



# APPLIED EARTH CONSULTANTS, INC

ENGINEERING - GEOLOGY - HYDROLOGY

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June 12, 1986  
Job No: 60747L4

Mr. Edgar B. Howell III  
Senior Hazard Materials Specialist  
Alameda County Health Care Services  
470 27th Street, Third Floor  
Oakland, CA 94612

Subject: STORAGE AND LABELING OF HAZARDOUS WASTES

Dear Mr. Howell:

Dublin Multilayer, Inc. has engaged APPLIED EARTH CONSULTANTS, Inc. to help them in their efforts to comply with environmental regulations. This letter contains the proposed plan for storage and labeling of hazardous wastes produced and stored at Dublin Multilayer, Inc. Enclosed are the following items which constitute the proposed plan. *6341 SCARLET CT DUBLIN (94568)*

- I Inventory of Hazardous Wastes
- II Facility Map
- III Hazardous Waste Storage Area Parameters
- IV Facility Inspection Procedure
- V Hazardous Waste Container Labeling Procedure
- VI Proposed Time Line

If you have any questions or need additional information, please contact me at your convenience.

Very truly yours,

APPLIED EARTH CONSULTANTS, Inc.

Danielle Ruchonnet  
Senior Environmental Manager

Rick Halzenhoff  
President

RH/DR/rh

Copies: Addressee (2)

John Chan, Dublin Multilayer, Inc. (1)

**RECEIVED**  
JUN 17 1986  
HAZARDOUS MATERIALS/  
WASTE PROGRAM

I - HAZARDOUS WASTE INVENTORY

The following is a list of hazardous wastes which Dublin Multilayer, Inc. will be producing and storing on site.

- Wastewater resulting from metal electroplating operation
- Wastewater pre-treatment system cake
- Ammoniacal copper etchant
- Miscellaneous spent electroplating chemicals

Dublin Multilayer, Inc. currently has two types of wastes stored on site which will not be produced or stored on site in the future:

- Spent reflow oil
- Solidified chromic acid solution

III - HAZARDOUS WASTE STORAGE AREA PARAMETERS

Area 1

Material Stored: Wastewater Pre-treatment System Cake

Maximum Amount Stored: 2,200 gallons

Container Size: 55 gallons

Secondary Containment Volume: 300 gallons

Secondary Containment Design: see Diagram 2 below

Area 2

Material Stored: Ammoniacal Copper Etchant

Maximum Amount Stored: 550 gallons

Container Size: 55 gallons

Secondary Containment Volume: 93 gallons

Secondary Containment Design: see Diagram 2 below

Area 3

Materials Stored: Miscellaneous Spent Plating Chemicals

Maximum Amount Stored: 550 gallons

Container Size: 55 gallons

Secondary Containment Volume: 3,340 gallons

Secondary Containment Design: A concrete floor surrounded with a 6-inch berm. The concrete is coated with six layers of tar and tar paper. A raised wooden floor is provided with spaces to allow drainage into containment area.

Area 4

Materials Stored: Wastewater  
Wastewater Pre-treatment Cake

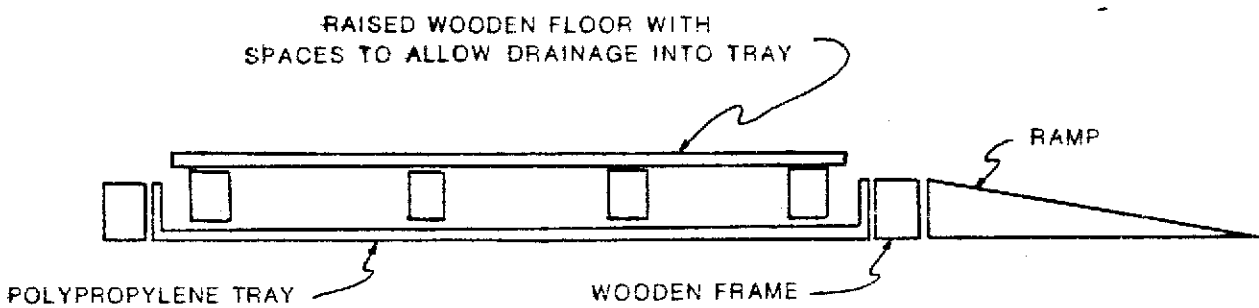
Maximum Amount Stored: 2,800 gallons

Container Size: 750 gallons (single largest container)

Secondary Containment Volume: 2,370 gallons

Secondary Containment Design: A concrete floor surrounded with a concrete berm. The concrete is coated with a chemically resistant epoxy coating.

Diagram 2  
Secondary Containment Design for Areas 1 and 2



IV - STANDARD OPERATING PROCEDURE

Facility Inspection

A visual inspection of all areas containing hazardous wastes is to be conducted once per week. The inspector is to use the Facility Inspection Guidelines and Log Sheet. Karl Sauter is responsible for ensuring required inspections are conducted properly.

Facility Inspection Guideline

Area Code	Area Description	Items to Check for
1	Cake Area	Area signs in place Containers closed Proper container labels Leaks or spills Integrity of primary containers Integrity of secondary container
2	Spent Ammoniacal Copper Area	Area signs in place Containers closed Proper container labels Leaks or spills Integrity of primary containers Integrity of secondary container
3	Plating Shop	Area signs in place Containers closed Proper container labels Leaks or spills Integrity of primary containers Integrity of secondary container
4	Memteck System Area	Area signs in place Leaks and spills All monitoring equipment functional All pumps functional All alarms functional Integrity of primary containers Integrity of secondary containers





## V - STANDARD OPERATING PROCEDURE

Hazardous Waste Container Labeling

As soon as a hazardous waste is placed inside a container the following labels must be placed on the drum.

1. Hazardous waste label must be placed on the container. The following information must be written on the label:
  - a. The words "Hazardous Waste: State and Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the California Department of Health Services."
  - b. Generator's name and address.
  - c. Accumulation start date.
  - d. DOT proper shipping description.
  
2. As soon as a hazardous waste is placed inside a container, hazard class label(s) must be placed on the drum if the waste is of one or more of the following hazard classes. At the present time these are the only hazard classes (aside from ORM, which does not require a hazard class label) which are represented at this facility.  
  
flammable  
corrosive  
oxidizer  
poison B
  
3. A label which gives the common name for the waste. (Example: Electroless Copper, Spent Etch, etc.)

It is the responsibility of Karl Sauter to ensure that this labeling procedure is followed. This is documented through a weekly, written inspection of hazardous waste storage areas. See STANDARD OPERATING PROCEDURES - Facility Inspection.

## IV - PROPOSED TIME LINE

Proposed Completion DateItem

July 16, 1986

Installation of hazardous waste storage area warning signs in all areas presently containing hazardous wastes.

Institution of the labeling procedures.

Institution of the facility inspections procedure.

August 31, 1986

Disposal of the spent reflow oil and solidified chromic acid solution.

October 16, 1986

Completion of Storage Areas #1 and #2. Storage of wastes as described in the accompanying attachments. (Storage Areas #3 and #4 presently exist as described.)

## Fire Department asks DA to evaluate toxic storage

The Dublin Fire Department has referred an allegation of illegal storage of hazardous materials to the district attorney.

Dublin Fire Capt. Tom Hathcox earlier complained to the county health department and to the city building inspector about open barrels of toxic wastes stored in the alley next to Dublin Multilayer on Scarlett Court.

Gerald Winn of the county's environmental services department said that although the wastes are technically toxic, they do not present a health hazard.

Bill Cosden, senior deputy district attorney, said his office will review the case.

If a storage violation under the state Hazardous Waste Act is found, Cosden said, his office would give the company an opportunity to comply with the law before suing.

Cosden said he also will consider whether any zoning violations have occurred.

Dublin Multilayer President John Chan has said he has replaced open barrels of sludge containing heavy metals with barrels with lids. But, he said, he lacks room in his plant to store the barrels inside.

Hathcox has said the storage of the barrels in an alley is dangerous because they can be knocked down by passing cars.

P. M.  
- Dublin Multilayer

# Dublin company storing toxic waste in open barrels

By Susan Frey  
Staff writer

DUBLIN — The company whose waste water has violated toxic metal standards for the past three years also has been storing hazardous waste — sometimes in open barrels — in an alley, a violation of hazardous substance control laws, according to local officials.

John Chan, president of Dublin Multilayer on Scarlett Court, said he now has new barrels with covers for the sludge — a muddy mixture of wastes including heavy metals

such as copper and lead that are byproducts of the circuit-board manufacturing process. But, he said, he has no room to store the barrels inside.

When asked if he knew whether it was illegal to store the material in the alleyway, Chan said he was afraid to ask.

"Where am I going to put it?" he asked last week as he surveyed his shop full of equipment and barrels of chemicals.

Dublin Fire Capt. Tom Hathcox said he wants the barrels out of the

alley, where they could be knocked down by passing cars. Because the company uses flammable chemicals, Hathcox is concerned about a health and fire hazard.

He said he referred the problem to both Alameda County's health department and to the city because he wanted the company zoned for hazardous material, which probably would force them to leave Scarlett Court.

But, Hathcox said, neither the city nor county did anything about the problem.

"I'm frustrated with the system," he said. "I was the only person who really gave a damn."

Gerald Winn, director of environmental health for the county, said the sludge is technically hazardous but he did not believe it was a health hazard.

"It's not going to hurt you unless you drink it," he said.

But, he said, it is illegal to store the wastes in an accessible area such as an alley.

City zoning inspector Vic Taugher said he agreed Dublin Multilayer would be restricted to a hazard zone

rather than be allowed in a typical business district under today's zoning laws. But, he said, the company went into operation in 1977 when zoning laws were looser.

"Codes are not retroactive," he said. If the company were classified under today's code "we would put it out of business."

Dublin Multilayer has been dumping levels of copper and lead above standards since 1983, accord-

ing to records of the Dublin San Ramon Services District. The district board will hold a compliance hearing June 3 to determine what to do about the violator. Options include refusing sewage service.

But Chan said he expected his company would have met standards by that time. The company installed \$200,000 worth of equipment that has not worked as promised, he said.