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September 13, 1992

Steve Slade, General Manager Charles Lowe Company 1400 Park Avenue Emeryville, CA 94608-0445

Dear Mr. Slade:

Attached are two copies of the final report for the closure of the Chromex plating facility. Please review the report and contact me if you need to have any changes made.

If no changes are necessary, please send the second copy of the report to the following agency contact:

Brian Oliva, REHS, REA Alameda County Health Care Services Agency Hazardous Materials Division 80 Swan Way, Room 200 Oakland, CA 94621

In order to have a record that you have sent a copy of the report to Alameda County, I suggest that you send the report by certified mail to Mr. Oliva.

Thank you for the opportunity to be of service to you and your company.

Very truly yours,

Mary L. Bost

Mary L. Boyd

Project Engineer



FINAL CLOSURE REPORT OF THE CHROMEX PLATING FACILITY

Prepared for CHARLES LOWE COMPANY 1400 PARK AVENUE EMERYVILLE, CALIFORNIA 94608-0445

For submittal to
ALAMEDA COUNTY HEALTH AGENCY
DIVISION OF HAZARDOUS MATERIALS
80 SWAN WAY, ROOM 200
OAKLAND, CALIFORNIA 94621

Prepared by
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NOVEMBER 1, 1992

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FINAL CLOSURE REPORT OF THE CHROMEX PLATING FACILITY

1400 PARK AVENUE EMERYVILLE, CALIFORNIA 94608-0445 (510) 652-5900

1 INTRODUCTION

The Chromex plating facility was a hard chrome plating shop located at 1400 Park Avenue, Emeryville, California. An area, vicinity, and site map of the Chromex facility are located in Appendix A. In January 1991 Chromex ceased all chrome plating operations and contracted Excel Trans, Inc. to perform a complete plant closure and facility decommissioning.

Excel Trans prepared and submitted to the Alameda County Health Agency (ACHA) on April 5, 1991 the "Technical Proposal and Workplan for Chromex" (hereafter called workplan) for the closure. Documented in the May 22, 1991 ACHA amendment, ACHA gave verbal approval of the workplan, and Excel Trans began closure activities on April 22, 1991. On April 17, 1992, Excel Trans submitted to ACHA a second amendment which outlined additional work at the site. The additional work commenced on June 19, 1992 and included demolition of the structure and vault. All closure activities at the site have been performed according to the ACHA approved workplan and amendments, and are documented in this report.

2 PROJECT OVERVIEW

The Chromex closure was a complete facility decommissioning and closure. Closure included the following activities:

- removal and disposal of tank contents
- removal and decontamination of equipment
- removal and/or decontamination of structural surfaces
- removal of concrete vault
- sampling of decontaminated equipment and surfaces for residue levels

The removal and disposal of tank contents was performed according to all applicable local, state, and federal regulations. Tank contents were transferred to D.O.T. containers, loaded onto registered hazardous waste haulers, and disposed at an EPA permitted treatment facility. After disposal of tank contents, workers commenced decontaminating equipment.

Equipment was washed with high pressure water, field tested for contaminant residue levels, and sorted for proper disposal. Disposition of decontaminated equipment included both nonhazardous and hazardous disposal.

During equipment cleaning, workers began decontaminating the concrete vault, steel structure, and building surfaces. However, cleaning the structure did not bring contaminant residue levels below the specified target limits. As a result, Excel Trans submitted an amendment to ACHA on April 17, 1992 which outlined the necessary steps to demolish the building structure and concrete vault. ACHA approved the amendment, and demolition of the vault began on April 29, 1992.

At present, all Chromex equipment, piping, structural supports, siding, and roofing have been transported from the site and disposed of according to all applicable local, state, and federal regulations. Only two structural surfaces remain at the site: the southern brick wall and 2/3 of the grade-level concrete floor. Analysis of samples of the washed brick wall confirm that the wall was decontaminated to acceptable residue levels (Appendix G). Further, results of a subsurface soil investigation performed in October 1992 will be used to assess the status of the grade-level concrete flooring.

The following sections of this report present details and documentation of closure activities at the site

3 OVERVIEW OF SAMPLING, TESTING, AND DISPOSITION OF WASTE

Throughout the decontamination and dismantling process, waste was categorized as hazardous or nonhazardous and was accumulated and handled accordingly. Categorizing waste was accomplished by testing residue levels of representative samples to confirm that approved cleaning levels had been achieved.

Testing of samples included both field testing at the site and analyses at a California DHS certified laboratory. Field testing was limited to test strips for pH, chromium, and oxidizer characteristic. Certified chemical laboratory analysis of grab, rinse, and composite samples were tested for metals and pH using EPA test methods.

Testing of residue levels was used as a tool to categorize decontaminated equipment as either hazardous or nonhazardous waste. Both field and analytical tests results were used to classify waste. Residual levels for pH, chrome, and oxidizer characteristic and the corresponding waste category are outlined in Table I.

TABLE I

CRITERIA FOR CLASSIFICATION

TEST RI	ESULTS	CLASSIFICATION
chrome: pH: oxidizer:	< 2ppm 5 - 10 negative	Target residue levels for cleaned structural surfaces. Acceptable to leave at the site.
chrome: ph: oxidizer:	< 5 ppm 5 - 10 negative	Nonhazardous waste for cleaned structural surfaces.
chrome:	≥ 5ppm	Hazardous waste for structural surfaces.

Once waste was classified, it was handled and disposed of according to all applicable local, state, and federal regulations. For example, structural surfaces that met the acceptable residue level of <2ppm chrome were left at the site. In addition, waste that was classified as nonhazardous was disposed of at Class III landfill, wood recycling, or metal reclamation facility. Waste that was classified as hazardous waste was sent to EPA permitted disposal facilities.

Moreover, the disposition of hazardous waste defined as organic and inorganic debris was disposed of at Envirosafe Services of Idaho under the EPA national capacity variance for Third Third debris (55 FR 22556, June 1, 1990 and 55 FR 22650, June 1, 1991).

Documentation of hazardous and nonhazardous waste disposal is located in Appendix C and D respectively. Documentation of the disposal of waste includes the following:

- manifests
- metal reclamation receipts
- wood recycling receipts
- scavenger receipts

A list of disposal facilities and their descriptions is outlined in Table II, page 4.

TABLE II

HAZARDOUS & NONHAZARDOUS DISPOSAL FACILITIES

DISPOSAL FACILITY	FACILITY DESCRIPTION
Norris Environmental Services 5215 So. Boyle Avenue	EPA permitted treatment facility for liquids
Los Angeles, CA 90058	EPA ID Number CAD097030993
US Ecology Highway 95	EPA permitted Class I landfill
Beatty, NV 29003	EPA ID Number NVT330010000
Envirosafe Services of Idaho 10.5 miles Northwest of Grandview Missile Base Road	EPA permitted Class I landfill
Grandview, ID 83624	EPA ID Number IDD073114654
Aptus 11600 North Aptus Road	EPA permitted incinerator
Aragonite, UT 04029	EPA ID Number UTD981552177
Forward Landfill 9999 So. Austin Road	California Permitted Class III landfill
Stockton, CA 95215	CAL EPA ID Number CAD990794133
Sharon Metal San Jose, CA	Scrap recycler for metal reclamation
Oakland Scavenger / Davis Street Transfer Station / Altamont Landfill 2000 Embarcadero, #101 Oakland, CA 94606	Local Class III landfill
Major Salvage Company 3237 Fernside Boulevard Alameda, CA 94501	Wood recyclers

4 SITE PREPARATION

Prior to the commencement of all work at the Chromex facility, the site was prepared for environmental remediation activities. Site preparation included training employees in project safety procedures, securing the site, and building a contamination reduction zone (CRZ) and temporary berm.

Employee training included hazardous waste worker training and site specific safety training. Excel Trans' employees received 40-hour OSHA training for hazardous waste workers (29 CFR 1910.120) and one hour of safety instructions specific to health and safety concerns at the Chromex facility. Site specific training included instruction in chemical and physical hazards, personal protective equipment, respirator training, hazard mitigation, and general safe work practices. In addition, the Site Safety Officer instructed employees on the routes to the nearest medical clinic and hospital.

After the site safety meeting was given, and before closure work activities began, Excel Trans' employees secured the Chromex site with a chain-link temporary fence. Installation of the fence restricted site access and served as a security measure for on-site storage of remediation equipment.

After the site was secured, an electrician locked-out the power supply, and Excel Trans workers constructed the CRZ and temporary berm. The CRZ was a temporary structure with separate personal protective equipment, shower/decontamination, and clean locker rooms. Site personnel were required to enter and exit through the CRZ.

The temporary berm was constructed simultaneously with the construction of the CRZ. The temporary leak proof berm enclosed the entire inside perimeter of the plating shop. The purpose of the berm was to collect and contain excess rinsate from decontamination of the equipment, piping, and surfaces.

Once the site was prepared for work activities, the workers mobilized equipment and began work activities as described in the workplan and amendments.

5 REMOVAL AND DISPOSAL OF TANK CONTENTS

Prior to closure, the Chromex facility contained eight aboveground tanks which contained plating, etching, and stripping solutions. Table III lists the volume, construction material, and contents of all eight tanks.

TABLE III

VOLUME, CONSTRUCTION MATERIAL, & CONTENTS OF TANKS

VOLUME (Gallons)	CONSTRUCTION MATERIAL	CONTENTS
3600 Gallons	Steel	Chrome Plating Solution
3200	Steel	Chrome Plating Solution
3200	Steel	Chrome Plating Solution
2800	Steel	Chrome Plating Solution
750	Polyethylene	20% Sodium Hydroxide
120	Polyethylene	20% Hydrochloric Acid
100	Polyethylene	20% Sulfuric Acid
60	Polyethylene	20% Hydrochloric Acid

TABLE IV

MANIFESTS AND SHIPPING DATES FOR TRANSPORT OF TANK CONTENTS
AND RINSATE

SHIPPING DATE	MANIFEST No.	DESCRIPTION	QUANTITY (GALLONS)
April 1, 1991	89887237	Rinsate	3,800
April 5, 1991	89887229	Chrome plating solution	4,200
April 8, 1991	89924867	Chrome plating solution	4,000
April 24, 1991	89924866	Chrome plating solution	1,000
May 29, 1991	90328817	Stripping solution	880
June 9, 1991	90328916	Chrome plating solution	330
July 12, 1991	90328987	Rinsate	4000
May 5, 1992	91716485	Rinsate	550

Beginning in April 1991, all plating, etching, and stripping solutions were pumped from the above listed tanks into vacuum trucks and were transported to Norris Environmental Services. In addition to the tank contents, rinsate contaminated with chromium which was generated during decontamination of equipment was also sent to Norris for disposal. Prior to transport, all containers were packaged, labeled, and handled according to all applicable local, state, and federal regulations. In addition, all loads were shipped on a California hazardous waste manifest as required by federal and state regulations. A registered hazardous waste hauler, Excel Trans, transported the tank contents to Norris. Table IV lists the manifests and shipping dates for shipment of tank contents and rinsate to Norris. Copies of all manifests are located in Appendix C.

6 REMOVAL AND DECONTAMINATION OF PROCESS AND RELATED EQUIPMENT

Process and related equipment at the site was removed and decontaminated prior to disposal. Equipment at the site consisted of the following:

- process and electrical piping
- fume scrubber
- rectifiers, boilers, heat exchanger, overhead crane
- polyethylene tanks
- steel tanks with rubber liners

Disposal methods for decontaminated equipment included metal reclamation, Class III landfill, and Class I landfill. Except for the rectifiers, equipment was not remarketed.

Metal piping and other metal equipment that was amenable to decontamination was cut into sections and cleaned with a high pressure steam washer. As discussed in Section 5, all wash water from metal decontamination was collected and stored on site for disposal at Norris Environmental Services. Final rinse water from decontamination was field tested for pH, chromium, and oxidizer characteristic. After field tests were performed on the final rinse water, decontaminated metallic items that met acceptable residue levels (Table I, page 3) were sent to metal reclamation for disposal. Typically, copper piping was cleaned to less than 5 ppm (Appendix E) by pressure washing, and was sent to metal reclamation. Items that were decontaminated but exceeded 5 ppm chrome (e.g.: the fume scrubber and heat exchanger) were placed in a bin for disposal at Envirosafe Services of Idaho. Nonmetallic equipment, such as polyethylene tanks and rubber tank liners, were placed directly in bins for transportation and disposal at Envirosafe Services of Idaho. Manifests documenting hazardous waste disposal are located in Appendix C.

7 DECONTAMINATION AND REMOVAL OF STRUCTURAL SURFACES

The plating room was a steel frame structure with wood siding and roofing. The north, east, and west sides of the structure were wood. The south side of the structure was a brick and glass

wall. In order to preserve the structure for later use, attempts were made to decontaminate structural surfaces in-place. Except for the southern brick wall, decontamination proved ineffective.

A pilot study for in-place decontamination confirmed that washing wood surfaces would be ineffective in reducing the chrome concentration to acceptable residue levels. For example, analysis (EPA method 1311 and 6010) of unwashed and washed wood from a pilot study showed a chrome concentration of 1,740 ppm and 121 ppm respectively (Appendix F). Thus, the siding was disposed of as hazardous waste at Envirosafe Services of Idaho.

Roofing material was removed from the structure and representative samples were field tested for residue levels (Appendix E). Roofing was found to meet acceptable residue levels and was categorized as nonhazardous. Roofing material was placed in bins for disposal to a Class III landfill and wood recycling facility. Documentation for disposal of roofing material by Oakland Scavenger is located in Appendix D.

The steel I-beams, crane, cross beams, and channel iron were removed to complete the demolition of the structure. Once removed, steel and iron pieces were decontaminated with high pressure water and sorted for disposal. Steel and iron that was below 5ppm chrome was sent to Sharon Metals for metal reclamation. Metal that field tested at 5ppm chrome or higher (Appendix E) was placed in the hazardous waste bin for disposal at Envirosafe Services of Idaho.

The southern brick and glass wall which adjoined the Charles Lowe manufacturing area was successfully decontaminated with high pressure water and was left in place. All rinsate was collected on site and disposed of according to regulations. Certificates of analysis documenting that the wall was cleaned to less than 2 ppm chrome are located in Appendix G.

8 INSPECTION OF FLOORS AND VAULT FOR CRACKS

After equipment was removed, the concrete floor and vault were inspected for cracks. The inspection revealed shallow surface cracks in the grade level and vault floors. Subsequently, surficial soil samples were taken at grade level. Complete results of the analysis, borehole locations, and chain-of-custody have been submitted to ACHA in the "Workplan for Initial Subsurface Investigation", July 24, 1992.

As a result of the surficial soil sampling and analysis, a subsurface investigation was completed in November of 1992 (see "Workplan for Initial Subsurface Investigation" submitted to ACHA on July 24, 1992). A final report documenting the results of the subsurface soil investigation was prepared for Charles Lowe for submittal to ACHA on November 4, 1992.

9 REMOVAL OF CONCRETE SURFACES AND THE CONCRETE VAULT

The closure workplan submitted to ACHA specified decontamination of the concrete floor and vault. However, attempts to decontaminate the concrete surfaces proved ineffective. Excel Trans submitted an amendment to remove the vault and concrete surfaces.

Concrete surfaces were not amenable to chemical cleaning. For example, analysis performed after chemical cleaning showed a chrome concentration of 7,200 mg/kg in a concrete vault wall sample (Appendix H). This analysis confirmed that chemical washing was inappropriate, and the original workplan was amended and submitted to ACHA on April 17, 1992.

After approval of the amendment by ACHA, Tank Excavators, Inc. was subcontracted to shore and excavate the vault. Tank Excavators applied for and received City of Emeryville excavation permit number B4301-492 on April 14, 1992. Prior to demolition, Tank Excavator shored the vault with sheetpile. During shoring, approximately 40 yd³ of soil was excavated. The soil pile was tested for California 17 metals and Volatile Organics by approved EPA methods at a DHS certified laboratory. Analysis of the soil, which was submitted to ACHA in the subsurface investigation workplan, indicated that the soil was neither a state or federally regulated waste. At present, soil has been accepted and assigned approval number 92-245 at Forward Landfill, a Class III landfill. A bill of lading documenting disposal will be submitted to ACHA as soon as the soil is transported to Forward.

After shoring was completed, the entire concrete vault was excavated and sent to Envirosafe Services of Idaho for disposal. In addition to the excavation of the vault, a portion of the concrete floor surrounding the vault was also excavated and sent to Class I landfill. Manifests documenting disposal are located in Appendix C.

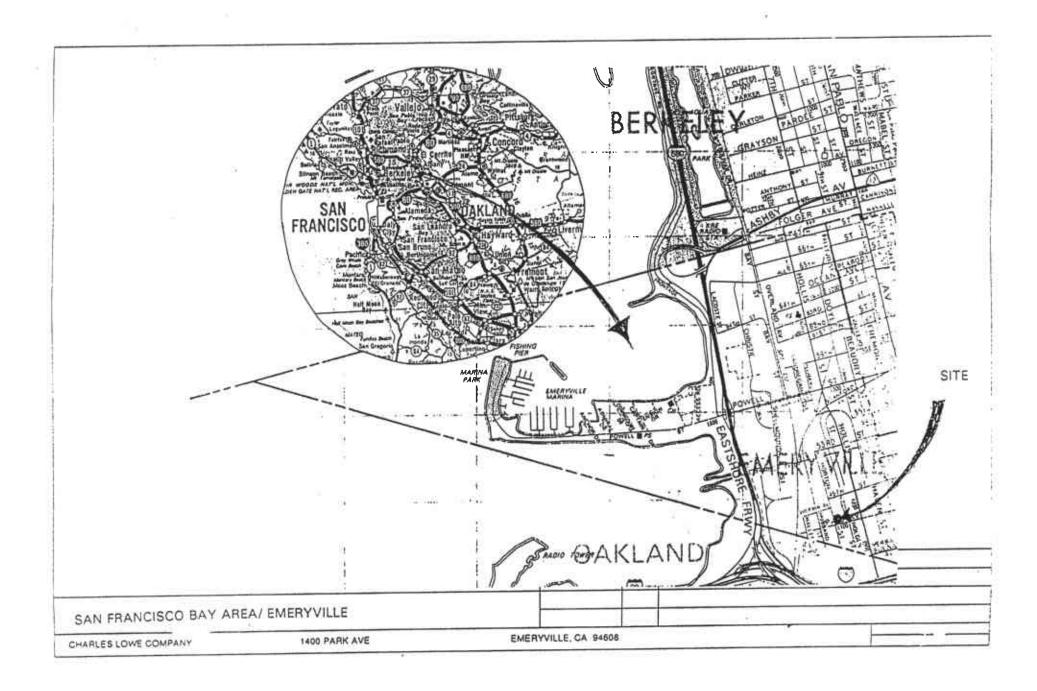
10 PRESENT STATE AND FUTURE USE OF SITE

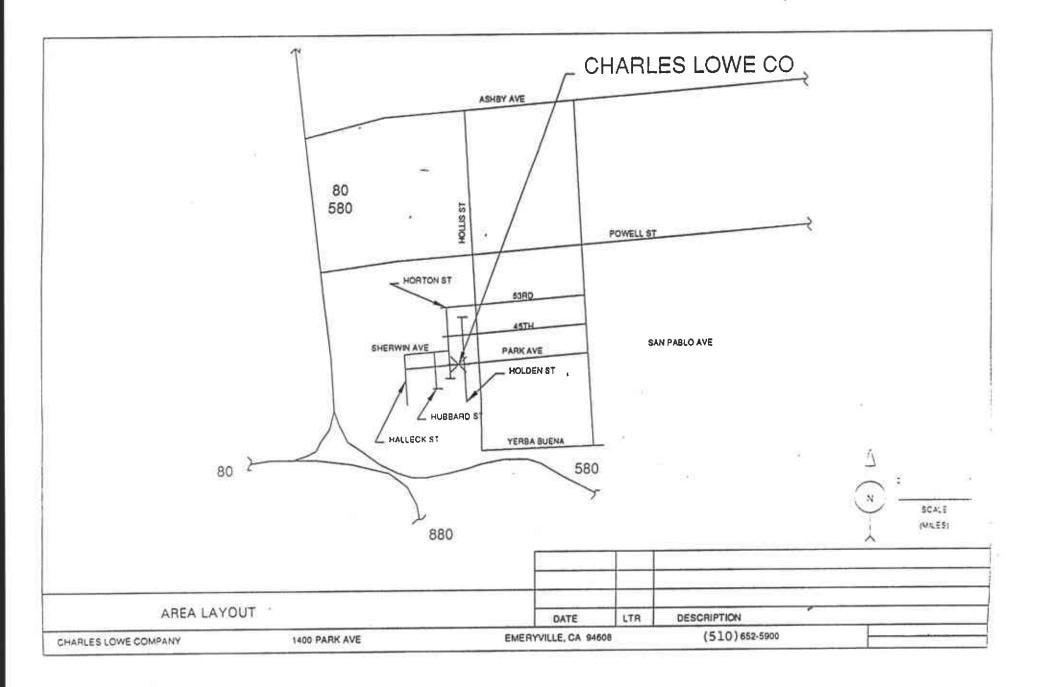
At the present time, the entire building structure has been demolished and approximately 30% of the concrete floor has been removed to expose native soil. In addition, a 10 ft deep excavation exists in the location of the former vault. The vault and soil were sampled in October 1992.

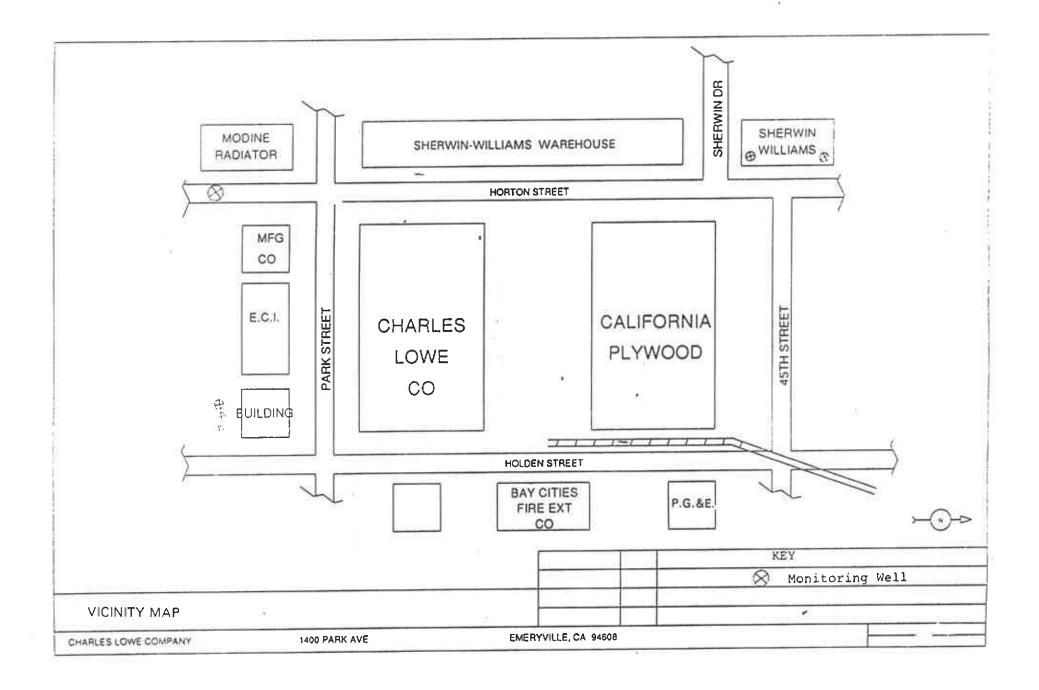
A preliminary subsurface investigation of the vault, soil, and groundwater was undertaken at the site on October 1, 1992. A summary of the findings were submitted to ACHA on November 4, 1992. As part of the summary, Excel Trans recommended that the soil in the vault be immediately excavated below the water, and that the excavated hole be refilled with gravel after analysis shows that soil chrome concentrations have dropped below a level of regulatory concern. ACHA has given verbal approval to the recommendations. Work will begin as soon as possible.

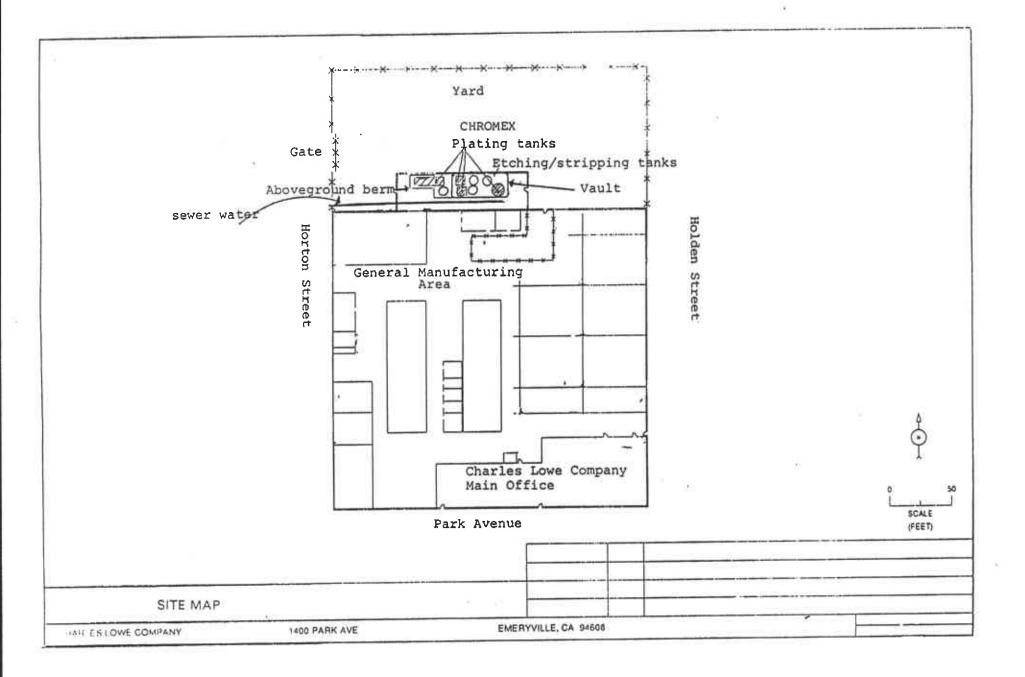
Once the pit has been filled, Charles Lowe intends to use the former Chromex site as an outdoor uncovered storage area for large equipment.

11/1/92









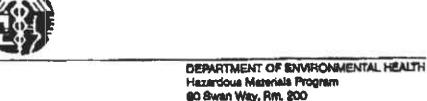
Caklend, CA 94821

ALAMEDA COUNTY HEALTH CARE SERVICES

AGENCY

DAVID J. KEARS, Agency Director

MAY 22, 1991



Mr. Fred Schappert Charles Lowe Company 1400 Park Avenue Emeryville, CA 94608

Workplan For Chromex, Closure of Plating Facility RE: 1400 Park Avenue, Emeryville, CA \$4608

Dear Mr. Schappert:

The Alameda County Department of Environmental Health, Hazardous Materials Division has received and reviewed the workplan for the closure of the plating facility at the referenced site, as submitted by Excel Trans under cover letter dated April 5, 1991. Through telephone conversation with Mr. David Nielsen of Excel Trans, the closure plan was given a verbal approval and is acceptable subject to the following conditions:

- * All other Federal, state or local statutes, regulations, ordinances, requirements or limitations which are applicable to your project must be followed.
- * The Health and Safety Plan consistent with applicable requirements of 29 CFR 1910.120 must be followed and a complete copy must be available at the site during the closure operation.
- * The on-site storage of any hazardous waste generated by the decontamination activities must not exceed 90 days.
- * Disposal of waste generated in the closure operation must be supported by analysis by a state certified lab.
- * Field tests are acceptable as a screening tool but laboratory analysis by a state certified lab are required for verification of the extent of decontamination.
- * A time achedule for the entire closure activities must be submitted to this department.
- * A written notification for any changes or deviation in the closure workplan must be submitted and approved by this department.

...

SUMMARY OF MANIFESTS DOCUMENTING DISPOSAL

DATE SHIPPED	DISPOSAL FACILITY	MANIFEST NUMBER	DATE RECEIVED
04/01/91	Norris Environmental	89887237	04/03/91
04/05/91	Norris Environmental	89887229	04/06/91
04/08/91	Norris Environmental	89924867	04/09/91
04/24/91	Norris Environmental	89924866	04/25/91
05/29/91	Norris Environemtnal	90328817	05/30/91
06/20/91	Norris Environmental	90328916	06/24/91
06/26/91	Envirosafe Services of Idaho	90328909	06/27/91
07/09/91	Envirosafe Services of Idaho	90328931	07/10/91
07/12/91	Norris Environmental Services	90328987	07/13/91
07/29/91	US Ecology	89887200	08/01/91
08/27/91	Envirosafe Services of Idaho	90329052	08/28/91
03/18/92/	Aptus, Inc.	91717669	03/24/92
03/26/92	Norris Environmental Services	91718071	03/26/92
03/31/92	Envirosafe Services of Idaho	91718022	04/02/92
04/29/92	Envirosafe Services of Idaho	91718026	04/30/92
05/01/92	Norris Environmental Services	91716488	05/05/92
05/04/92	Envirosafe Services of Idaho	91718094	05/05/92
05/05/92	Envirosafe Services of Idaho	91718029	05/06/92
05/05/92	Envirosafe Services of Idaho	91718092	05/07/92
05/05/92	Envirosafe Services of Idaho	91718030	05/06/92
05/07/92	Envirosafe Services of Idaho	91716474	05/07/92
05/06/92	Envirosafe Services of Idaho	91718086	05/07/92
05/06/92	Envirosafe Services of Idaho	91716475	05/07/92
05/06/92	Envirosafe Services of Idaho	91718089	05/07/92
05/06/92	Envirosafe Services of Idaho	91718090	05/07/92
05/05/92	Envirosafe Services of Idaho	91716473	05/07/92

	Steve A Stade I General Manager	Stallade	P 41011911
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1	18. Transporter 2 Acknowledgement of Receipt of Materials	Telling	Month Day Year
	Printed/Typed Name	Signature	
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19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

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Signature

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20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

112470

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Day

Year

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3. Generator's Name and Mailing Address			A. State	Manifest 8	197	48	67
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J. Additional Descriptions for Materials Listed Above A. HARD CHRONE PLATTING SOLD PCN # E 803-CCO PRO 15. Special Handling Instructions and Additional Information WCAR APPOPRIATE SPEETY GENERATOR'S CERTIFICATION: I hereby declare that the contents of this corand are classified, packed, marked, and labeled, and are in all respects in proper national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduct to be economically practicable and that I have selected the practicable method present and future threat to human health and the environment; OR, If I am a sm generation and select the best waste management method that is available to method.	nsignment are er condition for treatment, nell quentity one and that I come and I come	2 PPM a fully and or transpor a and toxic storage, cenerator, I can afford.	COA	describer vay accordate general currently de a good	d above	e by propapplicab	per shipping name le international and which minimizes thinimize my waste
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IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-862-7550

State of Celifornia—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Explicit 9-39-91)
Please print or type. Form designed for use on alite (12 pitch typewriter). Department of Health Services See Instructions on Back of Page 6 Toxic Substances Control Division and Front of Page 7 Sacramento, California 1. Generator's US EPA ID No. 2. Page 1 UNIFORM HAZARDOUS Information in the shaded areas WASTE MANIFEST is not required by Federal law. 3. Generator's Name and Mailing Address A. State Manifest Document Humber CHROME & DIVISION/CHARLES CU 1400 PARE AVE B. State Generator's ID MANARE LICHIDIGH 5. Transporter 1 Company Name US EPA ID Number C) State Transporter's ID D. Transporter's Phone CAIDPIRILIPIEDINE EXCEL TRANS E. State Transporter's ID 7. Transporter 2 Company Name F. Transporter's Phone 9. Designated Facility Name and Site Address US EPA ID Number G. State Facility's ID MORRIS ENVILONMENTAL 5215 SOUTH BOYLE AUE . H. Facility's Phone LOS ANGELES, CA 90058 CIADIDITITO BIOPINS (213) 588 12. Containers 13. Total 14. Unit Weste No. Quantity 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) No. Type Wt/Vol ORME, NA9189 (Chromium, Suther Acid) CONTUELOOBER WRQ." Hazordous Waste Liquid n.o.s. EPA/Other ORM-E, WASIES (Chroming Solimity to 1016DFO0BBO CURIO! Hazardays Wast Ligo + n.o.s. DRM-6 NAGISG - CCHECKIUM EPA/Other 1 Additional Descriptions for Materials Elsted Above -K. Handling Codes for Wastes Listed Above 45 Profile # £1803 CR 4 b. Probled E1803 CR 3 d. C) Profile # E1803CR2 In case of emergency control Fred Meyers Til (413.653) or s. slade at (415) 255-8433 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Year Printed/Typed Name Month Day Steve A. Stick 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Year Signature JERRY BUTLER

18: Transporter 2 Acknowledgement of Receipt of Materials Month Day Year Printed/Typed Name Signature 19. Discrepancy Indication Space Č, 20. Fability Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19. Month Day Printed/Typed Name

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Do Not Write Below This Line

IN VILLAGE

See instructions on back of Page o and Front of Page 7

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19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

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Department of Health Service Toxic Substânces Control Progran Sacramento, Californic

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9. Designated Facility Name and Site Address Envirosafe Services of Idaho, Inc.	IN DI SE	G. State	Foothy's ID	
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Missile Base Road Think 17 31 31 11			(2)	<u>18) 384-3</u>
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5. Transporter I Company Name FXCF TRADE		te Stave Slade umber 1811982468	C State Transporters Phone 70 7 74 75 76			
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9. Designated Facility Name and Site Address Invirosafe Services of 104 miles HW of Grandvi Hissile Base Road	Idaho, Gnc.	Namber N1713111114161514	H. Foolity's Phone	(206) 384-1500		
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www.completer.com/ . 1 . 1. tate of California—Health and Welfare Agency See Instructions on back of page 6. Total Substances Control Program m Approved OM8 No. 2050-0039 (Expires 9-30-91) Sacramento, California form designed for use on elife (12-pitch typeweller). case print or type. information in the shaded areas 2. Page 1 Monifest Document No. 1. Generator's US EPA ID No. is not required by Federal law. UNIFORM HAZARDOUS A 3 116141 14 15 19 13 11 15 17 13 12 12 11 A State Manifest Document Number 91 WASTE MANIFEST 1641 3. Generator's Name and Maling Address ž Chrocket B. State Generator's D. 1400 Fark Avenue, Everyville CA 34693 4 Generolog Phone (510) 552-5900 Emergency contact: Steve Flade C. State Introporters to 6. US EPA ID Number 5. Transporter 1 Company Name D. Transporter's Phone AD 98117,812,663 (707) 745-Excel Trons LAL E. State Transporter's ID 8. US EPA ID Number 7. Transporter 2 Company Name F. Ironsporter's Phone G. State Facility's ID 9. Designated Facility Name and Site Address
Environate Services of Idano, Inc 10. US EPA ID Number 1 1 1 1 H. Focility's Phone 104 miles MV of Grandview Minaile Base Road 394-1900 T In to to 17 13 11 11 12 16 15 14 13. Total 14. Unit GZANOVIEW, ICADO U.16.24
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) 12. Contoinen Wt/Vol 1. World Number Type Quantity Storie 181/352 EPA/Other "RO" Hazardous Waste Solid, M.O.S., ORM-E MA9189 (Chrome contaminated debris) 11,8 DI G 0,01 0007 E State N Ε EPA/Other R Sicon T EPA/Other 0 R State -800-424-8802: d EPA/Other K, Handling Codes for Wartes Listed Above J. Additional Descriptions for Materials Listed Above a) 0 - 7200 ppm chrome on condrete & wood ਰ: NATIONAL RESPONSE CENTER 15. Special Handling Instructions and Additional Information Wear gloves/goggles whom mandling ESII PCN No.: 12247-001 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If Lam a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, If I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste 置 management method that is available to me and that I can afford. Day Month CALL Signature Printed/Typed Name ナミリン 15-50 SPIL 17. Transporter 1 Acknowledgement of Receipt of Materials õ Printed/Typed Name A EMERGENCY 215106 charlehlasta SP 18. Transporter 2 Acknowledgement of Receipt of Materiols ORT Signature Printed/Typed Name E 6 CASE 19. Discrepancy Indication Space F Z C Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

DO NOT WRITE BELOW THIS LINE.

Signature

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Department of Health Service and Substances Control Program Surgice Substances Control Program

WASTE MANIFEST CALD 9	15 PA ID No. 18 1 5 7 7 3 2 2 3 1	6 4	1 13	of Monifest Document	III nor mick	uned by redella low, 117
3. Generator's Nome and Malling Address Chrossex					Seattle and	11/104/
1400 Park Avenue, Emeryville 4 Generators Phone 610) 652-5900 Emerge	ency contact: Steve	Slade	H	Generalors D , A , B , Q , B , 6		2 ,6 ,1 ,7
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See Instructions on back of page 6.

Tasic Substances Control Program Socramento, Cottonia

UNIFORM HAZARDOUS UNIFORM HAZARDOUS L. Generator's US EPA ID No. WASTE MANIFEST C, A, D, 9, 8, 1, 5, 7, 3, 2, 2, 1	nifest Documen		2 Page 1 of 1		n in the shaded areas ared by Federal law.
3. Generators Name and Making Address Chromex 1400 Park Avenue, Emeryville CA 94608	₹	A Signe	More en Document Senerators D	hamber (1718090
& Generator's Phone (510)652-3900 Beergency contacts Stave	- Carroso	C. Shore	A ST O G 6 Increporters D	293	2517
STAIN CO CADO 6354	7.4.4.4	THE RESERVE AND ADDRESS OF THE PERSON NAMED IN	poters Phone S ingraporter's ID	(00)-	321-1030
9. Designated FgcSty Name and Site Address 10. US EPA ID Number	1 1 1 1	- Briefrichterweiterbe	orter's Phone Facility's ID		
P. Designoted Focally Nome ond Sie Addes nyirosafe Services of Idaho, Inc. 10. USEPA ID Number 11. Di	. A. S. S.	M. Scientific	ys Phone (208	384	
Kandwiere Idaho 83624 1. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Confi		13. Total Quantity	14 Unit WI/Vol	L World Number
"RQ" Hazardous Wasta Solid, M.O.S., ORM-E NA9189 (Chrome contaminated debris)	0,01	DT	, , 20	Y	181/352 ENC/Other D007
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Steve A. Slade Stall	ado			01	510161712
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** KANDAII BENTKY Komdal	1/31	-10	7	01	56112
Printed/Typed Name Signature				Mor	nth Day Year
10 Photography in Gordino Strong					1 1 1 1
19. Decrepancy Indication Space					
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifer	if except as not	ed in item	19.	Mor	off Doy Year
Printed/Typed Name Signature				1	

IN CASE OF EMERGENCY OR SPILL CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

State of California—Health and Welfore Agency
Form Approved CMB No. 2050—0039 (Expires 9-30-91)
Please ordet or type — Form designed for use on elite (12-pitch typewriter).

See Instructions on back of page 6.

Department of Health Services Toxic Substances Control Program Sacramento, California

WASTE MANIFEST	Generator's US EPA ID No. A ₁ D ₁ 9 ₁ 3 ₁ 1 ₁ 5 ₁ 7 ₁ 3 ₁ 2 ₁ 2 ₁ 3	Monitest Document $1 + \frac{1}{1} + \frac{1}{1} + \frac{4}{1} + \frac{1}{1} 7$.3	2. Page 1 of]	5 not req	on in the shade uired by Feder
Generator's Name and Mailing Address			A State	Monifest Documen	t Number	91710
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4 Generators Phone (510) (552-590-)	Energancy Confider the	Te Fine	II C State	ransporters ID	6,0,1	2,6,1,7
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7. Transporter 2 Company Name	8. US EPA ID Number	C. D. 1.31.00		ironsporter's ID		
	1 1 1 1 1 1		MANAGEMENT PROPERTY.	orter's Phone		
9. Designated Facility Name and Site Address Envirogate Services of Id 104 miles aw of Grandview	aito, Inc		200-70000000000	Foodity's ID	1 1 1	1.1.1
154 miles aw of Granaview	$\mathbf{I}_1 \odot_1 \mathbf{D}_1 \odot_1 7_1 3_1 1_1$. 3. 4. 6. 5. 4	H Focial	ys Phone (20	9) 39	4-1500
Alesile Base Road Grandview, Inaho 03624		12. Conto	ners	13 Total	I4 Unit	
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RA9189 (Chrome contam	inated debris)	0,02	CM	00000	7	EPA/Other
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DAKLAND SCAVENGER CONTAINER DIV A WASTE MANAGEMENT COMPANY 76 7 OAKPORT ST #350 OAKLAND, CA. 94621

ACCOUNT 1545ER 780-UF 5/8415/92

THE CHARLES LOWE CO P O BOX 8445 EMERYVILLE, CA 94608

1 OF

PAGE

(50)430-8194

SERVICE AT: 1400 PARK AV EMERYVILLE, CA 94608

BILL NUMBER	DATE	DESCRIPTION	AMOUNT
		REMINDER-PAST DUE PREVIOUS BALANCE	868.95
454359 1454359	4/13/92 4/13/92 5/01/92 5/01/92	PAYMENT-THANK YOU PAYMENT-THANK YOU APR 1992 LOCAL AND STATE MANDATED FEES	289.65CR 289.65CR 275.75 13.90

PAYMENT COPY
INVOICE RECEIVED

MAY 1.4 1992

Approved 5 6 5/2-Date 55-14-90
P.O. No.

TOTAL DUE

¢.

579.30

JUST A FRIENDLY REMINDER THAT AS OF 04/24/92, WE HAD NOT RECEIVED YOUR PAYMENT.

F YOU HAVE ALREADY MAILED YOUR PAYMENT, KINDLY DISREGARD THIS MESSAGE. WE WILL

OT BE HELD RESPONSIBLE FOR ARTICLES PLACED IN OR NEAR THE RECEPTACLES.

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17 FRIDAY MAY 1991 138/227 ARMED FORCES DAY MAY Chromate field test on Copper beis Boso tests after Steaming # 1 PH 7 Oxidizor NAChiometer #2 NA 4 #3 NR 5 NA 3 #5 P. H. was 3-6 oudger NA

JUNE WEDNESDAY 19 18 TUESDAY JUNE PRESSURE WASHED TANK SECTIONS
CAMPIE, (F.GLD TESTS)

1 Chamate 377M

PH

OMOLIGER NA Tressure absched Jank section field tests Gamples # 1 Chronote 579M Ostolyer ds. # 2 chonates OPPM #2 Chamate 37pm oxideger NA oreolyse NA + 3 chromate 5 PPM #3 Chronot 37pm Osidajes NA Openlage, NA +4 Chromate 579m Medizer NA #4 Chronate 379M Odinger NA 15 Chromate 37Pm odialger NA in brea of granding underse sections ong. Drager ais samplings en brea of Cements semonal from Bit 0.1 mg

1991 1991 23 THURSDAY MAY Lead plating tank sod Tild Tello #1 Chamate 60 PPM Oxedizer NA # 2 chamate 60 ppm oxidizer NA #4 chromat 60 ppm onehon da #5 Chromato 60 Jpm oridges No. PHZ serapped land sade in oxidges do PH7 reded into Hay unste bis lux lar scrape

24 MONDAY JUNE prager air sample from Gressure washing orea. O. I mg Sorage metal loaded into Chromate field testo tank stands #1 chromate trace oxidezer NA 112 chromate tace Osideyer NA #3 Chamale 3 PPM
PH
Opeologies NA the chromate 599M Oneologer Na. proger air sample from comment removal

10 MONDAY JUNE Chamate Oxediner NA. #2 chromate 100+ FM PH 8 odedies NA. #3 Chromate Got PPM PH 7 oxiologers #4 Chamat 100+ FPM PH7 orioles Al desting labeled 947 Odiolzes NA It 2 Charate 100# PPm PH > oxidizes NA # 3 Chromato Loot FRM PH 7 Oxidas NA

210HS MARCH 3 TOF 1970 28 FEB. FRI 1992 LODGE ROOF DECKING INTO CLASS 3 BIN/WITH LOODED POOF DECKING ROOFING PAPER & GRADEL INTO CLASS 3 8in AROUND 40 SHEETS AROUND 35 SHEETS CHROMATE FIELD TESTS CHEOMATE FIELD TESTS ILI CHROMATE O OXIDIZER NA #1 CHOMATE O OXIDIZER NA #2 CHROMATE 3 OXIDIZER NA #2 CHROMATE O OXIDIZER NA #3 CHROMATE 3 OXIDIZER DA IJ3 CHROMATE 3 APM OX DA #4 CHROMATED OXIDIZER NA #4 CHROMATE O #5 CHROMATE O OXIDIZER NA #5 CHROMATE O #1. CHROMATEO OXIDIZER DA #6 CHROMATE O

JULY WEDNESDAY 31 MARCH 4 WED 1992 LOODED ROOF DECKING INTO CLASS 3 Bin with ROOFFIRE PAPERY GRADEL AROUND 40 SHEETS OF DECKING CHEOMATE FIELD TEST # 1 CHROMATE 3, OXIDIZER #2 CHROMATE OXIDIZER NA #3 CHROMPTE OXIDIZER #4 CHROMATE DXIDIZER #5 CHROMATE NA OXIDIZER #6 CHROMATE OXIDIZER NA P.H. #7 CHROMATE OXIDIZER NA PH. #8 CHROMATE 3 OXIDIZER NA



ERICKSON 3033 Richmond Parkway, Suite 300, Richmond, CA 94806 (415) 262-1500 • FAX (415) 758-8643

ERICKSON Analytical

Certificate of Analysis

Toxicity Characteristic Leaching Procedure Chromium EPA Method # 6010

Erickson W.O.: 80500

Matrix : Wood/ Debris Date Sampled : 05/21/91

Project Number: N/A

Date Prepared : 05/21/91 Date Analyzed : 05/22/91 Date Reported : 05/24/91

Instrument I.D.: ICP1

Reporting Sample Limit ID # MEthod# (mg/L) Siding

Chromium (Cr) 6010 1.00

Sample and Blank Extracted by EPA Method 1311 (TCLP).

Analyst

Saray Dhillon

E TRANS

P.O. 42-10530

CHAIN OF CUSTODY RECORD

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September 24, 1992

Ms. Mary Boyd Excel Trans, Inc. P.O. Box 866 Benicia, California 94510-0866

Dear Ms. Boyd:

Trace Analysis Laboratory received one solid sample and two water samples on September 10, 1992 for your project, Chromex (our custody log number 2475).

These samples were analyzed according to your chain of custody. Our analytical report and the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

If you should have any questions or require additional information, please call me.

Sincerely yours

Jehnifer Rekol Project Specialist

Enclosures

LOG NUMBER:

2475

DATE SAMPLED: DATE RECEIVED: 09/10/92 09/10/92

DATE EXTRACTED:

DATE ANALYZED:

09/15/92 and 09/17/92

09/17/92

DATE REPORTED:

09/24/92

CUSTOMER:

Excel Trans, Inc.

REQUESTER:

Mary Boyd

PROJECT:

Chromex

Toxicity Characteristic

Leaching Procedure

Sample Type: Extract of Solid

Method and Constituent:	<u>Units</u>	<u>East</u> Concen- tration	and West Reporting Limit	Metho Concen- tration	d Blank Reporting Limit	QC Sun % Recovery	mary % RPD
EPA Method 7190: Chromium Chromium Recovery Correct	ug/1 ug/1	1,800 1,700	50	ND	50	105	*
EPA Method 7210: Copper	ug/1	ND	200	ND	200	102	0.0

Concentrations reported as ND were not detected at or above the reporting limit.

The RPD is not reportable since the sample prepared in duplicate was not detectable.

Trace Analysis Laboratory, Inc.

LOG NUMBER: 2475
DATE SAMPLED: 09/10/92
DATE RECEIVED: 09/10/92
DATE EXTRACTED: 09/16/92
DATE ANALYZED: 09/17/92
DATE REPORTED: 09/24/92
PAGE: Two

.

Sample Type: Water

		Ea	st	We	st	Method Blank				
Method and Constituent:	<u>Units</u>	Concen- tration	Reporting Limit	Concen- tration	Reporting Limit	Concen- tration	Reporting Limit			
EPA Method 7190: Chromium	ug/l	500	50	160	50	ND	50			
EPA Method 7210: Copper	ug/l	ND	200	ND	200	ND	200			
Method and Constituent:	<u>Units</u>	<u> </u>	ummary % RPD			e.				
EPA Method 7190: Chromium	ug/l	104	*							
EPA Method 7210:										

Concentrations reported as ND were not detected at or above the reporting limit.

107

ug/l

Copper

* The RPD is not reportable since the sample prepared in duplicate was not detectable.

Louis W. DuPuis

Quality Assurance/Quality Control Manager

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CHAIN OF CUSTODY RECORD

1965

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Proj.No.		ct Name			No							/ / /
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P.O. BEDICTA Project Manager PAT KENLY						/	$\bigvee /$./		//		
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REMARKS		•	, "				•			-U -	·	



April 7, 1992

Mr. Patrick Kelly Excel Trans, Inc. P.O. Box 866 Benicia, California 94510-0866

Dear Mr. Kelly:

Trace Analysis Laboratory received one solid sample on April 3, 1992 for your Project No. 022011, Charles Lowe/Chromex (our custody log number 1965).

This sample was analyzed for Chromium. Our analytical report and the completed chain of custody form are enclosed for your review.

Trace Analysis Laboratory is certified under the California Environmental Laboratory Accreditation Program. Our certification number is 1199.

If you should have any questions or require additional information, please call me.

Sincerely yours

Jennifer (Pekol

Project Specialist

Enclosures

Trace Analysis Laboratory, Inc.

3423 Investment Boulevard, #8 . Hayward, California 94545

Telephone (510) 783-6960 Facsimile (510) 783-1512

LOG NUMBER: 1965 DATE SAMPLED: 04/03/92 DATE RECEIVED: 04/03/92 DATE EXTRACTED: 04/06/92 04/07/92

DATE ANALYZED: DATE REPORTED:

04/07/92

CUSTOMER:

Excel Trans, Inc.

REQUESTER:

Patrick Kelly

PROJECT:

No. 022011, Charles Lowe/Chromex

Sample Type: Solid								
		022	011 1	Metho	d Blank	OC Summary		
Method and <u>Constituent</u> :	<u>Units</u>		Reporting <u>Limit</u>			% <u>Recovery</u>	% RPD	
EPA Method 7190:								
Chromium	ug/kg	7,200,000	0 1,200	ND	1,200	82	8.0	

Concentrations reported as ND were not detected at or above the reporting limit.

Louis W. DuPuis

Quality Assurance/Quality Control Manager