(f) Training records complete	66265.16(1,2)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Requirement	Citation	In Compliance?		
		Yes	No	N/A
<b>5. Contingency Plan/Emergency Response Plan/Business Plan</b>				
(a) CP/ERP/HMBP submitted	66264.53(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) Copy of Plan on site	66264.53	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) Plan complete	66264.53	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Plan amended as necessary	66264.54	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) ER Coordinator familiar w/ Plan	66264.55	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>6. Preparedness and Prevention</b>				
(a) Spill control systems available	66264.32	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(b) ER equipment operating properly	66264.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(c) ER equipment storage secure	66264.14	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(d) Aisle space in HW area adequate	66264.35	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(e) Arranged w/ local ER agencies	66234.37	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Waste Streams**

(a) Used oil
(b) Non-halogenated solvents / Parts cleaner
(c) Ethylene glycol / antifreeze / coolant
(d) Oily sludge
(e) Used oil filters
(f) Spent photoprocessing chemicals
(g) Dry cleaning solvent
(h) Universal Waste
(i) Dispenser Fuel filters
(j) Paint waste
(k) Others: <u>Caustic Sludge</u>

All of the citations above refer to Title 22, California Code of Regulations.

**Pollution Prevention Program**  
 The Health and Safety Code, Section 25244.19 requires certain hazardous waste generators to prepare and implement a Source Reduction Plan. Has this facility completed a Source Reduction Plan?  
 Yes     No     Not Applicable

Comments: The only hazardous waste generated at this facility is the caustic sludge from the treatment tanks when they are cleaned. There was no hazardous waste or waste containers on-site during this inspection. Last disposal was on 9/7/04 by Phillip Transportation & Remediation CAR 000052803. Your waste can also be taken to an Alameda Household Hazardous Waste facility for disposal. For more information, call 800-606-6606.

Signature: [Signature] Name/Title: Russell Gates, Secretary Date: 6-20-06

**ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH**  
A Certified Unified Program Agency

**Hazardous Waste Generator Inspection Checklist**

Facility Name: Metcalco STID: \_\_\_\_\_ Date of Inspection: 8-21-02  
 Facility Address: 1475 - 67th St., Fremont Inspector: Cary Seto

Requirement	Citation	In Compliance?		
		Yes	No	N/A
<b>1. Identification Number</b>				
(a) Obtained EPA ID Number	66262.12(a)	✓	✓	
(b) Transporter and TSD used have EPA ID #	66262.12(c)	✓	✓	
<b>2. Pre-Transport Requirements</b>				
(a) HW determination done	66262.11(a)	✓	✓	
(b) Containers labeled	66262.31	✓	✓	
(c) Labels properly filled out	66262.32	✓	✓	
(d) Within legal accumulation time	66262.34(c)	✓	✓	
(e) Containers in good condition	66265.171	✓	✓	
(f) Compatible with containers	66265.172	✓	✓	
(g) Containers closed / sealed	66265.173(a)	✓	✓	
(h) Storage area inspected weekly	66265.174	✓	✓	
(i) Tanks equipment inspected daily	66265.195(a)			✓
(j) Incompatible HWs separated	66265.199	✓	✓	
(k) Used oil filters managed properly	66266.130(a)			✓
<b>3. Recordkeeping / HW Manifests</b>				
(a) LDR waste records kept 5 years	66268.7(a)(7)			✓
(b) Biennial Report submitted	66262.41(a)			✓
(c) HW shipped with manifests	66262.20	✓	✓	
(d) Manifests kept 3 years	66262.40(a)	✓	✓	
(e) HW analyses kept 3 years	66262.40(c)	✓	✓	
(f) Manifests received from TSD	66262.42	✓	✓	
<b>4. HW Personnel Training</b>				
(a) Training provided annually	66265.16	✓	✓	
(b) Personnel trained and supervised	66265.16(b)	✓	✓	
(c) New hires trained within 6 mos.	66265.16(b)	✓	✓	
(d) Training records kept on site	66265.16(d)	✓	✓	
(e) Training records kept for 3 yrs.	66265.16(e)	✓	✓	
(f) Training records complete	66265.16(1,2)	✓	✓	

Requirement	Citation	In Compliance?		
		Yes	No	N/A
<b>5. Contingency Plan/Emergency Response Plan/Business Plan</b>				
(a) CP/ERP/HMBP submitted	66264.53(a)	✓	✓	
(b) Copy of Plan on site	66264.53	✓	✓	
(c) Plan complete	66264.53	✓	✓	
(d) Plan amended as necessary	66264.54	✓	✓	
(e) ER Coordinator familiar w/ Plan	66264.55	✓	✓	
<b>6. Preparedness and Prevention</b>				
(a) Spill control systems available	66264.32	✓	✓	
(b) ER equipment in order	66264.33	✓	✓	
(c) ER equipment storage secure	66264.14	✓	✓	
(d) Aisle space in HW area adequate	66264.35	✓	✓	
(e) Arranged w/ local ER agencies	66234.37			✓
<b>Waste Streams</b>				
(a) Waste/Used oil				
(b) Non-halogenated solvents / Parts cleaner				
(c) Ethylene glycol / antifreeze / coolant				
(d) Oily sludge				
(e) Used oil filters				
(f) Spent photoprocessing chemicals				
(g) Dry cleaning solvent				
(h) Other: <u>Caustic waste</u>				
(i) Other:				
<i>All of the citations above refer to Title 22, California Code of Regulations</i>				

**Pollution Prevention Program**

The Health and Safety Code, Section 25244.19 requires certain hazardous waste generators to prepare and implement a Source Reduction Plan. Has this facility completed a Source Reduction Plan?

Yes     
  No     
  Not Applicable

Comments: <sup>Sludge</sup> Caustic waste is stored in a 55 gal drum. Acid waste is treated and discharged into the sewer via a discharge permit from EBHAD. A conditionally authorized permit application needs to be completed.

Signature: [Signature] Name/Title: Russell Gates, SECRETARY Date: 8-21-02

Plant number ..... 6972 A6972  
Business name ..... Metalco Inc  
Location address ..... 1475 67th Street  
    City ..... Emeryville, CA 94608  
    Telephone ..... (510) 652-7470  
Mailing address ..... 1475 67th Street  
    City ..... Emeryville, CA 94608  
Principal product ..... Anodizing Service  
SIC ..... 3471  
NAICS ..... 332813  
Contact ..... Fritz Wisbar,  
    Title ..... President  
    Address ..... 1475 67th Street  
    City ..... Emeryville, CA 94608  
    Telephone ..... (510) 652-7470  
Permit engr, Current ... Brian K Lusher (1015)  
    Former .... Tamiko D Endow (1065)  
Ownership type ..... Private  
Number of employees .... 8  
Inside city limits ..... Yes  
Ceased operation ..... Sep 15, 2008, Closed

Plant #: 6972  
Company name: Metalco Inc  
Location: 1475 67th Street, Emeryville, CA 94608

Application #: 7228  
Project title: IC Engine  
Engineer: Janet P Stromberg [545 ]  
Received: 06/18/91  
Final disposition: Waived A/C, 10/24/91



Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

2323 Fifth Street, Berkeley, CA 94710. Phone (510) 486-0900

Laboratory Job Number 241416  
ANALYTICAL REPORT

METALCO  
1475 67th Street  
Emeryville, CA 94608

Project : STANDARD  
Location : 2 Time Composite  
Level : II

Sample ID

1

Lab ID

241416-001

This data package has been reviewed for technical correctness and completeness. Release of this data has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signature. The results contained in this report meet all requirements of NELAC and pertain only to those samples which were submitted for analysis. This report may be reproduced only in its entirety.

*Desiree N. Tetrault*

Signature: \_\_\_\_\_

Desiree N. Tetrault  
Project Manager  
(510) 486-0900

Date: 12/06/2012

NELAP # 01107CA



**CASE NARRATIVE**

Laboratory number: 241416  
Client: METALCO  
Location: 2 Time Composite  
Request Date: 11/20/12  
Samples Received: 11/20/12

This data package contains sample and QC results for one water sample, requested for the above referenced project on 11/20/12. The sample was received cold and intact.

**Metals (EPA 200.7):**

No analytical problems were encountered.

# CHAIN OF CUSTODY

Page 1 of 1

Chain of Custody # \_\_\_\_\_

**cb** Curtis & Tompkins Laboratories  
 ENVIRONMENTAL ANALYTICAL TESTING LABORATORY  
 In Business Since 1976

2323 Fifth Street  
 Berkeley, CA 94710

Phone (510) 486-0900  
 Fax (510) 486-0532

Project No: 2  
 Project Name: Time Composite  
 Project P. O. No: ESMUD - 2012  
 EDD Format: Report Level  I  II  III  IV  
 Turnaround Time:  rush  standard

CAT LOGIN # 241416

Sampler: Russell Gates

Report To: Russell Gates

Company: Metako

Telephone: (510) 652-7470

Email: Metako46@comcast.net

## ANALYTICAL REQUEST

200.7	Silver	
200.7	Cadmium	XX
200.7	Chromium	XX
200.7	Copper	XX
200.7	Nickel	XX
200.7	Lead	XX
200.7	Zinc	XX

Lab No.	Sample ID.	SAMPLING		MATRIX		# of Containers	CHEMICAL PRESERVATIVE								
		Date Collected	Time Collected	Water	Solid		HCl	H2SO4	HNO3	NaOH	None				
1		11/24/12	0533	X											
2			0634	X											
3			0731	X											
4			0833	X											
5			0936	X											
6			1031	X		1				X					
7			1132	X											
8			1235	X											
9			1335	X											
10			1437	X											
11		11/24/12	1530	X											

Notes:

SAMPLE RECEIPT  
 Intact  
 Cold  
 On Ice  
 Ambient

RELINQUISHED BY:

Russell Gates DATE: 11/24/12 TIME: 4:40 PM

RECEIVED BY:

Pat Bluffly DATE: 11/24/12 TIME: 9:12 PM

DATE: TIME:

DATE: TIME:

**Metals Analytical Report**

Lab #:	241416	Location:	2 Time Composite
Client:	METALCO	Prep:	EPA 200.7
Project#:	STANDARD	Analysis:	EPA 200.7
Field ID:	1	Batch#:	193226
Lab ID:	241416-001	Sampled:	11/20/12
Matrix:	Water	Received:	11/20/12
Units:	ug/L	Prepared:	11/27/12
Diln Fac:	1.000	Analyzed:	11/30/12

Analyte	Result	RL
Cadmium	ND	5.0
Chromium	78	5.0
Cobalt	ND	5.0
Lead	7.0	5.0
Nickel	9.6	5.0
Silver	ND	5.0
Zinc	45	20

This page is  
The Actual  
Results

ND= Not Detected  
RL= Reporting Limit  
Page 1 of 1



## Batch QC Report

Metals Analytical Report			
Lab #:	241416	Location:	2 Time Composite
Client:	METALCO	Erep:	EPA 200.7
Project#:	STANDARD	Analysis:	EPA 200.7
Type:	BLANK	Diln Fac:	1.000
Lab ID:	QC667618	Batch#:	193226
Matrix:	Water	Prepared:	11/27/12
Units:	ug/L	Analyzed:	11/28/12

Analyte	Result	RL
Cadmium	ND	5.0
Chromium	ND	5.0
Cobalt	ND	5.0
Lead	ND	5.0
Nickel	ND	5.0
Silver	ND	5.0
Zinc	ND	20

THESE PAGES  
 7, 8 & 9  
 ARE CURTIS  
 TOMPKINS PROOF  
 RUNS OF RESULTS

ND= Not Detected  
 RL= Reporting Limit  
 Page 1 of 1

## Batch QC Report

**Metals Analytical Report**

Lab #:	241416	Location:	2 Time Composite
Client:	METALCO	Prep:	EPA 200.7
Project#:	STANDARD	Analysis:	EPA 200.7
Matrix:	Water	Batch#:	193226
Units:	ug/L	Prepared:	11/27/12
Diln Fac:	1.000	Analyzed:	11/28/12

Type: BS Lab ID: QC667619

Analyte	Spiked	Result	%REC	Limits
Cadmium	50.00	44.61	89	80-120
Chromium	200.0	159.9	80	80-120
Cobalt	500.0	401.2	80	79-120
Lead	100.0	83.83	84	78-120
Nickel	500.0	407.6	82	80-120
Silver	50.00	40.63	81	79-120
Zinc	500.0	431.9	86	80-120

Type: BSD Lab ID: QC667620

Analyte	Spiked	Result	%REC	Limits	RPD	Lim
Cadmium	50.00	45.20	90	80-120	1	20
Chromium	200.0	162.3	81	80-120	1	20
Cobalt	500.0	410.4	82	79-120	2	20
Lead	100.0	84.74	85	78-120	1	20
Nickel	500.0	416.1	83	80-120	2	20
Silver	50.00	41.39	83	79-120	2	20
Zinc	500.0	437.7	88	80-120	1	20

RPD= Relative Percent Difference

## Batch QC Report

Metals Analytical Report			
Lab #:	241416	Location:	2 Time Composite
Client:	METALCO	Prep:	EPA 200.7
Project#:	STANDARD	Analysis:	EPA 200.7
Field ID:	ZZZZZZZZZZ	Batch#:	193226
MSS Lab ID:	241387-003	Sampled:	11/19/12
Matrix:	Water	Received:	11/19/12
Units:	ug/L	Prepared:	11/27/12
Diln Fac:	1.000	Analyzed:	11/28/12

Type: MS Lab ID: QC667621

Analyte	MSS Result	Spiked	Result	%REC	Limits
Cadmium	<0.4753	50.00	45.93	92	76-120
Chromium	2.659	200.0	170.0	84	74-120
Cobalt	1.442	500.0	428.2	85	75-120
Lead	4.700	100.0	92.55	88	65-120
Nickel	7.539	500.0	434.7	85	74-120
Silver	<1.331	50.00	42.14	84	73-120
Zinc	274.8	500.0	726.5	90	75-124

Type: MSD Lab ID: QC667622

Analyte	Spiked	Result	%REC	Limits	RPD	Lim
Cadmium	50.00	45.39	91	76-120	1	20
Chromium	200.0	168.9	83	74-120	1	21
Cobalt	500.0	424.0	85	75-120	1	20
Lead	100.0	91.69	87	65-120	1	29
Nickel	500.0	429.3	84	74-120	1	21
Silver	50.00	41.72	83	73-120	1	25
Zinc	500.0	726.8	90	75-124	0	27

RPD= Relative Percent Difference

**CERTIFIED MAIL**  
**(Return Receipt Requested)**  
Certified Mail No. 7005 2570 0000 6629 7996

December 1, 2010

Mr. Russell Gates  
1475 67<sup>th</sup> Street  
Emeryville, CA

Dear Mr. Gates:

Re: Wastewater Discharge Permit No 07390021

Enclosed is the new Wastewater Discharge Permit Revision for Metalco for the permit that expires October 25, 2014. EBMUD has made the following changes to the discharge permit for Metalco in accordance with federal pretreatment streamlining regulations:

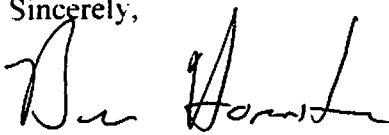
- Reduced inspection and sampling by EBMUD from one event per year to one event every other year. This will decrease Monitoring and Testing fees by approximately \$1,234 annually. The District may revise the permit to increase monitoring as necessary.
- Reduced self-monitoring from two events per year to one event per year.

Please read the EBMUD Wastewater Discharge Permit Standard Terms and Conditions. July 2010 edition. As a permit holder, you are legally responsible for complying with all permit conditions and requirements.

Metalco shall report to the Environmental Services Division any changes, either permanent or temporary, to the premises or operation that significantly affect the volume or quality of the wastewater discharged or that deviate from the Terms and Conditions under which this Permit is granted.

If you have any questions regarding this Permit, please contact Audrey Comeaux of the Environmental Services Division at (510) 287-1199.

Sincerely,

  
BENNETT K. HORENSTEIN  
Manager of Environmental Services

(510) 287-1199

FALE 287-1607

BKH:ALC:alc

Enclosures  
PO BOX 74055, OAKLAND, CA 94623-1055 (510) 287-1405

press 1 Then 1 again Then STATION LINE  
Then press 2 Then press next to the mail

**CERTIFIED MAIL**  
**(Return Receipt Requested)**  
**Certified Mail No. 7005 2570 0000 6629 8542**

March 2, 2011

Mr. Russell Gates  
1475 67<sup>th</sup> Street  
Emeryville, CA


Dear Mr. Gates:

Re: Wastewater Discharge Permit No. 07390021

Enclosed is a new page 3 of the Wastewater Discharge Permit Revision for Metalco, Inc. for the permit that expires October 25, 2014. This revision corrects *Self-Monitoring Reporting Requirement, Section IV*. The self-monitoring for Metalco, Inc. is to be performed during November 2010-2013 and the self-monitoring report is due by December 30, 2010-2013.

If you have any questions regarding this Permit, please contact Audrey Comeaux of the Environmental Services Division at (510) 287-1199.

Sincerely,



BENNETT K. HORENSTEIN  
Manager of Environmental Services

BKH:ALC:alc

Enclosure



**COMPLIANCE EVENT REMINDER NOTICE**

November 1, 2011

Mr. Russell Gates  
Metalco, Inc.  
1475 67th Street  
Emeryville, CA 94608

Dear Mr. Gates:

RE: Wastewater Discharge Permit No. 07390021

Metalco, Inc. is required to submit periodic compliance reports. This is a reminder that a TTOC Report is due by December 1, 2011.

The Compliance Report must contain the proper certification statement and shall be signed by an authorized person in accordance with Section B of the permit Standard Terms and Conditions. This report must be completed and mailed to the Environmental Services Division by the due date. A violation follow up fee may be assessed for late, incomplete or failure to submit this report.

Sincerely,



AUDREY COMEAUX  
Wastewater Control Representative

ALC:alc

**TOTAL TOXIC ORGANICS COMPLIANCE REPORT**

(Pretreatment Standards 40 CFR 413.03 &amp; 433.12)

**BUSINESS NAME:** METALCO  
**PERMIT NUMBER:** 07390021  
**FACILITY ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**STREET ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**Phone:** (510) 652-7470

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard of permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last Total Toxic Organics Compliance report. I further certify that this facility is implementing the solvent management plan submitted to EBMUD."

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

  
\_\_\_\_\_  
Signature of OfficialDate: November 21, 2011

Return to: EBMUD Source Control Division, MS#702  
PO Box 24055  
Oakland, CA 94623-1055

**COMPLIANCE EVENT REMINDER NOTICE**

May 2, 2012

Mr. Russell Gates  
Metalco, Inc.  
1475 67th Street  
Emeryville, CA 94608

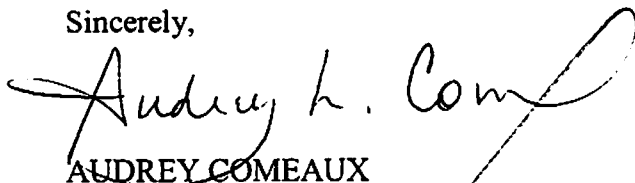
Dear Mr. Gates:

RE: Wastewater Discharge Permit No. 07390021

Metalco, Inc. is required to submit periodic compliance reports. This is a reminder that a TTOC Report is due by June 1, 2012.

The Compliance Report must contain the proper certification statement and shall be signed by an authorized person in accordance with Section B of the permit Standard Terms and Conditions. This report must be completed and mailed to the Environmental Services Division by the due date. A violation follow-up fee may be assessed for late, incomplete or failure to submit this report.

Sincerely,



AUDREY COMEAUX  
Wastewater Control Representative

ALC:alc

## TOTAL TOXIC ORGANICS COMPLIANCE REPORT

(Pretreatment Standards 40 CFR 413.03 & 433.12)

**BUSINESS NAME:** METALCO  
**PERMIT NUMBER:** 07390021  
**FACILITY ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**STREET ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**Phone:** (510) 652-7470

“Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard of permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last Total Toxic Organics Compliance report. I further certify that this facility is implementing the solvent management plan submitted to EBMUD.”

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

  
\_\_\_\_\_  
Signature of Official

Date: May 23, 2012

Return to: EBMUD Source Control Division, MS#702  
PO Box 24055  
Oakland, CA 94623-1055

**COMPLIANCE EVENT REMINDER NOTICE**

November 1, 2012

Mr. Russell Gates  
Metalco, Inc.  
1475 67th Street  
Emeryville, CA 94608

Dear Mr. Gates:

RE: Wastewater Discharge Permit No. 07390021

Metalco, Inc. is required to submit periodic compliance reports. This is a reminder that a TLOC Report is due by December 1, 2012.

The Compliance Report must contain the proper certification statement and shall be signed by an authorized person in accordance with Section B of the permit Standard Terms and Conditions. This report must be completed and mailed to the Environmental Services Division by the due date. A violation follow up fee may be assessed for late, incomplete or failure to submit this report.

Sincerely,



AUDREY COMEAUX  
Wastewater Control Representative

ALC:alc

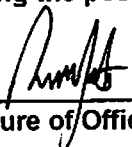
## TOTAL TOXIC ORGANICS COMPLIANCE REPORT

(Pretreatment Standards 40 CFR 413.03 & 433.12)

**BUSINESS NAME:** METALCO  
**PERMIT NUMBER:** 07390021  
**FACILITY ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**STREET ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**Phone:** (510) 652-7470

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard of permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last Total Toxic Organics Compliance report. I further certify that this facility is implementing the solvent management plan submitted to EBMUD."

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

  
\_\_\_\_\_  
Signature of Official

Date: November 20, 2012

Return to: EBMUD Source Control Division, MS#702  
PO Box 24055  
Oakland, CA 94623-1055



# WASTEWATER DISCHARGE PERMIT

## Terms and Conditions

Metalco, Inc.  
Permit No. 0739002 1  
Page 1

### GENERAL REQUIREMENTS

- I. Metalco, Inc. shall comply with all items of the attached Standard Terms and Conditions (STC), July 2010 Edition (or most recent edition).
- II. The discharge of used or spent process solutions is prohibited without prior notification to the District and prior approval by the District.

### COMPLIANCE REQUIREMENTS

- I. Metalco, Inc. shall implement and maintain a Slug Control Plan to eliminate or minimize the potential for an accidental or slug discharge of pollutants into the sanitary sewer system, in accordance with Section IV.f. STANDARD TERMS AND CONDITIONS, the most recent edition. The spill plan shall contain a response procedure that is posted in the work areas where spills are most likely to occur. The response procedure shall be according to Section B., STANDARD TERMS AND CONDITIONS, the most recent edition. EBMUD shall be notified immediately of changes that occur at the facility with potential for a slug discharge.
- II. Metalco, Inc. shall make available upon request copies of completed Uniform Hazardous Waste Manifests for all solid and liquid wastes removed from the facility.
- III. Metalco, Inc. shall practice pollution prevention techniques to reduce or eliminate pollutants released from the facility. Wastes remaining should be recycled whenever possible.

Metalco, Inc. shall review its waste generating processes and practices to identify pollution prevention opportunities such as:

1. Improved operations practices.
2. Material substitution.
3. Production substitution.
4. Technology and process modification.

Documentation of the identified pollution prevention opportunities shall be maintained at the facility and updated periodically to reflect any actions implemented to minimize wastes. The documentation must be made available for review upon request. Documentation that has been required by another agency will be acceptable.

- IV. Metalco, Inc. is prohibited from discharging any process wastewater to any location other than that passing through Process Sampling Point No. 1 (PSP #1). All discharges of wastewater subject to 40 Code of Federal Regulations (CFR) Part 413 standards shall pass undiluted through the sample location described in Paragraph IV, Self-Monitoring Reporting Requirements.



# WASTEWATER DISCHARGE PERMIT

Terms and Conditions

Metalco, Inc.  
Permit No. 0739002 1  
Page 2

2. Description of stored chemicals;
3. Procedures for immediately notifying EBMUD of slug discharges and for follow-up with written notification within five days, in accordance with Section B, Paragraph I, STC;
4. Procedures to prevent adverse impact from accidental spills including those that may occur during the transfer of waste to the emergency tanks and from leaks or failure of the pretreatment tank.

II. Metalco, Inc. shall submit semi-annual Total Toxic Organics Compliance (TTOC) Reports in accordance with 40 CFR Part 413.03(a).

REPORT TYPE	DUE DATES
Semi-annual TTOC Reports	December 1, 2009 - 2013 June 1, 2009 - 2014

## WASTEWATER DISCHARGE LIMITATIONS

I. Metalco, Inc. shall not discharge wastewater from PSP #1 or into the community sewer if the strength of the wastewater exceeds the following local limits or applicable Electroplating Categorical limits found in 40 CFR Part 413.44(b) and Part 413.64(b):

Regulated Parameter	ORDINANCE NO. 311A-03 LOCAL LIMITS *	40 CFR 413	
	Max. for any 1 day (mg/L)	Daily Max (mg/L)	4-Day Average (mg/L)
Cadmium, Total	<b>1</b>	1.2	0.7
Chromium, Total	2	-	-
Copper	5	-	-
Cyanide, Amenable	5	5.0	2.7
Lead, Total	2	<b>0.6</b>	0.4
Nickel	5	-	-
Silver	1	-	-
Zinc	5	-	-
pH (in S.U.)	not less than 5.5	-	-
Total Toxic Organics (TTO) <sup>1</sup>	-	4.57	

\* Local limits apply to: 1) non-process wastewater discharges, and 2) process wastewater discharges when a federal limit does not exist for the regulated parameter or when the federal limit is greater than the local limit. The more stringent limit is in bold print.

<sup>1</sup> Total Toxic Organics are defined in 40 CFR Part 413.02(i). In lieu of monitoring for TTO, Metalco, Inc. shall submit semi-annual compliance reports demonstrating compliance with their Toxic Organic Management Plan.

## SELF - MONITORING REPORTING REQUIREMENT

I. Metalco, Inc. shall obtain representative samples of wastewater discharges from processes regulated under 40 CFR Part 413 during representative operating days. The sampling shall be





# WASTEWATER DISCHARGE PERMIT

Terms and Conditions

Metalco, Inc.  
Permit No. 0739002 1  
Page 3

\* Local limits apply to: 1) non-process wastewater discharges, and 2) process wastewater discharges when a federal limit does not exist for the regulated parameter or when the federal limit is greater than the local limit. The more stringent limit is in bold print.

<sup>1</sup> Total Toxic Organics are defined in 40 CFR Part 413.02(i). In lieu of monitoring for TTO, Metalco, Inc. shall submit an annual compliance report demonstrating compliance with their Toxic Organic Management Plan.

## SELF - MONITORING REPORTING REQUIREMENT

I. Metalco, Inc. shall obtain representative samples of wastewater discharges from processes regulated under 40 CFR Part 413 during representative operating days. The sampling shall be performed according to the frequency outlined below and according to the methods and requirements found in STC.

II. Metalco, Inc. shall submit self-monitoring reports (SMR) which include the following:

1. Signature and certification statements in accordance with Section B, Paragraph VI, STC.
2. Laboratory analytical reports.
3. Chain-of-custody documentation in accordance with Section C, Paragraph II, STC.
4. Water meter readings for EBMUD meter No. 30774455 at the start and stop of the composite sample period, the date and time that each reading was taken, and the total number of gallons consumed.

III. Metalco, Inc. shall perform self-monitoring on one representative operating day during the month indicated below and submit a Self-monitoring Report by the due date listed below:

MONTH	DUE DATE
November 2010 - 2013	December 30, 2010 - 2013

IV. Metalco, Inc. shall perform self-monitoring in accordance with the conditions listed in the table below:

LOCATION (a)	SAMPLE TYPE (b)	PARAMETERS
PSP #1	Time Composite	Metals (Ag, Cd, Cr, Cu, Ni, Pb, Zn)
	Grab	pH; Cyanide, amenable

- a. Process sampling point #1 (PSP#1) is the drain located downstream from the final rinse tanks as shown on Metalco, Inc.'s Part 6 – Schematic Flow Diagram submitted with the permit application materials.
- b. Time composite - samples shall consist of hourly grab samples collected during hours of operation over a 24-hour period.



# WASTEWATER DISCHARGE PERMIT

Terms and Conditions

Metalco, Inc.  
Permit No. 0739002 1  
Page 4

pH	150.1
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VI. All samples must be obtained using containers, collection methods, preservation techniques, holding times and analytical methods set forth in 40 CFR Part 136 or Standard Methods for the Examination of Water and Wastewater.

SD-30.7.20\*



# WASTEWATER DISCHARGE PERMIT

Terms and Conditions

METALCO, INC.  
Permit No. 0739002 1  
Page 5

Rates Effective July 1, 2010, or  
Revised Rates Approved by EBMUD Board of Directors thereafter

## WASTEWATER FEES AND CHARGES

### Monitoring and Testing Charges\*

	<u>Frequency</u>	<u>Charge</u>
EBMUD Inspection	1 every 2 years	\$880.00 each

<u>Analyses</u>	<u>Frequency</u>	<u>Charge</u> <u>per test</u>
pH	1 every 2 years	\$23.00
Metals	1 every 2 years	\$104.00
Cyanide-Amenable	1 every 2 years	\$104.00

**\*MONITORING AND TESTING CHARGES TO BE BILLED  
AFTER COMPLETION**

### PERMIT FEE

The following fees and charges are due when billed by the District:

Annual Permit Fee: \$2,450 /year



# WASTEWATER DISCHARGE PERMIT

Terms and Conditions

METALCO, INC.

Rates Effective July 1, 2010, or

Permit No. 0739002 1

Revised Rates Approved by EBMUD Board of Directors thereafter

Page 6

## WASTEWATER DISPOSAL SERVICE CHARGE

All wastewater discharged will be charged for treatment and disposal service at the BCC (Business Classification Code) unit rate. Wastewater charges are determined by multiplying the metered consumption by the percent discharged, adding any fixed volume, and multiplied by the treatment charge.

<u>Meter No.</u>	<u>BCC</u>	<u>Treatment Charge</u>	<u>Description</u>
30774455	3470	\$0.84 /Ccf	Metal Coating

<u>Account Number</u>	<u>Meter Number</u>	<u>Percent Discharged</u>	<u>Fixed Volume Ccf / month</u>	<u>Meter Rate \$/Ccf</u>
0739002 1	30774455	93.0%	0	\$0.84

The District may change the terms and conditions of a Wastewater Discharge Permit, including changing the average limits on the elements of wastewater strength and rates and charges, from time to time as circumstances may require. The District shall allow a discharger reasonable time to comply with any District required changes in the permit except that a change in average limits of wastewater strength shall immediately affect calculation of the wastewater disposal charge.

Charges listed in this Permit will be assessed on EBMUD bills in accordance with the EBMUD Meter Reading Schedule.

### Authorization

Permit Holder shall report to EBMUD, Wastewater Department any changes, permanent or temporary, to the premises or operations that significantly change the quality or volume of the wastewater discharge or deviation from the terms and conditions under which this permit is granted.

Permit Holder is hereby authorized to discharge wastewater to the community sewer, subject to said Applicant's compliance with EBMUD Wastewater Control Ordinance as well as permit terms and conditions.

Effective: 03-14-11

*David R Williams*

Expiration: 10-25-2014

\_\_\_\_\_  
Director, Wastewater Department

3/14/11  
Date



# WASTEWATER DISCHARGE PERMIT

## Terms and Conditions

### APPLICANT INFORMATION

<b>APPLICANT BUSINESS NAME</b> METALCO		<b>PERMIT NUMBER</b> 0739002 1	
<b>ADDRESS OF SITE DISCHARGING WASTEWATER</b> <div style="display: flex; justify-content: space-between;"> <span>1475 67th Street</span> <span>Emeryville</span> <span>94608</span> </div>			
STREET ADDRESS	City	ZIP CODE	
<b>PERSON TO BE CONTACTED REGARDING THIS APPLICATION</b>			
NAME	ELECTRONIC MAIL ADDRESS	TELEPHONE NUMBER	FACSIMILE NUMBER
<b>PERSON(S) TO RECEIVE PERMIT AND CORRESPONDENCE IF DIFFERENT THAN PERSON SIGNING APPLICATION</b>			
NAME	MAILING ADDRESS		
NAME	MAILING ADDRESS		
<b>PERSON TO BE CONTACTED IN THE EVENT OF AN EMERGENCY</b>			
NAME	DAYTIME TELEPHONE NUMBER	NIGHTTIME TELEPHONE NUMBER	
NAME	DAYTIME TELEPHONE NUMBER	NIGHTTIME TELEPHONE NUMBER	
<b>AUTHORIZATION</b> Russell Gates, Secretary <i>is authorized to sign reports, documents, and other correspondence required by this Permit.</i>			
NAME & TITLE			
<b>CERTIFICATION</b>			
<i>I understand that I am legally responsible for discharge of wastewater from the facility and for complying with the Terms and Conditions of this Wastewater Discharge Permit.</i>			
<i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>			
Russell Gates <small>NAME</small>	Secretary <small>TITLE</small>		
 <small>SIGNATURE</small> <small>(TO BE SIGNED BY CHIEF EXECUTIVE OFFICER OR DULY AUTHORIZED REPRESENTATIVE. SEE CERTIFICATION REQUIREMENTS ON REVERSE)</small>	May 28, 2009 <small>DATE</small>		
1475 67th st., Emeryville 94608 <small>MAILING ADDRESS</small>	510-652-7470 <small>PHONE NUMBER</small>		



APPLICANT BUSINESS NAME METALCO

# WASTEWATER DISCHARGE PERMIT

## Terms and Conditions PROCESS DESCRIPTION

The information on this form provides a description of wastewater generating processes, characteristics of the wastewater, and waste management activities. Instructions are on the back of this form.

Permit Number

<b>BUSINESS ACTIVITY</b> ANODIZING	Standard Industrial Classification 3471	Business Classification Code 332813
---------------------------------------	--	--

**PROCESSES**

Process Description	Wastewater Characteristics	Schematic Process Number
RINSE WATER	both processes are water with traces of: sodium hydroxide;	ANODIZING AREA
TREATMENT TANK	aluminum; sulfuric and sulphatonic acids; lead; copper & magnesium.	TREATMENT TANK

**POLLUTION PREVENTION TECHNIQUES / BEST MANAGEMENT PRACTICES (BMPs)**

**RINSE WATER:** collects in the containment pit. The pH is checked and if it is under 12 and above 6 the sump pump sends the liquid to the PSP#1. If the results require an adjustment to the pH it is done by adding caustic to the materials collected in the treatment tank (NI-1). Once an acceptable pH is achieved the water is released to the PSP#1.

**TREATMENT TANK:** contains the process residue from the Ion Exchanger. The water has the pH adjusted to a range of 6 to under 12 prior to being pumped to PSP#1.

**PRETREATMENT**

Pretreatment System	Design Capacity	Loading Rate	Size	Side Sewer Number
<input type="checkbox"/> filtration				
<input type="checkbox"/> grease trap/oil and water separator				
<input type="checkbox"/> granular activated carbon				
<input type="checkbox"/> sedimentation				
<input checked="" type="checkbox"/> pH adjustment	1,000 gallons		15' x 30" x 52"	PSP#1
<input type="checkbox"/> chlorination				
<input type="checkbox"/> chemical precipitation				
<input type="checkbox"/> other (describe)				
<input type="checkbox"/> none				

**PROCESS GENERATED WASTE**

Waste / Disposal Method	Annual Waste Generation	
	Quantity	Unit
EPA 181 off hauled by: Philips Services, 2905 Newlands Drive #E Femely, NV 89408 Transporter # NWD 980895338	20 - 30	gallons



APPLICANT BUSINESS NAME METALCO

**WASTEWATER DISCHARGE PERMIT**

Terms and Conditions

**WATER BALANCE/STRENGTH SUMMARY**

The information on this form describes the volume, source, and strength of wastewater discharged to the community sewer. Instructions are on the back of this form.

Permit Number  
0739002 1

**WATER USE AND WASTEWATER DISCHARGE BALANCE**

Units expressed in: gallons per calendar day or  gallons per working day (Number of working days per year \_\_\_\_\_)

Water Use	Source			Wastewater Discharge to each Side Sewer					Water Diverted	Code <sup>2</sup>
	EBMUD	Other	Code <sup>1</sup>	No. 1	No. 2	No.	No.	No.		
Sanitary	139				139					
Processes	1,525			1,525						
Product										
Boiler	395			299					96	B
Cooling	42								42	B
Washing										
Irrigation										
evaporation	63								63	B
Sub-total	2,164			1,824	139				201	
Total	All Sources <b>2,164</b>			All Side Sewers _____					All Side Sewers + Water Diverted <b>2,164</b>	
Maximum Daily Discharge (gallons)				1,824	139					

**METERED WATER**

Water Meter Number	Code <sup>3</sup>	Percent Discharge to each Side Sewer					Total % Discharge
30774455	E	93	7				

<sup>1</sup>Other / Code: Compute the average gallon per day water use from non-EBMUD sources and enter the value in the Other "Sub-total" box. Do not include sources that discharge only to the stormdrain. Allocate the subtotal value to each type of water use. Enter the code(s) that identifies the source water:

A= Well Water / Groundwater B= Stormwater C= Reclaimed Water D= Other (describe)

<sup>2</sup>Water Diverted/Code: Enter the diverted volume for each type of water use. Enter the code(s) that identifies the diversion:

A= Product B= Evaporation C= Irrigation D= Creek/Bay E= Rail, Truck, Vessel F= Other (describe)

<sup>3</sup>Metered Water Code(s): E= EBMUD Meter P= Private Meter



APPLICANT BUSINESS NAME METALCO

**WASTEWATER DISCHARGE PERMIT**

Terms and Conditions

**WATER BALANCE/STRENGTH SUMMARY**

WASTEWATER STRENGTH ESTIMATES		Wastewater Discharge to each Side Sewer				
		No. 1	No. 2	No.	No.	No.
Total Suspended Solids mg/L (TSS)	Average	65	5			
	Maximum	65	5			
Filtered Chemical Oxygen Demand mg/L (CODF)	Average	75	5			
	Maximum	75	5			

**DISCHARGE FREQUENCY**

Days of Week	4	4			
Time of Day (Start & Stop Time)	0530 to 1530	0530 to 1530			
Volume, if Batch Discharge					

**SIDE SEWER LOCATION**

No. 1	ANODIZING AREA
No. 2	FRONT OF THE BUILDING
No.	
No.	
No.	

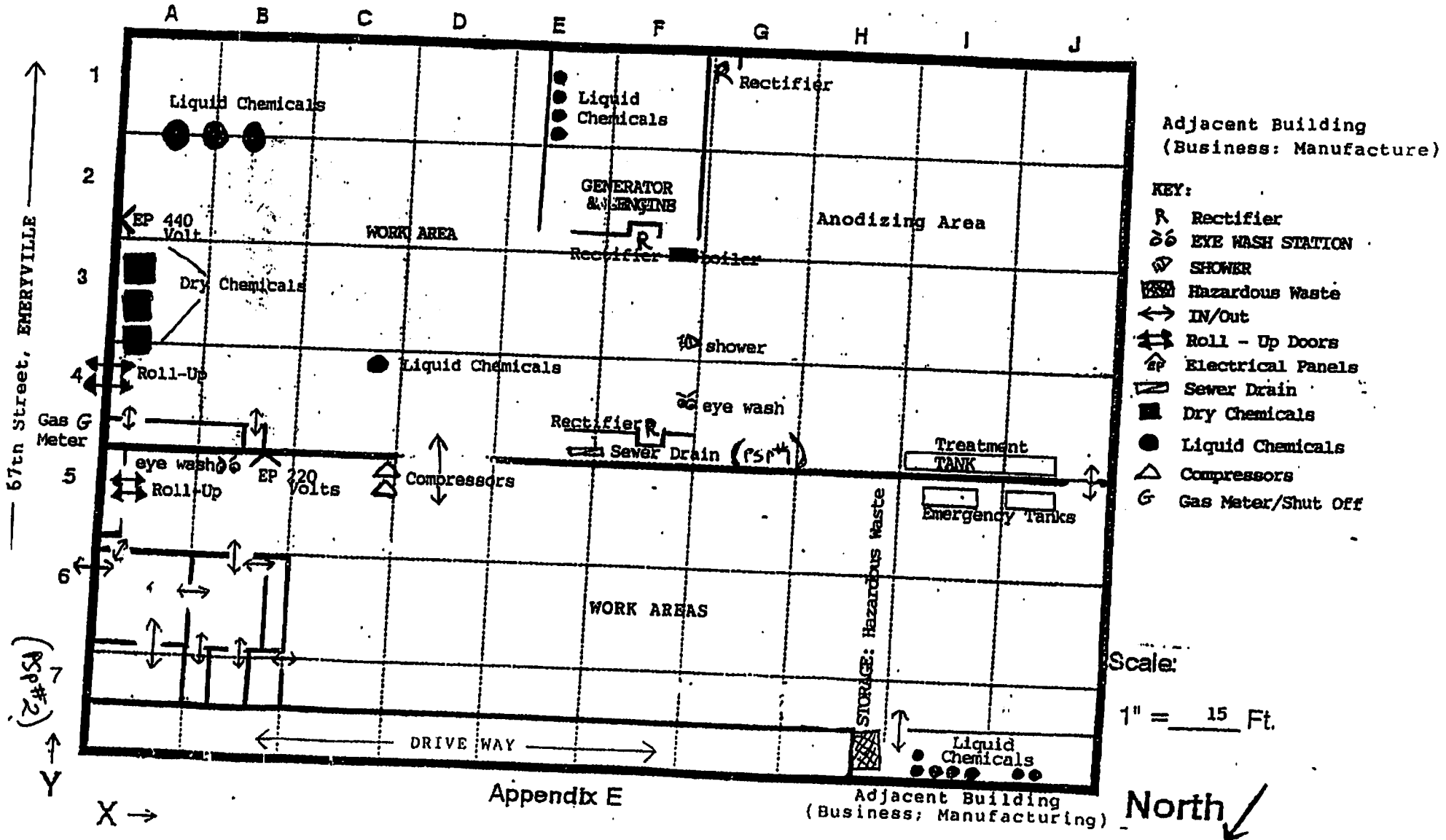
**STORMWATER AREA**

Total square-foot area exposed to stormwater that drains to the sanitary sewer: NONE sq. ft.



EBMUD Permit # 073-90021 Part D (Building Layout) Revised 07/27/00

Adjacent Building (Business: Unknown "RENTAL")



Adjacent Building  
(Business: Manufacture)

- KEY:
- R Rectifier
  - ⊗ EYE WASH STATION
  - ☔ SHOWER
  - ▨ Hazardous Waste
  - ↔ IN/Out
  - ⌌ Roll - Up Doors
  - ⊕ Electrical Panels
  - ⌌ Sewer Drain
  - Dry Chemicals
  - Liquid Chemicals
  - △ Compressors
  - G Gas Meter/Shut Off

Scale:  
1" = 15 Ft.

North ↙

Appendix E

Adjacent Building  
(Business: Manufacturing)

67th Street, EMERYVILLE  
↑  
Y  
↓  
(2#SA)  
↑  
X →

## Federal Environmental Protection Agency:

### METALCO ID Number CAL00100455

METALCO has a **Conditionally Authorized Permit** issued for the use of the Ion Exchanger and Treatment Tank (ION-1) to treat and then discharge into the public Sewer with a pH between 2.0 and 12.5.

On April 13, 1994, METALCO completed it EPA Notification Form (8700-12) enabling an application for the EPA permit. This was applied for as METALCO, Inc.

**SCHEDULE A MANIFEST** forms must be completed annually.

## ALAMEDA COUNTY - HAZARDOUS MATERIALS BUSINESS PLAN

Alameda County oversees the EPA program for the State of California. It is done through the Hazardous Materials Business Plan. The County reviews the plan each year and then issues a **Permit to Operate** .

## EAST BAY MUNICIAPL UTILITES DISTRICT

**Wastewater Discharge Permit Number 073-90021** oversees the actual discharges allowed by the EPA into the public sewer.

Here is a history of what has transpired since the 1994 permit has been issued:

<u>Year</u>	<u>Tests required of METALCO</u>	<u>Tests Required by EBMUD</u>
1994	January & July	2 random tests
2002	January, March, July & October	3 random tests
2003	January, April, June, August October & December	4 random tests
2007	January, March, August and October	2 random tests
2010	November	1 every two years

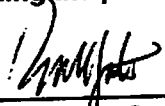
## TOTAL TOXIC ORGANICS COMPLIANCE REPORT

(Pretreatment Standards 40 CFR 413.03 & 433.12)

**BUSINESS NAME:** METALCO  
**PERMIT NUMBER:** 07390021  
**FACILITY ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**STREET ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**Phone:** (510) 652-7470

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard of permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last Total Toxic Organics Compliance report. I further certify that this facility is implementing the solvent management plan submitted to EBMUD."

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

  
\_\_\_\_\_  
Russell Gates, Secretary

Date: November 10, 2010

Return to: EBMUD Source Control Division, MS#702  
PO Box 24055  
Oakland, CA 94623-1055

**COMPLIANCE EVENT REMINDER NOTICE**

November 1, 2010

Mr. Russell Gates  
Metalco, Inc.  
1475 67th Street  
Emeryville, CA 94608

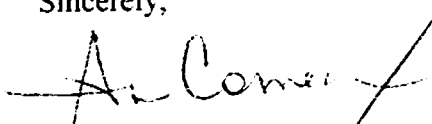
Dear Mr. Gates:

RE: Wastewater Discharge Permit No. 07390021

Metalco, Inc. is required to submit periodic compliance reports. This is a reminder that a TFOC Report is due by December 1, 2010.

The Compliance Report must contain the proper certification statement and shall be signed by an authorized person in accordance with Section B of the permit Standard Terms and Conditions. This report must be completed and mailed to the Environmental Services Division by the due date. A violation follow up fee may be assessed for late, incomplete or failure to submit this report.

Sincerely,

  
AUDREY COMEAUX  
Wastewater Control Representative

(510) 287-1199

ALC:alc

**TOTAL TOXIC ORGANICS COMPLIANCE REPORT**

(Pretreatment Standards 40 CFR 413.03 &amp; 433.12)

**BUSINESS NAME:** METALCO  
**PERMIT NUMBER:** 07390021  
**FACILITY ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**STREET ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**Phone:** (510) 652-7470

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard of permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last Total Toxic Organics Compliance report. I further certify that this facility is implementing the solvent management plan submitted to EBMUD."

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Russell Gates, Secretary

Date: May 12, 2010

Return to: EBMUD Source Control Division, MS#702  
PO Box 24055  
Oakland, CA 94623-1055

**COMPLIANCE EVENT REMINDER NOTICE**

May 3, 2010

Mr. Russell Gates  
Metalco, Inc.  
1475 67th Street  
Emeryville, CA 94608

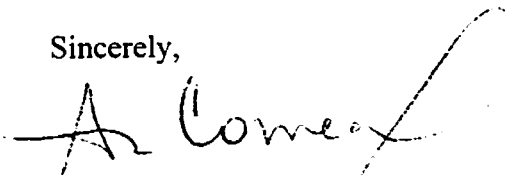
Dear Mr. Gates:

Re: Wastewater Discharge Permit No. 07390021

Metalco, Inc. is required to submit periodic compliance reports. This is a reminder that a(n) TTOC Report is due by June 1, 2010.

The Compliance Report must contain the proper certification statement and shall be signed by an authorized person in accordance with Section B of the permit Standard Terms And Conditions. This report must be completed and mailed to the Environmental Services Division by the due date. A violation follow up fee may be assessed for late, incomplete or failure to submit this report.

Sincerely,

  
AUDREY COMEAUX  
Wastewater Control Representative

ALC:alc

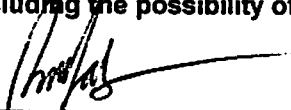
## TOTAL TOXIC ORGANICS COMPLIANCE REPORT

(Pretreatment Standards 40 CFR 413.03 & 433.12)

**BUSINESS NAME:** METALCO  
**PERMIT NUMBER:** 07390021  
**FACILITY ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**STREET ADDRESS:** 1475 - 67<sup>TH</sup> Street, Emeryville, CA 94608  
**Phone:** (510) 652-7470

"Based on my inquiry of the person or persons directly responsible for managing compliance with the pretreatment standard of permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last Total Toxic Organics Compliance report. I further certify that this facility is implementing the solvent management plan submitted to EBMUD."

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Signature of Official

Date: November 19, 2008

Return to: EBMUD Source Control Division, MS#702  
PO Box 24055  
Oakland, CA 94623-1055

## **APPENDIX B**

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ALAMEDA COUNTY DEPARTMENT OF ENVIRONMENTAL HEALTH  
1131 HARBOR BAY PARKWAY, ALAMEDA, CA 94502  
PHONE (510) 567-6700 FAX (510) 337-9335

**HAZARDOUS MATERIALS**  
**BUSINESS PLAN**  
**(HMBP)**

METALCO

FACILITY NAME

1475 - 67th Street, Emeryville, California 94608

FACILITY SITE ADDRESS

(510) 652-7470

FACILITY PHONE NUMBER

Russell Gates

ENVIRONMENTAL CONTACT PERSON

(510) 652-7470

ENVIRONMENTAL CONTACT PERSON'S PHONE NUMBER

July 02, 2012

DATE

### D. EMERGENCY CONTAINMENT AND CLEANUP PROCEDURES

SPILL PREVENTION, CONTAINMENT AND CLEANUP PROCEDURES: (Check all boxes that apply to indicate your procedures for containing spills, releases, fires or explosions; and preventing and mitigating associated harm to persons, property, and the environment.)

- 1. MONITOR FOR LEAKS, RUPTURES, PRESSURE BUILD-UP, ETC.;
- 2. PROVIDE STRUCTURAL PHYSICAL BARRIERS (e.g., Portable spill containment walls);
- 3. PROVIDE ABSORBENT PHYSICAL BARRIERS (e.g., Pads, pigs, pillows);
- 4. COVER OR BLOCK FLOOR AND/ OR STORM DRAINS;
- 5. BUILT-IN BERM IN WORK / STORAGE AREA;
- 6. AUTOMATIC FIRE SUPPRESSION SYSTEM;
- 7. ELIMINATE SOURCES OF IGNITION FOR FLAMMABLE HAZARDS (e.g. Flammable liquids, Propane);
- 8. STOP PROCESSES AND/OR OPERATIONS;
- 9. AUTOMATIC / ELECTRONIC EQUIPMENT SHUT-OFF SYSTEM;
- 10. SHUT-OFF WATER, GAS, ELECTRICAL UTILITIES AS APPROPRIATE;
- 11. CALL 9-1-1 FOR PUBLIC EMERGENCY RESPONDER ASSISTANCE / MEDICAL AID;
- 12. NOTIFY AND EVACUATE PERSONS IN ALL THREATENED AREAS;
- 13. ACCOUNT FOR EVACUATED PERSONS IMMEDIATELY AFTER EVACUATION CALL;
- 14. PROVIDE PROTECTIVE EQUIPMENT FOR ON-SITE RESPONSE TEAM;
- 15. REMOVE OR ISOLATE CONTAINERS / AREA AS APPROPRIATE;
- 16. HIRE LICENSED HAZARDOUS WASTE CONTRACTOR;
- 17. USE ABSORBENT MATERIAL FOR SPILLS WITH SUBSEQUENT PROPER LABELING, STORAGE, AND HAZARDOUS WASTE DISPOSAL AS APPROPRIATE;
- 18. SUCTION USING SHOP VACUUM WITH SUBSEQUENT PROPER LABELING, STORAGE, AND HAZARDOUS WASTE DISPOSAL AS APPROPRIATE;
- 19. WASH / DECONTAMINATE EQUIPMENT W/ CONTAINMENT and DISPOSAL OF EFFLUENT / RINSATE AS HAZARDOUS WASTE;
- 20. PROVIDE SAFE TEMPORARY STORAGE OF EMERGENCY-GENERATED WASTES;
- 21. OTHER (Specify):

D1.  
D2.

### E. FACILITY EVACUATION

THE FOLLOWING ALARM SIGNAL(S) WILL BE USED TO BEGIN EVACUATION OF THE FACILITY (CHECK ALL THAT APPLY):

- 1. BELLS;
- 2. HORNS/SIRENS;
- 3. VERBAL (i.e., SHOUTING);
- 4. OTHER (Specify):

E1.  
E2.  
E3.

THE FOLLOWING LOCATION(S) IS/ARE EVACUEE EMERGENCY ASSEMBLY AREA(S) (i.e., Front parking lot, specific street corner, etc.)

**IN FRONT OF THE Building**

Note: The Emergency Coordinator must account for all on site employees and/or site visitors after evacuation.

EVACUATION ROUTE MAP(S) POSTED AS REQUIRED  
 Note: The map(s) must show primary and alternate evacuation routes, emergency exits, and primary and alternate staging areas, and must be prominently posted throughout the facility in locations where it will be visible to employees and visitors.

E4.

### F. ARRANGEMENTS FOR EMERGENCY SERVICES

**Explanation of Requirement:** Advance arrangements with local fire and police departments, hospitals, and/or emergency services contractors should be made as appropriate for your facility. You may determine that such arrangements are not necessary.

ADVANCE ARRANGEMENTS FOR LOCAL EMERGENCY SERVICES (Check one of the following)

- 1. HAVE BEEN DETERMINED NOT NECESSARY; or
- 2. THE FOLLOWING ARRANGEMENTS HAVE BEEN MADE (Specify):

F1.  
F2.

G. EMERGENCY EQUIPMENT			
TYPE	EQUIPMENT AVAILABLE	LOCATION	CAPABILITY (if applicable)
Check all boxes that apply to list emergency response equipment available at the facility and identify the location(s) where the equipment is kept and the equipment's capability. (e.g. <input checked="" type="checkbox"/> CHEMICAL PROTECTIVE GLOVES   Spill response kit   One time use. Oil & solvent resistant only.)			
Safety and First Aid	1. <input checked="" type="checkbox"/> CHEMICAL PROTECTIVE SUITS, APRONS,	Amidizing Area	G2
	2. <input checked="" type="checkbox"/> CHEMICAL PROTECTIVE GLOVES	"	G4
	3. <input checked="" type="checkbox"/> CHEMICAL PROTECTIVE BOOTS	Amidizing Area	G6
	4. <input checked="" type="checkbox"/> SAFETY GLASSES / GOGGLES / SHIELDS	"	G8
	5. <input type="checkbox"/> HARD HATS		G10
	6. <input checked="" type="checkbox"/> CARTRIDGE RESPIRATORS	Amidizing Area	G12
	7. <input checked="" type="checkbox"/> SELF-CONTAINED BREATHING APPARATUS (SCBA)	OFFICE	G14
	8. <input checked="" type="checkbox"/> FIRST AID KITS / STATIONS	OFFICE	G16
	9. <input checked="" type="checkbox"/> PLUMBED EYEWASH FOUNTAIN / SHOWER	Amidizing Area	G18
	10. <input checked="" type="checkbox"/> PORTABLE EYEWASH KITS	shop	G20
	11. <input type="checkbox"/> OTHER		G22
	12. <input type="checkbox"/> OTHER		G24
Fire Fighting	13. <input checked="" type="checkbox"/> PORTABLE FIRE EXTINGUISHERS	shop/OFFICE	G26
	14. <input type="checkbox"/> FIXED FIRE SYSTEMS / SPRINKLERS / FIRE HOSES		G28
	15. <input checked="" type="checkbox"/> FIRE ALARM BOXES OR STATIONS	shop	G30
	16. <input type="checkbox"/> OTHER		G32
Spill and Control	17. <input checked="" type="checkbox"/> ALL-IN-ONE SPILL KIT	Chemical Storage	G34
	18. <input checked="" type="checkbox"/> ABSORBENT MATERIAL	"	G36
	19. <input checked="" type="checkbox"/> CONTAINER FOR USED ABSORBENT	Chemical Storage	G38
	20. <input checked="" type="checkbox"/> BERMING / DIKING EQUIPMENT	Amidizing Area	G40
	21. <input checked="" type="checkbox"/> BROOM	"	G42
	22. <input checked="" type="checkbox"/> SHOVEL	Amidizing Area	G44
	23. <input checked="" type="checkbox"/> SHOP VAC	"	G46
	24. <input checked="" type="checkbox"/> EXHAUST HOOD	Amidizing Area	G48
	25. <input checked="" type="checkbox"/> EMERGENCY SUMP / HOLDING TANK	"	G50
	26. <input checked="" type="checkbox"/> CHEMICAL NEUTRALIZERS	Amidizing Area	G52
	27. <input type="checkbox"/> GAS CYLINDER LEAK REPAIR KIT		G54
	28. <input type="checkbox"/> SPILL OVERPACK DRUMS		G56
	29. <input type="checkbox"/> OTHER		G58
Communications and Alarm Systems	30. <input checked="" type="checkbox"/> TELEPHONES (Includes cellular)	OFFICE	G60
	31. <input type="checkbox"/> INTERCOM / PA SYSTEM		G62
	32. <input type="checkbox"/> PORTABLE RADIOS		G64
	33. <input type="checkbox"/> AUTOMATIC ALARM CHEMICAL MONITORING EQUIPMENT		G66
	34. <input type="checkbox"/> OTHER		G68
Other	35. <input type="checkbox"/> OTHER		G70
			G71

### H. EARTHQUAKE VULNERABILITY

Identify areas of the facility that are vulnerable to hazardous materials releases / spills due to earthquake-related motion. These areas require immediate isolation and inspection.

<b>VULNERABLE AREAS:</b> (Check all that apply) <input type="checkbox"/> 1. HAZARDOUS MATERIALS / WASTE STORAGE AREA <input type="checkbox"/> 2. PROCESS LINES / PIPING <input type="checkbox"/> 3. LABORATORY <input checked="" type="checkbox"/> 4. WASTE TREATMENT AREA	H1	LOCATIONS (e.g., shop, outdoor shed, forensic lab)	
			H2
			H3
			H4
		ANODIZING AREA	H5

Identify mechanical systems vulnerable to releases / spills due to earthquake-related motion. These systems require immediate isolation and inspection.

<b>VULNERABLE SYSTEMS:</b> (Check all that apply) <input type="checkbox"/> 1. SHELVES, CABINETS AND RACKS <input type="checkbox"/> 2. SHELFS (EMERGENCY SHUTOFF) <input type="checkbox"/> 3. PORTABLE GAS CYLINDERS <input checked="" type="checkbox"/> 4. EMERGENCY SHUTOFF AND/OR UTILITY VALVES <input type="checkbox"/> 5. SPRINKLER SYSTEMS <input type="checkbox"/> 6. STATIONARY PRESSURIZED CONTAINERS (e.g., Propane dispensing tank)	H6	LOCATIONS	
			H7
			H8
			H9
		FRONT OF BUILDING	H10
			H11

### I. EMPLOYEE TRAINING

**Explanation of Requirement:** Employee training is required for all employees handling hazardous materials and hazardous wastes in day-to-day or clean-up operations including volunteers and/or contractors. Training must be:

- Provided within 6 months for new hires;
- Amended as necessary prior to change in process or work assignment;
- Given upon modification to the Emergency Response / Contingency Plan, and updated/refreshed annually for all employees.

Required content includes all of the following:

- Material Safety Data Sheets;
- Hazard communication related to health and safety;
- Methods for safe handling of hazardous substances;
- Fire hazards of materials / processes;
- Conditions likely to worsen emergencies;
- Coordination of emergency response;
- Notification procedures;
- Applicable laws and regulations;
- Communication and alarm systems;
- Personal protective equipment;
- Use of emergency response equipment (e.g. Fire extinguishers, respirators, etc.);
- Decontamination procedures;
- Evacuation procedures;
- Control and containment procedures;
- UST monitoring system equipment and procedures (if applicable).

INDICATE HOW EMPLOYEE TRAINING PROGRAM IS ADMINISTERED (Check all that apply)

<input type="checkbox"/> 1. FORMAL CLASSROOM; <input type="checkbox"/> 2. VIDEOS; <input type="checkbox"/> 3. SAFETY / TAILGATE MEETINGS;	11.
<input type="checkbox"/> 4. STUDY GUIDES / MANUALS (Specify):	12.
<input checked="" type="checkbox"/> 5. OTHER (Specify): <u>Attending any required seminars and safety meetings.</u>	13.
<input type="checkbox"/> 6. NOT APPLICABLE BECAUSE FACILITY HAS NO EMPLOYEES	

**Large Quantity Generator (LQG) Training Records:** Large quantity hazardous waste generators (i.e., who generate more than 270 gallons/1,000 kilograms of hazardous waste per month) must retain written documentation of employee hazardous waste management training sessions which includes:

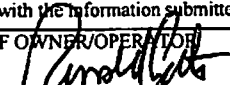
- A written outline/agenda of the type and amount of both introductory and continuing training that will be given to persons filling each job position having responsibility for the management of hazardous waste (e.g., labeling, manifesting, compliance with accumulation time limits, etc.).
- The name, job title, and date of training for each hazardous waste management training session given to an employee filling such a job position; and
- A written job description for each of the above job positions that describes job duties and the skills, education, or other qualifications required of personnel assigned to the position.
- Current employee training records must be retained until closure of the facility.
- Former employee training records must be retained at least three years after termination of employment.

### J. LIST OF ATTACHMENTS

(Check one of the following)	11.
<input type="checkbox"/> 1. NO ATTACHMENTS ARE REQUIRED; or <input checked="" type="checkbox"/> 2. THE FOLLOWING DOCUMENTS ARE ATTACHED:	12.
<p style="text-align: center;">PERSONNEL TRAINING PROGRAM</p>	

### K. SIGNATURE / CERTIFICATION

**Certification:** Based on my inquiry of those individuals responsible for obtaining the information, I certify under penalty of law that I have personally examined and am familiar with the information submitted and believe the information is true, accurate, and complete, and that a copy is available on site.

SIGNATURE OF OWNER/OPERATOR	DATE SIGNED	K1.
	JULY 5, 2012	
NAME OF SIGNER (Print)	TITLE OF SIGNER	K3
Russell Gates	SECRETARY	

ALAMEDA COUNTY DEPARTMENT OF  
ENVIRONMENTAL HEALTH

METALCO  
Facility ID# CAL 000100455

Page 17 of 41

PERSONNEL TRAINING

This personnel training program is set forth to reduce the potential for mistakes which might threaten human health or the environment. Each of METALCO's employees is subject to the use of hazardous chemicals and wastes. It is imperative that each employee understands the requirements associated with the use and by-products of the chemicals required for the anodizing process.

The intent of the personnel training program is to familiarize each employee of the mechanics of their job function. Each employee must follow a set and safe pattern in their individual job functions.

Our Personnel Training program is specific to each anodizing job function. It will be administered by means of on the job training. Training will be conducted by office personnel and or the shop foreman.

The location of, use of, and the dangers of chemicals will be addressed. The proper response for emergencies, the handling of chemicals and wastes will be covered in the program. Each job function will be described along with the duties of the individual performance tasks.

The Personnel Training program is designed to parallel the Contingency Plan. Completion of the training program will result in an understanding of individual job expectations, dangers and the ability to respond effectively to emergency situations.

ALAMEDA COUNTY DEPARTMENT OF  
ENVIRONMENTAL HEALTH

METALCO  
Facility ID# CAL 000100455

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PERSONNEL TRAINING

The following is a list of the chemicals used in METALCO's anodizing process. The list specifies the type of chemicals used for each of our anodizing processes. EACH OF THESE CHEMICALS IS CONSIDERED TO BE A HAZARDOUS MATERIAL. EVERY HAZARDOUS MATERIAL MUST BE HANDLED AS INSTRUCTED. These materials are:

<u>ANODIZING PROCESS</u>	<u>HAZARDOUS MATERIAL USED</u>
CLEANING	Houghto-clean A1058: Sodium Tetra Borate
CLEANING	Thinner: Petroleum Naphtha
ETCHING	Caustic Soda Beads
ETCHING	Houghto AX-1865: No Dump Etch Additive
ANODIZING	Pilot: D-300
ANODIZING	Sulfuric Acid

The following pages are summaries of chemical suppliers Material Safety Data Sheets (MSDS). These summaries tell the important steps to follow while using hazardous materials. The manufacturer MSDS sheets are maintained in the office. These MSDS sheets are available for inspection at any time. There are important safeguards such as:

Protection required  
Hazard warnings  
First Aid for eyes, skin, inhaling or ingestion  
Storage  
Fire  
Spills

ALAMEDA COUNTY DEPARTMENT OF  
ENVIRONMENTAL HEALTH

METALCO  
Facility ID# CAL 000100455

Page 19 of 41

TECHNICAL DATA FOR: Houghto-Clean A1083

Protection Required: CHEMICAL SPLASH  
RUBBER GLOVES  
RUBBER APRON

WARNING: HARMFUL IF SWALLOWED; CAUSES EYE AND SKIN IRRITATION.  
AVOID BREATHING DUST.

FIRST AID:

Ingestion: Consult Physician.

Inhalation: Remove to fresh air. Rinse mouth and nasal passages with water.

Eye Contact: Flush with plenty of water for at least 15 minutes. If irritation occurs, consult a physician.

Skin Contact: Wash skin with mild soap and water. Remove any contaminated clothing. If irritation develops, get medical attention.

Note to Physicians: No specific antidote known.

STORAGE: KEEP IN COOL, DRY AREA. KEEP CONTAINER TIGHTLY CLOSED TO PREVENT MOISTURE ABSORPTION AND CONTAMINATION.

FIRE: Leave area, call fire department. No unusual fire or explosion hazards.

SPILLS: Houghto-Clean 1083 is a dry material. Use a dust mask, rubber gloves and eye protection while sweeping up materials. Return to original container.

FROM MSDS: Houghton Metal Finishing Co. 19JUL04

ALAMEDA COUNTY DEPARTMENT OF  
ENVIRONMENTAL HEALTH

METALCO  
Facility ID# CAL 000100455

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TECHNICAL DATA FOR: THINNER

Projection Required: RESPIRATOR                      RUBBER APRON  
                                 SAFETY GOGGLES                      VENTILATION  
                                 RUBBER GLOVES

WARNING: HARMFUL OR FATAL IF SWALLOWED. DO NOT BREATHE FOR A  
PROLONGED PERIOD OF TIME. BRATHING OF VAPOR OR SKIN CONTACT  
MAY BE HARMFUL. PRODUCT IS COMBUSTIBLE.

FIRST AID:

Eye Contact: Immediately flush with plenty of water for at least 15 minutes. Get medical attention.

Skin Contact: Remove contaminated clothing. Flush skin immediately with plenty of water for at least  
15 minutes. Wash with mild soap and water. If irritation from burns is present,  
get immediate medical attention.

Inhalation: Remove to fresh air. Give artificial respiration if not breathing. If breathing is difficult  
provide oxygen.

Ingestion: DO NOT induce vomiting. If vomiting occurs, keep head below hips to prevent  
aspiration of liquid into the lungs. Get immediate medical attention.

STORAGE: Avoid heat, flame and contact with strong oxidizing agents. Keep barrel grounded with  
wire to avoid static electricity.

FIRE: FLAMMABLE. Use water fog, foam, dry chemical or CO2. Do not use a direct stream  
of  
Water as product will float and can reignite.

SPILLS: FLAMMABLE. Use spill protection coil absorbents to surround spill area. Soak up  
material and place in emergency tank for disposal.

FROM MSDS: Shell Oil 11NOV93





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TECHNICAL DATA FOR: Houghto-Etch AX-1865 - no dump etch additive

Protection Required: SAFETY GOGGLES  
RUBBER GLOVES  
RUBBER APRON

WARNING: CAUSES SEVERE BURNS; MAY BE FATAL IF SWALLOWED. HARMFUL  
IF INHALED.

FIRST AID:

Eye Contact: Immediately flush with plenty of water for at least 15 minutes.

Skin Contact: Flush skin immediately with plenty of water for at least 15 minutes. Remove contaminated clothing. Wash with mild soap and water. If irritation from burns are present, get immediate medical attention.

Inhalation: Remove to fresh air. If not breathing, give mouth to mouth artificial resuscitation. If breathing is difficult provide oxygen.

Ingestion: DO NOT induce vomiting. Dilute by drinking large quantities of water or milk.

Storage: Store in a cool dry place away from excessive heat or sunlight.

Fire: Non-flammable

Spills: Absorb with clay, vermiculite or inert absorbent.

FROM MSDS: Houghton Metal Finishing 22DEC99

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TECHNICAL DATA FOR: D300 (Sulfophthalic Acid)

Protection Required: SAFETY GOGGLES  
FULL FACE SHIELD  
RUBBER GLOVES  
ACID RESPIRATORS

WARNING: WILL CAUSE SEVERE CORNEAL EYE DAMAGE ON CONTACT. MAY CAUSE  
SKIN IRRITATION AND BURNS.

FIRST AID:

Eye Contact: Wash eyes with running water including under eye lids for 15 minutes. Get immediate medical attention.

Skin Contact: Remove contaminated clothing and flush area with soap and water.

Inhalation: Remove to fresh air. If breathing has stopped, administer artificial resuscitation followed with oxygen.

Ingestion: Give 2 to 3 cups of sodium carbonate or bicarbonate solution to drink. DO NOT induce vomiting. Get immediate medical attention.

Storage: No special storage precautions.

Fire: Will not burn.

Spills: Surround spill area with spill protection berms. Recover usable material with pump. Soak up balance with sand or dirt. Neutralize the residual with soda ash or bicarbonate of soda. Flush area heavily with water.

FROM MSDS: Pilot Chemical Company 03OCT96

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TECHNICAL DATA FOR: SULFURIC ACID

Protection Required: SAFETY GOGGLES  
FULL FACE SHIELD  
RUBBER GLOVES  
ACID RESPIRATORS

WARNING: WILL CAUSE SEVERE CORNEAL EYE DAMAGE ON CONTACT. MAY CAUSE  
SKIN IRRITATION AND BURNS.

FIRST AID:

Eye Contact: Wash eyes with running water including under eye lids for 15 minutes. Get immediate  
medical attention.

Skin Contact: Remove contaminated clothing and flush area with soap and water.

Inhalation: Remove to fresh air. If breathing has stopped, administer artificial resuscitation  
followed with oxygen.

Ingestion: Give 2 to 3 cups of sodium carbonate or bicarbonate solution to drink. DO NOT  
induce vomiting. Get immediate medical attention.

Storage: No special storage precautions.

Fire: Non-flammable. DO NOT contact with water. Material will evolve flammable or  
explosive hydrogen gas on contact with water and organic materials.

Spills: DO NOT put water directly on Sulfuric Acid. Surround spill area with spill protection  
berms. Recover usable material with pump. Soak up balance with sand or dirt.  
Neutralize the residual with soda ash or bicarbonate of soda. Flush area heavily with  
water.

FROM MSDS: Great Western Chemical Company 24OCT94

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PERSONNEL TRAINING

The following two pages show the storage and use areas for each of the hazardous chemicals used.

The first page shows the storage area for our dry chemicals. They are:

Caustic Soda Beads  
Houghto-clean A1083  
Ax-1865: No Dump Etch Additive

The second page shows the storage area for our liquid chemicals. They are:

Petroleum Naphtha: Thinner  
Pilot D-300  
Sulfuric Acid

Become familiar with these storage areas. For your safety and the safety of your fellow employees, it is important to know how to handle each of these individual chemicals in the appropriate manner.

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PERSONNEL TRAINING

The following list outlines the individual operations required to accomplish the anodizing process.

They are:

<u>OPERATION</u>	<u>REQUIREMENTS</u>
RACKER	Preparing and racking the materials to be anodized.
ANODIZER	Storage, mixing and use of chemicals and anodizing.
MAINTENANCE	Overseeing equipment and machinery.
SHIPPING AND RECEIVING	Overseeing of customer product delivery and receipt.
WASTE OPERATOR	Handling of wastewater stream and off-haul.

With each of these operations comes the responsibility of handling materials and product in a safe manner. Safety is required for individual health as well as healthy environment. The following pages address these issues by the individual operations.

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PERSONNEL TRAINING

OPERATION: RACKER

Protective Apparel: Gloves and work shoes. Rubber gloves, apron and mask when in anodizing area.

Hazardous Chemicals: Sodium Tetra Borate, Thinner, Duponol, Caustic Soda Beads and No Dump Etch Additive.

Hazards: Sharp edges on metals, heavy lifting, tools, chemical involved in cleaning and etching.

RESPONSIBILITIES:

Include, but are not limited to the following tasks. Select the proper rack or racking bars for the product to be anodized. Adjust rack for the product, being careful not to slip and skin knuckles. Get materials to be racked while using safe lifting techniques. When racking materials be careful of sharp edges and sharp points. When using racking bars or adjusting racks make sure the wrench socket is securely on the hex head or nut to avoid slipping. Use these same procedures when un-racking.

Stripping the anodize off the racks requires entering the caustic tank in the anodizing area. It is important to use the following while stripping parts: safety mask, glasses, rubber gloves and apron.

Be careful not to get any chemical on your skin or clothing. Follow all the procedures listed in the MSDS sheets for the chemical you are working with.

Immediately notify the foreman or office if you notice any unsafe conditions, including chemical spills, tank failure or leaking, fire, or other employees not following safety guidelines.

TRAINING : Training is on the job. It is to be a one-hour session at program implementation as well as for new hires prior to beginning work.

Assignments: Employees listed on the attachment are assigned responsibilities of RACKER.

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PERSONNEL TRAINING

OPERATION: RACKER

Protective Apparel: Gloves and work shoes. Rubber gloves, apron and mask when in anodizing area.

Hazardous Chemicals: Sodium Tetra Borate, Thinner, Caustic Soda Beads and No Dump Etch Additive.

Hazards: Sharp edges on metals, heavy lifting, tools, chemical involved in cleaning and etching.

RESPONSIBILITIES:

Include, but are not limited to the following tasks. Select the proper rack or racking bars for the product to be anodized. Adjust rack for the product, being careful not to slip and skin knuckles. Get materials to be racked while using safe lifting techniques. When racking materials be careful of sharp edges and sharp points. When using racking bars or adjusting racks make sure the wrench socket is securely on the hex head or nut to avoid slipping. Use these same procedures when un-racking.

Striping the anodize off the racks requires entering the caustic tank in the anodizing area. It is important to use the following while stripping parts: safety mask, glasses, rubber gloves and apron.

Be careful not to get any chemical on your skin or clothing. Follow all the procedures listed in the MSDS sheets for the chemical you are working with.

Immediately notify the foreman or office if you notice any unsafe conditions, including chemical spills, tank failure or leaking, fire, or other employees not following safety guidelines.

TRAINING : Training is on the job. It is to be a one-hour session at program implementation as well as for new hires prior to beginning work.

Assignments: Employees listed on the attachment are assigned responsibilities of RACKER.



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PERSONNEL TRAINING

RESPONSIBILITIES (continued)

**\*\*ANODIZING\*\***

These processes are required in anodizing.

- 1) get materials from the racking area. Be careful of sharp edges and corners.
- 2) secure hoist hook to lifting bar. Lift and transport materials to tanks being careful not to strike anything.
- 3) lowering materials into the tanks should be done with caution. Make sure you do not drop materials which could result in the splashing of caustic or acids.
- 4) transferring materials from tank to tank must be done with caution. Beware not to allow caustic or acids to run or drip to floors.
- 5) if reaching into the tanks from materials or hooks be especially careful not to get caustic or acids or hot water into rubber gloves.

**\*\*CHEMICALS\*\***

- Cleaning:
- 1) wear appropriate safety gear. (See MSDS sheets)
  - 2) be careful when transferring Sodium Tetra Borate from the storage area to the soap tank. Pour with care into the soap tank.

- Etching:
- 1) wear appropriate safety gear. (See MSDS sheets)
  - 2) place Caustic Soda Beads on movable pallet for transport to the anodizing area. Avoid any contact with water. When recharging the etching tanks add Caustic Soda Beads at a very slow rate to avoid a violent chemical reaction.
  - 3) with another individual, position the No Dump Etch Additive secondary containment container to a horizontal position. Turn valve and release appropriate amount of additive to a bucket for transport to anodizing area. Add to the etching tank.

(Anodizer P-2)

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PERSONNEL TRAINING

RESPONSIBILITIES (continued)

**\*\*ANODIZING\*\***

**\*\*CHEMICALS\*\***

- Anodizing: 1) Wear protective safety gear (SEE MSDS).
- 2) D-300 is transferred with the use of a portable pump. Place the suction hose into the barrel and the discharge hose into the anodizing tank. Secure hoses. Pump D-300. Use air agitation in the tanks to mix the chemicals, avoiding buildup of chemicals in any one area. When pumping is completed, remove the hose from the D-300 first. Drain discharge hose into tank before removing.
- 3) SULFURIC ACID is transferred with the use of the portable pump. Place the suction hose into barrel and the discharge hose into the anodizing tank. Secure hoses. Pump the sulfuric acid. Add at a slow rate to avoid any violent chemical reaction. When pumping is completed, remove hose from sulfuric acid first. Drain discharge hose into tank before removing.
- CAUTION: DO NOT contact sulfuric acid with water as it may cause a violent reaction.

Be careful not to get any chemicals into your eyes, on your skin or clothing. Do not inhale any of the chemicals. Follow the procedures in the MSDS for the chemicals you are involved with.

Immediately notify the foreman or office personnel if you notice any unsafe conditions. Conditions such as chemical spills, tank failure or leaking, fire, or other employees not following safety guidelines.

Training is done on the job. It is to be a one-hour initial session at program implementation and for new hires before beginning work. Follow-ups and reviews are to be listed on Training records.

Assignments for employees are listed on the attachment sheet as responsibilities of Anodizer.

(Anodizer P-3)

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PERSONNEL TRAINING

OPERATION: EQUIPMENT MAINTENANCE

PROTECTIVE APPAREL: Safety glasses, respirator, rubber gloves and work shoes.

HAZARDOUS CHEMICALS: THINNER

RESPONSIBILITIES:

The responsibilities of EQUIPMENT MAINTENANCE include, but are not limited to, the following:

While working in the engine room use caution around the Thinner Storage Area.

When replacing the filters in the cooling towers on the roof use caution in setting up the ladder to access the roof. Use rubber gloves and respirator when changing the filters.

Electrical - lock out switch box before working on any equipment. DO NOT WORK ON ANYTHING THAT YOU ARE NOT FAMILIAR WITH. BE SURE ALL JUNCTION BOXES HAVE COVERS AND NO BARE WIRES.

Immediately notify the foreman or office personnel if you notice any unsafe conditions.

Training

Training is done on the job. It is to be a one hour initial session at program implementation and for new hires prior to their beginning work. Follow ups and reviews will be scheduled as needed.

Assignments

Employees listed on the attachment are assigned responsibilities of EQUIPMENT MAINTENANCE.

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PERSONNEL TRAINING

OPERATION: SHIPPING AND RECEIVING

Protective Apparel: Safety glasses, gloves, shoes and safety vest.

HAZARDOUS MATERIALS: Caustic Soda Beads, Sodium Tetra Borate, and the No  
Dump Etch Additive.

HAZARDS: Splinters, sharp points and edges, forklift, hoist and moving trucks.

RESPONSIBILITIES:

The responsibilities include, but are not limited to, the following:

Analyze the load to be received and determine how it is to be unloaded. Unloading methods can be done by hand, 4 wheel truck, overhead hoist or forklift. When lifting or moving a load, be sure it is secure and cannot shift. NEVER CATCH A FALLING LOAD. When using overhead hoist NEVER STAND UNDER HOISTED MATERIALS. When shipping follow the same type of precautions. When working with a truck driver or other employees, work as a team not an individual. FORKLIFT OPERATORS MUST BE CERTIFIED!

Keep the floor clean and free from cardboard, plastic wrap strapping or equipment that may cause someone to trip.

When storing customer materials near the "Dry Chemical" storage area, use caution not to interfere with the storage area. Keep storage area clear and accessible at all times. DO NOT GET ANY OF THE DRY CHEMICALS WET.

Immediately notify the foreman or office personnel if you notice any unsafe conditions.

Training is done on the job. It is to be a one-hour initial session at program implementation and for new hires beginning work.

Assignments Employees listed on the attachment are assigned responsibilities of SHIPPING and RECEIVING.

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PERSONNEL TRAINING

OPERATION: WASTE OPERATOR

**Authorized waste operators are the foreman and the anodizers only!**

PROTECTIVE APPAREL: Safety Glasses, rubber gloves, rubber aprons, rubber boots and dust masks.

HAZARDOUS CHEMICALS: SODIUM SULFATE

HAZARDS: Sludge can cause burning to the skin, eyes and clothing.

RESPONSIBILITIES

The responsibilities of WASTE OPERATOR in cleaning the etch tanks include the following:

Pump water from the rinse tanks to the sewer. Then pump the sodium hydroxide into the empty rinse tanks. The remains in the etch tanks are an accumulation of anodizing residue that is identified as Sodium Sulfate. The composition of the sludge is waste sodium sulfate and aluminum. The sludge is shoveled from the bottom of the tanks into the appropriate container for moving to the waste area. Use care in shoveling material into the container. Adjust the pH by adding sulfuric acid. The move to the waste storage area. Spread the material for drying.

Once the sodium sulfate has dried. Place in the dumpster for pick up.

Immediately notify the foreman or office personnel if you notice any unsafe conditions.

Training

Training is done on the job. It is to be a one hour initial session at program implementation and for new hires prior to beginning work. Follow ups are reviews will be scheduled as necessary.

(Waste Operator p-1)

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PERSONNEL TRAINING

OPERATION: WASTE OPERATOR

PROCESS: OPERATION OF TREATMENT TANK

PROTECTIVE APPAREL: Safety Glasses, rubber gloves, rubber apron, rubber boots and dust mask.

HAZARDOUS CHEMICALS: Solution of Sulfuric and Sulfophthalic Acids.

HAZARDS: Solution can cause burning to skin, eyes and clothing.

RESPONSIBILITIES:

The responsibilities of WASTE OPERATOR include the following:

Treatment of ION exchanger residue in Treatment Tank NT I. Turn the flow valve on Ion Exchanger to allow residue to flow to the treatment tank. Once the tank is filled, shut off the flow valve. Turn on the airflow valve located next to the Ion Exchanger, this agitates the liquid in the treatment tank. Add caustic soda beads. Check the pH level. Repeat the process until desired pH level is achieved. Allow the liquid to cool for a minimum of five (5) hours before discharging to the public sewer.

The treatment tank is adjacent to the storage area for D-300 and sulfuric acids. Although there is no immediate danger from these chemicals during the treatment process, it is advisable to be familiar with the chemical safety requirements.

Immediately notify the foreman or office personnel if you notice any unsafe conditions.

Training is done on the job. It is to be a one hour initial session at program implementation and for all new hires prior to beginning work. Follow ups and reviews will be scheduled as necessary.

Assignments

Employees listed on the attachment are assigned responsibilities of WASTE OPERATOR.

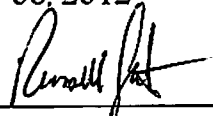
Consolidated Emergency Response  
Contingency Plan  
For  
METALCO  
1475 - 67<sup>TH</sup> Street  
Emeryville, CA 94608  
(510) 652-7470

Facility Number: CAL 000100455

Metalco is in the exclusive business of ANODIZING only. Metalco is not a plating business.  
Therefore there are none of the toxic chemicals used that apply to plating businesses.

Dated: July 06, 2012

Signed: \_\_\_\_\_

  
Russell Gates, Secretary

# Emergency Response/Contingency Plan

## (Hazardous Materials Business Plan Module)

Authority Cited: HSC§ 25504(b); 19 CCR §2731; 22 CCR §66262.34(a)(4)

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All facilities that handle hazardous materials in HMBP quantities must have a written emergency response plan. In addition, facilities that generate 1,000 kilograms or more of hazardous waste (or more than 1 kilogram of acutely hazardous waste or 100 kilograms of debris resulting from the spill of an acutely hazardous waste) per month, or accumulate more than 6,000 kilograms of hazardous waste on-site at any one time, must prepare a hazardous waste contingency plan. Because the requirements are similar, they have been combined in a single document, provided below, for your convenience. This plan is a required module of the Hazardous Materials Business Plan (HMBP). If you already have a plan that meets these requirements, you should not complete the blank plan, below, but you must include a copy of your existing plan as part of your HMBP.

This site-specific Emergency Response/Contingency Plan is the facility's plan for dealing with emergencies and shall be implemented immediately whenever there is a fire, explosion, or release of hazardous materials that could threaten human health and/or the environment. At least one copy of the plan shall be maintained at the facility for use in the event of an emergency and for inspection by the local agency. A copy of the plan and any revisions must be provided to any contractor, hospital, or agency with whom special (i.e., contractual) emergency services arrangements have been made (see section 3, below).

### 1. Evacuation Plan:

a. The following alarm signal(s) will be used to begin evacuation of the facility (check all that apply):

Bells;  Horns/Sirens;  Verbal (i.e., shouting);  Other (specify \_\_\_\_\_)

b.  Evacuation map is prominently displayed throughout the facility.

Note: A properly completed HMBP Site Plan satisfies contingency plan map requirements. This drawing (or any other drawing that shows primary and alternate evacuation routes, emergency exits, and primary and alternate staging areas) must be prominently posted throughout the facility in locations where it will be visible to employees and visitors.

### 2. a. Emergency Contacts\*:

Fire/Police/Ambulance ..... Phone No.: 911

State Office of Emergency Services ..... Phone No.: (800) 852-7550

### b. Post-Incident Contacts\*:

Certified Unified Program Agency (CUPA) ..... Phone No.: (510) 567-6700

Local Hazardous Materials Program ..... Phone No.: (510) 777-2149

California EPA Department of Toxic Substances Control ..... Phone No.: (510) 540-3739

Cal-OSHA Division of Occupational Safety and Health ..... Phone No.: (510) 286-7000

Air Quality Management District ..... Phone No.: (415) 771-6000

Regional Water Quality Control Board ..... Phone No.: (510) 622-2300

\* Phone numbers for agencies in Unidocs Member Agency geographic jurisdictions are available at [www.unidocs.org](http://www.unidocs.org).

### c. Emergency Resources:

Poison Control Center\* ..... Phone No.: (800) 876-4766

Nearest Hospital: Name: Alta Bates ..... Phone No.: (510) 204-4444

Address: 2450 Ashby Ave. ..... City: Berkeley

### 3. Arrangements With Emergency Responders:

If you have made special (i.e., contractual) arrangements with any police department, fire department, hospital, contractor, or State or local emergency response team to coordinate emergency services, describe those arrangements below:

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c. Emergency Resources:

Poison Control Center

Nearest Hospital: ALTA Bates

Address: 2450 Ashby Ave, Berkeley

City: Berkeley

Phone No.: (510) 207-4444

Phone No. (800) 876-4766

3. Arrangements With Emergency Responders:

If you have made special (i.e. contractual) arrangements with any police department, fire department, hospital, contractor, or State or local emergency response team to coordinate emergency services, describe those arrangements below:

4. Emergency Procedures:

2. Whenever there is an imminent or actual emergency situation such as an explosion, fire, or release, the emergency coordinator (or his/her designee when the emergency coordinator is on call) shall:

1. Identify the character, exact source, amount, and the extent of any released hazardous materials.

ii. Assess possible hazards to human health or the environment that may result from the explosion, fire, or release. This assessment must consider both direct and indirect effects (e.g. the effects of any toxic, irritating, or asphyxiating gases that are generated to control fire, etc.).

iii. Activate internal facility alarms or communications systems, where applicable, to notify all facility personnel.

iv. Notify appropriate local authorities (i.e. call 911).

v. Notify the State Office of Emergency Services at 1-800-852-7550.

vi. Monitor for leaks, pressure build-up, gas generation, or ruptures in valves, pipes, or other equipment shut down in response to the incident.

vii. Take all reasonable measures necessary to ensure that fires, explosions, and releases do not occur, recur, or spread to other hazardous materials at the facility.

b. Before facility operations are resumed in areas of the facility affected by the incident, the emergency coordinator shall:

i. Provide for proper storage and disposal of recovered waste, contaminated soil or surface water, or any other material that results from an explosion, fire, or release at the facility.

ii. Ensure that no material that is incompatible with the released material is transferred, stored, or disposed of in areas of the facility affected by the incident until cleanup procedures are completed.

iii. Ensure that all emergency equipment is cleaned, fit for its intended use, and available for use.

iv. Notify the California Environmental Protection Agency's Department of Toxic Substances Control, the Alameda County Department of Environmental Health CUPA and the local fire department that the facility is in compliance with requirements b-1 and b-ii, above.

Responsibilities of Other Personnel:

On a separate page, list any emergency response functions not covered in the "Emergency Coordinator Responsibilities" section, above. Next to each function, list the job title or name of each person responsible for performing the function. Number the page(s) appropriately.

**5. Post-Incident Reporting/Recording:**

The time, date, and details of any hazardous materials incident that requires implementation of this plan shall be noted in the facility's operating record.

Within 15 days of any hazardous materials emergency incident or threatened hazardous materials emergency incident that triggers implementation of this plan, a written Emergency Incident Report, including, but not limited to a description of the incident and the facility's response to the incident, must be submitted to the California Environmental Protection Agency's Department of Toxic Substances Control, the Alameda County Department of Environmental Health and the local fire department. The report shall include:

- a. Name, address, and telephone number of the facility's owner/operator;
- b. Name, address, and telephone number of the facility;
- c. Date, time, and type of incident (e.g. fire, explosion, etc.);
- d. Name and quantity of material(s) involved;
- e. The extent of injuries, if any;
- f. An assessment of actual or potential hazards to human health or the environment, where this is applicable;
- g. Estimated quantity and disposition of recovered material that resulted from the incident;
- h. Cause(es) of the incident;
- i. Actions taken in response to the incident;
- j. Administrative or engineering controls designed to prevent such incidents in the future.

**6. Earthquake Vulnerability:** [19 CCR §2731(e)]

Identify any areas of the facility and mechanical or other systems that require immediate inspection or isolation because of their vulnerability to earthquake-related ground motion:

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**7. Emergency Equipment:**

22 CCR §66265.52(e) [as referenced by 22 CCR §66262.34(a)(4)] requires that emergency equipment at the facility be listed. Completion of the following Emergency Equipment Inventory Table meets this requirement.

8. Emergency Equipment:

22 CCR §66265.52(e) [as referenced by 22 CCR §66262.34(a)(4)] requires that emergency equipment at the facility be listed. Completion of the following Emergency Equipment Inventory Table meets this requirement.

**EMERGENCY EQUIPMENT INVENTORY TABLE**

1. Equipment Category	2. Equipment Type	3. Locations *	4. Description**
Personal Protective Equipment, Safety Equipment, and First Aid Equipment	<input checked="" type="checkbox"/> Cartridge Respirators	001 (E)	
	<input type="checkbox"/> Chemical Monitoring Equipment (describe)		
	<input checked="" type="checkbox"/> Chemical Protective Aprons/Coats	001 (E)	
	<input checked="" type="checkbox"/> Chemical Protective Boots	001 (E)	
	<input checked="" type="checkbox"/> Chemical Protective Gloves	001 (E)	
	<input checked="" type="checkbox"/> Chemical Protective Suits (describe)	001 (E)	
	<input checked="" type="checkbox"/> Face Shields	001 (E)	
	<input checked="" type="checkbox"/> First Aid Kits/Stations (describe)	001 (E)	and oxygen unit
	<input type="checkbox"/> Hard Hats		
	<input checked="" type="checkbox"/> Plumbed Eye Wash Stations	001 (E)	
	<input checked="" type="checkbox"/> Portable Eye Wash Kits (i.e., bottle type)	001 (E)	
	<input checked="" type="checkbox"/> Respirator Cartridges (describe)	001 (E)	
	<input checked="" type="checkbox"/> Safety Glasses/Splash Goggles	001 (E)	
	<input checked="" type="checkbox"/> Safety Showers	001 (E)	
Fire Extinguishing Systems	<input type="checkbox"/> Self-Contained Breathing Apparatuses (SCBA)		
	<input type="checkbox"/> Other (describe)		
	<input type="checkbox"/> Automatic Fire Sprinkler Systems		
	<input checked="" type="checkbox"/> Fire Alarm Boxes/Stations	001	Fire Alarm
Spill Control Equipment and Decontamination Equipment	<input type="checkbox"/> Fire Extinguisher Systems (describe)		
	<input checked="" type="checkbox"/> Fire Extinguishers (describe)	001 (E)	
	<input type="checkbox"/> Other (describe)		
	<input checked="" type="checkbox"/> Absorbents (describe)	002	
	<input checked="" type="checkbox"/> Berms/Dikes (describe)	002 (E)	IN Spill Protection down of cement Base
	<input type="checkbox"/> Decontamination Equipment (describe)		
	<input checked="" type="checkbox"/> Emergency Tanks (describe)	002	4 TANKS
	<input checked="" type="checkbox"/> Exhaust Hoods	002	
Communications and Alarm Systems	<input type="checkbox"/> Gas Cylinder Leak Repair Kits (describe)		
	<input checked="" type="checkbox"/> Neutralizers (describe)	002 (S)	
	<input type="checkbox"/> Overpack Drums		
	<input checked="" type="checkbox"/> Sumps (describe)	002 (S/P)	
	<input type="checkbox"/> Other (describe)		
	<input type="checkbox"/> Chemical Alarms (describe)		
	<input type="checkbox"/> Intercoms/ PA Systems		
Additional Equipment (Use Additional Pages if Needed.)	<input type="checkbox"/> Portable Radios		
	<input type="checkbox"/> Telephones		
	<input type="checkbox"/> Tank Leak Detection Systems		
	<input checked="" type="checkbox"/> Other (describe)		VERBAL
	<input type="checkbox"/>		

\* Use the map and grid numbers from the Storage Map prepared earlier for your HMBP.

\*\* Describe the equipment and its capabilities. If applicable, specify any testing/maintenance procedures/intervals. Attach additional pages, numbered appropriately, if needed.

## **APPENDIX C**

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## CLOSURE PLAN

This Closure Plan is presented for inclusion as part of the requirements of our Conditionally Authorized permit granted by the State of California - California Environmental Protection Agency's Department of Toxic Substances Control.

The facility site and building are owned by The Corder Family Trust. Mr. Walter O. Corder constructed the building in 1946 to accommodate the anodizing process enabling a rental of the property to METALCO.

There are a total of seventeen (17) tanks used at this facility. There are thirteen (13) tanks in the anodizing process, a containment pit, two (2) emergency tanks, one (1) ion exchanger and one (1) tank for the treatment process (NT-1).

The Estimated Closure costs address three (3) processes. These processes are categorized into the following groups:

- I. Anodizing (pretreatment)
- II. Storage of Chemicals
- III. Treatment Tanks

## I. Anodizing (pretreatment)

The following are processes of the anodizing process requiring attention for closure.

- A. Houghto-Clean (A-1053) soap tank. One (1) tank  
This is a liquid that would be neutralized to a specific pH range and then pumped into the sanitary sewer for disposal. Remaining sludge would fill one (1) 55 gallon drum for off haul.
- B. Desmutter One (1) tank  
This is a liquid that would be neutralized with bicarbonate or soda ash and pumped into the sanitary sewer for disposal. Remaining sludge would fill one (1) 55 gallon drum for off haul.
- C. Etching Tanks Two (2) tanks  
These contain liquid formulated from Duponal, Caustic Soda Beads and Houghto-Etch (a no dump etch additive). These chemicals can be neutralized to a specific pH range and pumped into the sanitary sewer for disposal. Remaining sludge would fill (1) 55 gallon drum for off haul.
- D. Anodizing Tanks Four (4) tanks  
1. the Duranodic anodize process is conducted in two (2) tanks with the use of D-300 acids. These acids would be pumped through the ion exchanger. After that process the liquid is then pumped to the neutralization tank. After neutralization to a specific pH range and pumped into the sanitary sewer for disposal.  
2. the sulfuric anodize process is conducted in two (2) tanks with the use of sulfuric acids. These acids would be pumped through the ion exchanger. After that process the liquid is then pumped into the sanitary sewer for disposal.
- E. Rinse Water and Seal Tanks. Five (5) tanks  
These tanks contain water and would be pumped directly into the sanitary sewer.
- F. Containment Pit One (1) Pit  
Any liquids in the pit would be pumped into the treatment tank (NT-1) for testing and evaluation. An adjustment would be made to a specific pH range and then pumped into the sanitary sewer for disposal.
- G. Emergency Tanks Two (2) tanks  
These are empty tanks requiring no action for closure.

## II. Storage of Chemicals

There are both liquid and dry chemicals at this facility.

- A. Dry chemicals consist of:
- Houghto-Clean
  - Duonal
  - Caustic Soda Beads
- B. Liquid Chemicals consist of:
- Thinner
  - Desmutter
  - Houghto-Etch (no dump etch additive)
  - Pilot D-300
  - Sulfuric Acid

These chemicals, dry or liquid would be easily disposed of by returning them to the suppliers or offering them to other interested parties.

## III. Treatment Tanks

- A. Ion Exchanger one (1) tank

It is used for the filtration of the liquids contained in the anodizing tanks. The filtration process eliminates the metal and sludge.

- B. Treatment Tank (NT-1) one (1) tank

It is used to treat the discharge from the ion exchanger. After neutralization to a specific pH range the liquid is pumped into the sanitary sewer for disposal. There would be no residue or sludge remaining that would require off haul.

The following costs are projected for closure. Labor cost projections are based on a labor force of two men at an hourly cost of 80.00.

<u>Item</u>		<u>Unit</u>	<u>Total</u>	
Houghto-clean (soap) tank				
Neutralize, drain & clean tank	1 hour	80.00	80.00	
Desmutter tank				
Neutralize, drain & clean tank	1 hour	80.00	80.00	
Etching Tanks				
Neutralize, drain & clean tanks	8 hours	80.00	160.00	
Anodizing Tanks				
Process through Ion Exchanger to Treatment Tank (NT-1)				
Neutralize, drain & clean tanks	16 hours	80.00	1,280.00	
Rinse Water and Seal Tanks				
Drain and clean tanks	5 hours	80.00	400.00	
Containment Pit				
Pump any liquid to treatment tank, hose out pit, drain and pump to the treatment tank.	10 hours	80.00	800.00	
Cleansed tanks would be sold or given to scrap dealers. Stored Chemicals would be sold or returned to the point of purchase.				
Ion Exchanger				
Drain, rinse and remove beads	3 hours	80.00	240.00	
OFF HAUL REQUIREMENTS:				
Houghto-clean (soap)	55 gallon drum	1	435.00	435.00
Desmutter	55 gallon drum	1	435.00	435.00
Etching	55 gallon drum	1	435.00	435.00
Containment pit	55 gallon drums	3	435.00	<u>1,305.00</u>
TOTAL COSTS FOR CLOSURE			\$ 5,650.00	



The off hauls in 55 gallon drums would consist of the following compositions:

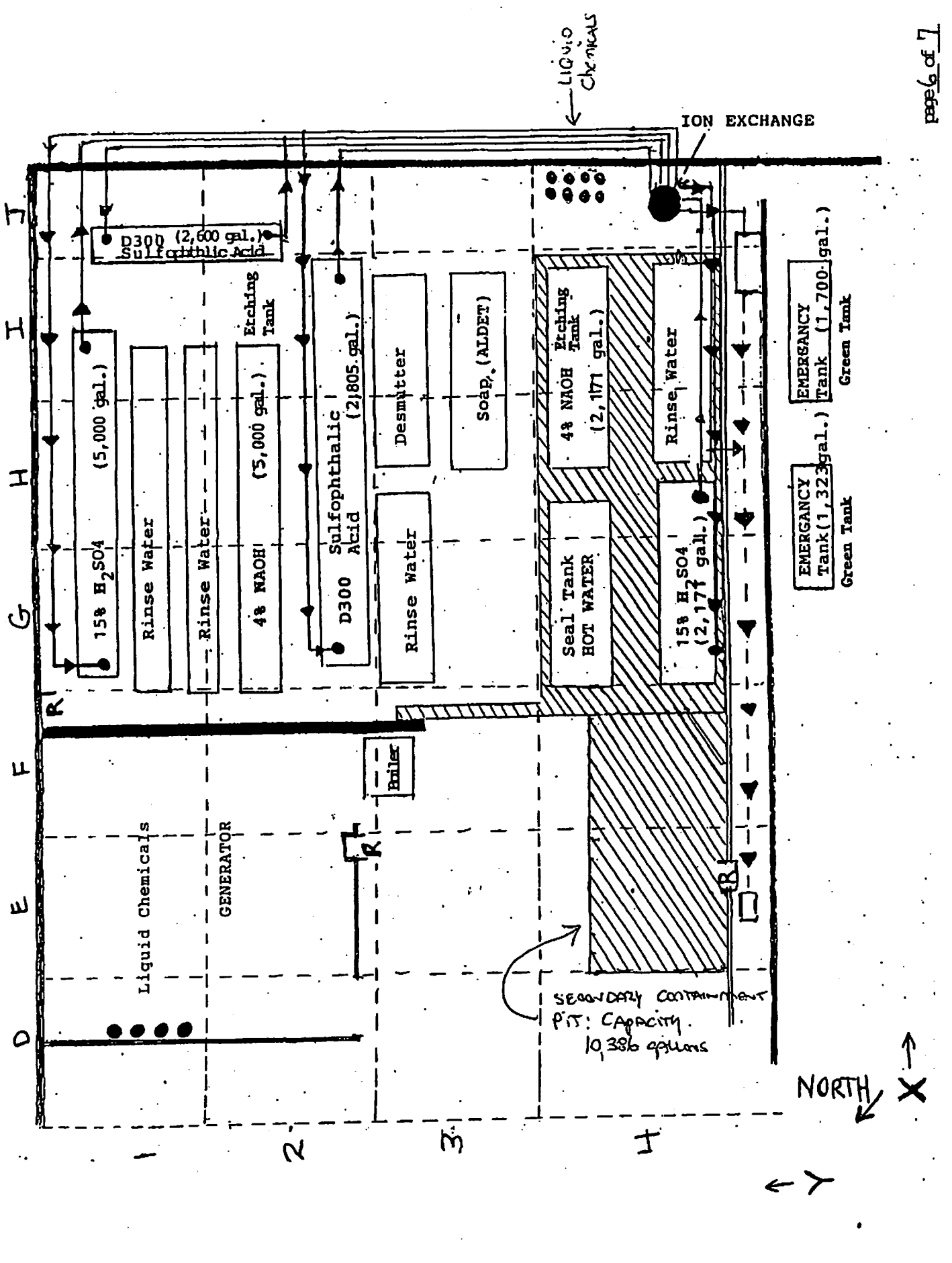
Sodium Hydroxide	65%
Aluminum Hydroxide	25%
Water	10%

The cost estimates of \$435.00 per drum are based on the most recent shipment.

In summary, the closure of METALCO would not constitute a major expense. Our landlord owns the building and its containment pit. The building would be returned in clean condition as out lined in our lease agreement.

## **APPENDIX D**

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LIQUID CHEMICALS

ION EXCHANGE

D300 (2,600 gal.) Sulphothalic Acid

15% H<sub>2</sub>SO<sub>4</sub> (5,000 gal.)

Rinse Water

Rinse Water

4% NaOH (5,000 gal.)

Etching Tank

D300 Sulphothalic Acid (2,805 gal.)

Rinse Water

Desmutter

Soap (ALDET)

4% NaOH Etching Tank (2,171 gal.)

Rinse Water

Seal Tank HOT WATER

15% H<sub>2</sub>SO<sub>4</sub> (2,171 gal.)

EMERGENCY Tank (1,323 gal.) Green Tank

EMERGENCY Tank (1,700 gal.) Green Tank

SECONDARY CONTAINMENT PIT: CAPACITY 10,386 gallons

NORTH